

7 October 2026

Ms Danielle Wood
Chair, Housing Supply Regulation Inquiry
Productivity Commission
GPO Box 1428
CANBERRA CITY ACT 2601

Upload via: <https://www.pc.gov.au/inquiries-and-research/housing-supply/make-submission/>

Dear Ms Wood

Engagement Response to Inquiry into Housing Supply Regulation – Interim Report

Thank you for the opportunity to review the Interim Report and provide input to assist with this Inquiry.

Australia is experiencing a significant housing supply challenge, and local government has an important role in facilitating appropriate housing growth. As one of Adelaide's oldest residential areas located just 10 minutes from the Central Business District and with a residential population over 46,000 people, the City of Burnside supports efforts to increase housing supply and improve housing affordability, while ensuring new development is coordinated with infrastructure provision and contributes positively to community outcomes.

At the City of Burnside, we are currently working constructively with our community and the State Government to ensure strategic planning and development decisions interact effectively with our State's Planning System to enable the delivery of new housing.

This includes preparation of a Local Area Plan to identify opportunities to accommodate future housing growth in response to the Greater Adelaide Regional Plan.

The City of Burnside offers the following comments for consideration:

- Recognising existing South Australian planning reforms.
- The role and benefits of strategic and statutory planning.
- The importance of coordinated infrastructure investment.
- Development approval timeframes in South Australia.
- Housing capacity versus housing delivery.
- Planning opportunities relating to medium density housing.

- The importance of creating attractive apartment living experiences.

Need to Recognise South Australian Planning System Reforms

The Interim Report would benefit from greater recognition of recent planning system reforms undertaken in jurisdictions such as South Australia. South Australia implemented a comprehensive statewide planning and development reform program in 2021 which significantly streamlined assessment pathways, established a consistent statewide planning framework and expanded opportunities for housing development.

It is also important to consider the outcomes of these reforms. Development assessment performance data referenced within the Inquiry indicates South Australia is performing strongly relative to other reporting jurisdictions. This suggests reforms have materially improved assessment efficiency and supports the need to evaluate existing reforms before pursuing further large-scale regulatory change.

However there have also been negative outcomes, such as key sustainability outcomes not being embedded in the reforms upfront, as well as the removal of community appeals. The reforms were economically driven with fast-tracking the system in mind but have not brought the community along leaving councils having to bear the brunt of community discontent.

South Australia's experience may therefore provide a useful case study when considering the effectiveness of planning reform initiatives and the extent to which planning regulation continues to act as a constraint on housing delivery.

Benefits of Strategic and Statutory Planning

Well-designed planning systems provide certainty to both developers and communities. Regulatory certainty can reduce project risk, assist with investment decisions and support more efficient delivery of housing.

Strategic and statutory planning systems have evolved to balance housing growth with infrastructure provision, environmental outcomes, public amenity and community wellbeing. Planning frameworks assist identify key issues early in the development process, providing greater certainty for developers while helping to avoid future costs associated with infrastructure deficiencies, environmental impacts or land use conflicts.

When undertaken effectively, strategic planning supports housing growth in appropriate locations, enables efficient infrastructure investment and contributes to the creation of thriving and sustainable communities.

Benefits of Investment in Transportation Improvements

Housing supply is dependent not only on planning reform but also on timely investment in enabling infrastructure. Provision of new housing being driven by housing numbers alone is not the complete solution.

Transport networks, utility services, community facilities and open space are all critical components of successful housing growth. Planning for housing supply and planning for infrastructure delivery should therefore be closely aligned.

Within the City of Burnside, Council's advocacy for the Greater Adelaide Freight Bypass highlights how strategic transport infrastructure can improve amenity, reduce constraints on urban development and create opportunities for additional housing in appropriate locations.

Housing growth is most successful when infrastructure planning occurs alongside land use planning rather than after development capacity has already been created.

A copy of Council's Advocacy Plan is available here: <https://www.burnside.sa.gov.au/About-Council/Policies-Plans-Reports/Strategies/Advocacy-Plan>

Approval Timeframes – Already Streamlined in SA

Recent South Australian planning reforms have significantly streamlined development assessment pathways.

Risk-based assessment streams, deemed-to-satisfy pathways and the Planning and Design Code have reduced approval requirements for many forms of residential development while increasing consistency across the State.

While opportunities for ongoing refinement will always exist, it is important to recognise that South Australia has already undertaken substantial reform designed specifically to improve assessment efficiency and reduce unnecessary regulatory burden.

Continued evaluation of the effectiveness of these reforms is important before further significant changes are considered. This is particularly relevant where evidence suggests planning approval processes may no longer represent the primary constraint on housing delivery.

Zoning Heights, Minimum Lot Sizes, Enabling Medium Density Housing

The City of Burnside recognises that planning policy can play an important role in supporting increased housing supply.

The experience within the City of Burnside suggests that planning capacity does not automatically translate into housing delivery. Despite the availability of land capable of accommodating medium-density housing within existing zones, development uptake has been lower than anticipated. This indicates that factors such as construction costs, access to finance, market conditions, infrastructure availability, development feasibility and landowner willingness may be equally important determinants of housing supply outcomes.

For this reason, regulatory reform should be evidence-based and responsive to local circumstances. A uniform national approach to increasing development capacity through blanket increases in building heights or the widespread removal of minimum lot sizes may not necessarily deliver the housing outcomes sought by the Inquiry.

The City of Burnside already contains areas zoned to accommodate medium density housing that remain underdeveloped, despite planning provisions enabling additional housing outcomes. Council has also sought additional rezoning opportunities consistent with

its City Master Plan – Urban Form and Transport. This experience suggests that the existence of development capacity within planning frameworks does not in itself guarantee housing delivery.

Where changes to zoning controls or minimum lot sizes are proposed, they should form part of a broader strategic planning process that considers infrastructure capacity, servicing requirements, environmental outcomes, neighbourhood character and community needs. In South Australia, Code Amendments and Local Area Planning processes provide mechanisms to assess such matters holistically and ensure housing growth occurs in locations that are appropriately serviced and supported.

The City of Burnside's community places a high value on tree canopy, open space and neighbourhood character, as demonstrated via recent Annual Community Surveys. Effective planning controls provide a framework that enables additional housing supply while also achieving important environmental and liveability outcomes. Well-designed medium-density development and housing growth can coexist with these objectives when supported by clear and appropriately targeted planning policy.

Council is currently preparing its Local Area Plan in response to State Government requirements arising from the Greater Adelaide Regional Plan. While this process required Council to defer consideration of some rezoning initiatives, it also provides an opportunity to better coordinate future housing growth with infrastructure planning at both the local and metropolitan level, providing greater certainty for developers, local government and the State Government. This focus on future housing growth will also consider opportunities to encourage State Government and other housing providers to redevelop existing social and public housing within the City of Burnside.

Enabling Positive Apartment Living Experiences - Make Downsizing Attractive

Regulatory reform should not focus solely on increasing dwelling numbers. High-quality apartment design, adequate storage, accessibility, private and communal open space, tree canopy and amenity are important factors influencing consumer demand for higher-density housing. Without attractive housing products, regulatory reform alone may not achieve the desired level of housing uptake.

The design and construction phase is the most cost-effective opportunity to incorporate these features. This is particularly important for apartments and smaller dwellings, where resident experience can significantly influence the attractiveness of higher-density living. In the context of a housing shortage, creating positive apartment living experiences may encourage downsizing and help release existing family housing stock to the broader market.

Consideration of key needs for occupants and neighbours of small dwellings and apartments should be prioritised and costed in from the start, so that the experience of residents is overwhelmingly positive. In the context of a housing shortage, a key reason for needing the experience of smaller dwellings and apartments to be an attractive lifestyle move, may be to make downsizing an attractive option for people who may be the sole occupants of existing family housing stock.

Conclusion

The City of Burnside supports ongoing efforts to increase housing supply across Australia and recognises the important role planning systems play in facilitating growth. However, planning reform is only one component of housing supply. Workforce availability, construction costs, infrastructure delivery, financing conditions, utility upgrades and market feasibility all influence whether approved housing is ultimately built.

South Australia's planning system has already undergone substantial reform and appears to be delivering comparatively strong development assessment outcomes. The focus should therefore extend beyond planning approvals alone and consider the broader economic, infrastructure and market factors that influence housing delivery.

The Inquiry may benefit from considering the distinction between creating theoretical housing capacity through planning reform and achieving the practical delivery of housing, which is influenced by a broader range of economic, infrastructure and market factors.

Thank you for the opportunity to provide feedback to this Inquiry. City of Burnside supports ongoing efforts to increase housing supply across Australia and looks forward to continuing to play its role in accommodating future housing growth within Greater Adelaide.

Should you require any further information on this submission, please contact Barry Cant, Director Environment and Place, on [Redacted] or burnside@burnside.sa.gov.au.

Yours faithfully,

Julia Grant
Chief Executive Officer