

Submission on housing supply regulation

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My submission focuses on practical barriers to infill, tiny and modular housing: council planning and decision making, finance, insurance and climate adaptation. I recommend stronger state leadership and control over planning processes, and straightforward approval pathways for safe, permanent homes in established communities. My research on tiny and alternative housing informs these recommendations.

1 Permanent residential approval for tiny and modular housing

States and territories should establish an enduring pathway for tiny houses, including those on wheels, to be occupied as permanent homes on suitable land. It makes little sense to facilitate small dwellings for tourism while making residential occupation unnecessarily difficult. My published work with Paul Burton identifies this mismatch and the need for clearer rules (Shearer and Burton 2025). The pathway should cover both long-term rental and owner occupation, with secure tenure and proportionate safety requirements.

Shellharbour provides a useful exemplar. Its Mobile Tiny Homes Pilot combines temporary exempt development provisions under the Shellharbour LEP 2013 with approval under section 68 of the Local Government Act 1993. Eligible mobile tiny homes can be used for long-term rental without a separate development application. The policy expressly excludes short-term rentals and requires a residential tenancy agreement. It retains structural certification, anchoring, servicing, fire safety and hazard safeguards (Shellharbour City Council 2026).

However, this is a two-year pilot, not guaranteed permanent approval. Continued rental use afterwards requires a development application, with no guarantee of approval. I recommend a nationally consistent, enduring residential pathway implemented through relevant state and territory legislation. It should adopt Shellharbour's practical approach while reviewing restrictive eligibility rules, including minimum lot sizes, rather than copying every local condition nationwide.

Modular housing needs a related but distinct pathway: Shellharbour's mobile tiny home policy does not cover manufactured or relocatable houses. For factory-built homes, authorities should recognise appropriate construction certification across jurisdictions and avoid repeating assessments already completed. Additional assessment should address site suitability, foundations, installation and connections. Small homes should face charges proportionate to their actual infrastructure demand.

2 Council planning and decision making

Complex schemes can prevent infill through the cumulative effect of zoning, lot sizes, setbacks, site coverage and parking requirements. States should review these controls together and require clear approval pathways for compliant secondary dwellings, tiny homes, townhouses and other modest infill. Permission in principle is of little use if the remaining requirements make a project impractical.

I oppose broad "character" overlays that preserve an existing suburban appearance at the expense of additional housing. The age of a house alone does not justify restricting change across an entire neighbourhood. Brisbane's character protections should be reviewed against demonstrable public benefit and their effect on infill. Individually significant heritage places can be protected through targeted, evidence-based provisions without treating whole suburbs as incapable of change.

Climate risk overlays serve a necessary purpose. I support evidence-based overlays that identify hazards and guide safe development, including future climate conditions. Planning reform should remove unnecessary character restrictions and setbacks that lack a clear planning purpose, while retaining controls needed for safety, environmental protection and reasonable amenity. This includes controls that protect people from flood, bushfire, coastal and other climate risks.

Qualified planning professionals should assess and determine all but the largest or most complex applications against published criteria. Elected councillors should set strategic policy through public processes. Individual

assessment should not become a fresh political contest about whether a neighbourhood should accommodate more people. Decisions must account for renters, prospective residents and people priced out of an area, alongside existing owners.

States should set the core rules, oversee council performance and provide clear review and intervention mechanisms where housing objectives are frustrated. Major proposals should have a defined state-led pathway. Published reasons, transparent conflict-of-interest processes and reporting of total elapsed approval times would improve accountability. Requests for further reports should identify a specific unresolved issue rather than repeat reliable existing evidence.

3 Finance for small homes and different building methods

Approval reform will achieve little if a lawful home cannot be financed. Modular construction commonly requires payments while the dwelling is being built offsite. Lending arrangements that release funds only after a structure is attached to land can therefore create a substantial upfront funding gap. Commonwealth Bank's prefab lending arrangements demonstrate that finance can accommodate offsite progress payments, subject to lending conditions (Commonwealth Bank n.d.).

I recommend that governments work with lenders, valuers and manufacturers on consistent certification evidence, valuation approaches and verified construction milestones. Finance should accommodate factory construction while addressing ownership of unfinished modules, manufacturer failure and completion risk. Applicants should receive clear eligibility requirements before committing to a purchase.

A movable tiny home on leased land presents different security and tenure issues from a conventional home on owned land. A tiny house on wheels generally cannot serve as the sole security for a conventional residential mortgage. Other arrangements may be available, including asset finance or borrowing secured against an existing property (Tiny Homes Australia n.d.). Banks should develop transparent options for these circumstances, supported by secure site tenure and clear ownership arrangements.

Minimum floor-area rules can also restrict finance for small dwellings. For example, Macquarie Bank's September 2026 credit guidelines list studios and bedsitters below 50 m² of living floor area, excluding balconies and car spaces, as unacceptable security (Macquarie Bank 2026, p. 36). This illustrates a lender-specific restriction rather than a universal rule for every small home. I recommend that lenders assess lawful small dwellings on their valuation, marketability and actual credit risk, rather than apply blanket exclusions based solely on floor area.

4 Insurance for lawful residential use

A permanent residential approval pathway should be developed with insurers so that purchasers can identify suitable cover before buying or installing a home. Policies should clearly explain whether they cover permanent occupancy, the dwelling, contents and liability, and where cover changes during manufacture, transport and installation. Approved residential use should not be confused with occasional caravan or holiday use.

Governments and insurers should agree on the evidence needed to assess certified tiny and modular homes, including construction quality, anchoring, servicing and site hazards. Insurers should recognise verified resilience measures where these reduce risk and explain material exclusions clearly. Uncertainty about a housing classification should not itself become an avoidable barrier to obtaining cover.

5 Climate adaptation and safer locations for infill

More infill and stronger climate adaptation should be pursued together. States should provide consistent, publicly accessible mapping that considers future hazards, social vulnerability and access to services and evacuation routes. Councils should use this evidence in assessment, with additional site studies required where there is a genuine information gap. Affordable housing policy should not push people onto cheaper, exposed land because safer, established areas are protected from change. Where greenfield development occurs in hazard-exposed locations with limited evacuation routes and poor public or active transport access, it can compound the risks faced by vulnerable households. The spatial research outlined below shows why housing location and accessibility need to be assessed together.

Climate risk overlays should distinguish locations where development is unsuitable from those where a demonstrated design response can manage risk. Requirements should address flood and bushfire exposure, coastal hazards, heat and severe storms as relevant. For tiny and modular homes, assessment should include anchoring, thermal performance, shade, ventilation and safe access. A dwelling’s mobility should not be assumed to make relocation during an emergency practical or safe.

Affordability must include running costs, insurance and resilience over the life of the home. APRA’s 2026 insurance climate stress test identifies how worsening insurance affordability and uninsured losses can increase financial risks for households and lenders. It highlights the value of adaptation and locating new homes in lower-risk areas (APRA 2026). Planning, lending and insurance should use compatible risk information, while recognising that insurance availability alone does not establish that a site is safe.

6 Findings from my GIS research

I have used geographic information systems (GIS) to investigate housing opportunities, hazard exposure and accessibility, principally in South East Queensland. Some of this work was undertaken with the City of Gold Coast. Further methodological information and shareable datasets can be provided on request.

Unapproved secondary dwellings and hazard exposure

As part of a City of Gold Coast project, I used GIS, artificial intelligence and council datasets to identify potentially unapproved secondary dwellings, including tiny houses, converted shipping containers and granny flats. The project aimed to identify where people might be living in locations exposed to natural hazards, rather than to support compliance action.

The analysis identified potentially unapproved dwellings in areas exposed to hazards such as bushfire and landslide, including locations with limited evacuation routes and poor mobile reception. These findings support clearer pathways for lawful secondary dwellings in safer locations, together with better information about where residents may need assistance during emergencies.

Capacity for secondary dwellings on existing residential lots

A separate study used the Gold Coast as a case study to assess the space available for small secondary dwellings on lots containing a single house. The analysis considered planning setbacks, mapped hazards and existing built structures. It explored detached dwellings and options attached to the main house. The SOAC 2025 conference abstract reported potential for infill on up to 50,000 properties with few or no identified constraints (Shearer 2025).

The sample results supplied for this submission identify 3,790 of 6,634 assessed properties as having both space for a secondary dwelling and a negligible or low mapped climate-risk classification: 57.1% of the sample. Applying that proportion to the initial pool of 87,086 properties gives an indicative estimate of approximately 49,752 properties. This extrapolation assumes that the sample represents the wider pool. It is a screening estimate, rather than a count of approved or commercially feasible homes.

Table 1. Preliminary screening results and indicative extrapolations for Gold Coast secondary dwellings (note, indicative numbers only, subject to further ground-truthing)

Measure	Properties
Initial pool of low-density residential properties meeting the study’s preliminary selection criteria	87,086
Properties assessed in the sample	6,634
Sample properties with space for a secondary dwelling	4,713 (71.0%)
Sample properties with space and a negligible or low mapped climate-risk classification	3,790 (57.1%)
Indicative total meeting both criteria, using the unrounded sample proportion: $87,086 \times 3,790 \div 6,634$	≈49,752

Measure	Properties
Illustrative sensitivity scenario with a further 30% reduction for additional constraints: 49,752.18 × 0.70	≈34,827

Notes: Percentages use all 6,634 sampled properties as the denominator. The totals are recalculated from the supplied counts, not independently validated GIS outputs. The additional 30% reduction is an assumed sensitivity scenario, not a measured exclusion rate; it should only be applied to constraints not already captured in the screening.

The policy implication is that existing residential land warrants systematic assessment for additional small homes. The estimate depends on the quality of building-footprint data, the treatment of pools and other structures, and the screening assumptions. Detailed site assessment and consideration of servicing, owner participation and feasibility would still be needed to determine how much of this potential could become housing.

Combining climate hazards with vulnerability and accessibility

More recent work has developed a multicriteria index and an ArcGIS Online Experience Builder application. The application allows users, including local government planners, to adjust the relative weights given to climate hazards, different forms of accessibility and socioeconomic vulnerability. South East Queensland and the City of Gold Coast have been used as study areas.

The results identify established urban areas that combine lower modelled hazard and vulnerability scores with better accessibility. This supports prioritising infill in locations where additional homes can be accommodated with lower exposure and better access to services. The study does not estimate the number of properties suitable for infill, and the index results do not establish that all infill locations are safer or predict future losses. Outcomes depend on the location, hazard layers, geographic scale and weights used.

Sources

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