Australian Institute of Architects

HOUSING SUPPLY REGULATION: FEEDBACK ON THE INTERIM REPORT

Productivity Commission Inquiry

ROYAL AUSTRALIAN INSTITUTE OF ARCHITECTS

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ABOUT THE INSTITUTE

The Royal Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation with more than 13,500 members across Australia and overseas.

The Institute exists to advance the interests of members, support professional standards and contemporary practice, and advocate the value of architects and architecture to the sustainable growth of our communities, economy, and culture.

The Institute actively works to maintain and improve the quality of our built environment by promoting better, responsible, and environmental design.

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The Royal Australian Institute of Architects recognises the unceded sovereign lands and rights of Aboriginal and Torres Strait Islander peoples as the First Peoples of these lands and waters.

This recognition generates acknowledgement and respect for Aboriginal and Torres Strait Islander Countries, Cultures and Communities, and their ways of being, knowing and doing.

Caring for Country practices including architecture and place shaping have existed on this continent since time immemorial.

The Institute recognises a professional commitment to engage and act meaningfully through reciprocal partnership and relationships with Aboriginal and Torres Strait Islander peoples. Together we will support and develop the emergence of new possibilities for our shared future.

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EXECUTIVE SUMMARY

The Australian Institute of Architects (the Institute) welcomes the Productivity Commission's Interim Report on housing supply regulation. The Institute supports the Commission's objective of identifying practical reforms to increase housing supply and construction productivity through better land-use regulation, simpler approvals and improved coordination of housing-enabling infrastructure.[1]

The Interim Report proposes four principles for reform:

1. Adopt a build mindset
2. Regulate only where necessary
3. Coordinate housing and infrastructure
4. Keep planning and approval systems simple

The Institute broadly supports these principles. Unnecessary, duplicative or poorly implemented regulation should be removed or improved. Greater housing diversity, strategic land-use reform, infrastructure coordination and clearer approval pathways can all help deliver more homes in well-located areas.

However, well-located housing is not defined solely by proximity to transport, employment or services. It also depends on the quality of the home and surrounding place, including access to schools, parks, public space, tree canopy, community infrastructure and culturally significant places. Urban design, landscape and heritage contribute to liveability, resilience and the long-term success of housing growth.

The Institute is concerned that the Interim Report applies a narrow productivity test to some design, liveability, landscape and heritage requirements. This risks overlooking the long-term costs that may be transferred to households, governments and communities. Housing productivity should not be measured only through theoretical zoning capacity, approval timeframes, dwelling yield or short-term development feasibility.[2] It should also account for whether homes are serviced, financed, commenced and completed, and how they perform over their full life.

The Institute's response is centred on a simple proposition: Housing performance and place quality are productivity outcomes.

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[1] Productivity Commission, *Housing Supply Regulation: Interim Report*, July 2026, available at: https://www.pc.gov.au/inquiries-and-research/housing-supply/interim/

2 National Housing Supply and Affordability Council, State of the Housing System 2026, available at: https://nhsac.gov.au/reports-and-submissions/state-housing-system-2026

High-performing housing can reduce future costs associated with defects, maintenance, retrofit, energy use, ill health and climate impacts.[3] The quality of the surrounding place also affects public health, liveability, infrastructure and long-term community value.

The Commission's recent work has recognised that prevention, resilience, quality and early adaptation can improve productivity and avoid larger future costs.[4] The same principle should apply to housing. Decisions made during planning, design and procurement establish many of the factors that determine long-term performance and cost.

Australia should not have to choose between more homes and better places to live.

Better regulation, coordinated infrastructure, strong evidence and informed design can increase housing supply while creating healthy, resilient and desirable neighbourhoods.

[3] Centre for International Economics, *Decision Regulation Impact Statement: Accessible Housing Options*, prepared for the Australian Building Codes Board, 2021, available at: *https://www.abcb.gov.au/sites/default/files/resources/2022/Final-decision-RIS-accessible-housing.pdf;* and Australian Housing and Urban Research Institute (AHURI), *A National Roadmap for Improving the Building Quality of Australian Housing Stock*, Final Report No. 426, 2024, available at: https://www.ahuri.edu.au/research/final-reports/426

[4] Productivity Commission, *Delivering Quality Care More Efficiently*, Inquiry Report No. 112, 2025, available at: https://www.pc.gov.au/inquiries-and-research/quality-care/ and Productivity Commission, *Investing in Cheaper, Cleaner Energy and the Net Zero Transformation*, Inquiry Report No. 113, 2025, available at: https://www.pc.gov.au/inquiries-and-research/net-zero/

ADOPT A BUILD MINDSET

The Institute supports the Commission's objective of enabling more homes in well-located areas. This will require land-use reform that permits a broader range of housing, including secondary dwellings, townhouses, terraces, low-rise apartments and mid-rise development in suitable locations.

International evidence indicates that broad upzoning can increase housing production and moderate housing costs over time. However, planning reform alone is unlikely to be sufficient. Research examining housing supply in Melbourne found that planning reforms and standardisation measures did not necessarily increase housing delivery in well-serviced locations, highlighting the importance of coordinated infrastructure investment, implementation mechanisms and market conditions in converting development capacity into completed housing.[5]

A build mindset should therefore focus on the conversion of housing opportunity into completed homes that meet community needs.

1.1 Deliver more homes in the right places

The Institute agrees that increasing housing supply requires substantial land-use reform. The most effective reforms will increase housing opportunity while connecting new homes to jobs, transport, services, open space and community infrastructure.

Land-use reform should also avoid increasing housing and infrastructure exposure to flood, bushfire, extreme heat and other hazards that create long-term costs for households, insurers and governments.

Stronger housing pipeline data and better coordination of Commonwealth housing and infrastructure investment would help distinguish theoretical zoning capacity from capacity that is safe, serviced, commercially feasible and ready for development.

The Institute considers that land-use reform should:

- expand missing-middle housing in established areas
- enable medium and higher density around effective transport networks
- support smaller, accessible and adaptable homes that reflect demographic need

[5] Australian Housing and Urban Research Institute (AHURI), *Planning and the Characteristics of Housing Supply in Melbourne*, Research and Policy Bulletin No. 148, available at: https://www.ahuri.edu.au/sites/default/files/migration/documents/AHURI_RAP_Issue_148_Planning-and-the-characteristics-of-housing-supply-in-Melbourne.pdf

- reduce minimum parking requirements where transport access and local conditions justify it
- align housing growth with utilities, transport, schools, health services, open space and community facilities
- direct development away from locations subject to unacceptable or unmanageable climate and natural hazard risks

Importantly, well-located housing depends not only on access to public transport and services, but also on the quality of the surrounding urban environment. Urban design influences walkability, access to open space, urban heat, public health, social connection, local identity and neighbourhood desirability. Housing supply policy should therefore support the creation of complete and liveable places, not simply additional dwellings.

1.2 Match supply to household and community need

Australia's housing challenge is both a shortage and a mismatch. Aggregate dwelling numbers do not reveal whether supply aligns with community need by location, type, size, accessibility, affordability or tenure.

Limited accessible and adaptable housing can force older people to leave their communities as their mobility changes. Similar mismatches can affect smaller households, regional workers and people who need social or affordable housing.

A productive housing system should provide a diverse mix of:

- smaller homes
- accessible and adaptable housing
- housing for older people
- housing for regional and remote workforces
- market, affordable and social housing
- culturally responsive housing for Aboriginal and Torres Strait Islander peoples and communities

The need for housing diversity will become increasingly important as Australia's population ages and household composition changes. The 2026 Intergenerational Report projects that the number of Australians aged 85 and over will more than triple by 2065-66, while the median age will increase from 38.6 years to 45 years. These trends reinforce the importance of accessible, adaptable and age-friendly housing that supports independent living and ageing in place.[6]

Demand for housing diversity extends beyond ageing households.

[6] Australian Government, *Intergenerational Report 2026: Australia's Future to 2066*, Commonwealth of Australia, Canberra, 2026, available at: https://treasury.gov.au/sites/default/files/2026-09/p2026-797917.pdf

Some households will continue to require dedicated affordable and social housing pathways regardless of overall housing supply. At June 2025, more than 200,000 households were on social housing waiting lists nationally, while growth in social housing has not kept pace with growth in Australian households and housing demand.[7]

Housing supply policy should therefore be assessed not only by the number of dwellings delivered, but by whether it provides a suitable mix of housing types capable of meeting changing community needs.

1.3 Implement density done well

The Commission proposes allowing development of up to three storeys across residential land, with limited exceptions for environmental protection, hazard-related overlays and heritage-listed buildings where the benefits of an exception outweigh its costs. It also supports mid-rise and high-rise apartments in high-demand areas with suitable transport infrastructure.[8]

The Institute supports expanding opportunities for missing-middle housing, including terraces, townhouses and low-rise apartments. Development of up to three storeys can make an important contribution to housing supply and diversity. However, a broadly applicable planning entitlement will not, by itself, ensure good housing or place outcomes.

Density done well is not simply about increasing development capacity

Successful reform requires additional housing to be well located, functional and supported by the infrastructure and services needed for daily life. Urban design, landscape, tree canopy, heritage, amenity and neighbourhood context must be considered alongside housing yield.

Proposed planning settings should be tested using representative sites and housing typologies before widespread implementation. Height, lot dimensions, site coverage, parking, setbacks, daylight, ventilation, privacy, landscape and construction systems interact in ways that affect both feasibility and housing performance. Testing can identify whether the permitted development envelope can deliver practical, liveable and commercially feasible homes.

[7] Australian Institute of Health and Welfare, 'Housing assistance in Australia: Households and waitlists', 23 June 2026, https://www.aihw.gov.au/reports/housing-assistance/housing-assistance-in-australia-2026/contents/households-and-waitlists

[8] Productivity Commission, *Housing Supply Regulation: Interim Report*, July 2026, Reform Direction 2.1 and Chapter 2, available at: https://www.pc.gov.au/inquiries-and-research/housing-supply/interim/

Planning and design must also operate at neighbourhood and precinct scales. Access to transport, employment, schools, open space, local services and safe, walkable streets influences whether additional density contributes to complete and liveable communities. These outcomes cannot be secured through individual development approvals alone.

Different forms of density also face different delivery barriers. Mid-rise housing can provide meaningful dwelling yield while supporting natural light, ventilation, neighbourhood connection and housing diversity. However, fragmented land ownership, land costs, financing constraints and limited industry capability may prevent zoning capacity from translating into completed projects.

Increasing housing supply will therefore require more than one development model.

Adaptive reuse can add housing in well-located areas while making better use of existing building stock. Research undertaken by Hassell for the Property Council of Australia identified approximately 86 Melbourne CBD office buildings potentially suitable for adaptive reuse. It estimated that converting around half could deliver 10,000 to 12,000 homes for up to 20,000 people, while retaining approximately half the upfront embodied carbon associated with demolition and replacement.[9]

Governments should support and evaluate a wider range of infill and housing delivery models through measures that:

- pilot diverse and climate-responsive infill typologies
- test projects on representative sites
- address planning, valuation and financing barriers
- support demonstration projects
- evaluate completed costs and housing performance
- translate successful models into future planning and approval reforms

This would build an evidence base for scalable infill housing and help ensure planning reform produces completed homes and successful places, not only additional theoretical capacity.

[9] Hassell, *Radical Re-Use: From Office to Home: Transforming B-D Grade Office Buildings into Residential*, prepared for the Property Council of Australia, September 2023, available at: https://www.hassellstudio.com/uploads/Office_to_Home_2023_Report.pdf

1.4 Co-located housing as an alternative infill model

South Australia's Co-located housing framework is an example of design-led planning reform that enables additional housing within established neighbourhoods while retaining existing homes and landscape character.[10]

Developed from Bluefield Housing research and implemented through South Australia's Future Living Code Amendment, the model allows an existing home to be retained, adapted or extended alongside additional dwellings arranged around shared open space. Homes can be separately owned, financed or rented through community title.

Unlike conventional subdivision, the model removes minimum lot-size and fixed dwelling-number restrictions while retaining broader planning controls relating to height, setbacks, site coverage, heritage and streetscape. Applications are assessed on their merits to determine what a site can appropriately support.[11]

The model may provide an alternative to increase housing diversity in established suburbs and regional towns where conventional infill development can be difficult to achieve.

The National Housing Supply and Affordability Council has recognised Co-located housing as a model with potential to provide more diverse and affordable housing in established suburbs while supporting ageing in place and retaining heritage, character and streetscape outcomes.[12]

As the framework has only recently commenced, there are not yet completed projects from which to assess housing delivery or post-occupancy outcomes. Its immediate value is therefore as a regulatory model that other jurisdictions could adapt, test and evaluate.

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[10] Damian Madigan, Bluefield Housing as Alternative Infill for the Suburbs, Routledge, 2024, https://www.routledge.com/Bluefield-Housing-as-Alternative-Infill-for-the-Suburbs/Madigan/p/book/9781032276915; Damian Madigan, 'What is Bluefield Housing?', Bluefield Housing, https://bluefieldhousing.com.au/what-is-bluefield-housing/

[11] State Planning Commission, Co-located Housing: An Explanatory Guide, August 2024, https://www.prospect.sa.gov.au/__data/assets/pdf_file/0042/1659786/Future-Living-Code-Amendment-Explanatory-Guide-for-Co-located-Housing-August-2024.pdf

[12] National Housing Supply and Affordability Council, 'Council endorses PlanSA Future Living Code Amendment', 4 November 2024, https://nhsac.gov.au/news/council-endorses-plansa-future-living-code-amendment

REGULATE ONLY WHERE NECESSARY

The Institute supports this principle, provided that "necessary" is assessed against the full costs and benefits of both regulation and regulatory absence, including outcomes experienced by future occupants. The objective should be to remove unnecessary barriers to housing supply while retaining requirements that deliver measurable long-term value.

Housing regulation exists because housing markets do not always allocate risk, information and costs efficiently. Occupants and governments often bear the long-term consequences of decisions made before a home is occupied. The challenge is therefore not to defend every existing control, but to distinguish unnecessary or poorly implemented regulation from proportionate, evidence-based requirements that deliver public value.

2.1 Apply a whole-of-life cost-benefit test

The relevant question is not whether a requirement affects initial feasibility. Most requirements have some cost. The question is whether that cost is proportionate to the benefits secured and whether those benefits can realistically be purchased, corrected or retrofitted later.

The Productivity Commission's recent inquiries into care and climate adaptation found that prevention, resilience and early investment can improve outcomes and reduce long-term costs.[13] The same principle is relevant to housing. Research commissioned by the National Indigenous Australians Agency found that upfront capital costs account for approximately one-third of the total 30-year lifecycle cost of remote Indigenous housing. This demonstrates that decisions made during planning, design and construction can have financial consequences that continue long after a dwelling is completed and highlights the importance of assessing housing regulation against full lifecycle costs rather than upfront expenditure alone.[14]

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[13] Productivity Commission, *Delivering Quality Care More Efficiently*, Inquiry Report No. 112, 2025, available at: https://www.pc.gov.au/inquiries-and-research/quality-care/ and Productivity Commission, *Investing in Cheaper, Cleaner Energy and the Net Zero Transformation*, Inquiry Report No. 113, 2025, available at: https://www.pc.gov.au/inquiries-and-research/net-zero/

[14] National Indigenous Australians Agency, *Efficient System Costs of Remote Indigenous Housing*, prepared by Nous Group, 2024, available at: https://www.niaa.gov.au/sites/default/files/documents/publications/Nous-Group-Final-Report-Efficient-system-costs-of-remote-Indigenous-housing.pdf

2.2 Recognise housing and place performance as productivity inputs

For this submission, housing performance includes daylight, natural ventilation, thermal comfort, accessibility, adaptability, functional storage, efficient layouts, and climate responsiveness.

These are not discretionary design preferences. Housing is a social determinant of health, and these features influence wellbeing, independence, liveability and how homes function over time.[15] [16]

Poor-performing housing can transfer costs from the development balance sheet to households, governments and future owners through higher energy use, increased maintenance, climate vulnerability, accessibility barriers, health impacts and premature retrofit. Conversely, high-performing housing can deliver measurable economic benefits over its full life.

Place quality also affects productivity and community wellbeing. Urban design, landscape, public space, access to services and the relationship between housing and its neighbourhood influence walkability, health, social connection, infrastructure use and long-term desirability. These outcomes should form part of any assessment of the costs and benefits of housing regulation.

- **Accessibility and adaptability:** Research supporting the Liveable Housing Design Standard found that incorporating accessibility features during construction is generally more cost-effective than retrofitting housing later, when modifications can be substantially more expensive.[17]
- **Energy affordability:** Climateworks Centre estimates that improving the performance of Australia's lowest-performing homes could reduce household energy costs by more than $2 billion per year, while improving comfort and energy affordability.[18] The Victorian Healthy Homes Program also found that

[15] Australian Institute of Health and Welfare (AIHW), Australia's Health: Social Determinants of Health, available at: https://www.aihw.gov.au/reports/australias-health/social-determinants-of-health

[16] World Health Organization, WHO Housing and Health Guidelines, 2018, available at: https://www.who.int/publications/i/item/9789241550376

[17] Centre for International Economics, *Decision Regulation Impact Statement: Accessible Housing Options*, prepared for the Australian Building Codes Board, 2020, available at: https://www.abcb.gov.au/sites/default/files/resources/2020/Decision-RIS-Accessible-Housing-Options.pdf

[18] Climateworks Centre, 'Upgrading Australia's worst-performing homes could save enough energy to power 4.5 million EVs', 26 March 2025, available at: https://climateworkscentre.org/news/upgrading-australias-worst-performing-homes-could-save-enough-energy-to-power-4-5-million-evs/

relatively minor energy-efficiency upgrades improved health outcomes with cost-benefit analysis indicating more than $10 in healthcare savings for every $1 saved in household energy costs.[19]

- **Building defects and remediation:** Independent modelling estimated the cost of addressing structural and safety defects in Australian apartment buildings at approximately $6.2 billion, demonstrating the long-term costs associated with poor building quality and inadequate design assurance.[20]
- **Health outcomes:** Housing for Health programs have been associated with a 40 per cent reduction in hospital separations for infectious diseases in participating Aboriginal communities, highlighting the relationship between housing performance and long-term public health outcomes.[21]

The Commission should therefore compare any modelled increase in short-term feasibility from reducing housing-performance requirements with the value of avoidable future costs. Where evidence is uncertain or incomplete, that uncertainty should be acknowledged rather than treated as evidence that a requirement delivers no benefit.

2.3 Reform heritage protection through evidence, not blanket removal

The Institute is strongly concerned that the Interim Report treats heritage protections primarily as constraints on housing supply and assumes that reducing protections will produce additional housing without sufficient evidence that delisting would materially increase completed supply. This approach does not adequately recognise the cultural, environmental, economic and social value of heritage places and precincts.[22]

In many established areas, heritage buildings, streetscapes and precincts contribute to the qualities that make neighbourhoods desirable places to live. These include walkable streets, fine-grain urban form, mature landscapes, established infrastructure,

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[19] Sustainability Victoria, The Victorian Healthy Homes Program: Research Findings, 2022, available at: https://www.sustainability.vic.gov.au/research-data-and-insights/research/research-reports/the-victorian-healthy-homes-program-research-findings

[20] Apartment Advocacy Australia, *The Cost of Defects in Australian Apartment Buildings*, 2021, available at: https://www.equityeconomics.com.au/report-archive/the-cost-of-building-defects

[21] Healthabitat, *Housing for Health*, available at: https://www.healthabitat.com/housing-for-health citing: NSW Ministry of Health, *Closing the Gap: 10 Years of Housing for Health in NSW 1998–2008*, available at: https://www.health.nsw.gov.au/environment/Publications/housing-health.pdf

[22] Historic England, *Evidence Enquiry for Wellbeing and Heritage: Review of Literature 2019–2024 and Policy Context*, 2025, available at: https://historicengland.org.uk/research/results/reports/9169/EvidenceEnquiryforWellbeingandHeritage

local identity and community attachment.[23] Heritage should therefore be recognised as an asset that contributes to place quality, liveability and cultural continuity.

Heritage protections operate at different levels and for different purposes. Individual heritage places are generally listed against established criteria for cultural, historical, architectural or social significance. Heritage overlays and precinct controls protect collective values arising from the relationship between buildings, streets, landscapes, mature trees and public spaces. These collective values cannot be protected effectively by listing selected buildings individually.

The Institute supports rigorous and periodic review of heritage listings, overlays and precincts. Reviews should:

- be undertaken by appropriately qualified heritage professionals
- apply transparent and established significance criteria
- clarify the contribution of individual places within heritage precincts
- distinguish heritage significance from more general character controls
- identify inaccurate, outdated or poorly supported protections
- inform suitable development, adaptive reuse and context-sensitive infill

Governments must adequately resource this work. Reviews are often delayed because local and state authorities lack the funding and specialist capability required to undertake comprehensive heritage studies. A lack of recent review should not, by itself, be treated as evidence that a heritage protection is unjustified.

Delisting should remain an evidence-based heritage decision. Heritage significance should be assessed independently using established heritage criteria before housing or development objectives are considered. The Institute does not support removing protections primarily to pursue development objectives before heritage significance has been properly assessed.

There is limited evidence that reviewing or delisting individual heritage places or precincts would produce a material increase in completed housing supply. Listings and overlays should not be assumed to be major constraints without evidence of their actual effect on development capacity, feasibility and housing completion.

[23] Parliament of Victoria, Parliamentary Library and Information Service, *Heritage Protections in Victoria*, Research Note No. 10, October 2024, available at: https://www.parliament.vic.gov.au/4a9299/globalassets/sections-shared/about/publications/research-papers/heritage-protections-in-victoria_rn_2024_10.pdf

Heritage protection and housing growth are not mutually exclusive.

Once significance has been established, planning and design processes can identify suitable responses such as adaptive reuse, additions, context-sensitive infill and altered lot arrangements. Early heritage analysis provides greater certainty and helps determine the housing models a place or precinct can appropriately accommodate.

Cost-benefit analysis should therefore consider not only potential dwelling yield, but also cultural and social value, place identity, embodied carbon retention, adaptive reuse opportunities, landscape value, tourism and broader economic contribution.

Adaptive reuse of heritage places should be recognised as a housing supply strategy. Reusing suitable existing buildings may deliver housing more quickly than demolition and redevelopment, while retaining embodied carbon, reducing construction waste and preserving cultural value. Planning and building frameworks should provide clearer pathways and stronger incentives for adaptive reuse. A robust justification should be required for demolition where viable reuse opportunities exist.

Examples the Commission could examine include: [24]

- Kerr Street Residences, Fitzroy, Victoria
- Brompton Gasworks, South Australia
- Southwark Grounds, South Australia
- Sirius, The Rocks, New South Wales
- Majestic Theatre Apartments, Petersham, New South Wales

These examples demonstrate that the policy choice is not simply between retaining heritage and delivering housing. With early assessment, appropriate expertise and well-resolved design, heritage places and precincts can accommodate change while retaining the values that make them important.

2.4 Improve regulatory design and implementation

Regulatory burden does not arise only from the detail of individual requirements. It can also arise from unclear drafting, inconsistent interpretation, duplicated assessment pathways, limited guidance and uncertainty about compliance.

Practitioner experience consistently identifies productivity losses arising from:

[24] Examples include Kerr Street Residences (Kerstin Thompson Architects), Brompton Gasworks (Renewal SA), Southwark Grounds (Renewal SA), Sirius (BVN), and Majestic Theatre Apartments (Hill Thalis Architecture + Urban Projects). Available at: https://kerstinthompson.com/projects/kerr-street; https://renewalsa.sa.gov.au/projects/the-gasworks-brompton; https://renewalsa.sa.gov.au/projects/southwark-grounds; https://www.bvn.com.au/project/sirius; https://www.hillthalis.com.au/projects/the-majestic-theatre-apartments

- duplicated or overlapping requirements
- inconsistent application of similar controls
- unclear assessment pathways
- repetitive requests for information
- limited guidance and examples
- poor coordination between agencies

Regulatory fragmentation can also impose disproportionate costs on small practices, builders and developers that lack the resources to navigate multiple systems for similar projects.

The Commission should consider how regulation operates in practice before concluding that the underlying outcome should be weakened or removed. In many cases, implementation failure rather than policy intent is the primary source of cost and delay.

2.5 Protect essential liveability outcomes

The Interim Report seeks evidence on apartment layouts, storage, private open space, balconies, windows and related controls. The Institute strongly supports retaining evidence-based requirements that protect health, safety, functionality and long-term housing performance.

Minimum functionality matters because consumers cannot easily influence or later correct many fundamental design decisions once housing has been built.

Daylight, natural ventilation, functional storage and usable living space are basic functional outcomes that people should reasonably expect from housing. They should be regarded as minimum expectations of housing performance, not optional add-ons or matters of individual preference.

A purchaser or renter accepting inadequate housing conditions does not demonstrate that those conditions are acceptable. In many cases, it reflects constrained housing choice rather than informed consumer preference.

Minimum functionality should be assessed not only by floor area but by whether a dwelling can support ordinary household activities and accommodate standard furniture, storage and circulation. These factors are often fixed at construction and rarely corrected later at reasonable cost.

Evidence-based design standards function as an important form of consumer protection. Purchasers and renters generally enter the market after building orientation, room dimensions, window placement and spatial arrangements have already been determined.

Where possible, governments should specify clear performance outcomes and allow flexibility in how those outcomes are achieved. Flexibility is particularly important for adaptive reuse and constrained sites. The objective should be to maintain health, liveability and performance outcomes while allowing alternative, evidence-based pathways to compliance.

A dwelling is not productive simply because it is approved, built or small. It must function as a home, perform over time and contribute to a liveable place.

2.6 Retain proportionate canopy and landscape outcomes

Tree canopy and landscape infrastructure should not be assessed solely as development constraints. They are increasingly important components of climate adaptation, urban heat mitigation, biodiversity, stormwater management, public health and neighbourhood resilience.

Australian research has demonstrated that urban heat island effects can significantly increase heat-related mortality during extreme heat events, and that greater tree canopy cover can help mitigate these impacts. This reinforces the role of trees and landscape in reducing heat exposure, supporting public health and improving climate resilience.[25]

As Australian cities experience more frequent and intense heat events, neighbourhood-scale landscape outcomes can help moderate local temperatures, improve outdoor comfort, reduce cooling demand and support more liveable higher-density communities.

Climate risk modelling also indicates that hundreds of thousands of Australian properties could become effectively uninsurable by 2030 if climate risks continue to intensify, highlighting the growing importance of adaptation and resilience measures across the built environment.[26]

The Commission should therefore evaluate landscape requirements against both their costs and their contribution to long-term climate resilience, liveability and housing performance outcomes.

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[25] Bambrick, H., Foreman, J., Johnston, F. et al., *Mortality Burden of Heatwaves in Sydney, Australia Is Exacerbated by the Urban Heat Island and Climate Change: Can Tree Cover Help Mitigate the Health Impacts?*, *Atmosphere*, Vol. 13, No. 5, 2022, available at: https://www.mdpi.com/2073-4433/13/5/714

[26] Climate Council, *Uninsurable Nation: Australia's Most Climate-Vulnerable Places*, 2022, available at:

https://www.climatecouncil.org.au/resources/uninsurable-nation-australias-most-climate-vulnerable-places/

2.7 Support parking reform where context permits

Minimum parking requirements can add construction costs, embodied carbon and site area requirements, particularly where basement parking is required. They can also constrain housing diversity, reduce landscape opportunities and weaken public-realm outcomes.

The Institute supports reducing or removing minimum parking requirements where effective public and active transport options exist, accessibility needs are addressed and kerbside demand can be managed appropriately.

However, reforms should remain sensitive to regional, outer-suburban and remote locations where alternatives to private vehicle use are limited.

COORDINATE HOUSING AND INFRASTRUCTURE

The Institute strongly supports the Commission's emphasis on housing-enabling infrastructure. Housing supply is not determined by planning approvals alone. Homes are delivered through the interaction of land-use planning, infrastructure provision, utility connections, financing, construction capacity and project delivery.

The Institute's original submission argued that post-approval constraints frequently play a greater role in limiting housing delivery than planning approvals themselves. The Interim Report appropriately recognises that increasing housing supply requires better coordination across the broader housing system.

3.1 Plan housing, infrastructure and services together

Strategic planning should align housing with transport, water, wastewater, energy, digital connectivity, health, education, open space and community facilities. It should resolve natural hazard and environmental constraints early and identify responsibilities, funding and sequencing.[27]

Strategic planning should identify opportunities for affordable and social housing alongside other housing types, particularly in well-serviced locations close to transport, employment and essential services. Integrating affordable and social housing within

[27] Productivity Commission, *Housing Supply Regulation: Interim Report*, July 2026, Chapter 4: Delivering Housing-Enabling Infrastructure, available at: https://www.pc.gov.au/inquiries-and-research/housing-supply/interim/

communities improves access to opportunity and can reduce long-term social and infrastructure costs.

Many delays and costs arise not from individual requirements themselves, but from conflicting requirements applied by different agencies without a clear mechanism for resolution. Housing projects may be required to balance competing objectives relating to vegetation, infrastructure, hazards, environmental protection or utility servicing, creating uncertainty for applicants and decision-makers.

Reform should improve coordination between agencies and establish mechanisms to identify and resolve recurring conflicts early and consistently, rather than transferring these costs to applicants through project-by-project negotiation.

The Institute also supports stronger alignment between Commonwealth housing investment, infrastructure funding and place-based outcomes.

Long-term infrastructure programs should help ensure housing growth occurs in locations that are serviced, connected and resilient. Evidence from Queensland demonstrates the scale of this challenge, with approximately 58 per cent of identified greenfield land requiring investment in roads, water or sewerage infrastructure before development can proceed.[28]

3.2 Measure delivery from zoning to occupation

Planning approvals are an incomplete measure of housing supply if projects are not serviced, financed, commenced and completed.

The Institute supports a more comprehensive approach to measuring housing delivery that distinguishes between:

- theoretical zoned capacity
- developable and serviced land
- infrastructure-ready capacity
- commercially feasible capacity
- development and building approvals
- infrastructure agreements
- commencements and dwellings under construction
- completions and occupation

[28] Economic Development Queensland, *Coordinated Infrastructure Planning to Support Greenfield Housing Delivery*, Queensland Government, accessed 21 September 2026, available at: https://www.edq.qld.gov.au/news/infrastructure/coordinated-infrastructure-planning-to-support-greenfield-housing-delivery/

The ABS Building Activity series and NHSAC reporting provide important insights into commencements, completions and housing pipelines.[29] These reporting systems provide valuable information, but they do not yet provide a consistent view of the housing pipeline from zoning and infrastructure readiness through to occupation.

More consistent national reporting would help identify where projects are delayed, stalled or abandoned and better target future reforms.

3.3 Improve utility and referral agency accountability

Member experience consistently identifies post-approval processes as a source of delay and uncertainty.

Problems frequently arise through:

- utility connections
- referral authority responses
- infrastructure agreements
- subdivision and titling processes
- inconsistent assessment requirements
- late requests for additional information

These delays often occur after planning approval has been granted and are therefore largely invisible within conventional approval statistics.

Governments should improve transparency, accountability and coordination across these processes through:

- published service standards and timeframes
- public reporting of agency performance
- escalation pathways for unresolved matters
- earlier multidisciplinary coordination
- clearer roles and responsibilities among agencies and utilities

In many cases, the greatest housing delivery gains may come from improving post-approval processes rather than further reducing planning assessment timeframes.

[29] Australian Bureau of Statistics, *Building Activity, Australia*, March Quarter 2026, available at: https://www.abs.gov.au/statistics/industry/building-and-construction/building-activity-australia/latest-release; and National Housing Supply and Affordability Council, *Quarterly Report*, March 2026, available at: https://nhsac.gov.au/reports-and-submissions/quarterly-report-march-2026

3.4 Improve contribution frameworks

Developer contribution systems should be predictable, transparent and aligned with infrastructure delivery.

The Institute supports contribution frameworks that:

- clearly identify infrastructure requirements
- demonstrate a nexus between development and infrastructure provision
- provide certainty regarding costs and timing
- avoid disproportionate first-mover disadvantage
- transparently report the collection and expenditure of contributions

Infrastructure funding arrangements should support the timely delivery of housing-enabling infrastructure while maintaining public confidence that contributions are being applied effectively.

More broadly, governments should recognise that housing supply outcomes depend on infrastructure delivery occurring alongside planning reform. Land should not be considered housing-ready simply because residential development is permitted by zoning.

KEEP PLANNING AND APPROVAL PROCESSES SIMPLE

The Institute agrees that planning and approval processes can be complex, costly and time-consuming. Inconsistent interpretation, duplication, fragmented referrals and unclear pathways often create delay without improving housing outcomes.

The Institute supports reforms that improve certainty, consistency and efficiency. However, simplification should not be understood as reducing scrutiny in all circumstances. The objective should be to remove avoidable delay while retaining confidence in housing quality, infrastructure coordination and long-term community outcomes.

Planning systems work best when assessment is proportionate to risk, requirements are clearly understood, and applicants have confidence in how proposals will be assessed.

4.1 Expand risk-based pathways

Assessment should be proportionate to the scale, complexity and risk of development.

Simple, complete and well-resolved proposals should not be subject to the same level of assessment as complex developments involving strategic planning, infrastructure or environmental considerations.

The Institute supports faster pathways where:

- requirements are clear and measurable
- infrastructure and hazard issues have been resolved
- proposals are prepared by appropriately qualified professionals
- documentation is complete and accurate
- performance outcomes can be objectively assessed

Social and affordable housing projects that meet established design, infrastructure and performance requirements should also be eligible for streamlined assessment pathways. Increased certainty and reduced approval timeframes can improve feasibility and accelerate delivery without reducing housing quality.

At the same time, streamlining should distinguish between avoidable administrative delay and legitimate scrutiny.

Duplicated referrals, unresolved agency conflicts and repeated requests for information create unnecessary cost and delay. By contrast, targeted design review, appropriate community engagement and access to local knowledge can improve outcomes for complex, significant or context-sensitive development.

Research examining resident objections and appeals against higher-density and social housing proposals found that appeal and objection processes may increase project costs and delivery timeframes. The research also highlights the importance of balancing housing supply objectives with participatory planning outcomes. Case studies examining fast-track approval pathways, strategic consultation and appeal processes suggest that policy certainty, effective community engagement, clear communication and well-resolved development can reduce conflict and support better planning outcomes.[30]

[30] Cook, N., Taylor, E., Hurley, J. and Colic-Peisker, V., *Resident Third Party Objections and Appeals Against Planning Applications: Implications for Higher Density and Social Housing*, AHURI Final Report No. 197, Australian Housing and Urban Research Institute, Melbourne, 2012, available at: https://www.ahuri.edu.au/research/final-reports/197

Assessment should therefore be proportionate, timely and accountable rather than simply minimised.

4.2 Reward good design with faster approval

Approval speed and housing performance should not be treated as competing objectives.

Governments should consider pathways that provide greater certainty and faster approvals for well-resolved housing that demonstrably meets agreed performance outcomes relating to:

- accessibility and adaptability
- energy and water performance
- climate resilience
- landscape outcomes
- housing diversity
- internal amenity
- public realm outcomes

Early design resolution can reduce redesign, requests for further information and downstream project changes.

Victorian reforms demonstrate one approach to linking streamlined approvals with higher design and sustainability outcomes. The Great Design Fast Track pathway provides a streamlined approval process for townhouse and apartment developments of two to eight storeys that demonstrate specified design, sustainability and liveability outcomes and are assessed against established design principles by the Office of the Victorian Government Architect.[31] This demonstrates that approval efficiency can be linked to design quality rather than achieved through lower standards.

Fast-track pathways should incorporate proportionate design assurance. For complex or context-sensitive proposals, independent design review can identify issues early and improve project outcomes. For more straightforward development, architect-authored or professionally reviewed housing typologies may provide equivalent assurance through a simpler process.

4.3 Use pattern books and pre-approved typologies carefully

Pattern books and pre-approved housing typologies can support housing delivery where they are developed by suitably qualified architects, tested across climates and sites,

[31] Victorian Government, *Great Design Fast Track*, available at: https://www.planning.vic.gov.au/guides-and-resources/strategies-and-initiatives/great-design-fast-track

responsive to different household needs, and integrated with landscape, infrastructure and construction realities.

Pattern books should be understood as a tool for improving efficiency rather than a substitute for place-responsive design.

Evidence suggests they are most effective when:

- adapted to local conditions
- supported by professional oversight
- linked to clear design guidance
- capable of responding to site constraints, climate and context

Pattern books work best as tested housing systems rather than fixed designs applied uniformly across different locations.

Fast-track eligibility should therefore be linked to demonstrated housing performance and local suitability, rather than template conformity alone. Pattern books should also be assessed against their long-term performance and adaptability. Well-designed housing should be capable of responding to changing household needs over time, including accessibility requirements, ageing in place and changing household composition.

4.4 Support modern methods of construction through quality assurance

Modern methods of construction (MMC), including prefabricated and manufactured housing systems, have significant potential to improve productivity, certainty and housing delivery. However, these benefits are not automatic.

Successful adoption depends on:

- early design resolution
- design for manufacture and assembly
- procurement certainty
- logistics planning
- nationally recognised certification pathways
- confidence in acoustic, thermal, durability and lifecycle performance

Governments should focus on reducing barriers to adoption, supporting nationally recognised quality assurance pathways and improving consistency across jurisdictions. Regulatory frameworks should support innovation without undermining confidence in building quality, safety, accessibility or long-term performance.

A performance-based approach provides the best opportunity to enable innovation while ensuring completed buildings achieve equivalent outcomes, regardless of the construction method used.

Realising the productivity benefits of MMC also depends on efficient testing, certification and conformity-assessment systems.

This is particularly relevant given uncertainty regarding the future of CSIRO's North Ryde Fire Technology Laboratory and the capacity of the broader testing system to meet growing demand.

4.5 Improve digital approval systems and data capability

Planning and approval systems remain fragmented across jurisdictions, agencies and utility providers. Better use of digital systems can improve transparency, consistency and efficiency without reducing assessment quality.

Governments should continue to improve:

- digital lodgement and document management systems
- standardised planning and development data
- referral tracking and workflow management
- public reporting of approval performance
- data sharing between agencies, utilities and approval authorities
- visibility of projects as they move from approval through to completion

Consistent digital systems would reduce duplication, improve coordination, support better performance monitoring and strengthen the evidence base for future reform.

Artificial intelligence also has the potential to improve navigation of regulatory systems, assist with completeness checking, identify relevant requirements and support administrative efficiency.

The Institute considers the built environment to be a priority sector for AI governance as planning, housing, infrastructure and building regulatory decisions can have significant implications for public safety, accessibility, resilience, environmental performance and long-term community outcomes.

Governments should consider national coordination mechanisms to support the responsible deployment of AI within planning, housing and building regulatory systems, including appropriate governance, accountability, transparency and risk-management frameworks.

ABORIGINAL AND TORRES STRAIT ISLANDER HOUSING OUTCOMES

The Commission seeks feedback on how housing regulatory systems can better meet the housing needs of Aboriginal and Torres Strait Islander peoples and communities.

Evidence consistently demonstrates that housing outcomes are improved when planning, procurement, design and evaluation processes are led and informed by Aboriginal communities and respond to local cultural, social and environmental conditions.

Best-practice approaches should:

- support Aboriginal community-controlled organisations
- embed community decision-making from the outset
- respond to local climate, culture and living patterns
- prioritise durability, repairability and functional housing infrastructure
- build local employment, inspection and maintenance capability
- provide consistent safety, quality, accessibility and certification protections regardless of location

5.1 Recognise housing as preventive health infrastructure

Housing should not be viewed solely as physical shelter. It is also an important determinant of health outcomes.

Recent peer-reviewed research identifies household crowding as a major contributor to acute rheumatic fever and rheumatic heart disease in remote Aboriginal communities, while also highlighting the role of thermal performance, energy insecurity and climate conditions in shaping health outcomes. The research presents the Wilya Janta Explain Home in Tennant Creek as an example of Aboriginal-led, climate-responsive housing developed to help address overcrowding-related harms.[32]

Housing regulation, procurement and funding frameworks should therefore consider:

- thermal performance

[32] Quilty, S., et al., "Designing housing to reduce overcrowding-related harms: rheumatic heart disease as the canary in the coal mine", *Medical Journal of Australia*, Vol. 224, No. 6, 2026, Article e70209, available at: https://espace.library.uq.edu.au/view/UQ:8fc32d9

- functioning health hardware (water, sanitation, washing)
- cultural suitability
- energy security
- household adaptability
- repairability and maintenance
- long-term health outcomes

5.2 Use Housing for Health evidence to measure outcomes

Housing for Health provides one of Australia's strongest examples of linking housing performance with measurable outcomes.

The program has reported improvements to more than 10,300 houses affecting more than 60,000 people. An independent NSW Health evaluation found a 40 per cent reduction in hospital separations for infectious diseases in participating communities.[33]

The key lesson is that housing outcomes should be measured after construction, not simply at project completion.

Governments should place greater emphasis on:

- post-occupancy evaluation
- functioning household infrastructure
- maintenance outcomes
- housing durability
- health outcomes associated with housing performance

This approach would improve understanding of which regulatory, procurement and design settings deliver the greatest long-term value.

5.3 Address gaps in housing regulation and building assurance

Housing regulatory systems should provide consistent protections regardless of location.

The Institute raises concerns regarding the operation of building control arrangements in some remote parts of Australia, where housing may not be subject to the same building approval, inspection and certification processes that apply elsewhere.

[33] Healthabitat, *Housing for Health*, available at: https://www.healthabitat.com/housing-for-health and NSW Ministry of Health, *Closing the Gap: 10 Years of Housing for Health in NSW 1998–2008*, available at: https://www.health.nsw.gov.au/environment/Publications/housing-health.pdf

While the National Construction Code is outside the scope of this inquiry, the broader question of equitable housing regulation remains relevant. Regulatory gaps can transfer safety, health, accessibility, maintenance and performance risks to residents and governments over time.

Aboriginal communities should have access to appropriate safety, quality and consumer protections, regardless of where they live. Regulatory reform should therefore consider housing performance, health outcomes and long-term maintenance costs alongside housing supply objectives.

AUSTRALIAN GOVERNMENT LEADERSHIP AND IMPLEMENTATION

While states and territories retain primary responsibility for planning systems, the Australian Government has an important role in shaping housing outcomes through national policy, infrastructure investment, housing programs, intergovernmental agreements and data collection.

The Commission's final recommendations provide an opportunity to strengthen national coordination while respecting state and local responsibilities.

6.1 Embed design expertise in national housing, infrastructure and productivity decision-making

Housing policy is often treated as a matter of economics, finance, planning and infrastructure. However, many of the decisions that ultimately determine housing quality, affordability, resilience and long-term productivity are design decisions.

Governments routinely draw upon specialist expertise in economics, engineering, health, science and the environment when developing policy.

Housing and urban policy should similarly have access to independent design expertise.

A stronger design in policymaking approach would help embed systems thinking within government decision-making. Housing, infrastructure, transport, climate resilience, public health and place outcomes are interconnected and are often considered through separate policy processes. Integrating design expertise into policy development would support more coordinated decision-making and help maximise the long-term value of public investment.

One mechanism to support this objective would be a Federal Government Architect or similar national design leadership function. Such a role would not operate as an approval authority or additional regulator. Instead, it would provide independent strategic advice, support evaluation of housing and place outcomes, coordinate national design evidence and help ensure Commonwealth investment delivers long-term economic, social and environmental value.

Similar design leadership functions already operate successfully at state and local government levels through Government Architects and related advisory arrangements. Alternatively, governments could embed design expertise directly within decision-making structures, including through representation on housing, infrastructure and place-based governance bodies.

6.2 Align funding with housing and place outcomes

Australian Government funding programs should support not only housing supply, but also the quality, location and long-term performance of housing.

Funding agreements should reward:

- completed and occupied housing rather than theoretical capacity alone
- infrastructure readiness and service provision
- housing diversity
- accessibility and adaptability
- climate resilience
- social and affordable housing in well-located areas
- transparent monitoring and reporting of outcomes

Improved alignment between housing funding, infrastructure investment and place-based outcomes would support more efficient use of public resources and help ensure housing growth occurs in locations that are connected, serviced and resilient.

6.3 Strengthen the national housing evidence base

The Commission has emphasised the importance of evidence, data and case studies throughout this inquiry. The Institute supports a stronger national housing evidence framework to assess how housing and neighbourhoods perform after completion.

National evaluation should include:

- operating performance and household costs
- accessibility and adaptability
- defects, maintenance and remediation
- climate exposure and resilience
- housing affordability

- social and affordable housing outcomes
- Aboriginal and Torres Strait Islander housing outcomes
- liveability and neighbourhood amenity
- post-occupancy outcomes and resident experience

Governments should place greater emphasis on post-occupancy evaluation.

Measuring how housing and places perform after completion would help identify which design, planning, infrastructure and procurement settings deliver the strongest long-term outcomes.

RECOMMENDATIONS

1. Measure housing delivery across the full supply pipeline

- Establish nationally consistent reporting that tracks housing from zoning and infrastructure readiness through to approval, commencement, completion and occupation, so supply reforms are assessed against actual homes delivered rather than theoretical capacity.

2. Assess regulation using a whole-of-life productivity framework

- Evaluate housing regulation against its long-term economic, social and environmental costs and benefits, including impacts on household operating costs, maintenance, retrofit requirements, health outcomes, climate resilience, infrastructure efficiency and public expenditure.

3. Enable more housing diversity in well-located areas

- Support housing diversity through strategic land-use reform, infrastructure coordination and architect-led typology testing that enables missing-middle housing, medium-density development and innovative housing models in well-located areas.

4. Support density done well

- Accompany broad upzoning reforms with infrastructure planning, place-based design frameworks, climate-responsive design principles and tested, architect-led housing typologies to ensure increased capacity translates into feasible, liveable and durable housing outcomes.

5. Retain evidence-based standards that deliver long-term value

- Maintain proportionate requirements relating to liveability, accessibility, adaptability, climate resilience, landscape outcomes and housing performance where evidence demonstrates long-term public, consumer or economic benefit.

6. Support evidence-based heritage protection

- Resource periodic, independent reviews of heritage places, overlays and precincts by appropriately qualified heritage professionals. Retain protections where heritage significance is substantiated and assess proposed reforms against their impact on cultural value, place identity, liveability and broader community outcomes as well as housing supply.

7. Support adaptive reuse as a housing supply strategy

- Promote adaptive reuse of existing buildings as a housing supply, productivity and decarbonisation strategy. Remove regulatory barriers to adaptive reuse, provide clearer pathways for conversion and reuse projects, and require robust justification for demolition where viable adaptive reuse opportunities exist.

8. Embed urban design in housing supply reform

- Evaluate housing reforms against their contribution to well-designed, liveable neighbourhoods, including access to public transport, schools, parks, community infrastructure, tree canopy, public space and local services. Ensure housing supply initiatives support complete communities rather than focusing solely on dwelling numbers.

9. Improve regulatory effectiveness before reducing outcomes

- Reduce duplication, uncertainty, inconsistent interpretation and unnecessary administrative burden through clearer requirements, nationally consistent guidance, improved coordination and more efficient approval systems.

10. Strengthen infrastructure coordination and accountability

- Align housing, transport, utilities and community infrastructure planning, establish transparent performance measures for referral agencies and infrastructure providers, and improve coordination across the housing delivery system from approval through to completion.

11. Improve planning and approval pathways

- Expand risk-based and expedited assessment pathways while retaining access to place-based design expertise, local knowledge and appropriate design review for complex or context-sensitive proposals.

12. Embed design expertise in housing, infrastructure and productivity decision-making

- Embed independent design expertise within housing, infrastructure and place-based policy development and governance, and consider national design leadership mechanisms to support better long-term economic, social and environmental outcomes from public investment.

13. Improve housing outcomes for Aboriginal and Torres Strait Islander peoples and communities

- Support Aboriginal-led decision-making, culturally responsive design, appropriate building regulation, improved housing performance and long-term evaluation of housing, health and maintenance outcomes.

14. Build a national evidence base for housing and place performance

- Develop nationally consistent research and post-occupancy evaluation frameworks that measure housing quality, accessibility, operating costs, defects, climate resilience, liveability, neighbourhood amenity and community wellbeing.

CONCLUSION

The Institute welcomes the Productivity Commission's focus on increasing housing supply and supports many of the reform directions outlined in the Interim Report. Greater housing diversity, strategic land-use reform, better infrastructure coordination and more efficient approval systems all have an important role to play in addressing Australia's housing challenges.

However, housing supply should not be assessed solely through zoning capacity, approval volumes or development feasibility. The ultimate measure of success is whether reforms result in completed homes that are well-located, connected to infrastructure and services, affordable to operate, resilient to future risks and capable of meeting community needs over time.

Housing policy should also recognise that people choose places, not just dwellings. The success of housing reform should be measured not only by the number of homes delivered, but by the quality of the places created. Heritage, urban design, landscape, public space and community infrastructure should not be treated simply as barriers to supply. They are often part of what makes neighbourhoods desirable, liveable and capable of sustaining growth over the long term.

The Institute's response is centred on a simple proposition: Housing performance and place quality are productivity outcomes.

The Productivity Commission has an opportunity to support reforms that improve housing supply while retaining the qualities that make homes healthy, functional, resilient and valued by the people who live in them. This includes recognising the role of design quality, adaptive reuse, heritage, landscape and broader place-based outcomes in supporting housing productivity over the life of a dwelling and across the life of a community.

The Institute encourages the Commission's final report to adopt a whole-of-life approach to housing productivity, ensuring that regulatory reform supports both the quantity of housing delivered and the quality of the places created.

The Institute would welcome the opportunity to continue contributing practitioner expertise, evidence and case studies as the inquiry progresses.