

Submission on the Draft Statewide Community Participation Plan and Discussion Paper

Introduction

Faith Housing Australia (FHA) welcomes the opportunity to provide feedback on the Draft Statewide Community Participation Plan and the accompanying Discussion Paper released by the NSW Department of Planning, Housing and Infrastructure.

Faith Housing Australia is the national peak body representing faith-based organisations involved in community housing, homelessness, aged care, retirement living, social services, specialist disability accommodation and the long-term stewardship of community land. FHA members operate across metropolitan, regional and rural Australia and collectively provide housing and support services to tens of thousands of Australians. FHA members are actively contributing to solutions across the housing continuum, including social housing, affordable housing, specialist housing and homelessness responses.

FHA supports the NSW Government's objective of creating a planning system that is faster, fairer and more outcomes-focused. We recognise that this reform agenda is being pursued in the context of a deepening housing crisis characterised by worsening affordability, rising homelessness, infrastructure constraints and increasing community concern regarding growth and change. In this context, the way communities are engaged in planning decisions is central to both housing delivery outcomes and public confidence in the planning system.

FHA acknowledges the Government's position that the existing approach of multiple local Community Participation Plans has resulted in inconsistent consultation requirements across New South Wales. We understand that there is a paradox whereby the opportunity to tailor participation processes to local conditions and the aspirations of local communities has resulted in the creation of more than 120 separate participation frameworks. This creates a tension whereby processes designed to facilitate engagement with the planning system can generate confusion for communities, duplication for planning authorities, and unnecessary complexity for housing providers—such as not-for-profit and faith-based organisations operating across multiple local government areas. For these reasons, FHA acknowledges the Government's decision to introduce a single statewide Community Participation Plan designed to establish clearer minimum standards, improve transparency and provide greater certainty.

At the same time, FHA emphasises that community participation should not be conceived solely as a procedural or compliance obligation. Foundational planning scholarship and contemporary Australian housing research demonstrate that meaningful, well-designed participation processes play a substantive role in building legitimacy, strengthening social licence, reducing conflict and supporting delivery certainty, particularly for affordable and social housing in established communities (Healey 1997; Forester 1999; Innes and Booher 2004). Acknowledging this tension, our submission supports the overall objectives of the Draft Plan while identifying opportunities to ensure that community participation functions as an enabler of housing delivery, place-making and long-term community wellbeing.

Summary of Recommendations

Faith Housing Australia recommends that the Department:

1. Retain and strengthen the focus on meaningful early engagement during strategic planning processes.
2. Support the proposed extension of exhibition periods for Regional Plans, District Plans and Local Strategic Planning Statements.
3. Ensure that consistent participatory processes do not come at the expense of recognising the different conditions, needs, and aspirations of the wide range of places and communities across NSW.

4. Explicitly recognise people experiencing housing insecurity, homelessness, rental stress and housing exclusion as important stakeholders in planning engagement processes.
5. Ensure that reduced exhibition requirements for planning proposals are only applied where earlier consultation has been comprehensive and meaningful and where proposals remain substantially consistent with previously exhibited strategic plans or masterplans.
6. Recognise the role of community participation as a mechanism for long-term place-making, neighbourhood integration and community acceptance, particularly for affordable and social housing projects.
7. Encourage collaborative and place-based engagement approaches for projects delivering significant public benefit through social and affordable housing.
8. Recognise community participation as a potential enabler of housing delivery, particularly where projects are led by trusted community institutions with demonstrated local relationships and long-term stewardship commitments.
9. Continue monitoring the impacts of reduced exhibition requirements on community confidence, appeal rates and housing delivery outcomes.

Acknowledging the argument for a Statewide Community Participation Plan

Faith Housing Australia acknowledges the argument for a single statewide Community Participation Plan.

The current variation in consultation requirements between councils and other planning authorities can be seen to deliver an uneven and opaque participation landscape. Similar planning proposals may be subject to markedly different engagement processes depending on location. This can lead to a situation in which acknowledging local conditions and preferences can undermine perceptions of fairness and consistency in the planning system. For communities, this variability arguably makes it difficult to understand when and how they can engage meaningfully. For housing providers, particularly those operating across multiple jurisdictions, it potentially increases administrative burden and could complicate project planning.

A statewide Community Participation Plan has the potential to address these issues by establishing clear minimum standards for participation, providing greater predictability for communities and proponents, and reducing duplication where meaningful consultation has already occurred. FHA supports the Draft Plan's emphasis on proportionality, recognising that participation requirements should be aligned to the scale, complexity and impact of planning decisions. However, proportionality must be applied in a way that maintains community confidence and trust, particularly where consultation requirements are reduced.

Early Engagement at the Strategic Planning Stage

Faith Housing Australia strongly supports the Draft Plan's emphasis on strengthening community participation at the strategic planning stage.

Strategic planning is the point in the planning system at which communities can most meaningfully influence long-term outcomes, including housing supply and diversity, infrastructure provision and sequencing, transport accessibility, environmental protection and affordable housing objectives. Decisions made at this stage establish the framework within which future development proposals are assessed and approved, often shaping outcomes for decades.

As Healey (1997) demonstrates, participation at the strategic stage allows communities to help shape the "rules of the game" rather than reacting defensively to individual proposals once strategic parameters are fixed. Forester (1999) similarly emphasises the importance of deliberative engagement that enables communities to understand constraints, trade-offs and policy objectives rather than responding primarily

through opposition. Engagement deferred to later development assessment stages often occurs after fundamental decisions have already been made, increasing frustration, mistrust and conflict.

FHA therefore supports the Draft Plan's proposal to extend exhibition periods for Regional Plans, District Plans and Local Strategic Planning Statements to a minimum of 60 days. These timeframes better reflect the complexity and significance of these documents and enable substantive participation by a broader range of stakeholders, including faith organisations and community housing providers. In the context of the housing crisis, strong strategic engagement is essential to building community understanding of housing need and supporting acceptance of future growth.

Community Participation, Social Licence and Housing Delivery

Faith Housing Australia supports the principle of proportionality embedded in the Draft Community Participation Plan, but cautions against interpreting proportionality primarily as a mechanism for reducing consultation.

The planning system is increasingly required to facilitate housing outcomes that respond to acute affordability pressures, rising homelessness and growing unmet demand. Contemporary Australian housing research indicates that social licence and community confidence are now critical enablers of housing delivery, particularly for affordable and social housing in established communities.

AHURI's recent national research program consistently finds that community opposition to affordable and social housing is shaped less by tenure or resident group and more by perceptions of process fairness, trust in proponents, and the timing and quality of engagement. Where engagement is late, opaque or framed narrowly as compliance, opposition is more likely to intensify. By contrast, early, transparent and meaningful engagement—particularly where led by trusted, mission-driven organisations—reduces contestation and improves delivery certainty.

This conclusion is reinforced by collaborative governance research, which demonstrates that participatory processes focused on shared problem-solving and mutual learning can reduce adversarial dynamics and improve implementation outcomes (Innes and Booher 2004).

Recent system-level analysis by the National Housing Supply and Affordability Council further underscores the importance of social licence in housing delivery. In its *State of the Housing System* reports, the Council identifies that while Australia has a substantial pipeline of zoned and approved housing, delivery is constrained by a combination of feasibility pressures, infrastructure sequencing challenges, workforce capacity limitations and community resistance to change (NHSAC 2024; 2025; 2026). The Council emphasises that planning systems which fail to build and maintain legitimacy and public confidence risk slower delivery, increased contestation and higher implementation costs, even where strategic settings are supportive.

The Council also highlights the role of high-quality strategic planning and early engagement in building a long-term pipeline of well-located housing, noting that coordinated, place-based planning can reduce infrastructure costs and support community acceptance of increased density (NHSAC 2025). This reinforces the Draft Plan's emphasis on earlier engagement, while underscoring the need to ensure that participation processes are meaningful rather than tokenistic.

FHA's experience aligns with this evidence. Participation processes that are initiated early, clearly articulate housing need and constraints, and build on existing local relationships can reduce misinformation, build confidence in proposed outcomes and support smoother delivery. Community participation should therefore be understood as a housing enabler, not simply as a procedural requirement to be minimised.

Faith-Based Housing and Long-Term Community Stewardship

Faith Housing Australia considers that faith-led housing projects present a distinct and important context for community participation.

Many faith communities have maintained a presence in their local areas for decades, and in some cases for more than a century. Unlike speculative or short-term development models, faith-based organisations typically retain long-term ownership of land and assets and remain embedded within communities long after development is completed. In addition to housing, they often contribute community services, volunteer networks, pastoral support and social infrastructure.

Australian housing research highlights the stabilising and trust-building role of mission-driven, not-for-profit housing providers that combine long-term asset stewardship with social purpose and accountability (Milligan, Martin and Phillips 2016). AHURI's recent research further indicates that such organisations are often perceived as more trustworthy by local communities because of their long-term presence and accountability beyond individual projects. This aligns with broader evidence on the role of social capital and long-standing institutions in supporting community cohesion and acceptance of change (Putnam 2000).

For faith-based organisations, engagement is not episodic or transactional. It is an ongoing commitment to place-making, neighbourhood integration and long-term community building. Reducing opportunities for meaningful engagement may therefore undermine social cohesion and acceptance where long-term outcomes are critical.

Case Studies: Community Participation as a Contributor to Successful Housing Outcomes

Faith Housing Australia members have extensive experience engaging local communities throughout the planning, delivery and operation of housing and homelessness projects. These experiences demonstrate that community participation can contribute not only to better planning outcomes, but also to stronger communities, improved project acceptance and more successful long-term housing outcomes.

Case Study 1: Wesley Edward Eagar Centre Redevelopment – Building Community Acceptance Through Engagement

The redevelopment of the Wesley Edward Eagar Centre in Surry Hills demonstrates how proactive community engagement can support housing and homelessness responses while strengthening neighbourhood relationships.

Located in an area that has experienced significant urban renewal and gentrification, Wesley Mission recognised that the redevelopment of a homelessness service could generate concerns among local residents and businesses. Rather than viewing community engagement as a procedural requirement, Wesley adopted an approach focused on relationship-building, transparency and ongoing dialogue.

Community engagement included direct consultation with local residents, door knocking, community information sessions and opportunities for neighbours to raise concerns and ask questions directly of project representatives. This approach enabled local concerns to be identified and addressed early in the process while building trust between the service and the surrounding community.

Importantly, engagement did not conclude when planning approvals were obtained. Following completion of the redevelopment, members of the local community were invited to tour the facility, learn more about Wesley Mission's work and establish ongoing relationships with staff. Local residents were encouraged to provide feedback and raise operational concerns directly, allowing issues to be addressed collaboratively as the service became established.

The Wesley Edward Eagar Centre demonstrates that community participation can be a powerful mechanism for building social licence and long-term neighbourhood acceptance. For organisations that intend to remain active members of their communities long after development is complete, engagement is not simply part of the planning process—it is part of successful long-term community stewardship.

Relevance to the Community Participation Plan: This example demonstrates that community participation can support housing and homelessness outcomes by building trust, addressing concerns early and creating ongoing relationships between projects and their surrounding communities. It highlights the value of engagement approaches that extend beyond statutory exhibition requirements.

Case Study 2: HammondCare Darlinghurst – Repurposing Underutilised Faith Land for Community Benefit

HammondCare Darlinghurst demonstrates how underutilised faith-owned land can be transformed into a long-term community asset that addresses homelessness, health needs and social isolation while remaining deeply connected to the surrounding neighbourhood.

The facility was developed on an underutilised portion of the St John's Anglican Church site in Darlinghurst. Through a partnership between HammondCare and St John's, church land that had previously accommodated a commercial car wash was repurposed to create a purpose-built residential aged care home for older people experiencing homelessness, or at risk of homelessness, with high care needs. Completed in 2020, the 42-bed facility fills a critical gap in existing homelessness and aged care services in inner metropolitan Sydney.

The redevelopment attracted strong support from local stakeholders, including the City of Sydney, which recognised the growing challenge of homelessness among older people and provided funding support for the project. Community partnerships remain central to the operation of the facility. HammondCare works closely with St John's Anglican Church, Rough Edges, local hospitals, homelessness services, health providers and Kings Cross community networks to support residents and maintain connections to the local area.

Local volunteers contribute through social visits, music programs, neighbourhood outings and community activities. Through initiatives such as the Social Club, residents are supported to build social connections and participate in community life, reducing isolation and improving wellbeing.

Importantly, community engagement did not conclude once the facility was completed. Ongoing partnerships with local organisations, volunteers and service providers continue to contribute to the operation of the service and the quality of life of residents.

The impact of this approach has been independently recognised, with Social Ventures Australia finding that every dollar invested in HammondCare Darlinghurst generates \$2.28 in social value through improved wellbeing, reduced hospitalisations, greater social connection and reduced reliance on crisis services.

Relevance to the Community Participation Plan: This example demonstrates that community participation is not limited to planning approval processes. Ongoing engagement, local partnerships and community involvement can contribute directly to successful housing and care outcomes, particularly for vulnerable groups who are at risk of social isolation and exclusion.

Case Study 3: Regents Park Anglican Redevelopment – Housing Delivery Through Community Stewardship

The redevelopment of the former Regents Park Anglican Church site demonstrates how faith-owned land can be repurposed to address housing need while strengthening long-term community connections.

Located at the corner of Edwin Street and Kingsland Road, the former church site is being transformed into 74 social housing homes for people in need of secure, long-term accommodation. Supported through the Housing Australia Future Fund, the development will provide housing primarily for single women over 55 and families, including those affected by domestic and family violence.

The project is being delivered through a partnership between Sydney Anglican Property, Sustainable Development Group and Anglicare Sydney, with Anglicare providing housing management and wrap-around support services for residents.

Importantly, the redevelopment has been designed not only as a housing project but as a long-term community asset. More than 500 square metres of communal space, including a rooftop terrace and shared community facilities, will support resident engagement, community activities and social connection. These spaces are intended to foster positive relationships between residents, service providers and the broader community.

As a faith-led initiative, the project reflects a stewardship approach to development. The objective is not simply to deliver housing, but to create a welcoming and supportive community where residents can establish long-term connections and thrive. The ongoing involvement of Anglicare Sydney and the Anglican community provides opportunities for residents to access support, participate in community life and build relationships over time.

Relevance to the Community Participation Plan: This example demonstrates that community participation should be viewed not only as a mechanism for assessing development proposals, but also as a contributor to successful long-term housing outcomes. Faith communities are often uniquely positioned to welcome new residents into existing communities, creating social infrastructure and community connections that continue long after construction has been completed.

Evidence of Community Support for Faith-Led Housing

Faith Housing Australia has commissioned national research to understand contemporary community attitudes towards faith-led housing development. This research, undertaken by McCrindle Research in 2025, provides robust and current evidence of community support for the role of faith lands and faith providers in housing delivery.

The research found that:

- 92 per cent of Australians agree that repurposing underutilised and disused faith-owned land can help address the housing crisis;
- 88 per cent support faith communities using their land to create affordable and social housing;
- 83 per cent would welcome such developments in their own neighbourhood; and
- 85 per cent believe faith groups are well placed to support affordable housing initiatives.

These findings are significant because they challenge assumptions that communities are inherently opposed to affordable or social housing. When considered alongside AHURI and NHSAC evidence, they suggest that faith-led housing projects often begin from a position of community trust and goodwill. This reinforces the importance of participation processes that build on existing social capital rather than assuming opposition as the default.

Inclusion of People Experiencing Housing Insecurity

Faith Housing Australia welcomes the Draft Plan's recognition of the need to engage diverse communities, including Aboriginal communities, culturally and linguistically diverse communities, people with disability, older people and young people.

However, FHA recommends that the final Plan explicitly recognise people experiencing housing insecurity, homelessness, rental stress and housing exclusion as stakeholders in planning engagement processes. People most affected by housing shortages are often least able to participate through traditional consultation mechanisms and are frequently under-represented in planning discourse (Alhassan 2025). Explicit recognition of these groups would strengthen the legitimacy of planning outcomes and better align community participation with the social objectives of the Environmental Planning and Assessment Act.

Community Participation as a Housing Enabler

A common assumption within planning debates is that community participation and housing delivery exist in tension, with consultation processes primarily acting as a constraint on development. FHA believes this framing is overly simplistic and not supported by either research or practice. Planning scholarship consistently demonstrates that early and collaborative engagement improves outcomes and reduces conflict, particularly where participation focuses on shared problem-solving rather than adversarial consultation (Innes & Booher 2004; Forester 1999).

Faith communities often possess significant social capital within the neighbourhoods in which they operate. Many are recognised as trusted local institutions with an established history of service and engagement. This social capital can play a critical role in building understanding and support for new housing initiatives.

Importantly, faith-based housing projects are often not simply proposing new development, but welcoming new neighbours into existing communities. Many projects incorporate features that actively support community building, including communal spaces, community facilities, volunteer programs and partnerships with local services.

Planning Proposals Following Strategic Planning Processes

Faith Housing Australia supports efforts to reduce duplication where meaningful consultation has occurred during strategic planning or master-planning stages.

However, any reduction in exhibition requirements for planning proposals should be accompanied by clear safeguards to maintain community confidence. Reduced exhibition should apply only where prior engagement was comprehensive and demonstrably meaningful, proposals remain substantially consistent with exhibited strategic frameworks, and no material changes have occurred to scale, density, housing mix or tenure. Where such changes occur, additional targeted engagement should remain available to preserve transparency and trust.

Conclusion

Faith Housing Australia acknowledges the rationale for the introduction of a statewide Community Participation Plan and welcomes the NSW Government's efforts to improve consistency and transparency in the planning system.

FHA strongly supports enhanced engagement at the strategic planning stage and recognises the importance of proportionality in participation requirements. At the same time, FHA emphasises that community participation is not ancillary to housing delivery but integral to it.

Foundational planning theory, contemporary Australian housing research, system-level national evidence from the National Housing Supply and Affordability Council, and FHA's own commissioned research

together demonstrate that early, meaningful and trust-based engagement can support housing delivery, reduce risk and strengthen long-term community outcomes.

Faith Housing Australia looks forward to continuing to work with the NSW Government to unlock faith-based contributions to housing supply while supporting inclusive, resilient and well-connected communities across New South Wales.

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