



FAITH HOUSING AUSTRALIA

Submission on the Establishment of the Development Coordination Authority (DCA)

February 2026





Submission on the Establishment of the Development Coordination Authority (DCA) Proposed Amendments to the Environmental Planning and Assessment Regulation 2021 and the State Environmental Planning Policy (Planning Systems) 2021

February 2026

Executive Summary

Faith Housing Australia (FHA) welcomes the NSW Government's proposed reforms to modernise and consolidate statutory input processes through the establishment of the Development Coordination Authority (DCA). The reforms aim to reduce duplication, streamline referrals and improve the clarity and reliability of development assessment pathways — outcomes strongly supported by FHA.

FHA members — faith-based not-for-profit organisations and community housing providers — operate in complex urban contexts where statutory inputs are frequently triggered by transport interfaces, environmental constraints, hazard overlays and heritage considerations. A well-designed DCA model has the potential to materially improve feasibility, sequencing and development certainty for social and affordable housing.

However, the proposed framework does not explicitly recognise housing delivery as a matter of State interest. Without this recognition, there is a risk that risk-averse, conservative or cumulative statutory input requirements will constrain the very projects the NSW Government seeks to accelerate.

To ensure that the DCA enables, rather than inadvertently delays or discourages, social and affordable housing delivery, FHA recommends the following key reforms:

- **Recognise social and affordable housing as a matter of State interest** within the Planning Systems SEPP and State Referral Provisions.
- **Introduce fee waivers, caps or concessions** to prevent cumulative statutory input fees from undermining project feasibility.
- **Establish a dedicated Housing Priority Stream**, including specialised case management and accelerated statutory input timeframes.
- **Embed specialist housing expertise within DCA**, ensuring proportionate, context-sensitive advice for common housing typologies.
- **Develop standardised, proportionate conditions** that avoid unnecessary yield loss or escalation of construction costs.
- **Clarify mapping-based triggers and thresholds** to prevent unnecessary referrals of low-risk development.
- **Publish housing-specific performance metrics**, including dwellings enabled, statutory input timeframes and feasibility impacts.

With these refinements, the DCA can become a powerful driver of improved housing supply outcomes in NSW.

1. Introduction

Faith Housing Australia is the peak body representing faith-based organisations involved in the delivery of social and affordable housing across NSW. FHA members develop housing in diverse metropolitan and regional contexts, often on sites characterised by multiple risk factors such as proximity to rail corridors, arterial roads, bushfire-prone land, environmentally sensitive areas and heritage items.

FHA supports the NSW Government's objective to modernise the statutory input system. The centralisation of technical expertise, early referral checking and the introduction of consistent statutory input timeframes can significantly improve clarity and reduce fragmentation. However, the design of the statutory input framework — particularly how the DCA interprets risk, public benefit and State interests — will determine whether these reforms unlock new housing supply or unintentionally constrain it.

2. Key Issues for Social and Affordable Housing Providers

2.1 Increased Statutory Input Fees and Cumulative Cost Impacts

The proposed fee structure — including \$1,100 for each concurrence, referral or integrated development input, and \$550 for statutory inputs on complex modification applications — risks imposing disproportionate costs on not-for-profit led housing projects. Social and affordable housing projects often involve constrained sites that trigger multiple concurrent technical inputs, and their funding structures cannot absorb escalating mandatory fees.

2.2 Centralisation and the Risk of a Single Systemic Bottleneck

Centralisation will reduce duplication, but without adequate resourcing and triage, DCA may become a single point of delay. As the final decision-maker for statutory inputs, DCA decisions could affect feasibility across the entire sector. Smaller community housing providers may be deprioritised relative to large infrastructure or commercial developments.

2.3 Housing Not Identified as a Matter of State Interest

The risk-based framework focuses on environmental, infrastructure, heritage and hazard considerations but does not identify housing delivery — including social and affordable housing — as a matter of State interest. This risks reinforcing risk-averse conditioning rather than enabling high-public-value development.

2.4 Over-conditioning and Feasibility Risks on Constrained Urban Sites

The DCA's multi-disciplinary structure is valuable but may unintentionally lead to cumulative, idealised requirements drawn from multiple specialist areas. Such layering can erode net developable yield, increase construction complexity, and undermine feasibility — particularly for tenure-regulated housing models where revenue cannot adjust to absorb cost escalation.

2.5 Absence of Prioritisation for Social and Affordable Housing

Although NSW faces a significant and well-recognised housing crisis, no differentiated statutory input timeframes, triage mechanisms or assessment pathways for social and affordable housing are proposed. Without explicit prioritisation, these projects risk becoming subject to general queues despite their high public value.

2.6 Social and Affordable Housing as a Dominant Consideration

A risk-only statutory input framework does not sufficiently recognise the critical, system-wide public benefits delivered by secure and affordable housing — including improved health and wellbeing, increased workforce participation, strengthened community stability and reduced pressure on the health, justice, disability, and homelessness systems. These benefits are not ancillary; they are foundational to the economic and social functioning of NSW.

In a proportionate assessment system, the public interest is best served when social and affordable housing is considered *first*, not last. Social and affordable housing is the only form of housing provision that directly addresses the housing crisis and meets the needs of those who are structurally excluded from the market. For that reason, it should be regarded as a dominant planning consideration, carrying determinative weight when balanced against technical risk-mitigation controls.

2.7 Learning from “Meanwhile Use” and Other Priority Pathways

Existing NSW planning mechanisms — such as meanwhile use provisions — fast-track socially valuable uses by simplifying assessment pathways. Social and affordable housing delivers long-term public value that exceeds these temporary uses and warrants a comparable enabling mechanism within the DCA framework.

3. Recommendations

3.1 Recognise Social and Affordable Housing as a Matter of State Interest

Recommendation 1

Amend the Planning Systems SEPP and State Referral Provisions to explicitly identify social and affordable housing as a matter of State interest and a dominant consideration when DCA issues statutory inputs.

This would require DCA to assess proposed conditions with explicit regard to their impact on feasibility and housing outcomes.

3.2 Introduce Fee Waivers, Caps or Concessions for Eligible Projects

Recommendation 2

Implement a public-benefit-aligned fee framework, including:

- Fee waivers or substantial discounts where a defined proportion of dwellings are social or affordable.
- Caps to prevent cumulative fees across multiple triggers within the same DA.
- Exemptions for minor or beneficial modification applications.

3.3 Establish a Housing Priority Stream

Recommendation 3

Introduce a DCA Housing Priority Stream with:

- Reduced statutory input timeframes (e.g. 14–21 days).
- Dedicated case managers for multi-stage and complex housing projects.
- A pre-determination case conference for applications where feasibility is at risk.

3.3A Create a Priority Pathway Comparable to “Meanwhile Use”

Recommendation 3A

Establish a housing priority pathway incorporating:

- Early, binding multi-disciplinary advice.
- Presumptive support for proportionate risk management.
- Streamlined documentation requirements.
- Fast-tracked dispute resolution.

3.4 Embed Dedicated Housing Expertise within DCA

Recommendation 4

Create a specialist Housing and Social Infrastructure team with expertise in:

- CHP regulatory and funding frameworks.
- Urban renewal, seniors housing and SDA typologies.
- Feasibility-sensitive, context-responsive design solutions.

3.5 Standardise Proportionate Conditions for Housing Typologies

Recommendation 5

Develop template conditions for common housing typologies to ensure consistency, proportionality and clarity for both applicants and assessing authorities.

3.6 Clarify Triage Rules and Reduce Unnecessary Referrals

Recommendation 6

Use clear, mapping-based triggers within the Planning Systems SEPP to ensure statutory inputs are only required where State-level expertise is genuinely needed. This reduces unnecessary referrals for low-risk infill development.

3.7 Introduce Housing-Specific KPIs and Performance Reporting

Recommendation 7

Require DCA to publicly report on:

- Dwelling yield enabled through statutory inputs.
- Processing times for social and affordable housing.
- Instances where conditions materially impacted feasibility or yield.

4. Conclusion

Faith Housing Australia supports the NSW Government's intent to simplify and modernise statutory input processes. The establishment of the DCA is a significant opportunity to improve planning clarity, integrate specialist expertise and accelerate housing delivery.

To fully realise this potential, the statutory input framework must explicitly recognise the public value of social and affordable housing, apply proportionate and feasibility-sensitive conditions, and embed processes that prioritise high-value community outcomes.

By adopting FHA's recommended refinements, the NSW Government can ensure the DCA operates not only as a coordinator of technical risk, but as a key enabler of the housing supply targets that NSW urgently needs.

Faith Housing Australia would welcome the opportunity to continue working closely with the Department of Planning, Housing and Infrastructure and the DCA implementation team throughout the finalisation and operationalisation of the reforms.

Contact: Amanda Bailey, Acting CEO | amanda@fha.org.au | 0429484632