

2 June 2026

Department of Planning, Housing and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Department of Planning, Housing and Infrastructure (DPHI),

Subject: Shelter NSW submission to the proposed statewide Community Participation Plan

Shelter NSW appreciates the opportunity to make a submission to the Department's proposed statewide, standardised, baseline Community Participation Plan (CPP).

Who are we?

Shelter NSW has been operating since 1975 as the State's peak housing policy and advocacy body. Our vision is to create a sustainable housing system that provides a secure home for all. We are especially concerned for low-income households who struggle to afford good quality and well-located housing. We provide systemic advocacy and advice on policy and legislation for the whole NSW housing system to resolve housing inequality. We are a member-based organisation; representing organisations and individuals committed to housing justice, including community housing providers, specialist homelessness services and related peak bodies, to community groups, policy professionals, academics and social housing tenants.

1. Context: Proposed changes to the Community Participation Plan

The introduction of a statewide CPP will see existing local community participation plans determined by local governments make way for a single, consistent, minimum requirement approach to community consultation across the state. It is the understanding of Shelter NSW that the objective of the introduction of a statewide CPP is to remove inconsistencies in the planning system and ensure that communities and proponents are subject to the same regulations, irrespective of the LGA in which they reside or operate.

To streamline this process, DPHI has sought not only to remove inconsistencies across LGAs but also to amend consultation requirements where the Department believes existing procedures are either insufficient or unnecessarily cumbersome. This has included the extension of consultation times for draft regional and district strategic plans, as well as masterplans, and the reduction or removal of

consultation for developments adhering to existing controls or where it is deemed sufficient consultation has been undertaken.

In sum, it is Shelter NSW's understanding that these proposed changes seek to make community consultation consistent and efficient across NSW.

2. Ensuring a consistent approach to planning across NSW

Community participation is a crucial part of the development process. When integrated effectively and meaningfully in the planning process, it can allow projects and proponents to build social capital with the communities in which they are developing. This process also can give communities a voice to ensure that changes or additions to their local area are informed by local knowledge and expectations.

Large inconsistencies in how community participation takes place, and the time in which the community has to respond, undermine the value and standing of CPPs. Instead of being seen as a meaningful interaction between proponent and community, they can become a cumbersome tick-a-box exercise where the community feels unrepresented, and proponents feel unnecessarily delayed.

These outcomes can be polarising, and stoke the perceived 'NIMBY vs YIMBY' division that we see in different parts of NSW today. As communities lose faith in the development process and their ability to influence design outcomes and considerations, their support for development diminishes. Feeling unrepresented by the formal pathways for community participation, these communities can explore alternatives such as political intervention and protest. Meanwhile, those supportive of development are often left to defend the proposal from such opposition, as is, and thus also miss their opportunity to shape development and community outcomes.

Shelter NSW understands the desire to pre-emptively mitigate what might be seen as unproductive and contrarian feedback from 'NIMBYs' as to allow otherwise sound development to occur, particularly in a context where housing delivery is falling behind state targets. However, we note that better consultation delivers better outcomes for all parties and should not be neglected in the pursuit of efficiency.

In making the case for the proposed adoption of a statewide CPP, DPHI highlights the current exhibition requirements for different development proposals according to the current CPPs of 14 different LGAs. What this analysis demonstrates is that existing frameworks for community participation are inconsistent. What one local government has exempted from exhibition

requirements, another might exhibit for 15 days. This highlights a system that currently is not working effectively for either proponent or community.

Shelter NSW commends DPHI in its efforts to ensure that community consultation is consistent both across geographies and in accordance with the size and scope of development. However, we note that consistency and efficiency must not be achieved at the expense of genuine community participation.

3. Consultation must be seen as more than a statutory requirement

The streamlining of consultation requirements should continue to allow for sufficient and effective community consultation. While the harmonisation of minimum exhibition requirements is a welcome change, some of the minimum exhibition timeframes proposed in the draft statewide CPP remain inadequate for productive consultation. This inadequacy may ultimately undermine the intentions of the statewide CPP, as it is highly likely communities (particularly people and communities who face personal or systemic barriers to engagement) will withdraw from these processes if they are unable to meaningfully respond to proposed developments in the given timeframes. This could then work to create a system where those with resources can hire lawyers and lobby parliamentarians to influence development outcomes during the exhibition period, while those without have minimal influence.

This is an issue that Shelter NSW has communicated to the Department previously, most notably in [our submission to the reduction of the minimum consultation](#) for residential state significant developments (SSD). Inadequate consultation timeframes place additional strain on community members, housing advocates and planning professionals, who often must prioritise their engagement with the planning process in accordance to greatest perceived need. This strain is then compounded in the instances that the community is asked to respond to multiple development applications at once. This is not a system that is set up to deliver the best outcomes for both proponent and community.

Shelter NSW is concerned that DPHI is proposing to exempt the development of residential flat buildings and shop-top housing from public exhibition requirements should they satisfy local planning controls. Developments of this scale have a greater impact on local communities and amenity, regardless as to whether they fit within local controls. Public consultation provides a necessary check and balance to ensure that local development meets local needs, both current and future, and achieves the best outcome for current and prospective residents.

There is little justification provided for this change. Removing public exhibition requirements will neither reduce negative community sentiment nor meaningfully accelerate housing delivery. On the contrary, excluding community consultation is likely to increase opposition, as residents are denied the opportunity to contribute local knowledge and address concerns. This may drive communities to escalate objections through political channels, ultimately offsetting any time saved by shortening the exhibition period.

Similarly, Shelter NSW holds concern over the ability of planning authorities to reduce consultation on masterplans due to ‘urgency, scale or the nature of the project.’ This criterion is unnecessarily broad. What does and does not satisfy this criterion needs to be made clear. We are concerned that planning authorities may use these grounds without adequate justification to reduce the exhibition time, with no established point of reference for the community to refer to. Shelter NSW believes that development proposals of this scale should accommodate longer consultation times, such as the proposed 42 days, due to the size and scale of development.

Shelter NSW supports the higher-impact development provisions requiring a minimum 28-day exhibition period for projects that involve an Environmental Impact Statement or are designated or nominated integrated developments. We agree that developments with greater impacts warrant more extensive consultation to allow communities to properly understand and respond. For this reason, Shelter NSW considers it appropriate that this minimum timeframe be reinstated for all residential State Significant Development, which are, by definition, significant.

4. Adequate consultation requires adequate resourcing

Listed in the proposed statewide CPP are five objectives by which community participation should adhere to: open and inclusive, easy to access, relevant, timely, meaningful. Shelter NSW commends the Department but notes that for these principles to be adhered to, community engagement cannot be limited to the publishing of technical documents on the online planning portal. This approach alone alienates non-planning professionals who may not have the time or expertise to engage with the consultation process in such a manner. This alienation is compounded for marginalised communities who may have lower levels of literacy, for example in communities where languages other than English are spoken or in lower socio-economic areas.

Accordingly, for projects of greater complexity and scale, or those that impact diverse communities such as social housing tenants during estate renewals, the Department must work proactively with proponents to facilitate meaningful and comprehensive consultation. This includes engaging the community across a number of forums, such as community briefings and drop-in sessions, as well as

providing assistance in the interpretation of and response to exhibited materials, whether that be through provision of plain and/or simplified English and/or community languages documents or submission writing guides. The Department should also seek to work collaboratively with local stakeholders who have strong connections to community to inform their consultation and to maximise community engagement.

We note that while this CPP is not yet in force, existing outcomes – where the Department has significant influence over their execution – are sub-optimal. In the case of the current Waterloo South renewal, where significant numbers of people have lower levels of digital literacy, the primary avenue available for residents to make a submission is not only via a digital portal, but also requires the creation of a user account, a significant barrier to engagement. Despite community groups and local advocates informing the Department that this would inhibit residents from making submissions, the only alternative is to source a written submission template from the Department, on an individual basis. This creates an unnecessary barrier for the local community to engage in the public exhibition process, that is not being overcome through other methods of community engagement.

Thus, while Shelter NSW strongly agrees with the Department's principles for community participation, we note that there is still much work to be done to ensure these principles are reflected in practice.

5. Recommendations

Shelter NSW recommends that:

1. The minimum public exhibition period for an application for development consent for residential SSDs be amended to 28 days to facilitate 'open and inclusive' and 'easy to access' consultation as per the objectives of the CPP and reflect the higher impact nature of this type of development.
2. Residential flat buildings and shop top housing be removed from the list of developments exempt from public exhibition.
3. The Community Participation Plan makes explicit provisions for community engagement in disadvantaged communities, e.g. social housing tenants facing renewal. These provisions should allow for the explanation of development proposals in plain English and for community to have their considerations recorded in formats outside of a traditional written submission.

This process may include community town halls, streetside pop-ups, spoken submissions, and community surveys.

4. Higher impact developments, such as state significant developments, report on how their community consultation has fulfilled the five objectives outlined in the statewide CPP before being granted approval.

Thank you for your consideration

Shelter NSW thanks the Department for its consideration. Should the Department wish to discuss this letter further, please contact Thomas Chailloux, Senior Policy Officer, on thomas@shelternsw.org.au or 0490 030809, or Drew Beacom, Housing Officer on drew@shelternsw.org.au or 0405 093 123. Our general contact email is admin@shelternsw.org.au.