



FAITH HOUSING AUSTRALIA

Unlocking Institutional and Community-Owned Land for Housing

Submission to the Productivity Commission Inquiry into Housing Supply Regulation

June 2026



Executive Summary

Faith Housing Australia (FHA) welcomes the Productivity Commission's inquiry into housing supply regulation and supports its objective of identifying practical reforms that increase housing supply, improve housing affordability and enhance construction productivity.

Australia's housing crisis is complex and has no single cause or solution. Increasing housing supply will require a combination of planning reform, infrastructure investment, construction capacity, institutional investment and continued land release in appropriate locations.

This aligns with the Commonwealth's *Homes for Australia* plan, which frames housing policy as a shared responsibility among governments and identifies planning reform, land-use regulation, enabling infrastructure, and social and affordable housing investment as key levers to improve housing outcomes.

This submission focuses on a significant but under-recognised housing supply opportunity: the activation of institutional and community-owned land for housing. Faith-owned land provides a well-developed case study of the barriers and opportunities affecting this broader category of landholdings, which includes land held by religious organisations, charities, schools, health providers and other mission-driven entities.

Faith communities collectively hold approximately 9,850 properties comprising more than 28 million square metres of land, including approximately 3,200 parcels larger than 3,000 square metres and approximately 2,430 sites located within 800 metres of public transport. While not all of these sites are suitable for housing development, their scale and location demonstrate a substantial opportunity to increase housing supply within established communities where infrastructure and services already exist.

Yet many institutional and community-owned land holdings remain underutilised because planning frameworks were generally designed to protect specific community, education, health, transport and religious uses rather than support mixed community and housing outcomes. As a result, housing is frequently prohibited, constrained or subject to additional planning processes.

Faith Housing Australia submits that Australia faces not only a housing supply challenge, but also a land activation challenge. The question is not simply how additional land is brought forward for housing, but how existing well-located land can be more effectively utilised to support housing outcomes.

Unlocking this opportunity will require planning systems that continue to protect essential community functions while providing greater flexibility for housing, together with approval pathways, infrastructure frameworks and delivery models that support affordable housing outcomes.

Faith Housing Australia recommends a national review of institutional planning frameworks, increased planning permissibility for mixed community and housing outcomes, streamlined approval pathways and better coordination of housing-enabling infrastructure. Together, these reforms would support the delivery of more homes in locations where infrastructure already exists and housing demand is strongest.

Priority Reforms

- 1 Review institutional and special purpose planning frameworks
- 2 Increase planning permissibility for mixed community and housing outcomes
- 3 Improve approval certainty and streamline delivery pathways
- 4 Better align infrastructure and contribution frameworks with housing objectives
- 5 Support delivery partnerships and sustained affordable housing investment

About Faith Housing Australia

Faith Housing Australia (FHA) is the national peak body representing faith-based organisations involved in housing and homelessness. Our members include community housing providers, homelessness services, faith institutions and mission-driven organisations that collectively steward substantial land and property assets across Australia.

Faith-based community housing providers currently deliver approximately one in five community housing homes in Australia and include some of the country's largest providers of social and affordable housing.

FHA's interest in this inquiry arises from the role that faith-owned and community-owned land can play in increasing housing supply and our members' experience delivering housing and homelessness services across Australia.

This submission draws on that experience and focuses on the role that housing supply regulation plays in enabling—or constraining—the activation of institutional and community-owned land for housing outcomes.

Institutional and Community-Owned Land as a Housing Supply Opportunity

Institutional and community-owned land represents a significant and under-recognised opportunity to increase housing supply.

This category includes land owned by faith communities, charities, schools, health providers, Aboriginal Community Controlled Organisations (ACCOs), Aboriginal Community Housing Providers (ACHPs) and other mission-driven organisations. These landholdings are often located within established communities, close to public transport, employment, education and other essential services, making them well suited to housing delivery.

Institutional and community-owned land also differs from many other forms of land ownership. Faith-based organisations, Aboriginal organisations and other community landholders frequently retain assets over long time horizons and are motivated by community benefit alongside financial sustainability. This creates opportunities to deliver and retain social and affordable housing while maintaining long-term stewardship of assets and community connection.

In many cases, the challenge is not identifying suitable land. Suitable sites already exist. The challenge is ensuring that planning, approval and infrastructure systems enable those sites to contribute to housing supply.

This opportunity is consistent with the National Housing Supply and Affordability Council's observation that Australia requires more housing from both the market and non-market sectors and that housing outcomes depend not only on the quantity of housing delivered, but also on whether housing is affordable, fit for purpose and secure. Institutional and community-owned land can contribute to these objectives by supporting additional housing supply in established communities while enabling long-term stewardship and affordable housing outcomes.

Understanding why this opportunity remains underutilised is therefore central to identifying reforms that can support additional housing delivery.

Why Isn't This Land Already Delivering Housing?

If institutional and community-owned land represents a significant housing supply opportunity, it is reasonable to ask why more housing has not already been delivered on these sites.

The answer is not a lack of willingness. Across Australia, faith communities, Aboriginal organisations, charities and other community landholders are increasingly exploring how land and property assets can contribute to housing outcomes. FHA's members report growing interest in affordable housing partnerships, mixed-use developments and the activation of underutilised land. Research commissioned by FHA from McCrindle found that 88% of Australians support faith communities using their land to create affordable or social housing, while 83% would welcome such developments in their own neighbourhoods.

The challenge is that institutional and community-owned land sits at the intersection of regulatory, financial and organisational barriers. These include planning frameworks that do not readily accommodate housing, project feasibility constraints, approval complexity, infrastructure requirements and the need to coordinate multiple delivery partners.

Examples of Institutional Planning Frameworks

While terminology and planning instruments differ between jurisdictions, Australian planning systems commonly apply special purpose, institutional and community facility zones to protect land for education, health, religious, transport and other public purposes. The examples below illustrate how institutional and community-owned land is regulated across multiple jurisdictions and demonstrate the common challenge of enabling housing outcomes on land originally reserved for specific community functions.

Jurisdiction	Example Zone or Planning Mechanism	Purpose
New South Wales	Special Purpose (SP) zones within Local Environmental Plans (LEPs)	Used to reserve land for specific purposes and shape what can be built or developed in an area
Victoria	Public Use Zone (PUZ) and Special Use Zone (SUZ)	Used to implement special purpose outcomes within the Victoria Planning Provisions
Tasmania	Particular Purpose Zones (PPZs)	Used to support specific land use outcomes through zone objectives and use tables
Common feature across jurisdictions	Zone objectives and land-use tables	Zones identify the primary purpose of land and determine which uses are permitted, discretionary or prohibited

Planning Frameworks Were Not Designed for Mixed Community and Housing Outcomes

Many faith-owned sites are subject to special purpose or institutional zoning frameworks established to protect land for community, education, health, transport and religious uses. While terminology differs between jurisdictions, these zones share a common purpose: preserving land for specific institutional functions and limiting incompatible uses.

This approach has historically provided certainty for community infrastructure and public facilities. However, it has also created a structural barrier to housing delivery on institutional and community-owned land.

Across Australian jurisdictions, residential uses are frequently not contemplated within institutional zone objectives or land-use tables. As a result, housing may be prohibited outright or require rezoning, planning scheme amendments or site-specific controls before development can proceed.

Consequently, many well-located sites remain underutilised despite being close to transport, employment, education and community infrastructure. This is not an incidental outcome of planning systems but a consequence of zone design. Institutional zones were generally created as purpose-specific regulatory

tools rather than frameworks capable of supporting contemporary mixed community and housing outcomes.

Additional planning processes can introduce time, cost and uncertainty, reducing the feasibility of adaptive reuse projects, mixed-use redevelopment and partnerships involving community housing providers and Aboriginal Community Housing Providers.

As governments seek to increase housing supply within established urban areas, these legacy planning settings warrant review. Planning systems should continue to protect essential community functions while providing greater flexibility for mixed community and housing outcomes where public benefit can be demonstrated.

Development Capability and Partnerships

The availability of suitable land does not, by itself, result in housing delivery.

Importantly, the challenge is not a lack of housing expertise within the faith sector. Faith-based community housing providers deliver approximately one in five community housing homes in Australia and include some of the country's largest and most experienced social and affordable housing providers.

However, the landholder and housing delivery entity are not always the same organisation. Housing projects on institutional and community-owned land often require partnerships between community housing providers, governments, property trusts, faith communities, developers, financiers and other stakeholders.

However, planning, funding and regulatory frameworks are not always designed to accommodate multi-party delivery models. In some jurisdictions, contractual and regulatory arrangements assume a single accountable entity, creating additional complexity, transaction costs and governance requirements.

Governments should recognise the importance of partnership-based delivery models and seek to reduce unnecessary barriers to collaboration between institutional landholders and housing delivery organisations.

Project Feasibility

The availability of land and planning approval does not guarantee housing delivery.

Housing projects on institutional and community-owned land must still be financially feasible and capable of attracting the investment required to proceed. This is particularly important where projects seek to deliver social and affordable housing while retaining long-term community ownership and stewardship of land.

Affordable housing projects operate under different financial parameters to market housing developments. Lower rental revenues, affordability objectives and broader community outcomes can limit returns, while projects remain subject to construction costs, infrastructure contributions, financing requirements, regulatory compliance obligations and delivery risks.

Planning uncertainty can further affect feasibility. Where residential development requires rezoning, planning scheme amendments or site-specific controls, additional time, cost and risk may be introduced before a project can proceed.

Conversely, planning and contribution frameworks that support affordable housing can improve project feasibility and increase housing supply. Well-designed Affordable Housing Contribution Schemes can facilitate infill development, respond to local housing needs and help unlock otherwise marginal projects.

Improving housing supply therefore requires more than identifying suitable land. Regulatory frameworks should support project feasibility by reducing unnecessary planning risk, improving approval certainty and ensuring that infrastructure and contribution frameworks support housing delivery.

Approval Complexity and Uncertainty

The experience of FHA members suggests that approval complexity and uncertainty can be as significant a barrier to housing delivery as planning permissibility itself.

Housing projects on institutional land often involve multiple approval pathways, referral authorities and regulatory requirements. Where residential development is not contemplated or permitted within existing planning controls, proponents may need to navigate rezonings, planning scheme amendments, site-specific controls or additional assessment processes before development can proceed.

These processes increase transaction costs, extend timeframes and create uncertainty regarding development outcomes and investment decisions. For institutional landholders, they may also interact with governance and stakeholder engagement processes, further increasing project complexity.

While individual regulatory requirements may be reasonable in isolation, their cumulative impact can discourage otherwise suitable housing projects from progressing. Improving housing supply therefore requires planning and approval systems that are proportionate, transparent and predictable, with clear assessment pathways, coordinated referral processes and timely decision-making.

For institutional and community-owned land, reducing unnecessary approval complexity may be as important as increasing planning permissibility. Landholders are more likely to pursue housing opportunities where pathways are clear, risks are understood and timeframes are predictable.

Implications for Housing Supply Regulation

Institutional and community-owned land represents a significant but underutilised housing supply opportunity. The principal barriers are not simply questions of land availability, but the interaction of planning permissibility, project feasibility, approval complexity and infrastructure requirements.

Addressing these barriers would enable a greater contribution from well-located institutional and community-owned land and support housing delivery in locations where infrastructure and services already exist.

The following sections respond to the Productivity Commission's information requests and identify opportunities for regulatory reform that could help unlock this potential.

Response to Information Request 1

Which regulatory reforms should governments prioritise to get more homes built more quickly?

Faith Housing Australia submits that governments should prioritise reforms that improve planning permissibility, reduce approval complexity and support the activation of well-located institutional and community-owned land.

For FHA members, the most significant regulatory barrier is that many institutional sites are located within planning frameworks that were not designed to accommodate housing outcomes. Increasing flexibility for mixed community and housing uses, particularly on suitable sites close to existing infrastructure and transport, would expand housing opportunities without requiring additional land release.

A second priority is reducing approval complexity and uncertainty. Streamlined assessment pathways, coordinated referral processes and greater certainty regarding infrastructure and servicing requirements would improve project feasibility and reduce delivery risk.

These reforms should be accompanied by continued investment in social and affordable housing to ensure that housing opportunities unlocked through planning reform can progress to delivery.

Priority	Reform Area	Intended Outcome
1	Review special purpose and institutional zoning frameworks	Enable housing on suitable community-owned sites while retaining essential community functions
2	Increase planning permissibility for mixed community and housing outcomes	Increase housing supply within established communities
3	Streamline approval pathways and improve assessment certainty	Improve project feasibility and accelerate delivery
4	Support partnership-based delivery models	Increase the number of housing projects progressing from concept to delivery
5	Review infrastructure and contribution frameworks	Improve feasibility of social and affordable housing projects
6	Improve coordination across housing, planning and infrastructure systems	Reduce project risk and support timely housing delivery
7	Align regulatory reform with sustained investment in social and affordable housing	Enable latent sector capacity to translate into completed homes

Response to Information Request 2

Which steps of the approvals process are the most onerous, time consuming and costly?

For FHA members, the most significant challenge is not any single step in the approvals process, but the cumulative impact of multiple planning, regulatory and infrastructure requirements.

Housing projects on institutional land often face additional complexity because residential development is not always contemplated or permitted within existing planning frameworks. Depending on the jurisdiction and site, proponents may need to pursue rezonings, planning scheme amendments, site-specific controls or other preliminary planning processes before a development application can be considered.

The most time-consuming and costly aspects of the process are typically those that introduce uncertainty. These include discretionary assessment pathways, multiple referral authorities, requests for additional information, infrastructure servicing requirements and planning processes that require separate approvals before housing can proceed.

For institutional landholders, delays can have consequences beyond project timing. Extended approval processes may increase holding costs, delay partnership arrangements, create financing uncertainty and reduce project feasibility.

The experience of FHA members suggests that planning systems perform best when approval pathways are clear, assessment requirements are proportionate, and development outcomes can be reasonably anticipated from the outset. Reducing unnecessary complexity and improving certainty may be as important as reducing approval timeframes themselves.

Response to Information Request 3

Which recent planning and housing supply reforms have been most and least effective?

The experience of FHA members suggests that reforms are most effective when they increase certainty regarding what can be built, where it can be built and how applications will be assessed.

Planning reforms that provide clear pathways for housing delivery, reduce reliance on discretionary decision-making and improve alignment between housing objectives and planning controls can support increased housing supply and improve project feasibility.

Conversely, reforms are less effective where they add complexity without addressing underlying constraints. Additional pathways, exemptions or assessment mechanisms may have limited impact if planning permissibility remains uncertain or if projects continue to require multiple approvals before housing can proceed.

For institutional and community-owned land, reforms that enable mixed community and housing outcomes are likely to be more effective than reforms that continue to treat these uses as separate and competing land uses.

Response to Information Request 4

Which zoning and land-use controls most limit the supply of new housing?

Faith Housing Australia submits that one of the most significant and under-recognised constraints on housing supply is the treatment of institutional and community-owned land within planning systems.

Across Australian jurisdictions, special purpose and institutional zones are used to protect land for community, education, health, transport, religious and other public purposes. These zones play an important role in safeguarding community infrastructure and ensuring that essential services can continue to operate and grow.

However, these planning frameworks were generally designed as purpose-specific rather than mixed-use zones. Residential development is frequently not contemplated within zone objectives or land-use tables,

meaning that housing may be prohibited, heavily constrained or require additional planning processes before development can occur.

The experience of FHA partners also suggests that similar challenges can arise outside institutional zoning frameworks. For example, some Aboriginal Community Housing Providers and Land Councils have reported that returned Crown land may be subject to environmental or conservation zoning that limits or prohibits residential development, even where the land was returned to support Aboriginal community outcomes. In these circumstances, housing delivery may require additional planning processes or site-specific planning interventions before development can proceed. This highlights the importance of ensuring that planning controls appropriately align with broader housing, community and self-determination objectives.

This creates a structural tension within the planning system. Many institutional landholdings are located in established communities close to transport, employment, education and other services. Yet the planning controls that protect these sites can also limit their capacity to contribute to housing supply, even where community functions could be retained.

The consequence is that well-located land may remain underutilised despite strong housing demand and existing infrastructure capacity. Unlike greenfield land release, this opportunity involves land that is already embedded within communities and frequently serviced by existing transport, utility and social infrastructure. In practice, introducing housing often requires rezoning, planning scheme amendments or site-specific planning controls, increasing time, cost, uncertainty and project risk.

Policy Implications

Faith Housing Australia is not advocating for the removal of institutional zoning frameworks. These zones perform an important role in protecting community infrastructure and public benefit uses.

However, governments should review whether existing planning controls appropriately balance these objectives with contemporary housing needs. In particular, there may be opportunities to increase planning flexibility for mixed community and housing outcomes on suitable sites while retaining essential community functions.

The experience of FHA members suggests that unlocking housing supply on institutional land will require planning systems that recognise housing and community uses as complementary rather than mutually exclusive outcomes.

Response to Information Request 5

How important are land release arrangements relative to other land-use controls?

For many institutional and community landholders, land release is not the primary constraint on housing delivery.

Unlike greenfield developers, many faith communities, charities, Aboriginal organisations and other institutional landholders already control land capable of supporting housing outcomes. The challenge is often not access to land, but the planning, regulatory and feasibility settings that determine whether housing can be delivered on that land.

This potential extends beyond traditional rental housing models. Recent Australian analysis of limited-equity housing by FERN for Uniting NSW.ACT found that institutional land could support new forms of affordable housing delivery that are less reliant on grant funding and provide an additional pathway for housing on public and institutional land, particularly where landowners are seeking long-term community benefit rather than immediate financial returns.

This highlights an important distinction between land supply and land activation. While continued land release will remain an important component of Australia's housing response, there is also significant

potential to increase housing supply through better utilisation of well-located land that is already within urban areas and served by existing infrastructure.

This distinction is increasingly recognised in national housing policy. The Commonwealth's *Homes for Australia* plan identifies the need not only to release additional land, but also to unlock well-located sites, remove barriers to development and better utilise existing infrastructure to support housing delivery.

For institutional landholders, planning permissibility, approval certainty and project feasibility are often more significant determinants of housing delivery than land availability itself.

Response to Information Request 6

How do development contributions frameworks affect project feasibility and new housing supply?

Development contributions play an important role in funding infrastructure, but their design can significantly affect project feasibility, particularly for social and affordable housing developments.

The experience of FHA members suggests that certainty is often as important as the level of contribution itself. Clear and predictable contribution frameworks enable projects to be assessed, financed and delivered with greater confidence.

Well-designed contribution schemes can also support affordable housing outcomes by facilitating infill development and improving project feasibility. Governments should continue to review contribution frameworks to ensure they appropriately balance infrastructure funding objectives with housing supply and affordability outcomes.

Response to Information Request 7

What other regulations relating to housing-enabling infrastructure should be a priority for reform?

Housing supply outcomes are strongest when land-use planning, infrastructure planning and housing policy operate in a coordinated manner.

The experience of FHA members suggests that infrastructure-related barriers often arise not from a lack of infrastructure itself, but from fragmented decision-making, servicing uncertainty and misalignment between housing objectives and infrastructure delivery processes.

This is particularly relevant to institutional and community-owned land. Many sites are already located within established communities with access to transport, utilities, education and community services. However, infrastructure requirements, servicing obligations and approval processes do not always recognise the value of existing infrastructure capacity or the opportunity presented by these locations.

Governments should prioritise reforms that improve coordination between planning systems, infrastructure providers and housing agencies. Greater transparency regarding servicing requirements, clearer infrastructure pathways and more integrated decision-making would help reduce uncertainty and support housing delivery.

For institutional and community-owned land, better alignment between housing, planning and infrastructure systems would improve the utilisation of existing infrastructure and help unlock additional housing supply in well-located areas.

Examples of Institutional Land Supporting Housing Supply

The following examples demonstrate how institutional and community-owned land can support housing supply across a range of typologies, delivery models and planning contexts in Australia. Across these examples, delivery depends on navigating planning controls, funding and delivery pathways.

Fresh Hope Communities – Nightingale Marrickville (NSW)



54 apartments, including affordable housing outcomes for priority cohorts.

Delivered by Fresh Hope Communities in partnership with Nightingale Housing, the project transformed a disused church into a high-quality residential development designed to improve housing affordability while fostering community connection. The project has received national and international recognition for its design quality and innovative approach to housing delivery.

However, approval required a Land and Environment Court appeal after the development application was refused and an interim heritage order was applied, demonstrating how planning uncertainty and multiple approval pathways can delay otherwise well-located, policy-aligned housing projects.

Salvation Army Housing Toowoomba (QLD)



23 social housing dwellings for families and community facilities.

The project transformed a site previously occupied by a Salvation Army Family Store into a purpose-built social housing development while retaining facilities that enable the local Salvation Army corps to continue delivering community support services. It demonstrates how housing and community uses can coexist on institutional land.

The project was delivered using Queensland's Ministerial Infrastructure Designation pathway, enabling faster approval and highlights how streamlined pathways can materially improve delivery timeframes.

Wesley Mission Curtin (ACT)



83 affordable homes and 15 Specialist Disability Accommodation dwellings to be delivered with support from HAFF Round 1 and the ACT Government

Located adjacent to Woden Valley Uniting Church in Canberra, the Wesley Mission Curtin project will deliver 83 affordable homes and 15 Specialist Disability Accommodation dwellings with support from the Territory and Commonwealth.

The project demonstrates how coordinated funding and delivery frameworks can enable more complex housing outcomes on institutional land.

St Paul's Bankstown (NSW)



184 social/affordable homes to be delivered with support from HAFF Round 1

Located within an established urban area with access to transport, employment and community services, the project will deliver social and affordable homes on church-owned land while retaining an active community presence on the site.

The project highlights the significant contribution that institutional land can make to housing supply in locations where infrastructure already exists. It also demonstrates the value of partnerships between faith groups and community housing providers in delivering housing outcomes at scale.

Evidence of National Housing Supply Potential

Faith Housing Australia's national mapping identified approximately 9,850 faith-owned properties comprising more than 28 million square metres of land, including approximately 3,200 parcels larger than 3,000 square metres and approximately 2,430 sites located within 800 metres of a train station.

While not all sites are suitable for housing development, the scale and location of these landholdings demonstrate that institutional and community-owned land represents a significant and under-recognised housing supply opportunity.

Recommendations

Recommendation 1: Review Institutional and Special Purpose Planning Frameworks

The Commonwealth Government should work with states and territories to undertake a national review of planning frameworks affecting institutional and community-owned land, including special purpose, community facility and institutional zones.

The review should examine how these frameworks can continue to protect essential community functions while enabling appropriate housing outcomes on suitable sites.

Recommendation 2: Increase Planning Permissibility for Mixed Community and Housing Outcomes

State and territory governments should review planning controls affecting institutional land and increase opportunities for mixed community and housing outcomes where public benefit can be demonstrated.

Planning systems should recognise that housing and community uses are not mutually exclusive and should support development models that retain community functions while contributing to housing supply.

Recommendation 3: Improve Approval Certainty and Streamline Delivery Pathways

Governments should reduce unnecessary complexity and uncertainty within planning and approval systems by establishing clearer pathways for housing delivery on institutional and community-owned land.

This should include coordinated assessment processes, greater transparency regarding approval requirements and timely decision-making frameworks.

Recommendation 4: Better Align Infrastructure and Contribution Frameworks with Housing Objectives

Governments should review infrastructure funding, servicing and contribution frameworks to ensure they support housing delivery in established communities and do not create unnecessary barriers to social and affordable housing projects.

Particular consideration should be given to opportunities to improve project feasibility on institutional land where housing outcomes are aligned with broader public policy objectives.

Recommendation 5: Support Delivery Partnerships and Expand Social and Affordable Housing Investment

Governments should recognise the important role of partnerships between institutional landholders, community housing providers, Aboriginal Community Housing Providers, developers and other delivery organisations.

Regulatory reform should be accompanied by increased and sustained investment in social and affordable housing, including grants, availability payments and other funding mechanisms capable of translating latent sector capacity into completed homes.

Conclusion

Australia's housing crisis demands a broad and coordinated response. This submission has highlighted a significant and under-recognised opportunity within that response: the activation of institutional and community-owned land for housing.

Faith Housing Australia's experience, case studies and national mapping demonstrate that many community-owned sites are well located, close to existing infrastructure and capable of supporting additional housing. The principal barriers are not a lack of land or commitment, but planning and regulatory frameworks that were not designed to support contemporary mixed community and housing outcomes.

Faith Housing Australia encourages the Productivity Commission to recognise institutional and community-owned land as an important and under-utilised component of Australia's housing supply response and to consider reforms that improve planning flexibility, reduce unnecessary complexity and support housing delivery on suitable sites.

The opportunity is not found in any single project or precinct. It lies in thousands of community-owned sites across Australia that, if better enabled through planning and regulatory reform, could make a meaningful contribution to the nation's housing supply.

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