



TOD for God – Converting convenient places of worship for housing justice

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Take a short walk from any train station and chances are you'll pass several churches – some barely used. Many of these places of worship could be re-imagined, promoting sustainable urban development and effective place making to benefit some of the most vulnerable people in our community using some of the best-located land in our cities.

NSW's share of the national housing target requires 377,000 additional homes, including 31,000 social or affordable rental homes, across the state by 2029.¹ A range of planning system responses have been announced, with the heavy lifting toward meeting the housing target being the "Transit-Oriented Development (TOD) Policy", which increases opportunities for intensive residential development near fixed transport nodes. While the TOD policy could accommodate up to 240,300 homes by 2039 – this is still 100,000 fewer homes, 10 years too late than agreed. To achieve the Accord target we will need even more innovative solutions to increase housing yields.

Places of Worship – an important urban land asset

Recent research shows faith-based sites, such as places of worship, occupy some of the best-located transport-oriented development sites across NSW, revealing more than 20,000 new dwellings could be accommodated on land currently occupied on places of worship within the Sydney metropolitan area alone. An initial pilot of a mapping tool, produced with funding from the NSW Community Housing Industry Development Strategy in 2023, identified that 2,434 parcels of land across NSW included a place of worship.

The pilot indicates the high potential for partnerships with the faith sector to unlock well-located faith-owned land in areas proximate to fixed transport nodes, with 747 – or almost one-third of all places of worship in NSW – located within 800 metres of a railway station. Many of these sites were



Figure 1: Characteristics of Places of Worship in NSW (source: Faith Housing Alliance, 2023)

acquired more than a century ago. Some have developed a wide range of community services, while others are barely used, as congregations have declined or shifted in line with changing demographic trends.² Many of these sites could be re-developed to support a range of residential needs, including social, affordable, and key worker housing.

Housing and hope

Redeveloping well-located places of worship can meet qualitative and well as quantitative targets for new housing. Re-using religious lands near train stations for affordable and social housing can counter the trend where transit-oriented development is associated with gentrification and displacement of lower-income residents.³ Faith-based housing providers are not just focused on the provision of social and affordable housing, but also on providing health, wellbeing, employment and other support services for vulnerable tenants which can amplify the social benefits of subsidised housing.⁴ In many cases, existing places of worship could remain alongside housing and a mix of community uses, ensuring that heritage structures can be protected and restored, while ancillary buildings or enclosed spaces can be converted into residential use or much-needed community open space as

surrounding lands become subject to more intensive residential development.

Yet, for many well-located places of worship across NSW that could otherwise support thousands of new affordable rental homes – social, affordable and key worker housing is prohibited. A significant proportion of places of public worship are currently zoned SP1 Special Activities or SP2 Infrastructure. In these zones, most housing tenures are not permitted, including special disability accommodation, affordable housing, serviced apartments, student housing and social housing.

Despite the laudable objectives of the proposed ToD reforms, they risk excluding some of the best located landholdings from housing development, with no proposal to permit housing on land zoned SP1 or SP2. This results in the perverse situation where an existing place of worship could be marooned as a disconnected land use surrounded by residential flat buildings much higher and denser than currently permitted. In such cases, custodians of existing places of worship will have no flexibility to adjust land use to meet the demands of a changing community. Sites much further away from services and public transport would be able to support significant increases in density with new residents having



Figure 2: Episcopal church of the Redeemer, Toronto –a place of worship marooned in a high-density urban environment (source: Robin Stevens, 2017)

to drive, walk or ride past places of worship unable to support a variety of mixed uses, including social and affordable rental housing.

Lessons from overseas

Jurisdictions facing similar housing affordability pressures are enabling the use of well-located faith lands for affordable housing. A recent Californian study has identified 978 hectares of land owned by religious institutions within 800 metres of a transit stop.⁵ Yet, opportunities for affordable housing development on these sites was hampered by zoning restrictions, and by limited by a lack of technical development expertise and a conservative risk outlook by custodians of faith lands.⁶

Such constraints were recently addressed by the *Affordable Housing on Faith Lands Act 2023* (California) which enables both faith-based institutions and non-profit colleges to build affordable housing projects by allowing them to build multi-family housing as of right, regardless of local zoning restrictions. The applicant must partner with a qualified affordable housing developer and maintain affordability of rental housing below 80 percent of the area median income for at least 55 years. Applications are not permitted in historic districts, and relocation protections apply to tenants in existing affordable housing. Developments must provide one parking space per unit unless located near transit, a car-share program, or unless the local Council waives parking.

Similar legislation, the *Faith-Based Affordable Housing Bill 2024* (New York) is currently at the committee stage in the New York Legislature. The bill aims to enable religious corporations to bypass restrictive zoning barriers to build

mixed affordable housing on their land, with a requirement that at least 20 per cent of the residential floor area is preserved for households earning less than 80 per cent of the area median income.

From Greenfields, Greyfields and Brownfields to railyards, schoolyards and churchyards

Traditional conceptions of urban development have focused on the efficient use of existing residential, commercial and industrial lands, especially land proximate to transit nodes. However, the scale of the housing task means we need to look beyond greenfields, greyfields and brownfields to consider affordable housing on land previously reserved for infrastructural or institutional purposes, like railyards, schoolyards and churchyards. Such land has traditionally been designated special purposes zoning, segregating it from surrounding landuse, so that governments and communities have ignored their capacity for mixed use – including affordable housing. This orthodoxy is starting to change, with the Transport Assets Holding Entity using superfluous railway land in NSW to support affordable housing development,⁷ and the Californian laws outlined above facilitating affordable housing projects by not-for-profit colleges.

In the same way, we need to maximise opportunities to enable affordable housing development on land zoned as a place of worship. Places of worship have a long and deep connection with the communities they serve, and a long-term commitment to remain. Unlike many developers, faith-based organisations stay in their communities, providing a wide range of social services and supports. Allowing places of worship at least

the same opportunities to provide housing as adjacent land uses will help meet the desired outcome of more housing supply, as well as the related outcome of increasing the supply of affordable rental accommodation in a desired range of convenient locations. ■

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Endnotes

1. See <https://treasury.gov.au/housing-policy/accord>
2. Shipman, C & Siemiatycki, M 2024, 'Building in common: (re)integrating social services and community space in church redevelopment projects', *Journal of Urbanism: International Research on Placemaking and Urban Sustainability*, Vol. 17, No. 1, pp. 69-88.
3. Padeiro, M, Louro, A, and Marques da Costa, N, 2019, 'Transit-oriented development and gentrification: a systematic review', *Transport Reviews*, vol. 39, no. 6, pp. 733-754.
4. ACIL Allen. Social return on investment of BaptistCare NSW & ACT. See www.baptistcare.org.au/uploads/images/ACIL-Allen_Social-Return-on-InvestmentStudy_BaptistCare.pdf. Also see Anglicare Sydney. More Than Shelter report. See www.fha.org.au/wp-content/uploads/2023/07/7660_ac_more-than-shelter-report_oct22-digital-sp-1.pdf.
5. Garcia, D & Sun, E 2020, *Mapping the Potential and Identifying the Barriers to Faith-Based Housing Development*, Terner Center for Housing Innovation, UC Berkeley. see: www.ternercenter.berkeley.edu/wp-content/uploads/2020/08/Mapping_the_Potential_and_Identifying_the_Barriers_to_Faith-Based_Housing_Development_May_2020.pdf
6. Garcia, D, Underriner, Q, Alameldin, M, & Romem, I 2023, *The Housing Potential for Land Owned by Faith-Based Organizations and Colleges*, Terner Center for Housing Innovation, UC Berkeley. see: <https://ternercenter.berkeley.edu/wp-content/uploads/2023/08/Faith-Based-Housing-Updated-October-2023.pdf>
7. Koziol, M 2023, 'Minns orders ministers to find surplus land to rezone for homes', *Sydney Morning Herald*, 15th May 2023.