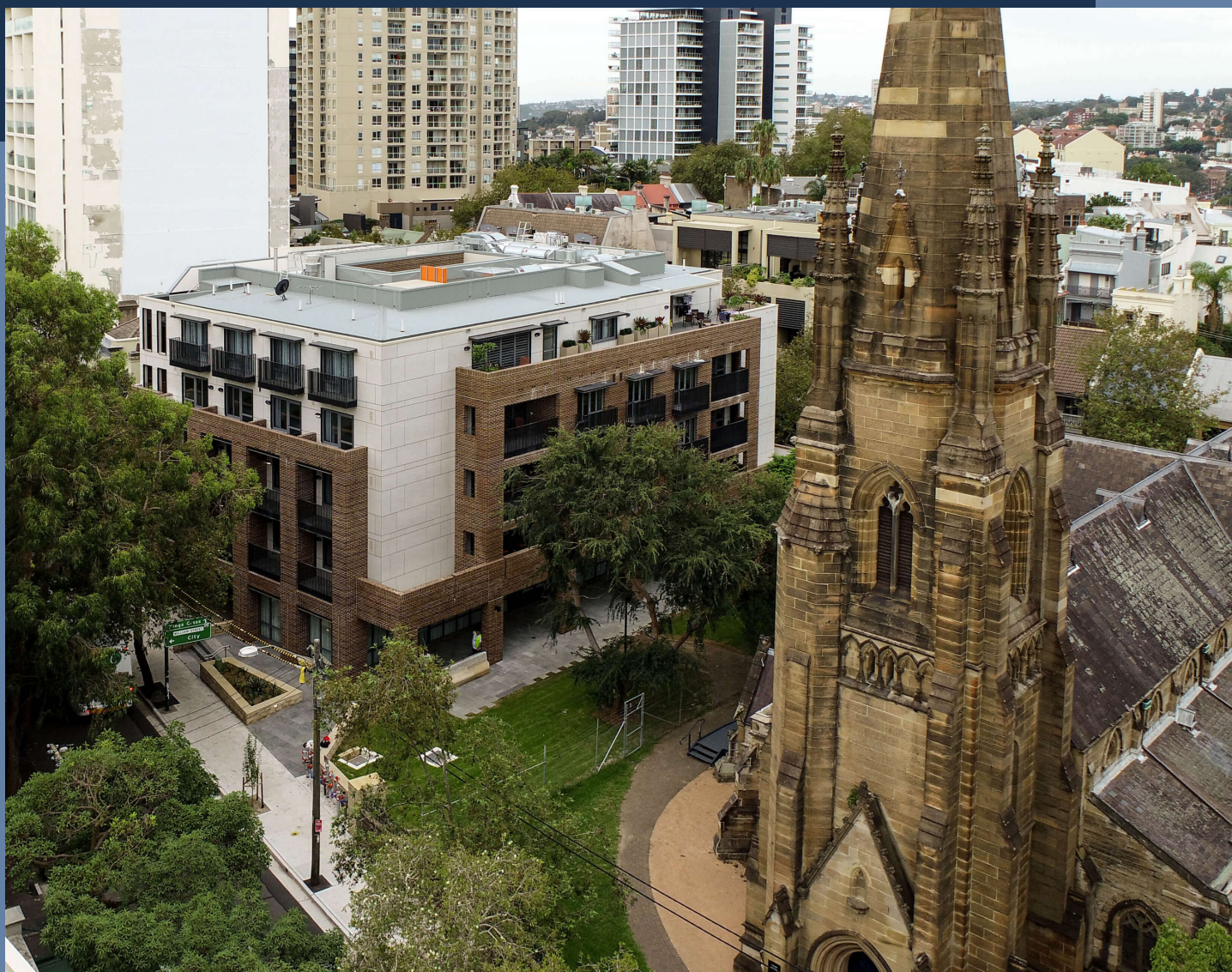




FAITH HOUSING AUSTRALIA

# Housing for All: Unlocking Mission-Led and Community Land for Housing Delivery

Submission  
May 2026



## 1. Introduction

Faith Housing Australia (FHA) welcomes the opportunity to provide a submission in response to the City of Sydney's *Housing for All* Discussion Paper.

FHA is the national peak body representing faith-based housing providers, mission-driven landholders, Community Housing Providers (CHPs), specialist homelessness services, and sector partners working across housing delivery, homelessness response, land activation, and system reform. FHA's members operate across the housing continuum, including crisis and transitional accommodation, social housing, affordable rental housing, community housing, specialist housing responses, and emerging housing innovation models.

The City of Sydney has demonstrated sustained leadership nationally in recognising housing as essential urban infrastructure and in advancing planning, funding, and advocacy settings that support social and affordable housing delivery, housing diversity, and inclusive communities. FHA strongly supports the City's ambition to increase housing supply while ensuring Sydney remains economically productive, socially cohesive, and accessible to households across a range of incomes, life stages, and housing needs.

This submission draws on FHA's national policy work, direct engagement with faith-based landholders and CHPs, and practical experience working with local governments to identify implementation barriers and delivery opportunities associated with mission-led land, CHP-led housing delivery, adaptive reuse, feasibility, and planning pathways.

## 2. FHA's Overall Position

FHA broadly supports the strategic intent and guiding principles of the *Housing for All* Discussion Paper. FHA recognises the City of Sydney as one of Australia's most mature local government actors in linking planning, affordability, and housing diversity within a coordinated urban policy framework.

Australia's housing challenge is not simply a matter of supply volume, nor solely one of affordability. It is fundamentally a structural delivery challenge — a failure to consistently translate strategic planning and zoned capacity into completed, serviced housing. Addressing it requires stronger alignment and sequencing between land use controls, infrastructure provision, development feasibility, financing pathways, and implementation capacity.

Within this context, the City of Sydney is well positioned to build on its leadership role in unlocking housing through:

- improving planning certainty and early engagement
- supporting a broader diversity of housing typologies and tenures
- facilitating adaptive reuse and more efficient use of land and buildings
- enabling partnerships with CHPs, mission-driven organisations, and faith-based landholders
- strengthening pathways for social and affordable housing delivery
- reducing avoidable friction for viable not-for-profit housing projects

FHA supports a planning framework that is outcomes-focused, place-sensitive, feasibility-aware, and responsive to both housing demand and delivery realities.

### 3. Where and How More Homes Can Be Delivered

#### 3.1 Strategic Intensification in Well-Located Areas

FHA supports the City's emphasis on concentrating additional housing in locations with strong access to public transport, employment, services, and social infrastructure. Well-located density remains essential to achieving both productivity and equity outcomes.

Strategic intensification should continue to prioritise:

- transport-connected centres and corridors
- mixed-use precincts
- urban renewal areas
- underutilised commercial, institutional, and community land
- sites capable of delivering integrated mixed-tenure outcomes

However, intensification must be accompanied by coordinated infrastructure delivery, high-quality urban design, and built-form outcomes that protect amenity and local character.

#### 3.2 Adaptive Reuse and Underutilised Built Assets

A significant opportunity exists to deliver additional housing through the adaptive reuse of underutilised buildings and marginal urban assets, including:

- above-shop accommodation
- ageing commercial floorspace
- institutional and community buildings
- community-owned and faith-owned land
- buildings suited to retrofit, transitional, or interim use

Adaptive reuse can deliver housing outcomes more quickly and at lower cost than major redevelopment pathways, particularly where planning controls, change-of-use provisions, fire compliance, and certification requirements are clear, proportionate, and consistently applied.

FHA encourages the City to build on its leadership in adaptive reuse by further strengthening policy and procedural support for this practical and scalable housing delivery pathway.

#### 3.3 Faith-Owned and Mission-Led Land Activation

Faith-based organisations collectively hold a substantial portfolio of land and built assets across the City of Sydney. Many of these sites are strategically located within established neighbourhoods, well served by transport and services, yet are disused, underutilised, or no longer required for their original institutional purpose.

These landholdings represent a form of patient, mission-aligned ownership that is particularly well suited to delivering secure and long-term social and affordable housing outcomes, while remaining consistent with charitable stewardship obligations and asset lifecycle management.

FHA's experience demonstrates that faith-owned sites can support:

- social and affordable rental housing
- key worker and essential worker housing
- crisis, transitional, and supported accommodation
- mixed-use developments retaining community and ministry functions
- mixed-tenure models that support feasibility while delivering public benefit

However, activation of faith-owned land frequently encounters barriers, including zoning constraints, feasibility gaps, planning uncertainty, governance complexity, and limited structured delivery pathways.

FHA encourages the City to continue strengthening recognition of faith-owned and mission-led land as a strategic housing resource and to support its activation through planning policy, strategic facilitation, and partnership-based delivery models.

#### **4. Early Strategic Planning Engagement and Zoning Flexibility**

FHA welcomes the City of Sydney's existing willingness to engage early with proponents on faith-owned and mission-led sites that are disused or underutilised, particularly where current zoning — such as infrastructure or special-purpose zoning — no longer reflects the site's contemporary function or surrounding urban context.

Through an agreed informal process, FHA members have identified and brought forward faith-owned sites for early discussion with the City's strategic planning team. These discussions have enabled non-binding, feasibility-aware conversations about potential housing outcomes before proponents incur significant sunk costs. To date, approximately ten sites have been identified through this process, with six progressing to more detailed strategic conversations.

FHA considers this early engagement model to be highly effective and encourages the City to consider building on this approach through a clearer and more explicit faith-owned and mission-led land activation pathway, providing greater transparency, consistency, and scalability while maintaining planning integrity and place-based assessment.

#### **5. Building on Existing Council Practice**

FHA has also worked with Inner West Council to help shape a structured approach to unlocking housing on faith-owned land.

Some of these principles align closely with approaches already emerging within the City of Sydney. Further codifying these strengths could support scalable, non-speculative housing delivery aligned with Housing for All principles.

Key elements could include:

- formal recognition of faith-owned land as a strategic housing resource
- a clear permissibility pathway for social/affordable housing on faith-owned sites
- early, structured engagement between Council planners, landholders, and CHPs
- feasibility-aware consideration of zoning, built-form, and heritage constraints
- flexibility to consider adjoining or contiguous land where this improves viability

## 6. What the NSW Government Should Do to Support Delivery

FHA agrees that housing delivery constraints cannot be resolved through local planning reform alone. State-level action is required to:

- improve planning certainty and approval efficiency
- support feasibility through gap funding, infrastructure coordination, and financing mechanisms
- enable modern methods of construction
- align housing growth with transport, utilities, and social infrastructure investment

## 7. Affordable Housing Contributions, CHPs, and Delivery Partners

FHA acknowledges the City of Sydney's longstanding and productive relationship with large Tier 1 CHPs, including City West Housing, and recognises the critical role these organisations play in delivering affordable housing at scale.

Nothing in this submission is intended to limit or alter the City's existing governance, probity, or due-diligence requirements in the allocation or application of Affordable Housing contributions.

FHA notes that Affordable Housing Contributions have played an important role in supporting delivery through established CHP partnerships. As future housing needs diversify, there may also be value in retaining flexibility to support a broader range of CHP models and delivery partnerships where this strengthens place-based outcomes.

FHA encourages the City to retain and exercise discretion to direct Affordable Housing contributions to CHPs of different tiers, including smaller and specialist providers, where they can demonstrably:

- deliver housing outcomes that directly benefit residents of the City of Sydney
- activate underutilised or mission-led land
- provide targeted housing types (such as transitional, supported, key worker, or culturally appropriate housing)
- partner effectively with faith-based or community landholders

An outcomes-based, tier-neutral approach would strengthen delivery resilience, encourage innovation, and maximise public benefit.

## 8. Affordable and Diverse Housing Fund

FHA strongly supports the City of Sydney's Affordable and Diverse Housing Fund, which has played a critical role in enabling high-impact projects that would not otherwise have proceeded. The Fund represents best practice in Council using its levers strategically to unlock housing outcomes.

FHA suggests that the principles underpinning the Fund — including project-based assessment, focus on community benefit, and openness to diverse delivery partners — could continue to inform a broader range of CHP-led and mission-led housing initiatives across the City.

## 9. Recommendations

To build on the City of Sydney's existing leadership, FHA recommends that the City:

1. Continue to prioritise housing as essential city-shaping infrastructure.
2. Support strategic intensification in well-located and well-served precincts.
3. Strengthen adaptive reuse as a formal housing delivery pathway.
4. Continue strengthening recognition of faith-owned and mission-led land as a strategic housing opportunity.
5. Establish a formal early strategic planning pathway for faith-owned and mission-led sites.
6. Improve planning certainty and early engagement for CHP and not-for-profit housing projects.
7. Retain flexibility to apply an outcomes-based, tier-neutral approach to Affordable Housing contributions and CHP partnerships.
8. Continue applying the principles of the Affordable and Diverse Housing Fund to support broader housing delivery opportunities.
9. Advocate for stronger NSW Government support for feasibility and delivery.
10. Establish an ongoing City–sector liaison mechanism focused on implementation and delivery.

## 10. Conclusion

The housing challenge facing Sydney requires coordinated action across planning, land use, infrastructure, feasibility, financing, and delivery.

FHA supports the City of Sydney's strategic intent to increase housing supply, improve diversity, and create inclusive, well-functioning neighbourhoods. Stronger and more explicit implementation pathways — particularly for mission-led land and CHP-led delivery — will be essential if strategic ambition is to translate into secure, long-term housing outcomes aligned with asset lifecycle horizons and stewardship obligations.

Faith Housing Australia and its members stand ready to continue working in partnership with the City to unlock social, affordable, and community-led housing that is equitable, place-responsive, financially viable, and aligned with long-term stewardship, sound governance and project feasibility.

### Contact

Amanda Bailey

Acting CEO

0429484632

[amanda@fha.org.au](mailto:amanda@fha.org.au)

**Front Cover image:** St Mark's Darling Point collaboration with HammondCare to provide homes for older people experiencing homelessness on an underutilised site adjoining the church.