

COMMUNITY PARTICIPATION PLAN JUNE 2026



RAIA Response to proposed changes to CPP

ROYAL AUSTRALIAN INSTITUTE OF ARCHITECTS

Submission date: 03 June 2026

ABOUT THE INSTITUTE

The Royal Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation with more than 13,500 members across Australia and overseas.

The Institute exists to advance the interests of members, support professional standards and contemporary practice, and advocate the value of architects and architecture to the sustainable growth of our communities, economy and culture.

The Institute actively works to maintain and improve the quality of our built environment by promoting better, responsible and environmental design.

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- + At the time of this submission the National President is David Wagner FRAIA.
 - + At the time of this submission the NSW President is Elizabeth Carpenter FRAIA.
 - + The Chief Executive Officer is Cameron Bruhn Hon. FRAIA.

CONTACT DETAILS

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The Royal Australian Institute of Architects recognises the unceded sovereign lands and rights of Aboriginal and Torres Strait Islander peoples as the First Peoples of these lands and waters.

This recognition generates acknowledgement and respect for Aboriginal and Torres Strait Islander Countries, Cultures and Communities, and their ways of being, knowing and doing.

Caring for Country practices including architecture and place shaping have existed on this continent since time immemorial.

The Institute recognises a professional commitment to engage and act meaningfully through reciprocal partnership and relationships with Aboriginal and Torres Strait Islander peoples. Together we will support and develop the emergence of new possibilities for our shared future.

SUBMISSION

1. Introduction

The Royal Australian Institute of Architects (RAIA) NSW Chapter welcomes the opportunity to provide input to inform the Community Participation Plan

The RAIA NSW Chapter is supportive of the proposed single statewide framework and its intent to streamline the process and allow for participation to be equitable for all.

Given the importance of Community participation plans to architects, engineers, regulators and industry, RAIA agrees in principle with the overall intent of the reform to:

- Streamline exhibition and notification requirements across the state, making it easier for stakeholders and the community to understand the minimum and typical public exhibition timeframes.
- Reducing unnecessary consultation for lower impact projects and for projects already assessed as part of strategic planning processes, while maintaining opportunities for meaningful input on proposals for significant development.
- Encouraging community participation during the consultation process, highlighting ways to stay informed on strategic plans or developments in your local area and how best to respond to development or plans that affect you.
- Identifying the need for simple communication and consultation mechanisms to ensure everyone in the community can access and understand the information being presented.
- Proportionality for Genuinely Low-Impact Development
RAIA support the principle that exhibition should be proportionate to impact. Exempting genuinely low-impact development such as minor internal alterations, ancillary structures, and boundary adjustments from notification is a reasonable efficiency measure with minimal risk to design quality or community confidence.

The NSW Chapter have identified some areas of the Statewide participation framework where additional details are needed to be sought or considered.

General Comments

The reforms as drafted appear weighted heavily towards assessment efficiency at the expense of community confidence and design quality outcomes. Several proposals that substantially reduce participation at the development assessment stage are not adequately justified by equivalent improvements elsewhere in the process.

A central concern is the assumption that code compliance is equivalent to acceptable local impact. A development can satisfy every numerical control in an LEP and DCP and still produce poor design outcomes, particularly where:

- Controls are performance-based and require qualitative judgement
- Cumulative impacts on streetscape and character are not captured by individual controls
- Heritage and character context requires sensitivity beyond minimum standards
- Site-specific conditions produce impacts not anticipated by generic controls.
- Early design led planning to be at the forefront of the participation process.

- Considerations of traffic flow and the implications at the design phase of a project.
- Possible pathway changes for exempt developments – which are clearly communicated at the commencement of a project.
- Terminology such as ‘or as specified’ and ‘may’ in relation to timeframes creates doubt on the potential period of exhibition and should be reviewed to remove ambiguity where possible.
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Exemption of Residential Flat Buildings and Shop Top Housing

This is the most significant concern in the draft Community participation plan, and we urge consideration and possible mitigation of the below identified risks and recommended solutions.

Residential flat buildings and shop top housing are proposed to be exempt from notification and public exhibition where they comply with LEP, DCP, and SEPP controls and do not require a Clause 4.6 variation.

Risks

- Multi-storey apartment buildings can generate substantial impacts on adjoining properties despite technical compliance, including privacy, overshadowing, view loss, wind, traffic, and interface with heritage areas
- DCP controls are often performance-based, requiring qualitative judgement that neighbours are best placed to inform
- Exempting these building types conflates code compliance with design quality
- Removing notification risks creating the perception that apartment approvals occur without community knowledge, eroding public trust.

Recommendation

- Retain notification requirements for residential flat buildings and shop top housing
- Where a reduced period is considered appropriate, apply a minimum 7 to 14 days rather than full exemption
- Limit exemptions to small-scale or genuinely low-impact proposals with tightly defined criteria.

Replacing Participation with Pre-Commencement Notification

For several development types, including residential flat buildings and shop top housing, the proposed substitute for public exhibition is a 7-day written notice to adjoining neighbours before works commence. This is not community participation.

Risks

- At the point of pre-commencement notice, approval has already been granted and design is fixed
- Community concerns at this stage cannot influence design, materials, or siting
- Likely to increase frustration, conflict, and post-approval complaints.
- A 7 days pre commencement notice for a potentially significant development is not proportionate to the extent of short term impacts (construction) and long term changes the area will experience.
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Recommendation

- Pre-commencement notices should supplement public exhibition, not replace it.

Heritage and Character-Sensitive Contexts

Several development categories proposed for exemption carry particular risk in heritage conservation areas and character-sensitive streetscapes.

Risks

- "Minor works" to heritage items that do not impact the item and sit behind the front facade: the definitions of "minor" and "impact" are inherently subjective and context-dependent
- Demolition is listed as exempt (excluding heritage items), but demolition of non-heritage buildings in heritage conservation areas can materially alter the character of a precinct
- Cumulative incremental changes can erode local character in ways that individual controls do not capture.

Recommendation

- Maintain notification requirements across all development types in heritage conservation areas
- Exclude heritage conservation areas from broad residential exemptions
- Provide a more precise threshold for "minor works" to heritage items.

Risk of Erosion of Public Trust

The combined effect of fewer notifications, fewer exhibition requirements, reduced planning proposal exhibition, and broad exemptions may create a perception that participation rights are being reduced to accelerate approvals.

Risks

- Increased community opposition to development, including to projects that are genuinely appropriate
- Increased merit appeals and complaints, adding time and cost to assessment
- Reduced confidence in planning institutions and in the broader housing reform agenda.

Recommendation

- Ensure reforms are accompanied by strong transparency measures, including public reporting on how community input influenced decisions
- Publish clear justification wherever consultation requirements are reduced relative to existing CPPs
- Actively communicate to communities what participation rights remain, and why the changes represent a proportionate and fair approach.

RAIA welcome the continued opportunity to participate and provide solution-focused options.

We look forward to continued discussions on this matter. Both NSW Chapter President and NSW Chapter Executive can be reached at any time on the email below:

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Yours Sincerely,



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