APPENDIX 1 **Consultation comments and Authority response**

APPENDIX 1A **Entity comments**

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APPENDIX 5 **Draft Major Plan Amendment - DPA-04 released for consultation**

APPENDIX 6 **Draft Missing Middle Housing Reforms - Supporting Report**

APPENDIX 7 **Draft Planning (Residential Zones) Technical Specifications 2025 - Missing Middle Reforms released for consultation**

APPENDIX 8 **Draft Planning (Subdivision) Technical Specifications 2025 - Missing Middle Reforms released for consultation**

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Consultation Summary and Responses

The following list of comments and issues raised is a summary of public feedback provided in the public written submissions, survey entries, 'quick comments', pop-ups and workshops. In some cases, competing comments were made by various respondents. Attempts have been made to present comments equally, grouped within various relevant themes.

1. Comments / feedback relating to the **Draft Missing Middle Housing Design Guide** (MMHDG) 1
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1. Comments / feedback relating to the Draft Missing Middle Housing Design Guide (MMHDG)

DRAFT MMHDG: Comments / issues raised	Authority response
MMHDG as Planning Tool	
The MMHDG is broadly supported as a valuable planning tool for facilitating housing diversity, affordability and high-quality design. Submissions and comments welcomed the visual diagrams, guidance and flexibility however noted the document's length and complexity may limit the accessibility for non-industry users. Concerns raised about the reliance on subjective elements, lack of enforceable standards and limited clarity on how practical implementation challenges will be assessed. Submitters also sought clearer guidance on how the guide applies to large-scale subdivisions and block consolidations, particularly for greenfield contexts.	Noted. The Missing Middle Housing Design Guide (MMHDG) provides planning and design guidance for missing middle residential dwellings within the ACT. Developments of this type are required to submit a design response to the MMHDG as part of the development application (DA) process, alongside consideration of the Territory Plan policies, where they may also consider the technical specifications which includes quantitative specifications. The guide outlines overarching design principles that support high-quality housing outcomes that contribute positively to their context. Unlike prescriptive regulation, the MMHDG promotes adaptable and innovative design through illustrative examples and flexible approaches. The MMHDG will not apply to larger-scale subdivisions or consolidations. Guidance for these types of developments will continue to be provided through the Urban Design Guide.
Site Analysis and Place-Based Design	
MMHDG was seen to lack sufficient direction on how to assess and demonstrate site context, analysis and response to local vernacular character. Submitters sought clarity on whether broader neighbourhood context should be considered and how place-based design principles should be applied. Feedback supports strengthening the contextual analysis requirements to ensure development integrate appropriately with their local surroundings.	Noted. The MMHDG provides design guidance for responding to the development context and site constraints. This includes responding to local character, responding to adjacent development, considerations for development interfaces with the public realm and key considerations in responding to site conditions.

	This guidance is located throughout the guide in association with specific design elements. Opportunities will be considered where this guidance can be strengthened.
Design Guidance, Communication, Landscape and Accessibility	
Stakeholders called for more context-sensitive and inclusive design guidance. While diagrams were generally appreciated, concerns were raised about their limited realism, narrow focus on single-block outcomes and lack of varied site conditions, transitions and cumulative neighbourhood impacts. Feedback emphasised the need for: – Guidance on setbacks for irregular lots and sloped sites – More diverse design examples, including single level townhouses/terraces. – Enhanced landscape and streetscape guidance, including communal open space and less-car dominant infrastructure. Stronger emphasis on accessible outcomes including both physical and cognitive design consideration to promote Canberra as a 'City for All Ages' and provide references to 'Liveable Housing Guide' and 'Age Friendly City Plan'.	Noted. Further refinement of the MMHDG will be undertaken to improve diagram legibility and ensure representation of diverse housing typologies that promote inclusion. Additional guidance will be developed to support high quality living infrastructure outcomes, including opportunities for increased planting areas and tree canopy cover.
Sustainability and Climate Resilience	
Submissions encouraged the MMHDG to more explicitly support climate-responsive design. Suggestions included: – Avoiding high-VOC materials and reducing embodied carbon. – Promoting circular economy principles and minimising construction waste. – Supporting nature-positive outcomes and tree canopy cover. – Recommending deciduous tree species to balance shade and bushfire risk. – Incorporating water-sensitive urban design and rainwater capture in higher-density areas. Enhancing Principle Two to address urban heat mitigation and referencing tools such as the 'WSROC Urban Heat Planning Toolkit'.	Noted. The MMHDG supports environmentally responsive design through guidance on biodiversity and climate resilient design. Chapter 7 of the guide is focussed on sustainability and environment, with guidance on building design performance, natural features and resource management. Opportunities will be considered where this guidance can be strengthened.
Technical Corrections, Definitions and Regulatory Alignment	
A range of technical issues or errors were raised, including the need for clearer definitions, duplication or conflict with the National Construction Code (NCC) or seemingly contradictory statements.	Noted. Technical errors and issues will be addressed. In some instances, guidance exceeds that required by the National Construction Code to demonstrate best practice, rather than basic compliance.

2. Comments / feedback relating to the Residential Zones Policy (E1)

RES ZONES POLICY: Comments / issues raised	Authority response

Policy Outcomes Alignment	
There is potential for lack of certainty regarding how proposed changes allowing density can be consistent with desired 'low density' character for RZ1 areas. Consider aligning RZ1 policy outcomes with RZ2 outcomes and removing the word "some" from RZ1 outcome 3. Provide clearer, objective guidance on what "primarily low density" means.	No change. The missing middle reforms propose a number of changes to permissible built form outcomes in the residential zones including RZ1 and RZ2. Notably, while some change is anticipated and is desirable for RZ1, the extent of change and distinction between the RZ1 and RZ2 zones has been managed through provisions that apply to RZ1, such as by limiting the maximum consolidation size (varies by location within a section, up to an upper limit of 3000m^2 that applies for end of section blocks) and maximum number of storeys (i.e. 2 storeys with attic). While the provisions provide opportunity for change in RZ1, the policy outcomes highlight that it is anticipated that change will be incremental in nature and will occur over a long timeframe.
Density Calculations/Targets	
Some feedback that proposed density targets take no account of location, character and suitability, with higher-density redevelopment having potential significant impacts on older suburbs. Alternate comments suggest that market demand should drive density rather than enforced strict targets that are too high.	Noted. The Residential Zones Technical Specification will be amended to clarify the intent of the policy that the multi-unit housing densities for RZ1 are provided as maximums, rather than targets. The technical specification has also been amended to remove reference to 'more where basement provided' to provide greater clarity where basements are proposed. The notes that density maximums, being technical specifications, do not provide an 'as of right' to develop up to the specified density. As development proposals are required to demonstrate comprehensive responses to the *Planning Act 2023* and the Territory Plan, including the Residential Zones Policy which may limit the development capacity of individual blocks.
Climate Change Response	
Some concerns that draft documents don't adequately promote design for climate resilience and reducing urban heat island effect, particularly given the reduction in planted area. Opportunity to establish monitoring and evaluation systems to track rate of cumulative change and environmental outcomes in various streets / suburbs. Others noted that missing middle housing reforms can contribute to reduction in greenhouse gas emissions by enabling people to live closer to where they work, shop and play, with more people able to walk or ride to destinations (although older people, people with young children and those living with disabilities will likely still rely on use of cars).	Noted. Through the actions outlined in its 2019-2025 ACT Climate Change Strategy, the ACT Government continues to build the Territory's climate resilience capacity. As outlined above, the MMHDG supports environmentally responsive design through guidance on biodiversity and climate resilient design. Chapter 7 of the guide is focussed on sustainability and environment, with guidance on building design performance, natural features and resource management. Opportunities will be considered where this guidance can be strengthened. The reforms include an increase in the requirements for canopy cover as an offset for a reduction in planted area. The ACT Government monitors tree canopy cover using Light Detection and Ranging (LiDAR) technology. This supports evaluation of associated strategies, such as the Living Infrastructure Plan 2019. Collected data helps track progress, inform urban planning and other decisions. You can view the canopy data, including the 2020 and 2024 reports, through the ACT Government's Geospatial Data Catalogue and open data portal.

Provide Guidance on Natural Systems	
There is no guidance currently provided in the Design Guide or technical specifications about how the assessment outcomes related to protecting biodiversity connectivity, native habitat or waterway health (Assessment outcomes 1,2 and 2 in the Residential Zone Policy) should be applied.	No change. While there are no technical specifications to support Assessment Outcomes 1, 2 and 3 in the Residential Zones Technical Specification, guidance is provided in the draft MMHDG and current suite of design guides that provide useful guidance for practitioners to achieve the relevant outcomes. Specifically, the MMHDG provides several guidance points relating to biodiversity (5.1B), habitat (7.1B, 7.1C) and water sensitive urban design (7.3A) in support of environmental outcomes.
Zoning Recommendations	
Recommendations to merge RZ1 and RZ2 zones outcomes into one Suburban Low-Mid Density Zone as reforms make them very similar. Alternative recommendations are to: • expand the extent of RZ2 zones (effectively rezoning some RZ1 areas) and discourage single detached houses in RZ2-RZ5 zones. • restrict the development of new single dwelling houses in RZ2	Noted. Refer above on 'Policy Outcomes Alignment'. The Authority are currently considering the appropriateness of current land use zones in well-located areas, such as around commercial centres. This is considering opportunities to rezone sites from RZ1 to RZ2. Should rezoning be proposed, it will be subject to further public consultation. Provisions in RZ2 enable greater scales where new development is for multi-unit housing. This is intended to incentivise greater residential densities in well suited locations (i.e. RZ2 sites) while maintaining some flexibility to accommodate individual leaseholder preferences.
Height Controls	
Heights of 3 storeys in RZ1 would lead to poor outcomes, overshadowing and overlooking.	Noted. No change. The missing middle reforms propose a maximum of two storeys for RZ1. This is identified as an assessment requirement in the Residential Zones Policy.
Consider increase in RZ1 allowable height (e.g. to 9m from 8.5m) to enable greater flexibility for complex sites (such as those with large cross fall), reducing likelihood of ground floor levels below natural ground, and increasing the potential for attics to be used as habitable spaces.	Noted. No change. Mandatory height controls are specified in storeys. Height provisions (in metres) are proposed to be located in the Residential Zones Technical Specification. As the technical specifications are not mandatory departures can be considered on individual design merit and in relation to site context.
Lack of support for reference to building height in storeys rather than metres, with perception that this will lead to taller buildings impacting on neighbours' solar access and privacy. Some community groups and design professionals have suggested that having no limit on storeys would allow for more creativity and flexibility in design to deliver split level designs and have potential to enhance planting area / tree canopy cover with a reduced building footprint.	No change. The missing middle reforms propose to direct built form outcomes through the use of storey limits. Setting maximum building height in metres has incentivised undesirably low/compressed ceiling heights to achieve additional stories. This impacts the amenity of dwellings through reduced solar and natural ventilation performance. The Authority acknowledges that minimum floor to ceiling heights are directed by the NCC, however the Missing Middle Housing Design Guide, current Housing Design Guide and Residential Zones Technical Specification jointly encourage a general minimum of 2.7m floor to ceiling heights, as these offer superior design outcomes when compared to lower height dimensions.

Consider the inclusion of view protection (for example through to mountains) as part of assessing developments that propose to increase height.	No change. The ACT planning system does not consider the right to a view. Rather the impact to neighbouring developments are considered through a range of other considerations, including privacy and overshadowing.
Technical issue identified - apparent typo in Specification 14.1 limiting RZ5 to 14m height if close to other zones but RZ4 has no similar restrictions. Changes from 12.5m to 21m in RZ4 may not be appropriate in all areas.	Agreed. Technical specification to be amended. The Authority proposes to remove transitional height provisions articulated for RZ5. This is appropriately controlled through other means, such as a general consideration where developments must achieve appropriate transitions between zones, which is established as a DA consideration under section 186 of the *Planning Act 2023*.
Need to clarify that two storeys plus attic and basement are allowed in RZ1 (and whether basements can be used other than for storage and vehicle accommodation)	No change. Under the Territory Plan 2023, 'basement' and 'attic' are excluded from the definition of storeys.
Recommendation to increase the allowable height of attic roofs from 36 degrees to provide useable floor space.	Agreed. Definition to be amended. The Authority proposes to revise the 36-degree roof pitch from definition of attic in the Territory Plan Dictionary.
Allowing basements means that some buildings are built above ground level to accommodate the basement parking, increasing building height	No change. Mandatory building heights continue to be controlled in storeys. The definition of basement outlines that these are not a storey. It is noted that building heights in metres are outlined in the proposed Residential Zones Technical Specification. As the technical specifications are not mandatory departures can be considered on individual design merit and in relation to site context.
Consider requiring the use of architects for developments over the dwelling/hectare ratios in the Technical Specifications and for all apartment buildings 3 storeys and above, to align with NSW regulations.	No change. Modifications to the *Building Act 2004* or *Planning Act 2023* to regulate the use of architects for missing middle developments is not within the scope of this reform. A design response to the MMHDG, which will be required to support the lodgement of a DA is required to be endorsed by a built environment professional with experience and expertise relevant to the type and scale of development proposed. This is established under the *Planning (General) Regulation 2023*.
Setbacks	
A range of views were presented on setback requirements. Some indicated concern that allowing zero setbacks will mean single homes will be surrounded by tall, multi-residential buildings built to boundaries at all edges. Others welcomed the reduction and considered the potential for terrace style or courtyard developments to deliver good urban outcomes and housing diversity.	Noted. See discussion on various comments on setbacks below.
Various recommendations for relaxation of setback requirements were made, to maximise flexibility in designing to specific site conditions. Comments included:	Partially agree. Changes to be made. The maximum setback of 8m for single dwelling to be removed. Initial rationale was to limit deeply set buildings

• Recommend standardisation of setback controls in Residential Zones Specification by removing distinction between post and pre-1993 blocks. • Reduce minimum front setbacks from 6 metres to 4 metres on all sites (both single and multi-unit) to provide more flexibility in design and allow better use of sites (e.g. where it is more beneficial to have tree canopy cover in the rear of the site). • Remove the proposed single dwelling front setback 'Maximum of 8m' requirement. This is inconsistent with maintaining streetscape character where some existing suburbs have larger setbacks. Would also allow optimal aggregation of private open space and landscape • Remove garage setbacks which are increased from 5.5m to 6m in older blocks • Remove setbacks to open spaces/paths regardless of their minimum dimensions • Current setbacks to unscreened elements are too onerous and will lead to increased use of screening, reducing the thermal performance and natural light into dwellings. • Avoid setback requirements that result in 'wedding cake' design solutions • Reconsider fencing / courtyard wall requirements to allow for more useable front open space (if there are larger front setbacks)	however, this has been removed to allow greater flexibility in site planning, particularly on steep sites. No change is proposed to minimum front setbacks. Front setbacks are considered important in enabling positive contributions to streetscape, character and living infrastructure. Under the proposed Residential Zones Technical Specification, the building separation provisions (i.e. 16.1, 16.2) have changed, however, the intent of these provisions remains. Where a proposal requires a development application it will be assessed for, among other things, adequate privacy to neighbours through the assessment outcomes in the Residential Zones Policy. The technical specifications related to these outcomes may be used for guidance if needed but can be departed from where it can be demonstrated that the assessment outcomes are still able to be achieved.
Query regarding the application of rear / front setbacks requirements and battleaxe blocks.	No change. It is noted that battle-axe blocks have different boundary and setback definitions, due to the lack of street frontage. Boundary definitions are to remain as currently expressed. Battle-axe blocks naturally have more neighbours and adjoin more rear boundaries than dwellings with a street frontage. Noting this, these definitions appropriately control the built form.
Liveable/Accessible Design	
A number of submissions called for accessible standards for more missing middle homes to enable more inclusive communities, built to gold liveability standard for future residents living with disabilities and older Canberrans.	No change. The most recent NCC (2022) has introduced Liveable Housing Design requirements for new homes, impacting Class 1a (houses - Volume 2) and Class 2 (apartments – Volume 1) buildings, that seek to improve dwelling accessibility. The NCC 2022 Liveable Housing Standard is based on the Liveable Housing Design Guidelines (silver level) developed by Liveable Housing Australia. The Liveable Housing Standard achieves a balance between delivering liveable housing and cost-effectiveness. It focuses on core elements for adaptability and flexibility, that mean new homes can be more easily adapted to changing needs, with reduced costs. Additionally, the MMHDG includes design element 6.3 "Diverse Housing Choice and Occupant Amenity" that includes discussion of universal design principles.

DPA-04 typo	
pp 13-14 of the DPA-04 document deletes assessment requirements 16, 17, 18, 19, 20 and 21 SHOWN BELOW... for the following.." but no replacement text is provided (or 'shown below' is a typo). Needs to be clarified.	Noted. Typographical error to be corrected. The identified assessment requirements are intended to be deleted and there is no direct replacement for these.
Section 17.7(a) Page 24 – The Draft Major Plan amendment (Page 16) notes that minimum floor to floor heights are to be removed. However, this appears to be unchanged in the draft residential specifications.	Noted. Technical specifications have been amended. The technical specification has been amended to clarify that 3.2m floor-to-floor heights apply only to larger scale multi-unit housing developments, not missing middle developments.

3. Comments / feedback relating to the Residential Zones Specifications (ZS1)

RES ZONES SPECS: Comments / issues raised	**Authority response**
Car Parking	
Some submissions raised concerns with proposed reduced carparking rates: • has potential to lead to excessive on-street and verge parking, with negative impacts on cycle / pedestrian safety, access issues for emergency vehicles and waste trucks, and general traffic safety or car security • will lead to negative streetscape outcomes • narrower / quiet streets and cul-de-sacs have limited capacity for on-street parking • existing controls for verge parking and driveways are inadequate. Verge parking that disrupts footpaths / cycleways should not be permitted. Multiple verge crossings (driveways) should be avoided. • lack of footpaths in some areas suggests difficulty for residents to access public transport and active travel networks • if no parking is available this may negatively impact older residents or people with a disability requiring services and carers' visits. Other submissions welcomed the reforms: • reduced rates allow the market to respond to demand for parking as needed • will encourage sustainable transport including public transport and active transit • missing middle developments distributed gradually won't create concentrated traffic pressure • will enable car-free households and drive use of public transport and active transit • on street parking can serve as a traffic calming measure • future city planning shouldn't cater to a car dominant approach	Noted. No change. The reduced car parking rates are proposed to be retained as this recognises the limited space available on blocks to balance living areas, living infrastructure, parking and associated services. The reduced car parking rates will provide greater flexibility in designing and proposing useable and high-amenity dwellings. The reforms also incentivise consolidation and larger-scale developments closer to the active travel network. It is considered this will assist in encouraging transport-mode shift. It is noted that there may be additional demand for on-street and other local parking areas, which often have ample capacity. Notwithstanding this, car parking provisions will continue to be is considered through the development assessment process, with the acceptable rate of parking considered on a case by-case basis, involving consideration of factors such as proximity to public transport and active travel corridors, and capacity of the existing street and parking network to support off-site car parking. The City and Environment Directorate (CED) is responsible for the management and regulation of the Territory's verges and nature strips. It recognises these spaces are an important part of Canberra's urban streetscape and that they help create the 'garden city" character. These spaces will continue to be managed through a combination of relevant legislation and supporting guidelines.

Some recommended the reforms go further and completely remove any parking requirements.	
If onsite parking requirements are reduced, there is a need for a balanced strategic approach to planning for on-street parking, on-verge parking (where appropriate) and investment in effective public transport / active transit infrastructure.	Noted. Investment in public transport and active travel infrastructure is outside the scope of the missing middle reforms, but the ACT Government will continue to consider these opportunities.
Consider allowing carports forward of garage / tandem parking or landscaped and formal on-verge parking if more than one spot is provided.	Noted. No change. As setbacks are technical specifications, carports forward of the building line can be considered through the DA process where it can be demonstrated that the development meets the associated assessment outcomes.
Infrastructure planning could include consideration of suburban on-street charging for electric vehicles.	Noted. The provision of on-street electric vehicle parking is outside the scope of the missing middle reforms.
Consider alternative thinking such as: • provision for public car sharing spaces across the city (such as Pop Car) • requiring someone to demonstrate access to a permanent car space before registering their car • timed street parking and resident permits for on-street parking	Noted. The missing middle reforms do not limit the consideration of these alternative methods during the assessment of a DA. Broad-scale investment or incentivisation in these industries is outside the scope of the missing middle reforms.
Consider the potential impact on parking at local shops if density increases. Parking is already at capacity at many centres.	Noted. No change. The impact to local parking, including street parking, will be considered on a case-by-case basis during the DA process.
Site Coverage	
Driveways should be included in site coverage calculation to avoid loss of green space and tree canopy (and resulting poor outcome on urban heat island effect).	No change. Site coverage is defined as areas of a site covered by buildings and other roofed structures (excluding eaves and awnings). Site coverage is used as a development measure to limit the extent of non-permeable areas on a site. It works in conjunction with planting areas, tree planting and canopy cover requirements to limit hard surfaces across a site and ensure developments achieve sufficient living infrastructure to reduce urban heat island effect.
Communal and Private Open Space	
If private open space requirements are reduced, requirements for communal open space should be quantified and enforced to ensure adequate resident access to green spaces (and with associated design guidance on good design outcomes).	No change. While the reforms propose a reduction in total site area allocated to communal and private open space for multi-unit developments, from 40% of the site area to 30% of the site area, what constitutes private open space is proposed to change. Under the current specification, private open space for muti-unit housing requires a minimum 2.5m dimension. Under the reforms, private open space for missing middle housing must be made up of either communal open space or principal private open space, or a

	combination of both. Both types are subject to minimum solar access requirements and, when located at ground level, must meet larger minimum dimension standards than the current 2.5 metres: 4m for principal private open space, and 5m for communal open space. These changes aim to enhance the quality, usability, and overall amenity of open space in multi-unit developments. They are further supported by additional assessment criteria, including a minimum 20% tree canopy cover and 30% planting area, which together contribute to site amenity.
Deep Soil Zone	
Some submissions suggest 30% requirement for deep soil area should apply to all RZ areas, not just RZ1 and RZ2.	No change. The specification guides minimum deep soil areas and planting areas on development sites to minimise stormwater runoff and to support tree health. The range in planting areas reflects the proposed development types, and outcomes of each residential zone. The reform offers increased built environment/ urban density. It is recognised that urban density needs to be balanced with a natural environment, green spaces and trees. The Canberra community values the natural assets and the important role these assets play in planning, design and managing the city. However, reliance on a deep soil area within residential blocks alone will not be sufficient to ensure alignment with the vision of Canberra's Living Infrastructure Plan. Tree planting within both public and private land will be required, including planting of over 450,000 trees on public land over the next 25 years to achieve urban canopy targets.
Minimum Dimensions for Rooms	
Concerns that minimum dimensions for living spaces and bedrooms are now less than NSW guidelines.	Noted. The reduction in minimum dimensions for living spaces and bedrooms were intended to provide greater flexibility in delivering diverse housing, including compact dwellings. It is acknowledged that while these minimum dimensions can work well in some planning configurations, in others they may limit flexibility for users. The specification has removed these changes. Where a proponent elects to deliver less than minimum room dimensions a suitable layout will need to be demonstrated.
Planting Area	
Some concerns that reduction in planting area will reduce green garden space impacting resident mental health and losing supporting garden space around	No change. Planting area has been carefully balanced against a variety of other provisions, including site coverage,

canopy trees, making it hard to combat heat island effect. Others have welcomed the focus on canopy cover instead of low scale gardens plantings, and the resulting opportunity for more useable outdoor space (rather than garden beds).	principal private open space, private open space and canopy cover. Planting area alone does not manage urban heat, it is supported by canopy cover, which is proposed to increase under the reforms, and managing the extent of hard surfaces across a site, such as through the use of permeable paving as promoted by the guide. As referenced above, guidance that supports high quality living infrastructure outcomes will be strengthened within the MMHDG.
Tree Canopy	
General acknowledgement of the importance of tree canopy cover to help reduce urban heat island effects and submissions largely welcomed the proposed increase. Examples of other comments include: • suggested that the increase to 20% is not enough, recommending an increase to 30% to 40% site cover for tree canopy • introduce a transparent exemption mechanism, allowing developers on constrained sites to apply for relief (such as paying a fee, or identifying an alternative site for a planting such as on adjacent public land) • concern re impact of tree plantings on boundary and overshadowing of neighbour's open space, solar panels or potential for limb dropping • suggestion that Government provide mature trees to compensate for loss of planting area and taking into account the time taken for trees to grow.	No change. The reforms propose an increase in canopy cover from 15% to 20% for multi-unit development. The 20% canopy cover balances an increase in housing stock, with the need to reduce associated urban heat. This also acknowledges that significant canopy coverage in existing RZ1 and RZ2 areas is often heavily constrained from onsite services, such as overhead powerlines. A further increase in canopy cover would see the majority of a site's planting area and private open space under tree canopy. This would reduce the opportunity for medium-height planting, which can contribute greater use, visual amenity and biodiversity on a site. The reforms do not impact existing tree protections, however the ACT Government is currently reviewing the *Urban Forest Act 2023*, which will lead to consequential amendment to the *Planning Act 2023* to consider how protection to trees can be appropriately balanced with on-site development provision. The review aims to introduce greater flexibility into the Urban Forest Act, enabling applicants and decision-makers to respond more effectively to future issues and challenges. The review will ensure that the framework remains adaptable and responsive to individual needs moving forward. The Act and its supporting instruments currently contain a range of provisions to address concerns relating to tree plantings on boundaries, overshadowing, and the protection of public safety and property. These include circumstances where a tree represents an unacceptable risk to safety; is causing, or is likely to cause, substantial damage to a building, structure, or service; is in a location inappropriate for its potential size and growth habit; or is causing excessive shading to the lessee's residence or a neighbouring residence. The review is examining ways to strengthen and improve these provisions to ensure they remain effective and fit for purpose.
Privacy	

Concerns that neighbours' privacy will be threatened by new higher developments built close to boundaries, with recommendations for privacy screening, height/design limits to minimise overlooking.	No change. Under the proposed Residential Zones Technical Specification the building separation provisions (i.e. 16.1, 16.2) have been proposed to change, however, the intent of these provisions remain. Where a proposal requires a development application it will be assessed for, among other things, adequate privacy to neighbours through the assessment outcomes in the Residential Zones Policy. The technical specifications related to these outcomes may be used for guidance if needed but can be departed from where it can be demonstrated that the assessment outcomes are still able to be achieved.
Private Open Space Assessment	
Suggestions that private open space should be assessed appropriately to support larger more useable courtyards.	No change. Under the reforms, the private open space specification has changed. The minimum 2.5m dimension has been removed and replaced with the specifications for principal private open space or communal open space, specifications 11.4 and 11.6. These have minimum dimensions that support more usable space, as well as minimum solar access requirements. The minimum dimension for private open space for single dwellings has also been reduced from 6m in most cases. This enables greater flexibility in how private open spaces are provided on site, allowing for improved outcomes that respond to site context more effectively. The minimum dimensions for principal private open space for single dwelling development remains unchanged.
Solar Access / solar envelope	
There was some variation in feedback on the proposed changes to solar access, solar fence and envelope. While some submissions welcomed the increased flexibility of the changes and potential for responsive design outcomes, others did not support the proposed changes. The range of feedback included: • review solar envelope / solar fence and angle – consider standardising solar fence height to 3 metres (in both front and rear zones) with retention of the existing solar angle (31 degrees) to align with Canberra's winter sun or slight increase to 35 degrees • establishing a consistent approach on solar access for new single dwelling housing and medium density developments • reconsider solar envelope to better allow for solar access to open space and neighbouring dwellings (in rear zone) • provide for consistency and equitability so impacted neighbours are assured of solar access regardless of whether their northern neighbour is a new single residence or multi-unit property • Potential for clearer expectations regarding solar access for neighbours (eg. "not reducing solar	Noted. Partially agree with changes, no change for others. No change to proposed 45° solar envelope. The proposed change in solar envelope from 31°, which represents the sun angle on the winter solstice, to a 45° angle, which represents the sun angle on the equinox, is proposed to increase opportunity for greater building density to support the delivery of multi-unit development. This specification is to work in conjunction with other specifications, including building setbacks, to limit impacts to neighbouring sites. The increase in the solar envelope enables the minimum side setbacks in the primary building zone to be achieved: - zero metres at the lower level (proposed specification), and - 3m at the upper level (current specification). The change in building bulk resulting from the envelope and setback changes will predominantly be seen in the

access for any neighbouring dwelling to less than 3 hours between 9am to 3pm". Having quantifiable rules around solar access would provide greater certainty to the community about the outcomes of development (alleviating concern about discretionary approvals) • relax solar access provisions further to enable consumer choice and perimeter block development	primary building zone, where it typically has lesser impact on a neighbour's rear private open space. To enhance the intent of these proposed changes and to consider potential overshadowing, amended specifications are now proposed that include: - Amended specification 15.2 to outline that minimum solar access requirements to living areas of multi-unit development are considered. - New specification 15.3 'Solar access of adjoining residential blocks'. This provides that solar access to neighbouring sites is considered, aligning with solar access specifications that apply to the development site. This approach to overshadowing considerations broadly aligns with the approach in NSW and Victoria.
Some submissions expressed concern about the negative impacts of overshadowing (by new housing or tree plantings) on installed solar panels or passive solar homes (noting the considerable investment in response to the government's renewable energy targets). Assessment of compliance with solar access requirements and the location of new tree plantings should take into account solar access to a neighbour's solar photovoltaic panels (so as not to unfairly overshadow them).	Noted. Changes to an assessment outcome and technical specification are proposed. Assessment Outcome 15 and a new technical specification (15.3) are proposed that to consider solar access to the main living space and principal private open space on neighbouring blocks. Consistent with other solar access considerations in the ACT planning system, overshadowing from vegetation will not be considered as this contradicts and limits the provision of canopy coverage.
Should ensure consistency between Policy Outcomes for "all residential zones", and Assessment Outcomes in amended technical specifications / MMHDG. The term 'good' solar access is used in policy outcome 3, whereas 'reasonable' is used in the Assessment Outcome 15 in the technical specifications.	Noted. Changes proposed. References have been amended from 'good' to 'reasonable' to ensure consistency in terminology where relevant.
Impacts from glare / heat from neighbours roofs has not been included in the reforms but can have negative effects.	Noted. Changes proposed. The MMHDG will be reviewed to provide additional guidance encouraging selection of low-reflectivity roofing materials where glare can reasonably be otherwise expected to have adverse amenity impacts on neighbouring sites.

4. Comments / feedback relating to the Subdivision Policy (F1)

SUBDIV POLICY: Comments / issues raised	**Authority response**
Policy Outcomes application	
Requests for clearer guidance on meaning / assessment of compliance with "appropriately located" subdivisions (to provide greater certainty to community and those seeking to redevelop).	Noted. Changes to Part A of the Territory Plan proposed to confirm the purpose of the policy outcomes.

	Assessment outcomes provide the outcome to be achieved through the DA assessment process. These outcomes are supported by the MMHDG and Subdivision Specifications, which both provide qualitative and quantitative guidance on subdivision and consolidation types that are encouraged (e.g. adjacent to open spaces and the path network) and discouraged. The policy outcomes in the Territory Plan set the objectives for the relevant zone, district or development type. While they inform the subsequent assessment outcomes and requirements and are a general consideration, the policy outcomes are not intended to be a direct assessment item that must be met. Part A and other administrative parts to the Territory Plan will be amended to better reflect this purpose.
Definition / distinction between 'subdivision', 'subdivision development proposal' and 'subdivision design application'	
New planning system has removed clear distinction between 'subdivision', 'subdivision development proposal' and 'subdivision design application' creating limited clarity about assessment application. There is uncertainty about how the Planning Act, subdivision policy and technical specifications now apply.	Noted. Changes proposed to the Subdivision Specifications. While no changes to these terms have been proposed as part of these initial reforms, it is noted that changes to the *Planning Act 2023* may be necessary to simplify subdivision processes for missing middle housing developments. The ACT Government is considering reforms in this space. Changes are proposed to the Subdivision Specifications to clarify what provisions apply in particular circumstances (i.e. distinguishing between 'greenfield' and subdivision activities proposed for existing urban areas).

5. Comments / feedback relating to the Subdivision Specifications (SS1)

SUBDIV SPECS: Comments / issues raised	Authority response
3.2 - Block Size and Configuration	
More clarity is required on application of 3.2 requirements. The current rule mandating 45% of subdivision designs remain as large blocks in RZ1 restricts densification and is inconsistent with housing needs. Various recommendations included: • RZ1 and RZ2 should be consistent. • Consider removal of restrictive percentage controls on compact and mid-sized blocks - the planning instruments should be encouraging subdivision design appropriate to the housing needs of the particular precinct. • A standardized limit of 250m^2 for all blocks could be an equitable approach that provides greater opportunity for appropriate density in RZ1 and RZ2. • Alternative standard could be that new development is not of a size or bulk that dominates or overwhelms the surrounding neighbours	Noted. Subdivision Policy and Technical Specification to be amended to clearly distinguish between provisions that apply to estate level development versus subdivision in existing residential areas. While the Missing Middle reforms are intended to facilitate increased development of new housing with an emphasis on RZ1 and RZ2 zoned areas, the Authority notes the policy intent to maintain a clear distinction and transition between the various residential zones. The relevant provisions under proposed Subdivision Specifications provide for a range of block sizes, in keeping with the policy intent to provide a diverse range of housing choice for the Canberra community. This includes the continued provision of large blocks to ensure this option remains available to the community. The percentages under specification 3.2 apply to estate level development. Amendments to the specification have been made to more clearly communicate this intent.

• Consider providing more clarity on allowable subdivision for large corner blocks	While outside the scope of the current missing middle reforms, the ACT Government is currently undertaking work to simplify the subdivision process including clarifying definitions under the Planning Act 2023 to ensure anticipated missing middle subdivision activities are able to be assessed more efficiently. Additional guidance will also be provided within the MMHDG to demonstrate opportunities for block subdivision.
Provide a definition of micro blocks and develop suitable guidelines to ensure high-quality outcomes for the use of this typology.	No change. While micro blocks are being piloted as a potential dwelling typology, this is not a development outcome within the scope of this stage of the missing middle housing reforms. Following completion of the pilot project and an evaluation of the outcomes, this housing typology may be considered within the planning system for appropriately zoned areas.
There is currently no guidance for rural blocks regarding minimum lot sizes and how many additional worker cottages / farm tourism buildings are allowed.	No change. Development on rural blocks are out of scope under the current missing middle reforms.
Build Prior to Subdivision	
Current requirements that prohibit sale of subdivided blocks without built new dwellings are seen as reducing feasibility for new developments (particularly for 'mum and dad' investors) and restricting potential for future purchasers to design and build a home to meet their needs. Submissions request allowing sale of subdivided blocks without requiring construction first.	Noted. To increase development opportunity within RZ1, the Subdivision Policy and Subdivision Specifications are proposed to be modified to remove the requirement to construct a dwelling prior to subdivision. Amendments proposed to the Subdivision Policy will align RZ1 to other residential zones regarding subdivision requirements. Amendments to the Subdivision Policy establish a minimum block size for RZ1 where a block is subdivided without construction of a dwelling prior. Further specifications are also included to guide subdivision outcomes. It is noted that this will create further single dwelling blocks, where single dwellings are able to be DA exempt. As outlined above, the ACT Government is considering further reforms to help facilitate missing middle housing developments. This will include reviewing the Exempt Development Single Dwelling Housing Development Control.
Consolidation	
Current consolidation rules restrict good medium density outcomes and options for better site planning. Consolidation can be a preferable way to achieve quality missing middle housing – with some submissions suggesting that single block redevelopment results in small net housing yields and loss of private green space. A number of submissions called for removal of arbitrary block consolidation limits (2,000-3,000m^2) and expanded flexibility for consolidation of larger or more blocks to unlock better design outcomes. Larger	No change. The block consolidation limits proposed under the reforms provide context for the level of change deemed appropriate for RZ1 areas. As currently proposed, mid-section consolidations are limited to approximately 2-3 blocks, with larger consolidations permissible for suitable end of section sites or sites fronting urban open space where there is a less perceivable disturbance to the established subdivision pattern.

developments over 3,000m^2 could be subject to DA assessment and referral to a design review panel. Some submissions recommended incentives for block amalgamations near urban amenities. Others recommended that larger consolidations should occur in consultation with the local community (including potential for development control plans or similar).	Precinct-scale redevelopment, that would result in a significant change to established suburbs are not intended to be captured by these reforms. The Authority is currently considering the appropriateness of existing land use zones in well-located areas, such as around commercial centres. This will examine opportunities to rezone sites from RZ1 to RZ2. Should rezoning be proposed, it will be subject to further public consultation.
Frontage Requirements	
The requirement for subdivided blocks to have street frontage or public pathway frontage discourages retention of existing dwellings and contradicts the design guide's layouts for mid-section blocks. There should be no design limitation on how blocks are subdivided provided suitable amenity and accessibility is delivered.	Agreed. Changes proposed to the Subdivision Policy and Subdivision Specifications. The Subdivision Specifications as proposed via DPA-04 will be amended to delete the following specification from the document; "Currently leased blocks – frontage of RZ1 block 2.4. RZ1 blocks created through the subdivision or consolidation of a currently leased block have one of the following: a) A street frontage. b) A frontage on to an urban open space or the community path system."
Minimum Block Size of sub-divided blocks	
Some submissions requested that specifications should prescribe allowable minimum sizes for blocks created by subdivision to provide certainty.	Agreed. Changes proposed to the Subdivision Specification. The Subdivision Policy has been amended to incorporate a minimum block size of 350m^2 for residential subdivision undertaken without the construction of a dwelling. Smaller blocks can be considered where dwellings are proposed or developments are undertaken in an integrated manner.

6. General comments on the proposed Missing Middle Housing Reforms

POLICY	
Housing Opportunities for Young People	
Missing middle will enable young people, key workers , apprentices and downsizers to find homes close to jobs and amenities in suburbs where they've previously felt locked out.	Noted.
Multigenerational living	
Some people commented that there is an opportunity through these reforms to make it easier for 'multi-generational' living.	Noted.
Affordability	
Some submissions noted that there is no evidence presented that missing middle housing provides affordable housing. Reforms will further diminish detached housing stock and will drive up housing and	Noted. While the missing middle reforms are anticipated to enable greater housing supply and diversity, it is acknowledged that elements outside of the planning system's control, such as construction labour, skills

rental prices. The new homes will likely not be affordable. Other comments suggested that although some of the new homes may not be 'affordable' the chain of movement they create will free up other homes in the existing housing market for people who would otherwise be in competition for those same, older homes.	and supply market constraints will continue to influence the affordability of dwellings.
Increased competition for older homes	
Some people expressed concern that homeowners looking to redevelop or 'mum and dad' investors won't be able to compete with developers.	Noted. Changes proposed to enable the subdivision of existing blocks without constructing a dwelling would enable 'mum and dad' investors to make use of the reforms.
The increased demand for older, developable housing will reduce the supply of these properties which currently provide affordable rental options for people unable to afford to rent newer homes.	Noted. The missing middle reforms will provide broad opportunities for additional housing supply, which is anticipated to provide additional owner-occupier dwellings and rental dwellings.
Not missing	
How has Government confirmed that there is a 'missing' middle? Call for evidence base for the claim that the current supply of medium density is not sufficient or already located across Canberra	As outlined in the DPA-04 supporting report, over 75% of the ACT's urban land is zoned RZ1and RZ2, which is typified by single dwelling detached housing, with the remaining residential zones generally typified by high-density multi-unit housing. It is acknowledged that Canberra features examples of missing middle housing, however, this highlights that increasing the distribution and availability of these housing typologies will provide substantial benefits to the community.
Timing of planning reform	
Recent changes so soon after changes to RZ1 to allow dual occupancies destabilise the system, creating uncertainty for investment. In some cases will lead to people having made significant investment in design development on block that now potentially has more value (under the new reforms).	Noted. The Authority acknowledges the influence of the planning system on the feasibility of individual proposals. The missing middle reforms will enable greater opportunity for well-located housing and notes that the development capacity of impacted blocks is generally anticipated to increase as a result of the reforms.
Missing Middle Housing for Ageing in Place	
At the moment there are no specific targets for homes suitable for older Canberrans looking to downsize or 'age in place', with a risk that missing middle housing delivered by industry will not be a product to suit this demographic. There is an opportunity for missing middle housing to be targeted at increasing options for ageing in place, ideally located in areas known to have higher population of older Canberrans with fewer existing medium density homes. Consider incentives / targets to encourage missing middle development in priority localities (those without many ageing in place options) where there are more than 15% of residents aged 65 or over.	No change. The MMHDG includes design element 6.3 "Diverse Housing Choice and Occupant Amenity" that includes discussion of universal design principles, supporting ageing in place outcomes. While outside the scope of the current missing middle reforms, the Authority also notes that the most recent NCC (2022) has introduced Liveable Housing Design requirements for new homes, impacting Class 1a (houses - Volume 2) and Class 2 (apartments – Volume 1) buildings, that seek to improve dwelling accessibility. The NCC 2022 Liveable Housing Standard is based on the Liveable Housing Design Guidelines (silver level)

	developed by Liveable Housing Australia. The Liveable Housing Standard achieves a balance between delivering liveable housing and cost-effectiveness. It focuses on core elements for adaptability and flexibility, that mean new homes can be more easily adapted to changing needs, with reduced costs.
Character Protection	
A number of submissions raised preservation of Canberra's character as a concern about the proposed reforms. The following range of comments were made: • new medium density housing will result in the loss of character of Canberra's older suburbs and the Garden City heritage. In other suburbs, the lack of clear criteria regarding typologies, mix and character will lead to homogenous and poor design outcomes. The draft MMHDG provides no guidance in assessing and responding to the design context including "existing local character and amenity". • calls for better protection of heritage precincts and clearer guidance of how 'character' will be considered in assessing applications. • Some submissions supported the creation of a 'Special Character Zone' to protect particular 'high-quality residential areas' (similar to Auckland's Single House Zone). • Other submissions have suggested that the existing requirements for green space, canopy cover and consideration of local context will work to preserve Canberra's valued neighbourhood character. • Submissions argue preserving character shouldn't become code for preserving exclusion, and that city identity should reflect people and diversity rather than fixed architectural styles.	Not agreed. No change. RZ1 and RZ2 will be maintained as each of these zones are intended to achieve the Policy Outcomes unique to each respective zone. Future phases of the reforms will consider the suitability of land across Canberra for potential rezoning to higher order zoning (e.g. RZ1 to RZ2 in well-located, suitable areas). Block consolidations in RZ1 zones are generally limited to maximum sizes varying by location within a section, as detailed in the Subdivision Specification. These maximum consolidation size limitations are intended to provide a balance of consolidation opportunities with maintenance of suburban character in keeping with the RZ1 Policy Outcomes. It is noted that provisions of the *Heritage Act 2004* continue to apply to objects and places with formal heritage listings.
Heritage Policy and Missing Middle Housing	
Concern that the existing Heritage policy is not strong enough to ensure protection of heritage buildings / registered heritage character in Canberra's older suburbs (including the Radburn Precinct in Curtin). Potential for review of ACT Heritage policies to support appropriate missing middle development in heritage areas, with guidelines drawing on models like Bluefield Housing, to encourage densification while retaining existing building fabric and shared landscape. Need for more specific guidance on how the Missing Middle Reforms will apply in heritage areas to provide greater certainty to residents and developers about what development can (and cannot) happen in those areas (eg in Hall Village). Potential to consider special incentives for retention of existing building fabric outside of heritage precincts as well (eg examples of quality mid-century architecture and landscapes).	Noted. Heritage provisions will continue to apply to development proposals involving heritage objects and places. Heritage protection and planning in the ACT is governed by the *Heritage Act 2004* and the *Planning Act 2023*, which work together to conserve the natural and cultural heritage of the territory. Further notes have been added to the Residential Zones Policy to note that certain built form outcomes may be impacted by heritage requirements, where they apply. The ACT Heritage Council is responsible for the identification, management, and protection of heritage places and objects, including Aboriginal places and objects, and must be consulted by the Territory Planning Authority on development applications that could affect heritage significance. Amendments will be made to the MMHDG to incorporate additional guidance regarding heritage considerations.
Landscape planning	
To ensure good landscape outcomes across the city Government should appoint an ACT Government	Agreed.

Landscape Architect and develop a Strategic Landscape Plan and Policy.	The ACT Government has committed to the establishment of a Government Landscape Architect and the development of a Landscape Plan for the ACT.
Location of density	
Some submissions argued there has been no comprehensive forward-planning involving communities to identify appropriate areas for increased density: • The proposed reforms will allow 'uncontrolled' urban intensification in high quality residential areas with no consideration of character or suitability. • There should be a policy to drive targeted strategic infill redevelopment, in areas of demand (walkable to local amenities), rather than a 'set and forget', market driven approach. Other submissions welcomed the broad application of the policy across all RZ1 areas: • will minimise significant land value increases in concentrated areas and will promote more 'salt and peppering' of missing middle housing • the proposed 'gentle infill' will allow housing growth across whole city, meaning current infrastructure can be relied on, making better use of existing assets with redevelopment occurring gradually over decades • proximity to services and amenities increases opportunities for physical activity and heart health through walking and cycling.	Noted. CED is currently undertaking further work, which includes locational suitability which may inform future rezoning opportunities for well-located blocks, such as those in close proximity to commercial centres.
Where RZ1 blocks are not located within walking distance of local shops and services, the positive impact of walkable suburbs are reduced. The reforms should ideally first focus on those blocks located closer to local amenities. Opportunities were noted for controls that allowed mixed uses (eg corner store / shop-top housing) within RZ1 areas to enable walkable communities (where local shops might otherwise be further away).	Noted. CED is currently undertaking further work, which includes locational suitability which may inform future rezoning opportunities for well-located blocks, such as those in close proximity to commercial centres.
Expand RZ2 zones to better respond to current density requirements / contemporary walkable suburbs	No change Changes to RZ2 appropriately distinguish it from the other residential zones. CED is currently undertaking further work, which includes locational suitability which may inform future rezoning opportunities for well-located blocks, such as those in close proximity to commercial centres.
Strategic Infrastructure and Transport Planning	
A number of submissions noted that increased housing density will place additional pressure on existing utilities and infrastructure, highlighting the need for strategic government planning and coordination with the development sector: • The government should demonstrate a comprehensive proactive city-wide approach to infrastructure upgrades—including water, sewer, and electrical capacity—to support density increases effectively. • Strategic planning and timely infrastructure investment (rather than relying on ad hoc, single developer upgrades) will help ensure efficient	Noted. The sufficiency and capacity of utility infrastructure continues to be considered during the DA assessment process. The ACT Government acknowledges that investing in infrastructure capacity to support increased density is crucial. The ACT Government will continue to work closely with utility services providers, such as ICON Water and EvoEnergy, to monitor development activity within existing suburbs and consider the need for

outcomes and prevent potential strain on ageing infrastructure systems. • This planning should include consideration of how any upgrades will be funded, and the plans for implementation	investment and upgrades to maintain infrastructure capacity. CED continues to monitor the need for city services and facility upgrades through existing programs and will consider the need for new investment as suburbs are regenerated through redevelopment. As part of the reforms, the MMHDG includes guidance that directs proponents and the Authority to consider infrastructure impacts, including existing infrastructure capacity. While additional housing will place additional load on infrastructure, it is anticipated that on a per-capita basis there will be reduced infrastructure and delivery costs as a result of efficient land-use patterns, including through greater density near activity centres, employment areas and public transport.
A proactive transport planning strategy needs to be implemented to 'lead demand', including addition of bus services in areas of anticipated growth, allowing public transport to stimulate demand, and accelerate high quality active travel infrastructure (such as footpaths and bike lanes) in areas of anticipated growth (for example the Garden City Cycleway project).	Noted. The ACT Transport Strategy 2020 and the Planning Strategy 2018 work together to outline the vison and focus for a more compact, sustainable and efficient transport network in the ACT for the next 20 years. Notably, the Transport Strategy highlights key features and initiatives—such as development of active travel and a more efficient public transport network—that are designed to meet the community's evolving needs. The Territory is engaged in ongoing monitoring of community demand for transport infrastructure and services and this will continue to ensure transport provision responds effectively to demand.
ACT planning strategy, district plans / strategies should be reviewed to reflect infrastructure commitments, planning for public transport upgrades, and clarity about on-street / verge parking policy	Noted. The District Strategies are subject to regular review on a five-yearly basis, as required under Section 41 of the *Planning Act 2023*. This ensures that these strategies remain aligned with Canberra's long-term planning policies and goals. Regular reviews are legislated to ensure these strategies continue to evolve and respond to changing circumstances and demand, including for infrastructure, transport and other important aspects of our urban environment.
Planning for Community Amenity	
Strategic forward planning is needed for community infrastructure appropriate to meet increased demand caused by higher density, including for example local schools, shops, and community / sporting facilities, with associated connections to public transport / active transit networks and sufficient parking. Government should also plan to coordinate increases in density with investment in quality public realm / green space to ensure community amenity, biodiversity and habitat. This planning should be proactive (rather than reactive). It should also make provision for ongoing maintenance of public spaces.	Noted. The ACT Government carefully monitors the need for city services and facility upgrades through existing programs and will consider the need for new investment as suburbs are regenerated through redevelopment. CED is currently undertaking further work, which includes locational suitability which may inform future rezoning opportunities for well-located blocks, such as those in close proximity to commercial centres. This may consider planning controls within centres as well.

Comments received during pop up interactions indicated support for re-invigorated local centres, with increases in local demand for shops, and local businesses / services.	
Opportunities for innovation	
Government has an opportunity to demonstrate best practice design or innovative housing options as part of the missing middle initiative, including for example: • Buy-back of suitable blocks, or use of currently unleased land, to deliver best-practice/innovative missing middle housing projects • enabling community led (or mum and dad investors) cooperative housing initiatives (similar to the Wybalena Grove, Swinger Hill and Urambi Village models from the 1960s / 70s). Government could establish an advisory and capacity building program to assist with these 'citizen led' housing projects, and could consider a deferred repayment loan scheme for non-profit cooperative / sustainable housing proposals • showcasing innovative construction methodology and / or use of prefabricated housing • demonstrating housing for older Canberrans • demonstrating housing for people with disabilities	Noted. The ACT Government has supported a range of demonstration housing projects, through its Demonstration Housing program. These include the recently completed Stellulata co-housing development. The Suburban Land Agency (SLA) also regularly undertakes projects aimed at demonstrating innovation in planning, design and construction across a variety of development scales, from single developments through to precincts. Further details are available at https://suburbanland.act.gov.au/innovation-and-sustainability/showcasing-our-innovation
Consider the potential for alternative financing models as a Permanent Asset Market or Fair Share Market: to enable affordable, community controlled missing middle housing, and to keeping financial benefits within the Canberra economy.	Noted. Alternative financing models are not in scope of the current missing middle reforms.

7. Comments related to implementation

Guidance for applications	
Amend the Residential Development Outcome Report template with clear instructions for applicants to outline the valued neighbourhood and landscape character in which the new development is located and to demonstrate design attributes that respect those characteristics and avoid adverse impact to them.	Noted. This will be considered through the implementation phase.
Need better guidance regarding what shadow diagrams /solar access plans are expected for missing middle housing applications	Noted. This will be considered through the implementation phase.
Issue Industry Guidance Notes supplementing DOR templates to assist applicants to provide appropriate levels of documentation for various DA types and to understand the key elements that will be considered by the Planning Authority	Noted. This will be considered through the implementation phase.
Assessment of applications	
How will various design elements be balanced in assessment? Eg. Will site coverage be allowed above	Assessment requirements in the Territory Plan, including site coverage are mandatory controls. Other controls outlined in the technical specifications can be

good outcomes for trees, sun, privacy and outdoor space?	departed from where a development can demonstrate it is delivering on the overall assessment outcome.
Application approval process / timeframes	
The Guide talks about key factors in developing Missing Middle housing. Questions were raised about how government will streamline the planning application process to enhance the feasibility of missing middle housing projects, whether clear timelines would be applied, incentives for projects that meet specific criteria would be consider or early community engagement would occur (and how).	Noted. The ACT Government has committed to develop an ACT Pattern Book of Missing Middle housing, which will be a future stage of reform work along with amendments to the *Planning Act 2023* and *Planning (Exempt Development) Regulation 2023*, highlighted in earlier responses. This work is currently being undertaken and will consider opportunities for accelerated or exempt pathways for some missing middle housing developments.
Third Party Appeals	
Mixed views on third-party appeals - some argue that the right to appeal proposals is an important safeguard against poor design outcomes and were concerned that missing middle proposals might be approved without rigorous assessment (with no right of appeal by local community) Others suggest that appeals should not be allowable in certain circumstances (eg. on traffic/parking basis or where a proposal meets all the Assessment Outcomes / technical specifications) and support merit-based thresholds - where only well-founded concerns proceed to full review, reducing unnecessary delays and supporting more predictable planning outcomes. Some expressed concerns that appeal rights create uncertainty.	Noted. As described above, CED is currently undertaking work to investigate a possible exempt development or accelerated assessment pathway for missing middle housing developments. It is noted that exempt development is not subject to development approval and therefore third-party appeals.
The role of third party appeals is potentially heightened under an outcomes-based planning system, with a decision being potentially less transparent to neighbours and local residents, compared to a rules-based process. If the third-party appeal process remain, alternatives to the current system should be investigated, introducing a higher threshold for appeals to progress or to provision to award costs if an appeal is not successful	Noted. See response above.
MMHDG should not be used as a strict planning control. Disclaimers related to diagrams and examples should be included in the document where there is a reference to courts and tribunals. The Authority should carefully consider if any changes to the assessment outcomes are required to ensure that ACAT's interpretation of the outcomes are consistent with the Technical Specifications and Design Guide.	Noted. The *Planning Act 2023* clearly outlines the role of the Design Guides and technical specifications as considerations or supporting documents to the Territory Plan. Their application is a matter of law. This is outside of the scope of these reforms.
Alignment with other Planning Instruments	
MMHDG should be consistent with other planning instruments including the Territory Plan / Planning Act and District Policies	Noted. The missing middle reforms do not propose any changes to the hierarchy of Territory Plan components. The MMHDG will be made as a notifiable instrument, consistent with other Design Guides and the requirements under the *Planning Act 2023*.
Definition of 'Missing Middle' housing should be included in the Territory Plan definitions, and design	Noted.

principles should align with the 10 Principles of good planning in the Planning Act	'Missing middle' housing is not a term that is used within the Territory Plan or technical specifications. The missing middle housing typologies are defined under existing Territory Plan definitions. Missing middle is a term used through the MMHDG, which includes a definition of 'missing middle'.
Current provisions within district policies include some development restrictions relating to specific blocks. District policies / strategies should be reviewed to ensure that they align with the new policy intent outlined in the Missing Middle Housing Reforms, and the outcomes based planning system	Noted. Site-specific provisions are not within scope of the current reforms.
How do the missing middle reforms align with the National Urban Policy Principles (NUPP).	Noted. The four Missing Middle Design Principles are broadly aligned with the NUPP principles, notably through encouraging sustainable design practices, greater housing diversity, and through encouraging well designed streets and communal spaces that contribute to equitable, liveable suburban/urban environments.
Approval Delays	
Delays in approvals, often related to entity referrals, impact project costs and delivery, requiring urgent government intervention. Even where planning approval is secured, projects frequently encounter delays, uncertainty, and inconsistent requirements relating to utility and infrastructure regulation. Need to review Six-stage DA assessment model with industry feedback	Noted. The ACT Government has recently undertaken Machinery of Government (MOG) changes that will serve to improve collaboration on planning matters within and across government. The entity referrals process is an identified area for efficiency improvements that will be targeted as the MOG activities progress and will be further supported by work undertaken as part of the ACT Planning System Evaluation Framework 2024-2029. As noted above, CED is currently investigating possible exempt development or accelerated assessment pathways for missing middle housing projects. This would alleviate these concerns.
Assessment Resourcing	
Concerns that the planning authority does not have capacity to manage an increase in demand for approvals, nor is there a good track record of working in partnership with other government agencies.	Noted. The ACT Government continually monitors resourcing requirements for administering the planning system to ensure it can operate efficiently and in response to demand. Staff are provided with regular training opportunities to ensure their capacity to undertake rigorous assessments. As noted above, CED is currently investigating possible exempt development or accelerated assessment pathways for missing middle housing projects. This would alleviate these concerns.
Need to ensure the assessment team is adequately resourced for informed, considered and timely assessment of missing middle proposals	See above.
Implement ongoing internal training for assessment staff to ensure they are consistent in their approach to consideration of Assessment Outcomes	See above.

Compliant Development Pathways	
Recommendations to make multi-unit proposals complying with Residential Zones Policy, Subdivision Policy and Technical Specifications exempt developments, not subject to DA approvals.	Noted. As noted above, CED is currently investigating possible exempt development or accelerated assessment pathways for missing middle housing projects.
Design referrals	
Proposals with density over target figures should be reviewed by a Missing Middle Housing Design Review Panel to ensure higher quality outcomes.	No change. The establishment of a new design review panel is outside the scope of the missing middle reforms. These applications can be assessed by experts employed within the assessment teams of the Authority. The current National Capital Design Review Panel is legislated to review large-scale developments, typically 5 storeys or more. Requiring missing middle developments to be reviewed by a similar design review process would be a substantial change to the current development application assessment process delaying delivery and may disincentivise the uptake of missing middle housing, which is contrary to the aims of these reforms.
Establish a design review panel to assess complex (blocks greater than 2000m^2) missing middle developments.	See response above.
Missing Middle reforms evaluation and data collection	
Demand analysis needs to be done and monitored regularly to determine how much housing is actually needed in the future, (should also take into account future migration and potential impacts of AI on the workforce)	Noted. ACT Housing Strategy 2018-2028 considers housing supply and is reported on annually. Treasury also produces population projections informed by Australian Bureau of Statistics (ABS) and Territory data.
Development data should be recorded and reported by the Territory, such as location, housing typology, dwelling size, number of bedrooms per dwelling, number of carparks, etc to better understand the mix of dwellings being approved and built in the Territory. Conducting this analysis, together with ensuring there is baseline data available, will enable the ACT Government, industry, and community, to track the progress of the reform and identify where improvements are required.	Noted. Baseline data on many of these elements are captured through ABS Census data and the ACT Land and Property Report. As part of ongoing digital improvements, including the eDevelopment Replacement Program, CED will be modernising its internal systems to improve the ability to capture, monitor and report on development activities in the ACT.
Dedicated 'missing middle' coordination and facilitation	
Establish a dedicated internal agency (a 'Development Solutions Department', 'Housing Implementation Unit' or 'Missing Middle Development Authority') to: • have responsibility for reporting / evaluation of the policy, collection of relevant housing approvals and construction data • promote a development facilitation mindset • fast-track missing middle developments	No change. Many of the items raised here are being considered by CED as part of Machinery of Government (MOG) changes that will serve to improve collaboration on planning matters within and across government. The entity referrals process is an identified area for efficiency improvements that will be targeted as the MOG activities progress and will be further supported

• liaise with industry / community to understand any barriers to missing middle housing and seek to address them • enable / develop / champion infill demonstration projects • facilitate high-standard multi-unit developments in existing suburbs, particularly consolidated block redevelopments	by work undertaken as part of the ACT Planning System Evaluation Framework 2024-2029.
Strata / Body Corporate	
A number of submissions mentioned the complexity and costs of strata / body corporate – particularly as a barrier for downsizers / people looking to age in place. Comments included: • Annual strata costs (rates, body corp, sinking funds, insurance) can be significant. There is also uncertainty about what the insurance covers. • Strata committees / body corporates can contribute to poor building management. If government is encouraging more apartments / unit titled properties then should also consider how to promote / facilitate best practice strata management • Strata fee reductions for committee members should be considered (to encourage community engagement); opportunity to improve strata company accountability (eg rating system) and provide training for committee members • conduct a research project into how to create a sense of community in apartment complexes • commission a guide for older residents on Owners Corporations (eg. roles and obligations) to improve understanding in the community about how Owners Corporations operate and to support older Canberrans moving into strata developments as they age in place	Noted. Reforms to the strata or unit title legislation is out of scope for the current missing middle reforms. The ACT Government acknowledges that reforms to strata have been raised a number of times by the community through the engagement process. It is also noted that the Standing Committee on Legal Affairs is in the process of undertaking an inquiry which commenced on 15 January 2025 and is ongoing. This community feedback has been referred to Justice and Community Safety Directorate (JACS), as policy leads of the unit title legislation.
Building Quality	
Concerns were raised regarding building quality and defects, particularly in relation to multi-unit development.	Noted. While building reform is out of scope of the missing middle reforms, the ACT Government is progressing implementation of a property developer licencing scheme, as well as licencing of select building trades to improve building quality and support consumer protection.

8. Comments related to perceived barriers to implementation of the reforms

FEASIBILITY	
Taxes and charges	
The range of taxes and charges impact directly on development feasibility, the number of dwellings proposed, and may be significant disincentives to 'mum and dad' investors looking to access missing middle housing. Costs include stamp duty, lease variation charges and developer licencing fees.	Noted. A review of taxes, including Lease Variation Charges (LVC) is out of scope of the current missing middle reforms. CED however acknowledges the potential impact that fees and charges have in influencing the feasibility of individual development proposals. This feedback has been referred to Treasury for consideration.

Lease Variation Charges (LVC) will be a significant disincentive to missing middle redevelopment - there is lack of clarity about what charges will apply, how and when (difficult for 'mum and dad' investors to navigate, and fees are significant with potential to impact critically on project feasibility (current LVC ($100k-$440k) makes missing middle unviable). There is a need for enhanced transparency with clear benchmarks. Current requirements should be reviewed and 2025 increases paused. Consider a 5 year moratorium on chargers to monitor impact on housing delivery. LVC remissions can also act as incentives for certain desirable types of development (eg missing middle housing for downsizers) • introduce LVC exemptions or discounts for developments that align with the objectives of the Missing Middle reforms, particularly those that deliver affordable or diverse housing types (eg for people ageing in place / downsizers) • review codified charges to introduce a sliding scale based on dwelling size, rather a flat charge per dwelling. This would more accurately reflect the development impact and improve financial viability. • Provide greater transparency and predictability in how LVC is calculated for medium-density developments, to support feasibility assessments and investment decisions. Align LVC policy with housing targets, ensuring that economic settings do not undermine the Government's goal of delivering 30,000 new homes by 2030.	Noted. A review of taxes, including Lease Variation Charges (LVC) is out of scope of the current missing middle reforms. CED however acknowledges the potential impact that fees and charges have in influencing the feasibility of individual development proposals. This feedback has been referred to Treasury for consideration.
Stamp duty can be a disincentive to downsizing. Exemptions for eligible purchasers could be considered to better enable ageing in place for older Canberrans.	Noted. A review of taxes, including stamp duty is out of scope of the current missing middle reforms. CED however acknowledges the potential impact that fees and charges have in influencing the feasibility of individual development proposals. This feedback has been referred to Treasury for consideration.
Rates	
Concerns that changes in allowable developments will lead to rates increases for all landholders even if they don't wish to redevelop.	Noted. It is acknowledged that land values in areas which are most likely to see missing middle redevelopment may see a modest increase over time. However, any rates increases are expected to be gradual and to be limited to areas where missing middle development is the most feasible. This is primarily because rates are calculated based on a 5-year average of the unimproved value of blocks. Increases to the unimproved value will only come after sales evidence of higher price increases in those areas compared to others. Property owners taking up redevelopment opportunities will experience a larger and quicker increase in both unimproved values and rates as the average unimproved value of their properties will be reset with the lease variation.

Construction Costs and Skills Shortages	
Current levels of demand and availability of large development sites provide opportunities, but high building material costs and availability of qualified personnel are constraints to delivery.	Noted. It is acknowledged broader labour, skills and material supply issues will influence the development industry's capacity to deliver housing supply. However, these are out of scope of the missing middle reforms and the ACT planning system. To assist the construction sector during a particularly challenging time, the ACT Government has focused on productivity and policy settings, in addition to investment in housing, land release and infrastructure. For example, in March, the ACT Construction Productivity Agenda was announced where work is underway with the construction industry to identify and implement a range of agreed measures to help support the delivery of more housing, more efficiently. Similar to the Better Regulation Taskforce, this work will identify specific, targeted and agreed reforms to inform future regulatory change with the aim of supporting supply and affordability of housing.
Critical shortages in plumbing, carpentry and electrical trades needed for construction impact on capacity to meet increased demand from new missing middle housing. Payroll tax acts as a disincentives for employers to take on apprentices, and has a flow on impact on dwelling affordability as costs are passed on to purchasers. Consider: • creating a skills pipeline for critical shortage areas in construction, particularly in plumbing, carpentry and electrical. Fund targeted pre-apprenticeship and skills conversion programs in key building and construction trades such as carpentry, plumbing, electrical work, bricklaying, tiling, roofing and project management • payroll tax exemption for apprenticeships • provide a payroll tax exemption for apprenticeship wages • removing the levy exemption for government-funded projects to ensure all developments contribute fairly to workforce training	Noted. Refer to response above.
Disincentives for people looking to downsize or 'age in place'	
Cost, complexity and timing of developments act as barriers to older Canberrans looking to redevelop their asset to age in place. If older people redevelop (ie. don't sell and purchase new home) then they cannot access the Cth downsizer superannuation incentive.	Noted. Commonwealth tax and superannuation incentives are out of scope for the missing middle reforms. These missing middle reforms, particularly with changes that allow additional subdivision of existing single dwelling housing blocks without constructing will significantly increase the opportunity for older Canberrans to age in place and/or redevelop. The cost, complexity and timing of development is being reviewed and will be considered through future stages of the missing middle housing project, and from the ACT Construction Productivity Agenda .
Developer Licencing	

Projects over three dwellings will be required to obtain a Developer Licence. This may become a barrier to take up of multi-dwelling missing middle housing for industry, and also for everyday Canberrans choosing to undertake a development on their parcel of land. The lack of expert knowledge, and of obtaining a licence may be a barrier to entry.	Noted. No change. In setting the threshold for the requirement for a developer licence, the ACT Government has carefully considered the complexity and risk inherent in larger-scale development projects. The current requirements are considered appropriate to bring developers into the chain of accountability (in addition to the builder and other parties) to help ensure high quality housing supply.

MM HOUSING REFORM (MMHR) DPA-04 - Agency Circulations - Summary of comments

Copies of full entity comments are provided in Appendix 1A.

Agency (Mandatory)	Response
National Capital Authority (NCA) **Position:** Supported with comments **Comments** • Supports the intent of proposed changes to lower-density residential zones (RZ1 and RZ2), which aim to expand housing options and introduce a housing design guide. • Changes align with key principles of the National Capital Plan and the Territory Plan, particularly the principle that growth should occur within or adjacent to the existing urban footprint. • Concern regarding reduced planting areas. • Supports increased canopy cover for RZ1 and RZ2 blocks, as outlined in Residential Zone Specification 19.3. • Concern about reduced internal living space, referencing NSW minimum dwelling size standards. • Concern about parking requirements for multi-unit developments located away from public transport. • Notes that images in the design guide showing front fencing depart from existing ACT policy. **Queries and Clarifications** • Seeks clarification on the removal of minimum dimensions for private open space (POS) for single dwellings. • Questions the removal of maximum depth requirements, suggesting that quantitative measures may help ensure better indoor living environments. • Requests clarification on dwelling density requirements (maximum or minimum) in the RZ1 zone. **Recommendations** • Suggests hedging along front boundaries as an alternative that maintains amenity and complements the streetscape.	Noted. **Minimum dwelling sizes** The minimum dwelling sizes proposed under the missing middle reforms align with those in the NSW Apartment Design Guide. The reduction in minimum dimensions for living spaces and bedrooms were intended to provide greater flexibility in delivering diverse housing, including compact dwellings. As described above, the specification has removed these changes. Where a proponent elects to deliver less than minimum room dimensions a suitable layout will need to be demonstrated. Under the reforms, storage is expressed as cubic metres, rather than square metres, and does not result in an overall increase in allocation. It is also expressed as both internal and external spaces, to provide greater flexibility in delivery. **Parking** Parking arrangements will continue to be assessed for suitability at DA stage with the determination considering existing street capacity/conditions. Detailed response to other parking concerns are outlined above. **Planting area** Planting area has been carefully balanced against a variety of other provisions, including site coverage, principal private open space, private open space and tree canopy cover. Planting area alone does not manage urban heat, it is supported by canopy cover, which is proposed to increase under the reforms, and managing the extent of hard surfaces across a site, such as through the use of permeable paving as promoted by the guide. **Fencing** Some front fences are able to be assessed where they do not have an adverse impact on the streetscape. The technical specifications outline setback, height, transparency and articulation to minimise their impact. This partners the courtyard walls specifications, which are currently permitted forward of the building line. Permitting some low impact front fences will encourage greater flexibility in location and use of private open space on a block. Amendments to the specification have been made to articulate minimum requirements for front fences for multi-unit development.

	Multiple guidance points are provided in the MMHDG to ensure these contribute positively to amenity and streetscape outcomes. **Maximum building depth removal** The maximum building depth is proposed to be deleted to provide greater flexibility for building design and siting on larger sites. Maximum habitable room depths continue to be addressed by the specification. **Private open space** While the reforms propose a reduction in private open space for multi-unit developments, from 40% of the site area to 30% of the site area, what constitutes private open space is proposed to change. Under the current specification, private open space for muti-unit housing requires a minimum 2.5m dimension. Under the reforms, private open space for missing middle housing must be made up of either communal open space or principal private open space, or a combination of both. Both types are subject to minimum solar access requirements and, when located at ground level, must meet larger minimum dimension standards than the current 2.5 metres required for private open space: 4m for principal private open space, and 5m for communal open space. These changes aim to enhance the quality, usability, and overall amenity of open space in multi-unit developments. They are further supported by additional assessment criteria, including a minimum 20% tree canopy cover and 30% planting area, which together contribute to improved site amenity. **Dwelling Density** The Residential Zones Technical Specification will be amended to clarify the intent of the policy that the multi-unit housing densities for RZ1 are provided as maximums, rather than targets.
Environment Protection Authority (EPA) **Position:** Supported with comments **Comments** • Recommends that the design guide reflect EPA noise zone standards. • Proposes specific noise-related conditions for inclusion in the notice of decision. • Increased residential density may require careful placement of mechanical plant equipment to mitigate noise and odour impacts between neighbouring properties. **Recommendations** • Suggests inclusion of technical specifications addressing setbacks and locations of	Noted. The missing middle reforms do not propose to amend existing noise standards or the regulatory powers in relation to noise and odour emissions. Guidance is provided within the MMHDG to encourage consideration of plant location and waste management to mitigate potential amenity impacts. Agreed. The MMHDG and Residential Zones Technical Specifications will be amended to provide guidance discouraging the use of plastic turf products within landscape components of new development.

mechanical plants to manage environmental impacts. • Refers to the Commissioner for Sustainability and the Environment's report, recommending discouragement or prohibition of plastic turf due to environmental concerns (microplastic contamination and reduced permeability).	
Conservator of Flora and Fauna **Position:** Supported with comments. **Comments** • Support for the Assessment Outcomes 22.2 for Residential Zones and 18.1 for Subdivisions which require mitigation measures to minimise erosion and site disturbance.	Noted.
ACT Heritage Council **Position:** Supported with comments. **Recommendations** • Providing additional and strengthened heritage provisions within: o the Subdivision and Residential Zones Policies that will form part of the Territory Plan; o the Subdivision and Residential Zones Technical Specifications which will assist proponents in meeting Territory Plan requirements; and o A new 'Heritage' section within the Missing Middle Design Guide, which will provide early guidance to proponents on how to deliver new development within heritage areas.	Agreed. While it is noted that the *Heritage Act 2004* and its guidelines will continue to apply, irrespective of these reforms, amendments have been made to the Policies to further highlight the need for heritage considerations as part of missing middle development activity. The MMHDG will be amended to incorporate additional guidance regarding heritage considerations. The technical specifications will be amended to incorporate additional specifications highlighting need to respond to heritage elements.
Agency (Others)	**Response**
CED – Transport and City Services (former TCCS) **Position:** Supported with comments. **Comments** • CED – Transport and City Services supports the overall intent of the proposed changes and provides comments for further consideration. • Notes that the design guide recommends permeable pavers for driveways and car parking areas; however, CED – Transport and City Services does not support this treatment for driveways across the verge, as permeable paving has not yet been trialled. • Emphasises the importance of safe and efficient pedestrian connections through public pathways to support active travel. • Highlights the need to respect tree protection zones and ensure adequate front setbacks to support healthy tree root systems and avoid conflicts with built form.	Noted. The proposed reforms do not impact the applicability of existing tree protection controls established by the *Urban Forest Act 2023*. The appropriateness of specific design and subdivision outcomes, such as street frontages, driveway placement, car parking and pedestrian connections will continue to be assessed and approved through the DA process. CED – Transport and City Services feedback will be considered for incorporation into the MMHDG to strengthen guidance on specific issues. It is noted that permeable paving is not currently supported by CED – Transport and City Services for driveway verge crossings. The MMHDG will continue to promote permeable paving for driveways within the block boundary. This will help manage stormwater runoff and contribute to the reduction of urban heat island effect.

• Indicates that subdivided blocks will require individual stormwater connections. • Notes that adequate street frontage is essential to support waste collection services. **Recommendations** • Suggests exploring on-site parking solutions to reduce pressure on surrounding on-street parking. • Recommends guidance on driveway verge crossings, including the adoption of co-shared driveways where feasible to reduce the number of verge crossings and increase opportunities for new street tree planting.	
ACT Education Directorate **Position:** Supported with comments **Comments** • Requested a comparison table outlining the proposed Territory Plan changes for RZ1. • Sought information on the estimated short- and medium-term population growth resulting from the policy changes. • Asked how existing urban areas will support increased residential growth through infrastructure, green spaces, community facilities, and schools. • Raised questions about the impact of increased residential growth on the character of existing neighbourhoods, particularly in relation to higher-density environments. • Queried how shifts in housing demand will influence the planning and provision of social infrastructure and non-residential land uses. **Recommendations** • Provide clear data and projections on population growth to inform infrastructure and service planning. • Ensure that planning for residential growth is integrated with strategies for education, community facilities, and green space provision. • Consider the implications of built form changes on neighbourhood character and the need for responsive social infrastructure planning.	Noted. A concise summary table of changes proposed is available for viewing via the Authority website, available at Missing Middle Housing Reform Snapshot. While it is noted that the missing middle reforms are intended to increase housing supply for a growing population, the reforms do not influence population projections. Rather, they respond to increases in demand for housing over time. Regular population projections are reported by ACT Treasury, with updated figures for 2025 –2065 available at https://www.treasury.act.gov.au/snapshot/demography/act. The importance of strategic infrastructure planning is noted. Please refer to the full response under Strategic Infrastructure and Transport Planning above. This extends to planning for social infrastructure and non-residential uses. The MMHDG provides design guidance for how developments can respond to the site's context and constraints. This includes responding to local character. See above for more detailed responses regarding Character Protection.
Health and Community Services Directorate **Position:** Supported with comments **Comments** • Recognises that increasing housing choice can help reduce urban sprawl. • Notes that enabling more residents to live closer to existing health and community services improves accessibility. • Highlights that the proposed changes may reduce pressure on the need for new health facilities by allowing ACTHD to deliver services from existing infrastructure. **Recommendations**	Noted. The importance of strategic infrastructure planning is noted. Please refer to the full response under Strategic Infrastructure and Transport Planning above. This extends to planning for social infrastructure and non-residential uses.

• Continue to align residential growth with access to existing health and community services. • Monitor population growth and service demand to ensure existing facilities can accommodate increased usage. • Consider health infrastructure planning as part of broader urban intensification strategies.	

Emergency Management (ACTSES)
 	
Position: Supported with comments
 	
Comments
• Comments primarily relate to the use of building materials in residential development.
• Expressed support for the current recommendations in the Housing Design Guide relating to:
  ○ Permeability
  ○ Water Sensitive Urban Design
  ○ Freeboard
  ○ Flood resilience
Recommendations
• Recommends against the use of tiled roofs due to potential risks in emergency scenarios.
• Encourages the use of building materials that are resilient to high wind conditions.
	Noted.
	
	CED will consider opportunities to further expand climate resilience and adaptation guidance within the MMHDG to include material selection and building design to ensure resilience to extreme weather events.

Suburban Land Agency (SLA) **Position:** Supported with comments **Comments** • Highlights the importance of understanding potential impacts on land values and market demand. • Expresses support for housing type diversity and recommends inclusion of additional typologies such as manor houses and micro blocks. • Supports the removal of minimum block size requirements in zone policies. • Endorses the current direction of the reform but notes the need to define new terminology introduced in the Territory Plan. • Notes that site servicing investigations and infrastructure upgrades may be required to support growth. **Recommendations** • Recommends consideration of flexible parking options, including car-share models and centralised parking. • Suggests reviewing and defining density limits and aligning reforms with ACT Building Policy priorities. • Suggests adopting a context-responsive approach to building height limits. • Encourages further investigation into market trends and recommends sharing findings from market analysis. • Increase building height allowances in higher-density residential zones.	Noted. **Economic impact analysis** The missing middle reforms are design-led policy changes intended to enable greater housing choice and opportunity. The reforms build capacity into the planning system to enable land within existing residential areas to be used to respond to future housing demand. This demand will be influenced by economic conditions, which will impact the rate and time of take up. While CED undertook broad feasibility analyses to understand the potential impact of the reforms, the economic viability of a project is significantly influenced by many external factors, including construction costs, financing and availability of skilled labour, which are outside of the planning system's control. The economic impacts are just one element that will influence the implementation and success of the reforms. With this, the implementation and evaluation of the policy will include a broader range of elements. **Density limits** Further revisions have occurred to clarify the intent of density specifications in the Residential Zones Technical Specifications. It is noted that specifications are non-mandatory and can be departed from where the development demonstrates it meets the applicable assessment outcomes and requirements. **Manor House and Micro blocks**

• Allow development application (DA) exemptions for proposals aligned with the Missing Middle Design Guide (MMDG). • Include micro blocks as part of the reform to support housing diversity. • Define all new terminology introduced in the reform within the Territory Plan. • Consider strategies to support affordability and accessibility, including lower-cost construction, partnerships with community housing providers, and financial incentives for affordable, community, or public housing. • Conduct economic feasibility analysis and establish threshold criteria for project viability in consultation with industry. Address findings in a policy implementation plan. • Explore more flexible leasing arrangements to support diverse housing models. • Ensure infrastructure capacity is assessed and upgraded where necessary to accommodate increased residential density.	Manor House is captured as a type of apartment. Noting the reforms enable apartments in RZ1, these are captured by the reforms. While micro blocks are being piloted as a potential dwelling typology, this is not a development outcome within the scope of this stage of the missing middle housing reforms. Following completion of the pilot project and an evaluation of the outcomes, this housing typology may be considered within the planning system for appropriately zoned areas. **Building Heights** The missing middle reforms propose modest increases to building heights through change to the maximum number of storeys across all residential zones within the Residential Zones Policy, except RZ1. Building heights are also guided in metres by the Residential Zones Technical Specification. These changes ensure a suitable hierarchy and transitions between zones are achieved. **DA exemptions** Streamlined approval pathways, include exemptions from the requirement to obtain development approval, will be considered alongside the development of an ACT Pattern Book of Missing Middle Housing. Please refer to detailed response under 'Application approval process / time frames' above. ' **Terminology** Some definitions will be amended (e.g. 'attic') and/or added (e.g. 'end-of-section block'). 'Missing middle' is not a term that is used within the Territory Plan or technical specifications. It is defined in the MMHDG, which uses the term widely. The missing middle housing typologies are already defined under existing Territory Plan definitions. **Partnerships, incentives, feasibility** These elements are out of scope of the current missing middle reforms. The ACT Government is engaged in a wide variety of initiatives to support affordable, community and public housing. Further details of these initiatives can be found on the ACT Government's Housing page. **Infrastructure** The importance of strategic infrastructure planning is noted. Please refer to the full response under Strategic Infrastructure and Transport Planning above. This extends to planning for social infrastructure and non-residential uses.
City Renewal Authority (CRA) **Position:** Supported with comments **Comments**	Noted. **Public realm outcomes** Noting the anticipated development arising from the missing middle reforms is predominantly of a low to mid

• Supports increased residential density where it is contextually appropriate and can be sustained by existing and proposed infrastructure. • Interested in whether transport modelling has been conducted to assess the impacts of the reform. • Enquired about traffic and parking analysis, recommending a context-based approach that differentiates between areas close to public transport and those further away. • Notes that without a holistic approach, parking requirements considered only at the development application (DA) stage may result in unintended and inequitable outcomes. • Expressed interest in whether economic analysis has been undertaken to assess the reform's impacts. • Acknowledges that the reform may reduce pressure on agricultural land and greenfield development. • Raised concerns that the reform does not adequately address urban heat impacts. • Seeks clarification on the definition of cohousing and other terminology to better understand the reform's context. • Notes that replacing height in metres with storeys provides flexibility but may constrain split-level designs. • Emphasises the importance of protecting solar access, privacy, and noise levels for both neighbours and residents. • Stresses that impacts on the public realm must be carefully managed. **Recommendations** • Encourages exploration of opportunities to incentivise enhanced public realm outcomes. • Encourages consideration of affordable housing options and ways to enhance community benefits and connections. • Conduct and share transport modelling and traffic/parking analysis to inform planning decisions. • Apply a context-sensitive approach to parking requirements based on proximity to public transport. • Consider bonus height or yield incentives for developers who deliver enhanced public realm outcomes. • Undertake and publish economic analysis to support transparency and informed decision-making. • Strengthen provisions addressing urban heat mitigation. • Explore strategies to support social sustainability, including affordable housing and community-building initiatives. • Clearly define key terms such as "cohousing" within the Territory Plan. • Ensure new developments maintain solar access, privacy, and acoustic amenity, and manage public realm impacts responsibly.	rise, public realm has been primarily considered from the perspective of contributions to streetscape through passive surveillance and potential for activation. Contribution schemes and the like are considered more appropriate for larger scale development and are guided by the Urban Design Guide and related processes. Height and yield incentives for enhanced public realm are not considered appropriate for developments in RZ1 and RZ2 areas. **Economic impact analysis** Refer to the response to the SLA above. **Traffic and Parking** Refer to detailed responses in the traffic and parking sections above. **Urban Heat** A range of provisions including increased canopy cover percentages and other amendments to open space requirements are anticipated to contribute to mitigating urban heat island effect while balancing the ability to deliver sensible built form outcomes. **Terminology** Refer to previous responses above. Co-housing is a defined term under the Territory Plan. **Development impacts** The missing middle reforms have been developed with a key focus on maintaining solar access, privacy, amenity and appropriate interfaces with public domain, this includes extensive guidance in the MMHDG. Several relevant provisions have been strengthened in response to consultation feedback. **Affordable housing and community housing** While the delivery of affordable and community housing is not the direct aim of these reforms, the Authority supports and anticipates they would be encouraged and given greater opportunity to be delivered by the proposed reforms. Further policy work may be considered to further support these developments in the future.

Housing ACT **Position:** Supported with comments **Comments** • Supports the reform for its potential to increase housing options, diversity, and overall supply. • Notes that the reform will assist in the delivery of additional public housing across the ACT. • Raises concern that the reform may negatively impact the Children, Youth and Families division by reducing the availability of suitable land for therapeutic service facilities. **Recommendations** • Suggests that the City and Environment Directorate (CED) explore adjustments to the Lease Variation Charge (LVC). A reduction in LVC could help support the reform by incentivising both industry and community participation. • Recommends that planning for housing reform consider the land needs of therapeutic and community service facilities to avoid unintended impacts on service delivery.	Noted. A review of taxes, including Lease Variation Charges (LVC) is out of scope of the proposed missing middle reforms. CED however acknowledges the potential impact that fees and charges have in influencing the feasibility of individual development proposals. This feedback has been referred to Treasury for consideration. While out of scope of the current missing middle reforms, under the District Strategies the ACT Government has identified that community facilities are to be reviewed to ensure the Canberra community continues to receive high levels of service and availability.
Justice and Community Services Directorate (JACS) **Position:** Supported with comments **Comments** • Identifies challenges in reforming the Unit Titles Management Act 2011 (UTMA) to suit smaller unit plans. • Notes the complexity of compliance with UTMA for small unit plans, particularly where owners' corporations lack access to guidance and support. • Highlights a lack of awareness and understanding among unit owners, compounded by insufficient government resources to meet information demand. • Smaller unit plans are less likely to engage a strata manager, resulting in limited support and increased risk of disputes. • Raises concerns about disproportionate insurance requirements for small common property areas and the potential for owner disconnection. • Parking issues are frequently a source of complaints and disputes in unit-titled properties due to inadequate planning. • Increased residential density may lead to higher noise levels, especially in mixed-use developments, contributing to resident conflict. • Notes that UTMA has limitations in managing planning-related issues such as parking and noise. **Recommendations** • Actively consider parking and noise impacts during the planning stage to prevent long-term management challenges and resident dissatisfaction.	Noted. Changes to subdivision provisions proposed. The community has expressed a preference for single title and a desire for improvements to the day-to-day function of unit-titled developments. In this regard, while reform to strata is considered out of scope for the current missing middle reforms, CED acknowledges that reforms to strata have been raised as a subject of significant community interest through the engagement process. It is also noted that the Standing Committee on Legal Affairs is in the process of undertaking an inquiry into strata management which commenced on 15 January 2025 and is ongoing. The Authority anticipates that revisions to the subdivision provisions will enable a greater proportion of dwellings to be separately titled, rather than unit titled. This is anticipated to largely avoid the challenges associated with smaller unit plans. CED will consider opportunities to support the implementation of the reforms, such as through the provision of improved unit title information.

• Improve access to information and guidance materials for owners' corporations, particularly for smaller unit plans. • Review insurance requirements for small common property areas to ensure proportionality. • Enhance public awareness and education around unit title responsibilities and governance. • Consider reforms to UTMA that better accommodate the unique needs of small unit plans.	
ACT Fire & Rescue Nil comment.	Nil.

MPA-04 Entity Comments

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EPA Planning Liaison

Dear Territory Plan and Coordination Team,

Thank you for referring the attached draft Major Plan Amendment 04 (Missing Middle Reform) to the Office of the Environmental Protection Authority (EPA) for comments.

EPA provides the following comments:

- A rewrite of paragraph vi of Section 7.2C of the proposed housing design guide (*20250512 - Missing Middle Housing Design Guide - Draft*) is suggested to more accurately reflect compliance with EPA noise zone standards is required.
- As a guide, following is a condition applied to relevant development applications by EPA:

Noise

- Noise from equipment, which is installed permanently or used temporarily during development, including air conditioning units, heat pumps, pool pumps, etc. must comply with the noise standard at all times as per the Environment Protection Regulation 2005.
  - Please consider the type and location of noise generating equipment prior to installation.
  - Written assurance should be sought from the supplier/installer of the equipment confirming it complies with the Noise Zone Standard as per the Environment Protection Regulation 2005.
- The technical specification for residential does not have any requirements regarding adherence to noise zone standards from mechanical plants. As the increase of dwellings per block and the reduction of setbacks will result in people living closer together, specification regarding location/distance of both mechanical plant and exhaust outlets (to reduce odour complaints) from boundaries and adjacent dwellings should be included in the documentation.
- As per the Commissioner of the Environment's report, there should be some specifications regarding the use of plastic turf, or preferably, prohibition on use of plastic turf. This is the perfect opportunity to introduce this requirement into the housing design guide. Plastic turf falls under contamination of the environment due to microplastics entering the environment and eventually shifting a permeable surface into a non-permeable surface.

For further information, please contact the EPA Planning Liaison Officer at EPAPlanningLiaison@act.gov.au.

Strategic Regulation, Office of the Environmental Protection Authority | Access Canberra | ACT Government

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Conservator of Flora and Fauna

Good Morning

Thank you for the opportunity to review this draft major plan amendment.

The office of the Conservator have reviewed the proposal and, while noting the amendment will result in a loss of connectivity across the urban landscape, this is preferable to urban spread and we are therefore overall supportive of the proposal.

Regarding the draft Technical Specifications, the OoW supports the Assessment Outcomes 22.2 for Residential Zones and 18.1 for Subdivisions which require mitigation measures to minimise erosion and site disturbance.

With thanks

Conservator Support | Environment, Heritage & Parks

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National Capital Authority

Dear Territory Plan team

Thank you for the opportunity to comment on Territory Plan Draft Major Plan Amendment 04 (Missing Middle Reform). And thank you for your patience whilst our comments have been finalised.

The NCA's comments address general matters concerning the intent of the missing middle reforms, as well as some more detailed matters for EPSDD's consideration.

General comments

The NCA supports the intent to remove barriers in the planning system and allow more housing options (including more townhouses, terraces, duplexes, and low-rise apartments) within current low-density RZ1 and RZ2 areas. The NCA also supports the introduction of a Housing Design Guide to assist with interpretation of the Territory Plan and illustrate design principles.

The proposed Territory Plan changes contribute to the achievement of the key principles and policies of the National Capital Plan including:

- containing urban expansion so as to minimise impacts on valuable natural and rural areas (section 2.3)
- locating a substantial portion of new development within existing urban areas (section 2.3)
- introducing measures through which urban consolidation can occur (section 2.1 and 3.3.3).

The NCA recognises that the Territory Plan's Planning Principles reflect these provisions of the Plan, stating that growth should be mostly within the existing urban footprint, or in areas close to the existing footprint.

Detailed comments on Residential Zones Specifications and Housing Design Guide

Landscape and sustainability

Both the Plan's Statement of Planning Principles and the Territory Plan's equivalent refer to sustainability and resilience. For example, Planning Principle 2.9(b) of the Territory Plan identifies the need to focus on adapting to the effects of climate change, including through mitigating the effects of urban heat. The landscape within urban areas (in both the public and private domains) is critical to helping achieve this. The NCA makes the following observations about the missing middle reforms:

- The required minimum planting area within RZ1 and RZ2 areas is proposed to be reduced from 35% to 30%. This seems to conflict with other ACT Government policies and objectives concerning climate change mitigation and green infrastructure.
- Notably, Territory Plan assessment outcomes refer to the need for sufficient planting areas, canopy trees, and deep soil planting zones to enhance living infrastructure, etc and to reduce urban heat island effects through limiting impervious surfaces. The Missing Middle Housing Design Guide also includes provisions to reduce hardstand surfaces to reduce heat island effect. These outcomes and objectives could be met more effectively by keeping the planting area requirement to a minimum of 35% of a site.
- With over 90% of residential land in the ACT being zoned RZ1 or RZ2, reducing requirements for planting area could have a significant compounding effect in terms of the potential area lost to hardstand.
- The NCA's own policies for the Deakin/Forrest Residential Precinct require a minimum of 40% of a block to be soft planting area. Increases in density are being achieved with this requirement in place.

- Whilst the NCA has concerns about any reductions to minimum planting areas and softscape, the NCA supports increasing canopy cover for RZ1 and RZ2 blocks, as suggested by Residential Zone Specification 19.3.

Liveability

The NCA is of the view that whilst more housing options within the existing urban footprint can provide benefits, the dwellings created as a result should be liveable, functional, and meet the needs of users. The following comments are in response to proposed provisions that contribute to the achievement of these matters:

- Minimum requirements concerning dwelling sizes (for studio and 3+ bedroom dwellings) are proposed to be reduced, whilst storage requirements are proposed to be increased. It's noted that storage within dwellings is included in the area calculations. By reducing minimum sizes of dwellings and increasing storage requirements, this may result in not insignificant decreases in living space within a dwelling (potentially around a 14% reduction in the case of a studio dwelling). It could be reasonably expected that in lower density areas, dwellings have a larger floor area (as noted in the NSW Low Rise Housing Diversity Design Guide). The NSW Design Guide also suggests minimum internal floor areas of the following:
    - 1 bed – 65m2
    - 2 bed – 90m2
    - 3+ bed – 115m2

Minimum size requirements in the ACT are already lower than in NSW, and it would be useful to understand why further reducing minimum sizes is proposed.

- Parking rates for multi-unit housing are proposed to be reduced. The NCA generally supports this, however suggests that in some cases higher parking rates would better service a development (for example, where public transport is less accessible). The comparison table suggests that EPSDD retains the capacity to require a higher rate of parking even if the specification is met, however it is not clear how this would work in practice. Does EPSDD retain the capacity to request a higher rate of parking, even if the relevant specification is met?
- The NCA questions why the minimum dimensions for private open space for single dwellings are proposed to be removed. These provide a useful guide to ensuring that open spaces provide sufficient and useable space.
- The NCA also questions why the maximum building depth specification is proposed to be removed (specification 17.5). The Missing Middle Housing Design Guide provides some general provisions requiring building depth to optimise cross-ventilation, daylight access, etc however a minimum requirement would still be useful to help contribute to high quality indoor living environments. The NCA recognises the intent to provide an 'outcomes' based planning system, however is some circumstances a quantitative measure can be beneficial.

Other matters

- In regard to new targets identified in Residential Zone Specification 5.3, the NCA suggests clarification is required as to whether these are minimums, maximums, or 'must' be met? If not clarified, different outcomes may result depending on interpretation.
- The Housing Design Guide suggests that fencing facing residential streets is permitted (including within RZ1 and RZ2 zones), for example to delineate public and private space. This is evident in section 5.2B including associated figures, Photo 18 and its caption on page 41, etc. This is a departure from long-standing (and current) policy whereby fences facing the street in suburban residential areas are generally not allowed. An alternative could be to permit hedging – this would both be consistent with current policy and increase soft plantings provided on a site. The images on pages 75 and 85 show this arrangement, which positively contributes to the streetscape whilst providing privacy for residents.

NCA officers are available to discuss these comments. Please contact Joseph Sutton via WorksApproval@nca.gov.au to arrange a meeting.

Kind regards

((02) 6271 2851

National Capital Authority | Treasury Building, King Edward Terrace, PARKES ACT 2600

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ACT Heritage

ACT Heritage Council advice:

Draft Major Plan Amendment, Missing Middle Housing Reform (DPA-04)

Thank you for seeking ACT Heritage Council (the Council) entity advice on the Draft Major Plan Amendment 04 (DPA-04) for Missing Middle Housing Reform (the reform).

The reform proposes change to permissible development in residential blocks throughout Canberra, to meet the growing demand for housing resulting from Canberra's anticipated population growth. It aims to provide an increased variety of housing choice, with missing middle housing typologies defined as dual or tri-occupancies, townhouses, terrace homes and low-rise apartments.

Heritage is a significant consideration for the delivery of the reform. The ACT Heritage Register currently includes 304 registered places and including heritage precincts, over 1,700 residential blocks are listed on the ACT Heritage Register for their heritage significance.

These residential heritage blocks dominantly relate to historic values and include a variety of heritage places, such as 19th rural villages such as Hall, Garden City heritage precincts which represent the initial growth of Canberra as the nation's capital, other heritage precincts which

result from Canberra's continued growth, and many individual blocks with buildings of architectural significance. Most of these heritage blocks are located in the Inner North and the Inner South, which are significant areas for reform delivery.

For most heritage blocks, *Heritage Act 2004* (Heritage Act) provisions allow for secondary dwellings, where their design is consistent with heritage conservation requirements. While densification opportunities may be more modest in some heritage areas, due to site coverage and landscaping requirements, they nonetheless will have an important contribution to make to increasing housing stock and achieving greater diversity in housing typologies.

Review of DPA-04 identifies that no changes are proposed to existing Territory Plan provisions that require compliance with Heritage Act provisions where they apply, such as within Part A Administration and Governance. This is a positive outcome and will support a balanced approach to development in heritage areas and deliver reform in ways that also conserve heritage values. This approach is also consistent with the principles of good planning set out in Section 10 of the *Planning Act 2023* (Planning Act), which includes cultural heritage conservation principles.

In this context, the Council is broadly supportive of the proposed reform. However, our of review of DPA-04 identified opportunities to strengthen consideration of heritage within the planning framework and to give proponents additional guidance on how to deliver sensitive and appropriate development in heritage areas. Our advice on DPA-04 recommends a range of amendments as set out in detailed comments in Attachment A.

In summary, these include:

- • Additional and strengthened heritage provisions within the Subdivision and Residential Zones Policies that will form part of the Territory Plan;
- • Additional and strengthened heritage provisions within the Subdivision and Residential Zones Technical Specifications which will assist proponents in meeting Territory Plan requirements; and
- • A new 'Heritage' section within the Missing Middle Design Guide, which will provide early guidance to proponents on how to deliver new development within heritage areas.

The Council welcomes further engagement about the proposed reform, and through ACT Heritage, can also provide more detailed input on the Missing Middle Design Guide.

Attachment A: Detailed Council Comments

_____ ***GPO Box 158***
CANBERRA ACT 2601 heritage@act.gov.au

Subdivision Policy

DPA-04 proposes a range of amendments to the Subdivision Policy of the Territory Plan, which have been assessed by the Council in relation to the Heritage Act framework. Recommendations made by the Council for the Subdivision Policy are set out below:

Recommendation 1: Amend Assessment Requirement 8, to expand the existing heritage provision relating to the subdivision and consolidation of residential blocks.

Assessment Requirement 8 will be a new provision, with the following proposed text:

"For blocks that are registered or provisionally registered under the Heritage Act 2004, subdivision or consolidation is only permitted where all the following apply:

a) it is not specifically prohibited by a guideline, order or agreement made under the Heritage Act 2004.

b) it complies with the relevant requirements relating to community uses".

The Council recommends the following amendment to proposed text:

"For blocks that are registered or provisionally registered under the Heritage Act 2004, subdivision or consolidation is only permitted where all the following apply:

a) it is not specifically prohibited by a guideline, order or agreement made under the Heritage Act 2004; and would not otherwise diminish the heritage significance of the place.

b) it complies with the relevant requirements relating to community uses."

This additional text is recommended as heritage guidelines, orders or agreements are not in place for many heritage registered places, but they also do not form the only Heritage Act control on subdivision and consolidation proposals.

Importantly, where an ACT Heritage Register entry identifies the existing subdivision pattern to be of heritage significance, it would not be appropriate to subdivide or consolidate that block, as that act would diminish heritage values, even where it is not specifically prohibited by a heritage guideline, order or agreement.

Recommendation 2: Amend Assessment Requirement 10, to include an additional heritage provision relating to the consolidation of residential blocks.

Assessment Requirement 10 will be a new provision, with the following proposed text (in part):

"Consolidation complies with all of the following:

a) Not more than 2 blocks are consolidated.

b) All blocks proposed to be consolidated have adjoining street frontages.

c) None of the blocks proposed to be consolidated has been previously consolidated."

The Council recommends the following amendment to proposed text:

"Consolidation complies with all of the following:

a) Not more than 2 blocks are consolidated.

b) All blocks proposed to be consolidated have adjoining street frontages.

c) None of the blocks proposed to be consolidated has been previously consolidated.

d) Consolidation is not specifically prohibited by a guideline, order or agreement made under the Heritage Act 2004; and would not otherwise diminish the heritage significance of the place."

This amendment would be consistent with the approach adopted in Assessment Outcome 8, where a heritage provision was included for subdivision proposals.

As noted above, consolidation could also have adverse heritage impacts on registered places where the existing subdivision pattern is of heritage significance; and the amended provisions provides the appropriate framework to manage this risk.

Residential Zones Policy

DPA-04 proposes a range of amendments to the Residential Zones Policy of the Territory Plan, which have been assessed by the Council in relation to the Heritage Act framework. Recommendations made by the Council within the Residential Zones Policy are set out below:

Recommendation 3: Amend Policy Outcomes for RZ1 to include an additional reference to heritage.

New Policy Outcomes are proposed for RZ1 blocks, which include (in part):

"4. Development respects valued features of the neighbourhood and landscape character of the area and does not have unreasonable negative impacts on neighbouring properties."

The Council recommends the following amendment to proposed text:

"4. Development respects valued features of the neighbourhood, including the heritage and landscape character of the area, and does not have unreasonable negative impacts on neighbouring properties."

This amendment would strengthen the consideration of heritage in development proposals for heritage places and would also promote the consideration of cultural heritage as part of good planning in heritage areas, in accordance with Planning Act provisions.

Recommendation 4: Amend Assessment Requirement 10 to clarify that Heritage Act provisions can also limit the number of storeys within registered blocks.

The new provision relates to the number of permissible storeys in residential blocks, including up to two storeys in RZ1 and up to three storeys in RZ2.

The Council recommends an amendment in this section, within the provision or within an explanatory note, which states:

"For blocks that are registered or provisionally registered heritage places, the maximum number of storeys can also be limited by a guideline, order or agreement made under the Heritage Act 2004".

This is recommended, as while many registered heritage blocks permit secondary dwellings, in some areas Heritage Act provisions limit new development to one storey; such as the examples provided in Attachment B. In this context, the amendment would provide greater certainty to proponents on requirements in heritage areas and ensure development outcomes that are consistent with heritage requirements.

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Recommendation 5: Amend Assessment Requirement 12 to clarify that Heritage Act provisions can also limit site coverage within registered blocks.

The new provision relates to permissible site coverage within residential blocks, ranging from 40% (for blocks with street frontages, and large blocks) to 70% (for compact blocks).

The Council recommends an amendment in this section, within the provision or within an explanatory note, which states:

"For blocks that are registered or provisionally registered heritage places, site coverage can also be limited by a guideline, order or agreement made under the Heritage Act 2004".

This is recommended, as while many registered heritage blocks permit secondary dwellings, in some areas Heritage Act provisions limit new site coverage within a block to 25%-30%; such as the examples provided in Attachment B. In this context, the amendment would provide greater certainty to proponents on requirements in heritage areas and ensure development outcomes that are consistent with heritage requirements.

Residential Zones Technical Specification

Proposed amendments to the Residential Zones Technical Specification have been included in the referral and would occur if DPA-04 is approved. These amendments have been assessed in relation to the Heritage Act framework, with recommendations made by the Council set out below:

Recommendation 6: Include new heritage specifications under Assessment Outcome 23.

Assessment Outcome 23 is that "*The development considers and addresses site constraints, including heritage, natural features, topography, infrastructure and utilities*."

Currently, no specifications for heritage are identified as part of Assessment Outcome 23, and this creates risk of inappropriate development at heritage places that would diminish identified heritage significance values. This also does not provide proponents with practical guidance on how to ensure a development meets the Assessment Outcome.

The Council considers that inclusion of new heritage specifications under Assessment Outcome 23 is a simple and practical way to ensure appropriate new development at heritage places, in accordance with the Heritage Act and the principles of good planning in the Planning Act.

The recommended specifications are set out below:

"23.1. Where a block is registered or provisionally registered on the ACT Heritage Register:

a) development complies any heritage guideline, order or agreement made under the Heritage Act 2004, and

b) development does not diminish the heritage significance of the place.

23.2. Where impacts to a registered or provisionally registered heritage place or object are proposed, the application demonstrates that those impacts are justifiable and that there are no other reasonably practicable alternatives.

23.3. Developments at a block registered or provisionally registered on the ACT Heritage Register achieve endorsement from the ACT Heritage Council."

Recommendation 7: Amend Assessment Outcome 5 to include a new heritage provision relating to dwelling density.

Assessment Outcome 5 relates to dwelling density within residential blocks and introduces a new calculation for the target number of dwellings.

While multiple dwellings are permitted in many heritage blocks, the maximum number of dwellings within a registered block can be limited by Heritage Act provisions. In this context, a new provision is recommended, such as:

"For blocks that are registered or provisionally registered heritage places, the maximum number of dwellings can also be limited by a guideline, order or agreement made under the Heritage Act 2004".

Recommendation 8: In Assessment Outcome 14.3, delete or amend the provision relating to front boundary setbacks for pre-October 1993 blocks.

The new provision relates to front boundary setbacks of new development, and states (in part):

"*For blocks approved before 18 October 1993 the front boundary setbacks on all levels have been standardised irrespective size of the blocks. Maximum of 8m limit has been set on the primary setback on lower and upper floor."*

This provision has the potential for significant adverse impacts on registered heritage places, as many registered places – especially in Garden City Precincts – are characterised by generous front gardens, which are conserved by front boundary setbacks often above 8m, and sometimes up to 15m, from the front boundary.

For those blocks, Heritage Act provisions require conservation of these generous front gardens, and do not permit new buildings or structures forward of the original building line. As proposed, this provision is inconsistent with heritage requirements for many places and would result in inappropriate development in heritage areas.

In this context, the Council does not support the provision as proposed. The provision should either be removed, or expanded to state that:

"*For blocks that are registered or provisionally registered heritage places, the front boundary setbacks are as defined by a guideline, order or agreement made under the Heritage Act 2004".*

Recommendation 9: Amend Assessment Outcome 14.4 to include a new provision relating to heritage side and rear setbacks.

Assessment Outcome 14.4 relates to side and rear setbacks for multi dwellings and would allow a 0m side setback on the lower floor of development.

This provision has the potential for significant adverse impacts on registered heritage places. As noted above, many registered places – especially in Garden City Precincts – are characterised by generous side gardens, which are conserved by side boundary setbacks. New development with a 0m setback in these areas would be inappropriate development.

In this context, a new provision is recommended in this section such as:

"*For blocks that are registered or provisionally registered heritage places, the side and rear setbacks are as defined by a guideline, order or agreement made under the Heritage Act 2004".*

Recommendation 10: Amend Assessment Outcome 19.1 to include a new provision relating to heritage planting area requirements.

The amended planting area provision has potential to impact heritage registered places, particularly those which have significant landscaping characteristics, such as Garden City Precincts.

In Garden City Precincts, a significant feature of the place is modest dwellings in a generous garden setting, and Heritage Act provisions require a minimum planting area of 40%.

The reduction of planting area requirements for those blocks is inconsistent with heritage requirements, and in this context, a new provision is recommended in this section such as:

"For blocks that are registered or provisionally registered heritage places, planting area requirements are as defined by a guideline, order or agreement made under the Heritage Act 2004".

Subdivision Technical Specification

Proposed amendments to the Subdivision Technical Specification have been included in the referral and would occur if DPA-04 is approved. These amendments have been assessed in relation to the Heritage Act framework, with recommendations made by the Council set out below:

Recommendation 11: Include new heritage specifications in Assessment Outcome 1.

Assessment Outcome 23 is that "*The subdivision design considers and responds appropriately to cultural significance and history or heritage*."

Currently, no specifications for heritage are identified as part of Assessment Outcome 1, and this creates risk of inappropriate development at heritage places that would diminish identified heritage significance values. This also does not provide proponents with practical guidance on how to ensure a development meets the Assessment Outcome.

In this context, the Council recommends inclusion of the following specifications:

"23.1. Where a block is registered or provisionally registered on the ACT Heritage Register:

a) development complies any heritage guideline, order or agreement made under the Heritage Act 2004, and

b) development does not diminish the heritage significance of the place, and

23.2. Where impacts to a registered or provisionally registered heritage place or object are proposed, the application demonstrates that those impacts are justifiable and that there are no other reasonably practicable alternatives.

23.3. Developments at a block registered or provisionally registered on the ACT Heritage Register achieve endorsement from the ACT Heritage Council."

Missing Middle Housing Design Guide

The Design Guide aims to help proponents interpret and apply the Territory Plan's assessment outcomes when proposing development across Canberra.

The Guide identifies heritage as a key consideration for reform development, with a Territory Plan Assessment Outcome identified as *"The development considers and addresses site characteristics, including heritage…"*.

However, Council's review of the Guide identifies that there are limited references to heritage, and in its current form, the Draft Guide does not provide practical guidance to proponents on how to deliver reform in heritage areas. This is a missed opportunity, and the Council recommends including additional heritage content in the Guide as set out below.

These amendments would also provide the Territory Planning Authority with a practical way to consider local heritage values, noting that the cultural heritage conservation principles of the Planning Act include promotion of the unique heritage of the ACT, and development outcomes that respect local heritage.

Recommendation 12: Strengthen references to heritage throughout the Guide.

Noting that heritage is a key consideration to delivering reform, there should be strengthened references to heritage throughout the Guide, including the below:

- • In Part One: heritage should be identified as part of good design; heritage should be identified as a design element; and existing references to the natural environment should be expanded to the 'natural and cultural environment'.
- • In Part Two: heritage should be included under urban character and as an existing site condition, where it occurs, as heritage registration will be one of the most significant influences on missing middle development opportunities.

Recommendation 13: Include a new 'Heritage Context' design guidelines section in Part 3 of the Guide

A new 'Heritage Context' design guidelines section should be included, to give proponents practical advice on how to deliver reform in heritage areas. Guidance that could be provided in this section would include:

- • How to identify the specific heritage requirements that apply to the block.
- • How to select the preferred typology for sensitive densification – such as secondary residences, low scale dual occupancies or possible co- housing.
- • Subdivision and consolidation requirements.
- • Siting, site coverage and planting area requirements.
- • Tree retention and replanting requirements.
- • Design principles for registered precincts, where new dwellings must reflect and complement streetscape character.
- • Importance on setting and landscaping.
- • Adaptive reuse strategies for heritage buildings.

This new Heritage section could also include illustrative guidance and photos of past developments within heritage areas.

Attachment B: Permissible Development, Heritage Precincts

Element	Planning reform	Development permitted under heritage guidelines										
		Wakefield Gardens	Blandfordia 4	Tocumwal	Curroboree Park	Reid	Braddon	Blandfordia 5	Forrest Housing	Hall Village	Kingston/ Griffith	Barton
Site coverage	No change – 45%	25% - 30%	30%	No limit	27.5% - 30%	27.5% - 30%	27.5% - 30%	25% -27.5%	25% -27.5%	25%	27.5% - 30%	27.5%
Heights	No change – two storeys	Single storey	Two storeys	Two storeys	Single storey/ Two storey where original	Single storey/ Two storey where original	Single storey	Single storey/ Two storey where original	Single storey	Single storey / Two storey at rear	Single storey	Single storey
Planting area	Reduce from 40% to 35%	40%	40%	No limit	40%	40%	40%	40%	40%	No limit	40%	40%
Tree canopy area	Increase from 15% to 20%	No minimum area *Existing suburb is 18%*	No minimum area *Existing suburb is 35%*	No minimum area *Existing suburb is 44%*	No minimum area *Existing suburb is 58%*	No minimum area *Existing suburb is 41%*	No minimum area *Existing suburb is 41%*	No minimum area *Existing suburb is 35%*	No minimum area *Existing suburb is 35%*	No minimum area *Existing suburb is 38%*	No minimum area *Existing suburbs are 19% and 31%*	No minimum area *Existing suburb is 21%*
Max. number of dwellings	Limit of two dwellings per block removed	No limit, provided single dwelling character is maintained	No limit, provided single dwelling character is maintained	No limit	No limit, provided single dwelling character is maintained	No limit, provided single dwelling character is maintained	No limit, provided single dwelling character is maintained	No limit, provided single dwelling character is maintained	No limit, provided single dwelling character is maintained	Limit of one dwelling	No limit, provided single dwelling character is maintained	No limit, provided single dwelling character is maintained
Subdivision and consolidation	Permitted, with limits for blocks adjoining public space	Not permitted	Not permitted	No limit	Not permitted	Not permitted	Not permitted	Not permitted	Not permitted	Not permitted	Not permitted	Not permitted
Unit titling	Permitted for all blocks over 600m2	No limit	No limit	No limit	No limit	No limit	No limit	No limit	No limit	No limit	No limit	No limit

City and Environment Directorate - Adaptation and Resilience Policy

Good afternoon, we have been working closely with [the project] team on this and therefore have no comments.

ACT Fire and Rescue

Hi Emergency Management,

ACTF&R has reviewed Terrplan Draft Major Plan Amendment – Missing Middle Housing reform and have no comments or objections at this time.

Further consideration may be required for technical specifications.

Justice and Community Safety Directorate - Emergency Management

Comment on TerrPlan Draft Major Plan Amendment:

Territory Plan:

No comment.

ACT Missing Middle Housing Design Guide:

ACTSES is strongly supportive of **maintaining the document's current recommendations** for:

• Permeability (throughout document)

• Freeboard (this could be emphasised, especially as climate change is likely to see more intense storm with associated increased overland flow)

• 7.3A SWUD

• 7.4A Flood Resilience.

ACTSES recommends enhancing the sections regarding building materials throughout, including 6.1B, to ensure that development is resilient to the higher winds and more intense downpours expected from storms under climate change. ACTSES recommends against the use of tiled roofs.

ACTESA Further Information:

Further information regarding Development Applications can be obtained by emailing ACTESA Emergency Management EmergencyManagement@act.gov.au

City and Environment Directorate – Deed Management

Yuma Team

Thank you for referring the below to Deed Management.

Please see the following comments.

- Does this have a clear effective date?
- Would there be any impacts on the existing Deeds of agreements that are already in place, given they have already received Subdivision Design Application approval.

Dhjan Yimaba/Thank you

City and Environment Directorate – Strategic Planning and Policy

Hi Team

The draft MPA aligns well with strategic planning policy in that it promotes and enables greater housing diversity which is a central tenet of endorsed planning policy.

In this regard the draft MPA is consistent with:

1 . The ACT Planning Strategy 2018, which commits (under Strategic Direction 1.1) to working towards delivering **up to** 70% of growth within the existing urban footprint (the Government subsequently committed to this being **at least** 70% of growth- Parliamentary and Governing Agreement for the 10th Legislative Assembly)

The draft MPA supports this goal by increasing opportunities for missing middle housing in established urban areas by removing current barriers to development. In addition, by enabling housing typologies such as terraces, town houses and dual occupancy development, it supports a range of dwelling types and responds to changing household formations which the Planning Strategy identifies (page 28) as a trend that is reshaping our suburbs and requires an appropriate planning response.

The Planning Strategy identifies (page 39) the need for strategic identification of:

- infill areas on *"blocks or sites in appropriate locations with the capacity to accommodate increased housing supply, density and choice for example large blocks in accessible locations with the potential for dual occupancy development. This could apply to the RZ1 Residential zone under the Territory Plan"*; and
- *"areas close to local centres (400 metres/average 5 min walk)- areas that could be suited to medium density housing typologies. This could apply to the RZ2 Residential Zone under the Territory Plan"*.

By focussing on removing barriers to missing middle development in RZ1 and RZ2 zones, the Draft MPA supports the intent of the Planning Strategy to identify opportunities for greater infill development within existing suburbs.

2. **District Strategies** which aim to deliver between 117,800 to 148,500 dwellings over the next 25 years. District Strategies Volume 1 – Metropolitan context and big drivers includes ACT-wide targets for the five 'big drivers' or themes under the district strategies including the following sustainable neighbourhoods target (page 67):

"Greater housing choice and affordability to meet community needs

Increase the share of all dwellings particularly missing middle and affordable housing options, that are within a walkable catchment to a town centre (1,000m), group centre (800m) or local centre (400m)".

The draft MPA supports this district strategy target by encouraging missing middle housing in RZ1 and RZ2 zones by removing barriers to development of this housing type.

3. The ACT Minister for Planning's Statement of Planning Priorities 2024-25. A key focus of the Statement of Priorities is to enable diverse housing choices and increase the number of 'missing middle' dwellings such as town houses, terrace homes and low-rise apartment living. It also includes the development of a Missing Middle Housing Design Guide.

The draft MPA aligns with the Statement of Planning Priorities as it amends the Territory Plan, specifically the Subdivision Policy and the Residential Zones policy to support greater housing diversity, focussing on missing middle housing. In addition, the draft MPA will amend Part A of the Territory Plan to reflect the creation of the Missing Middle Housing Design Guide, its triggers, and consequential amendments to the triggers of the existing Housing Design Guide, thereby

further supporting the Statement of Priorities which calls for the development of a Missing Middle Housing Design Guide.

Thanks [staff] for pulling this response together.

If you need any further advice or information please don't hesitate to contact the team.

ACT Health Directorate

Good morning

The Missing Middle Reform amendment has been reviewed, please see comments below.

The ACT Health Directorate (ACTHD) supports the intent of Missing Middle Reform draft major plan amendment. Delivering more housing choices in existing urban areas will help to reduce urban sprawl and allow residents to access existing health and community services from facilities close to where they live. This will help to reduce the requirement for new health facilities and allow ACTHD to consider focusing on providing services from the existing facilities.

City Renewal Authority

Missing Middle Housing Reform

City Renewal Authority Comments

19 June 2025

The City Renewal Authority (City Renewal) has been referred under Section 62 of the Planning Act and welcomes the opportunity to comment on the Draft Major Plan Amendment 04 (DPA-04) for the Missing Middle Reform (reform).

The Missing Middle Housing Reforms include the

Draft Major Plan Amendment – DPA-04

Draft Supporting Report

Missing Middle Housing Design Guide (YourSay Version)

Missing Middle Housing Reform – Comparison Table

Missing Middle Housing Reform – Snapshot

Draft Planning Technical Specifications Residential Zones, and

Subdivision.

We recognise the reform's intent to widen housing choice, support the objectives of a compact city and accelerate the provision of housing to respond to increasing population and affordability pressures. City Renewal supports this intent and proposed amendment to the Territory Plan in principle and offers feedback for consideration at this draft stage to enhance the effectiveness of the policy and its enactment.

As the agency responsible for revitalisation of the City Centre and broader designated precinct, City Renewal recognises the potential of these reforms enhance vibrancy and liveability in and around our precinct area, and in adjacent suburbs. The introduction of a wider variety of housing options will help attract a broader demographic of people to live in Canberra, support local business and contribute to a more dynamic and modern urban environment.

Our feedback is centred around three key areas of interest:

- The economic, infrastructure and sustainability impacts of this policy approach and any modelling that has been conducted
- The opportunities for infill that create a broader typology across missing middle which could extend for four or five storeys in well-serviced areas, and
- The opportunities to enhance community connections, wellbeing and liveability.

Our city will need up to 100,00 additional dwellings by 2050, with 70 percent of that growth targeted as infill under the ACT Planning Strategy 2018, *Compact and Efficient City* policy direction. This reform removes regulatory barriers, including minimum block size triggers and strict unit constraints to allow broader diversity of medium density typologies in RZ1 and RZ2 zones, which currently represent around 90 percent of land use in the Territory. Consistent with the ACT Planning Strategy, it is vital to consider the ways in which we also ensure we create a sustainable, resilient, accessible and liveable city. Missing Middle Housing Reform

Liveability

In order to achieve all of the priorities of the ACT Planning Strategy, infill approaches should be aligned to areas that have adequate infrastructure and service provision, or investments that will generate high-quality infrastructure outcomes in the immediate future. Coordinated approaches to infill support sustainability through reduced impacts on the surrounding natural environment and greater use of existing infrastructure and therefore existing ACT Government investments. There frequently exist disparities in access to infrastructure, health, education and public transport between inner and outer suburbs, while a number of Canberra's outer suburbs experience higher levels of disadvantage1

1 Dropping off the Edge. Dropping off the Edge2021:Persistent and multilayered disadvantage in Australia – Findings ACT, 2021 . Combined with greater density in these fringe suburbs, the reform could trigger a deepening of this gap if not considered alongside improvements in infrastructure, transport and services.

City Renewal supports residential density that is contextually appropriate and consistent with an area's existing and projected populations, provided it can be sustained by existing or proposed infrastructure and access to public transport, jobs, community facilities and public amenities.

Transport infrastructure

Modelling shows daily trips in the metropolitan area will rise by around 30 percent by early 2030, outpacing road capacity2

2 Infrastructure Australia, Regional Strengths and Infrastructure Gaps: Regional Analysis ACT, 2022. . Many inner-city areas and adjoining suburbs are well serviced by public transport and

active travel networks, particularly dwellings within walkable distance to light rail. Increasing populations in outer suburbs may have unintended consequences for increased car dependency and impacts on traffic. This may create the need for greater investment in the road network, which is far less efficient from a cost benefit perspective than investments in public transport, and inconsistent with the objectives of the ACT Transport Strategy 2020.

City Renewal would be interested in understanding whether transport modelling has been conducted that includes the impact of this reform. Our view is that land use planning reform may be more effective if aligned more specifically around existing investments in public transport infrastructure, including planned light rail corridors. There may also be unexplored policy opportunities including the establishment of clear infrastructure contribution schedules or value-capture mechanisms to fund network upgrades.

There is value in exploring the application of greater density in Canberra's city centre and inner areas in line with transit-oriented development. This would incentivise development near existing amenity and put less dependency on 'grey-field' suburbs, which may require disproportional infrastructure investments to accommodate increasing populations and may present a barrier to gaining momentum for missing middle housing.

Parking

The reduced parking allowances are likely to shift car parking to local streets, particularly in car-dependent outer suburbs. City Renewal is interested to understand if analysis on this has been undertaken. An improved approach may be to lower minimums in central areas where there is greater access to public transport and set context-based minimums elsewhere. If car parking is to be considered on an individual development application basis, without holistic policy guidance, it may create unfair or unintended negative outcomes, particularly where assessors may not have relevant information and analysis on the traffic arrangements or impacts within a broader area. Missing Middle Housing Reform

Green & open space

Canberrans have benefited from living in the 'bush capital', founded on access to abundant green and open spaces. Increasing infill may place additional pressures on our parks, nature reserves and open spaces. It will be vital to ensure adequate access to green and open spaces, including investment in the provision and maintenance of green infrastructure, play spaces and municipal assets (seating, lighting, pathways, etc), particularly in outer suburbs as they densify.

Likewise, planning for healthcare, schools, childcare and community services must also align with increasing populations, which may be difficult to achieve with an infill reform approach being applied to around 90 percent of land use, rather than a planned and staged land use change approach.

There are opportunities to embed service provision triggers (for example, parks, schools, community services) tied to dwelling yield thresholds into district strategies, alongside targets linked to green infrastructure performance metrics, for example average distances to green space. There may also be opportunities to incentivise improved public realm outcomes through potential bonus height or yield for developers.

Economic opportunities and impacts

City Renewal anticipates that supported population growth will have a positive economic impact on our city. This reform will help to attract a more diverse population to Canberra through the provision of more affordable and suitable housing offerings, which, if managed carefully, could support economic performance of the city centre which represents 17.1 percent of the Territory's gross value added, around $7.37 billion.

There is the potential that this reform would result in an uplift of values in RZ1 and RZ2 areas, particularly corner lots, or large single frontage lots that are closer to the CBD. Developers may shift focus to these lots given the relaxations in parking, setbacks, DA scrutiny and opportunities to fast-track where applications are compliant.

Likewise, with a reduced scarcity of developable land, dilution of middle density availability and potential for reduced interest in apartments there is potential this reform will soften values for RZ3 and CZ5 lots, which make up a significant portion of the City Renewal precinct. There are also potential impacts for proposed greenfield land, with a potential softening of values in these areas as buyers are likely to preference established suburbs with higher amenity.

City Renewal is interested to understand whether economic modelling and analysis has been undertaken on this reform, including effects on land values in reform-impacted and non-impacted zones. Given these reforms have potential to alter land values, particularly in our precinct, City Renewal requests that the economic modelling be provided and shared (or made public) for further assessment prior to the finalisation of the reform. It is also suggested that the Territory consider publishing annual data on development approvals, commencements, and median land value shifts by zone, making the impact of this policy reform transparent.

Sustainability

Reform in the Territory's approach to development is critical, as is ensuring the benefits from greater densification are captured. The reform will assist in alleviating pressure on agricultural land and greenfield sites to service projected population growth in the Territory over the next 20-30 years. This restrains Canberra's growing urban footprint and preserves landscape, biodiversity and ecosystem values. A steady urban footprint will also minimise the need for new infrastructure and embodied carbon impacts, reduce per-capita energy and water use and encourage more efficient service delivery. Missing Middle Housing Reform

Many missing middle typologies allow a connected approach to urban living, which enables residents to reduce heating and cooling needs compared with detached dwellings. Alongside higher energy standards for new builds, reductions in the cost of operating and maintaining housing represent a positive outcome for residents.

There is an opportunity through this reform to mandate sustainable initiatives including solar panels, permeable paving of driveways (particularly where the driveway area will be increased), deep soil zones, rainwater harvesting and water recycling. The reform also presents opportunities to increase permeable surfaces and green infrastructure such as communal open spaces, vegetable gardens, and canopy cover help to reduce the urban heat effect produced by increased density and achieve a more sustainable outcome for infill development across the Territory. It could be strengthened through quantified performance targets (e.g. NatHERS rating, electric-ready, zero gas, permeable surfaces, green infrastructure), and greater consistency with the ACT Climate Change Strategy 2019–2025. City Renewal would like to see sustainability strategies incorporated as mandatory conditions.

Urban heat

The reform does not adequately address the potential impacts it will create for urban heat. Modelling from the Australian Urban Design Research Centre demonstrates the negative urban heat impacts infill strategies may have on western Perth3

3 Australian Urban Design Research Centre, Evidence-based adaptive urban design strategies for Western Australia, 2024. . There has also been criticism of infill policies in low-density parts of Brisbane, alongside the substantial urban heat impacts being experienced in western Sydney exacerbated by infill.

The proposed removal of controls on minimum block sizes for subdivision and setbacks may result in inappropriate block-to-dwelling ratios, creating negative impacts on wellbeing and urban heat. It is vital the Territory's planning policies help to build resilience and future-proof our city against climate change impacts including increased urban heat effects, stormwater runoff, reduced biodiversity, and habitat connectivity.

Strategic urban infill needs to consider the cumulative impact of urban heat, particularly in a city that experiences extreme heat in summer. Under this reform, urban heat and other sustainability impacts will continue to be considered via individual development application, often without specific expert input, rather than at a holistic level that is able to understand and respond to conditions within the locality as it changes. City Renewal would like to understand if urban heat or broader sustainability impacts have been assessed as part of this policy development, and if not, proposes it forms part of the next steps of policy development.

Social sustainability

The reform also presents the opportunity for many residents to opt to 'age in place' or consider multigenerational housing typologies or approaches on existing blocks, providing continued community connection and the ability to share caring responsibilities within families.

City Renewal would encourage greater consideration of the ways this policy can improve community benefit and connection where infill occurs, for example the incorporation of triggers for shared and community assets including mailboxes, driveways, rear access parking or bicycle parking, communal spaces, urban farms, barbecues and solar batteries.

City Renewal would also encourage a more considered approach to affordable and social housing particularly through the Design Guide. Potential mechanisms include mandatory inclusionary zoning thresholds, more ambitious affordable housing targets, financial contributions to an affordable housing fund or partnership with community housing providers, particularly on larger-scale Missing Middle Housing Reform development sites. Density and affordability-linked bonuses could also be an area for exploration, particularly in relation to parking minimums and additional height in key areas with high-quality infrastructure provisions.

Governance & policy considerations

There are a range of interacting policies that should be considered to support the successful delivery of the missing middle reform, however they do not appear to be currently prioritised. There could be opportunities to reform housing governance models to achieve greater take-up of missing middle housing types, including removal of body corporate arrangements for smaller sub-division and shared title arrangements, and other models such as shared equity, community land-trusts or co-housing schemes.

Additionally, the reform and take-up of missing middle development may benefit from a range of lot consolidation mechanisms, for example the creation of a public registry of owners supportive of lot consolidation, supporting guidance for consolidation (particularly for non-developer owners), stamp duty discounts or deferrals on next home purchase for sellers who opt in to a consolidation process. Other cities have also considered financial support for neighbours who undertake joint redevelopment. It may also be worth considering opportunities for owners to access shared equity financing models to enable development of secondary dwellings on lots.

City Renewal is interested to understand the definition being applied to co-housing and any further information (governance approaches, etc) that could be made available to assist in our understanding of this in the context of the reform.

Housing quality and diversity

Diversity of dwelling types and sizes is critical for providing housing choices that support social and demographic diversity. An appropriate level of amenity is required to support the diversification of housing in suburbs. This includes good design that enables sufficient solar access, natural ventilation and communal spaces to create liveable, sustainable developments. It also includes ensuring any new developments do not negatively impact the amenity of neighbouring residences (such as solar access, privacy, noise) or surrounding public realm.

The reform's approach to building height lacks specific controls. Replacement of height in metres (current) to height in storeys (reform) creates flexibility to fit different floor-to-ceiling heights or roof forms within the envelope, however it may constrain opportunities to explore split levels, or create unintended negative outcomes where increased heights are endorsed to the detriment of the locality's context and character, and amenity for neighbouring residences or public spaces.

The Missing Middle Housing Design Guide (guide) provides good practice in the integration of missing middle housing, including an emphasis on 'human scale' development and neighbourhood character, consistent with best-practice frameworks such as form-based codes in the U.S. and gentle density strategies in Canada).

It also supports a variety of housing typologies including manor houses, walk-ups, and terraces, which aligns with best practice planning in Australia and internationally. The Guide focuses on the suburban and the lower-end of medium density with an adjusted height of up to three storeys. Its suburban lens focuses the guide on modification of single-detached residential dwellings. Medium density in many other cities across Australia can include four and five storeys. The guide would be more beneficial with a broadened focus that includes more infill and attached or terraced dwellings in a city or diverse urban context, to which this scale could readily apply. There are opportunities to consider this as part of the reform, and in more detail through the guide. Broadening this definition would also support opportunities to increase density around well-serviced public transport routes, in line with transit-oriented development principles. Missing Middle Housing Reform

There are opportunities for the guide to also share the benefits of living in the city, including from a cost lens to the individual, benefits to business, liveability, and overall sustainability outcomes – all to incentivise a move into long-term (not 'investor' product) medium density

housing, particularly with a range of new sites in development around the City Renewal precinct.

It may also be helpful to clarify the role of the existing Housing Design Guide in relation to the new Missing Middle Housing Design Guide.

The statutory planning provisions within the guide are outcome-light and do not mandate built-form types, frontage typologies, or public realm interface controls, which may lead to poor design or over-engineered responses in sensitive suburbs. Strengthening these may drive more effective improvements in built form and sustainability outcomes.

City Renewal appreciates the opportunity to participate in the review of the Missing Middle Housing Reform, and would welcome the opportunity to discuss any economic, sustainability or transport modelling available.

City Renewal stands ready to collaborate on the future direction of the reform, detailed implementation frameworks and the refinement of the design guide and potential benchmarks. We believe that with improvements, the reform can become a model of balanced infill while delivering improved liveability, sustainability and affordability outcomes for the Territory.

City Renewal Authority

Chief Minister, Treasury and Economic Development Directorate

Hi Terrplan team,

CMTEDD Policy and Cabinet has no specific comments to make during this round of consultation.

Our previous comments made through the Cabinet circulation process were to advocate for the uniqueness of each of the residential zones to be maintained so that the Government can continue to direct where density should be located through zoning.

We look forward to reviewing the proposal again once any updates are made following the public consultation period.

City and Environment Directorate – Impact Assessment

Hi Territory Plan Team

Thank you for referring the Draft Major Plan Amendment 04 - Missing Middle Reform to the Impact Assessment Team. We have no comments.

Kind regards,

Impact Assessment

Justice and Community Safety Directorate

Comments on Draft MPA – DPA-04 - Missing Middle Reforms

Thank you for the opportunity to comment on the Draft Major Plan Amendment (DPA-04). JACS has policy responsibility for the *Unit Titles (Management) Act 2011* (UTMA), which legislates the administration and management of unit titled properties in the ACT. We do not have any comments in relation to the proposed changes to the Territory Plan or Technical Specifications. However, we would like to provide some general comments in relation to the outcomes expected as a result of these changes, specifically, the increase in smaller, unit titled dwellings.

Increase in smaller Unit Plans

As the changes promote the development of more units plans in RZ1 areas, it follows that there will be an increase in the number of registered units plan that only contain a small number of units. It should be noted that small units plans still need to comply with the requirements of the *Unit Titles (Management) Act 2011* (UTMA) for the ongoing administration and management of the units plan. JACS has previously received feedback that the obligations the UTMA places on owners, occupiers and the owners corporation can be difficult to navigate for smaller units plans. While it does address some specific matters for smaller units plans, the UTMA is geared more towards the management of larger units plans. Matters that may seem more appropriate for neighbours in a small units plan to discuss over coffee on a weekend, are instead subject to meeting procedures which may be intimidating and impractical.

There is an exemption provision provided under the UTMA which allows the Executive to make a regulation to exempt a units plan from a provision of the UTMA (s147, UTMA). However, the practical application of this is difficult as exempting a units plan from a certain requirement may have significant impacts for unit owners.

JACS anticipates that changes to planning laws to allow more units plans with small numbers of units will lead to increasing calls for amendments to the UTMA to create particular provisions relating to smaller units plans. Our previous experience in this area is that this sort of reforms is not necessarily straightforward. It requires a balancing of interests that can result in all parties involved feeling like the solution is not ideally suited to their particular needs. Given this, JACS would like to be kept up to date on proposed reforms in this area as it may lead to future reform work for JACS in relation to unit titles management laws.

Access to information and guidance materials for owners corporations

With the increase to the number of registered units plans, JACS anticipates there will be additional resourcing needed to help these owners corporations understand and comply with their obligations under the UTMA. Many unit owners within small units plans (particularly Class B) are often unaware or misinformed about what they are buying and the obligations and responsibilities they must comply with as a unit owner. Further, smaller units plans may be less likely to employ a owners corporation manager (colloquially known as a strata manager) and so may not have assistance when it comes to understanding and complying with legislation.

JACS receives a high volume of ministerial correspondence related to unit titles. From this correspondence, it is evident that many issues and complaints would benefit from having accessible information about the management and administrative requirements for units plans. While Access Canberra are responsible for being the first point of call for information and advice

about units plans, this is challenging as they currently lack the dedicated staff or information materials available to meet the existing demand.

The Government has also committed to introducing a Strata Commissioner. While the nature and scope of the Commissioner's role has not yet been defined, it is anticipated that the role will involve some degree of information services to the strata industry. With the increase of registered units plans expected as a result of the Missing Middle Housing Reforms, it is very likely that Government will need to provide additional resourcing to meet the information needs of individual unit owners, owners corporations executive committees and strata managers. JACS anticipates that the Missing Middle reforms will increase the need for additional information resources for units plans, including specific guidance for smaller units plans.

Common Property – Size and liability

It is a requirement of units plans that they contain an area of common property, which is identified on the registered units plan documents. In JACS' experience, the built form of the common property can impact on it subsequent management. JACS urges consideration of this in planning approvals.

For example, common property areas can sometimes be substantial, incorporating parking and shared facilities like swimming pools BBQs or communal areas, which is generally seen in the larger Class A units plan developments. However, with Class B units plans, these common property areas are generally smaller and may only consist of driveways, the mailbox or just a small, obscure portion of garden or lawn.

The owners corporation of a units plan is required by law to take out and maintain common property public liability insurance (s102, UTMA), with the policy covering a minimum of $10 million liability. This can be impractical where the common property area is limited to a small patch of grass or a letterbox. However, there is no exemption provision for this requirement as it is important for public safety reasons. In such circumstances, it may have been better if the property was subdivided rather than unit titled as there would then not be a need for the ongoing management and financial burden of a small common property area.

JACS is often approached by unit owners for information and guidance around the management and liability of these areas. We have also encountered some unit owners who don't know where their common property is located or that they have an obligation to insure and maintain the area. Some owners are disconnected from their common property as it may be located in an area they have no relationship with or that it is a token piece of the land that has no real use or purpose. Anecdotally, it appears that many small units plans do not have any common property public liability insurance at all, exposing the owners to a significant risk. This is becoming more common place, with the smaller common property areas becoming a source of dispute between unit owners as some owners are disconnected from the common property and therefore don't see it as their responsibility. JACS considers that this issue may become more common with Missing Middle Reforms which are likely to result in the greater prevalence of small units plans with small areas of common property.

While more information and guidance material will help address this, we suggest further consideration is given at the planning and approval stage of a development to assess:

- The suitability of the size, placement and purpose of the common property – ensuring the area is significant to all owners so it is given appropriate recognition as being something that is shared and carries responsibility for all owners to maintain and insure.
- Whether the development is better suited to subdivision rather than unit titling considering the long-term obligations and responsibilities that owners will be required to comply with once they become unit titled.

Planning considerations – noise, parking

With the increase in population density as a result of more unit titled properties in residential areas, the planning considerations around design and specifications should be carefully scrutinised to ensure the best outcome for all residents. Aside from common property issues already raised, requirements for parking and noise mitigation should also be considered. These are both areas (particularly parking) that are the source of many disputes and the topic of many Ministerial correspondences we receive and for which the UTMA is not well adapted to manage.

In regard to parking, there are limited means under the UTMA to manage disputes about parking. The owners corporation can create rules about parking but these are only enforceable against owners corporation members and occupants (not against the general public). This means that if a member of the public parks in a units plan without authorisation, the only recourse available is under the Uncollected Goods Act which provides a burdensome process to dispose of the vehicle. The process involves issuing public notices, storing a car for several months and then selling it at auction. This is not practical in the case of short-term parking breaches. However, parking breaches can still have significant impacts on the daily lives of owners corporation members.

The owners corporation has no ability to issue parking fines, even against its own members. The only enforcement option available is to issue a rule breach notice and then to apply to the ACT Civil and Administrative Tribunal (ACAT) for orders. At most, ACAT can order financial penalties of $1,000.

JACS receives a high volume of complaints related to unauthorised use of car spaces, abandoned vehicles and insufficient common property parking. While many of these issues must be addressed as a management issue by the owners corporation, some of these issues may be mitigated by the design of the car park and the initial allocation of car parking spaces during the planning and design stage. For example, including barriers to the car park may prevent members of the general public being readily able to access the units plan car park. Further, adequate provision of visitor parking spaces may mean there is less likelihood of unauthorised parking in a unit owner's private car parking space.

In regard to noise, living in close proximity to other will inherently bring an expectation that there will be a higher level of noise. Within unit titled properties, rules of the owners corporation can help address noise issues amongst unit owners and occupiers. However, neighbours outside of the units plan are not subject to these rules, leading to conflict and poor social outcomes.

To help reduce this risk, we suggest more stringent rules to ensure better soundproofing within the design of units plan, as well as considering noise impacts to neighbouring properties. This can be impractical where the common property area is limited to a small patch of grass. This is particularly an issue in mixed use developments where the operation of businesses within the units plan may have significant noise impacts on residents. Implementing noise management

plans to help reduce the noise impact of the increased number of dwellings on residents within the units plan as well as neighbours (such as requiring planting and fencing/screening) may be a way to help. Actively considering these issues during the planning and design phase will help reduce the likelihood of future noise complaints and disputes.

Education Directorate

Hello,

Thank you for the opportunity to provide agency comments regarding the 'Missing Middle' Housing Reform. Please find below comments on behalf of ACT Education:

Proposed Territory Plan Change

Comparison table RZ1: **Maximum Dwelling Numbers in RZ1 and RZ2 Zones**

- **RZ1**: The appropriate number of dwellings is guided by the site context and dwelling density targets outlined in the *Residential Zones Technical Specifications*.
- **RZ2**: No maximum dwelling limit applies.

ACT Education Comments:

The *Missing Middle* policy proposes removing barriers in the planning system to allow more housing options in RZ1 and RZ2 zones, which constitute the majority of residential areas in Canberra.

- What is the estimated short- and medium-term population growth resulting from this policy change?
- How will the anticipated residential growth be supported by infrastructure, recreational spaces, community facilities, and educational institutions within established urban areas?

Built Form and Character

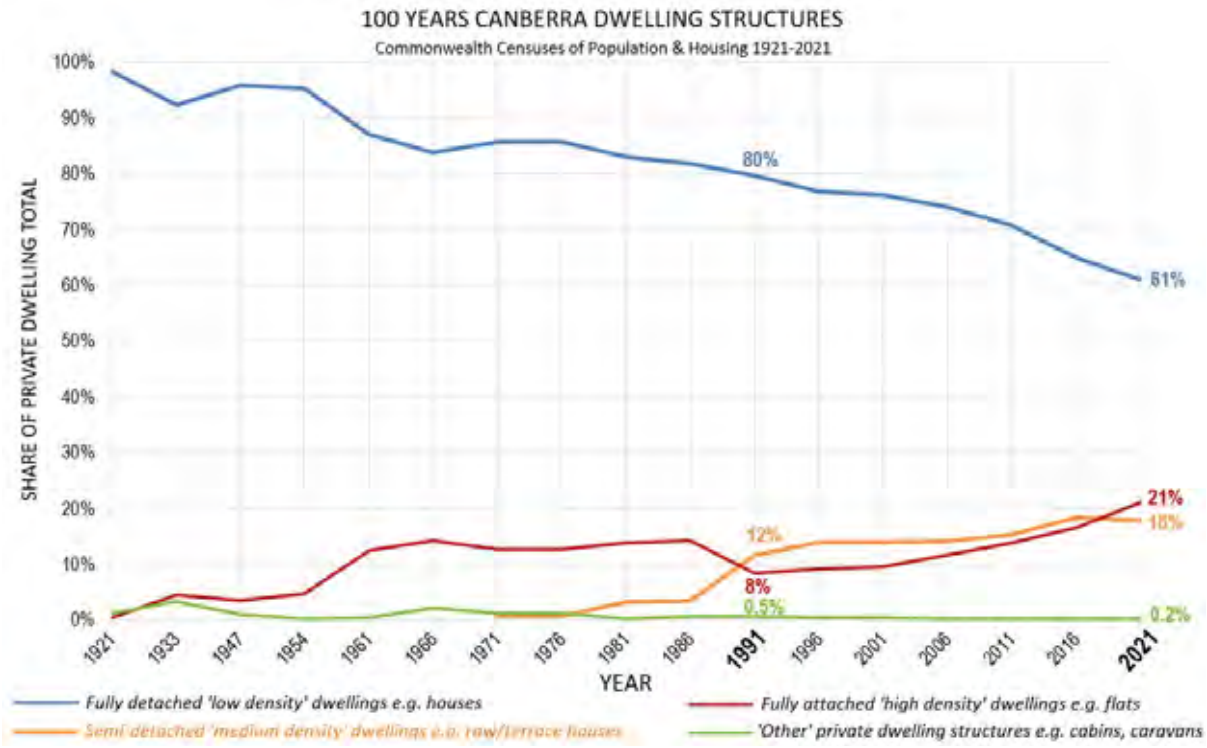
Principle 1 – Design Guideline:
Respond to neighbourhood context and character to create a sense of identity and reflect local styles.

ACT Education Comments:

- Will the character of existing neighbourhoods evolve into higher-density environments due to this growth opportunity?
- The re-orientation of housing structure supply upon the demand, design and provision of social infrastructure (e.g. community and recreational facilities), as well as other non-residential land uses needs to be examined and quantified to support an adequate land-use planning and infrastructure response

In support of the housing reform work being undertaken by EPSDD, please find below a timeseries line chart illustrating the relative change in dwelling structure share across the Canberra's urban residential history from a point shortly after foundation (1913) to a point shortly after self-government (1989) to the latest ABS Census of Population and Housing.

Note the **Semi-detached** ('medium density') dwelling structure group is directly comparable to dwelling structures identified as the 'Missing Middle'.



ACT Education would be happy to discuss its comments further.

City and Environment Directorate - Transport Canberra and City Services

Dear TerrPlan team,

Thank you again for the extension to provide comments. TCCS acknowledges the importance of the Missing Middle Housing Reform in supporting Canberra's growing population and the associated need for increased housing density that integrates effectively into existing neighbourhoods.

However, TCCS would like to raise the following key considerations for further review:

Driveway/Verge Crossing Guidelines

- Minimise the number and width of driveways to reduce conflict points, improve streetscape continuity, limit impacts on existing street trees, and maximise opportunities to plant new trees.
- Where practical, adopt co-located garages and consolidate driveways to reduce the number of verge crossings and associated impacts on street trees, while increasing space for new tree plantings (see example image below).
- Where necessary, provide on-site queuing space to prevent vehicle backup onto public roads.
- Where required, incorporate adequate on-site turning areas to allow vehicles to enter and exit in a forward-facing direction, improving safety.
- Ensure a clear sight triangle at driveways to maintain visibility for both drivers and pedestrians.
- Design all driveways in accordance with Municipal Infrastructure Standard 07.

Note: Section 4.1A(iv) of the Design Guide recommends the use of permeable surfaces for driveways and parking areas where possible, and a reduction in impermeable surfaces such as concrete and tarmac. TCCS is yet to trial permeable pavers for driveways and would not recommend this to be adopted as business as usual for driveways within the verge until such trials are undertaken. Driveways within the verge are to be maintained by TCCS, and there is high risk that permeable pavers for driveways will result in excessive maintenance impacts/costs.

Example image showing a co-located garage with single shared driveway.



Pedestrian network

- While the current planning specifications already acknowledge the role of active travel in providing safe and convenient access, it's essential that footpath connections are clear, direct, and link effectively to the wider active travel network, such that pedestrian connections within residential areas enhance safety, accessibility, and walkability for all users.

LMPP/Landscape

- Integrate existing trees into the site design to preserve natural character and enhance environmental value.
- Respect Tree Protection Zones (TPZs) to ensure the health and longevity of retained vegetation.
- Provide adequate setbacks to support healthy root systems and reduce conflicts with built structures.
- Include new plantings to complement existing vegetation and contribute to long-term landscape quality.

Stormwater

- Identify and address existing stormwater easements on the site as part of the design process; specific requirements apply when building in proximity to these easements. For example, structures generally cannot be built on top of a stormwater easements.
- Provide maintenance and, where necessary, emergency access to stormwater easements in accordance with TCCS requirements.
- Ensure one stormwater service connection (tie) is provided per block.
- Plan for future subdivisions, as each new block will require its own stormwater tie.
- Allow for on-site stormwater retention to manage runoff and reduce pressure on public drainage infrastructure, in line with WSUD principles.

Traffic/Parking

- Consider potential increases in traffic volumes resulting from the development.
- Ensure efficient and safe traffic flow within and around the site.
- Note existing kerbside pressures in infill areas for locating visitor parking on street and within laneways
- Provide adequate on-site parking to meet demand, including underground options, if necessary, to help reduce pressure on surrounding streets.

Waste:

- Ensure sufficient street frontage is available to accommodate kerbside waste collection, with clear space free from obstructions such as trees, poles, or street furniture that may hinder bin placement or collection access.
- Provide a dedicated and appropriately sized area for bin storage, easily accessible for residents.
- If on-site waste collection is necessary, provide unobstructed access and adequate turning space for waste collection vehicles.

Please do not hesitate to contact TCCS.DCDevelopmentCoordination@act.gov.au if you have any further questions. Thank you!

Community Services Directorate

ceTopic:	Draft Major Plan Amendment 04 (DPA-04) – Missing Middle Reform
Requested by:	EPSDD/Territory Planning Authority
Date requested:	23/05/2025
Due date:	24/06/2025
Cleared by:	Director-General 24/06/2025

CSD input:

1. The amendments proposed as part of the Missing Middle Housing Reforms may negatively impact Children, Youth and Families division, and our ability to identify and utilise suitable land for therapeutic residential care or bespoke out-of-home care placements. Ensuring access to land that is appropriately zoned and has sufficient green space is already challenging, and further changes to the Territory Plan are likely to make this even harder.

2. The Missing Middle Housing Reforms package is supported.

   The Missing Middle Housing Reforms package, including the Draft Plan Amendment, will create new opportunities for Housing ACT to increase both the number and diversity of dwellings on RZ1 and RZ2 sites. This will support the delivery of additional public housing across the ACT.

   As a next step, the Environment, Planning and Sustainable Development Directorate (EPSDD) could explore adjustments to the Lease Variation Charge

(LVC). Reducing the LVC would help support the reforms and further incentivise the design and construction of 'missing middle' housing types in the ACT.

Office of the Commissioner for Sustainability and the Environment

TerrPlan |Territory Plan & Coordination
Planning and Urban Policy Division
Environment, Planning and
Sustainable Development Directorate
480 Northbourne Avenue
DICKSON ACT 2602

Dear Territory Plan & Coordination team

Re: Comments on Draft Plan Amendment 04 – Missing Middle Reform (DPA-04)

The Commissioner for Sustainability and the Environment is an independent statutory position established by the *Commissioner for Sustainability and the Environment Act 1993* (the Act). Relevant to this matter, Objects (s2B) of the Act include:

a) encourage decision-making that facilitates ecologically sustainable development; and

b) enhance knowledge and understanding of issues relating to ecologically sustainable development and the environment; and

c) encourage sound environmental practices and procedures to be adopted by the Territory and territory authorities as a basis for ecologically sustainable development.

These comments are provided in the context of the ACT Government's recent agreement to amend the Territory Plan to establish an urban growth boundary by June 2027. A growth boundary will assist with limiting development impacts on greenfield land around the city. The proposed Missing Middle Reform aims to complement this by removing barriers within the planning system that will support increased urban density and housing diversity within the Territory's existing urban footprint.

Implementation of the Missing Middle design principles would be expected to result in positive outcomes for the ACT environment. However, the following considerations may assist in ensuring sustainability and environment are more carefully considered and prioritised in the proposed Reform.

1) The scale of the potential redevelopment under the Missing Middle Reform across such a large portion of the urban landscape in the ACT presents both risks and opportunities for the natural environment. To ensure planning principles that underpin the implementation of 'missing middle' developments incorporate ecological principles, Design Principle Three should be strengthened. Rather than only *encouraging* sustainable design practices and *minimising* impact on the natural environment, the design principle should explicitly incorporate nature positive principles. This will ensure that the planning decisions are best placed to embed sustainability and the environment at the core of urban redevelopment supported by the Missing Middle Reform. Other EPSDD plans and policies such as the soon-to-be-finalised ACT Nature Conservation Strategy may help to inform how best to consider nature positive principles for the Missing Middle Reform.
2) The supporting documentation for the proposed Missing Middle Reform does not include information about the mechanisms that will be used to monitor and evaluate achievement of the Reform objectives. Regarding environmental impacts and outcomes, monitoring and evaluation mechanisms should be developed and considered as part of the Reform, including:
    a. Clear, measurable goals for the uptake of best practice design in relation to environmental objectives as outlined in the Missing Middle Housing Design Guide (MMHDG).
    b. Collection of data on key environmental indicators such as tree canopy cover, biodiversity, urban heat island effects, energy efficiency, and active travel.
    c. Establish an evidence base on barriers and opportunities for uptake of Missing Middle developments, which includes tracking the implementation of MMHDG principles across developments, suburbs and districts.
    d. Ensure transparency in how data is collected, reported, and used to inform future planning decisions to deliver against the Territory's environmental and sustainability goals, including the ACT's Nature Conservation Strategy.

Please do not hesitate to contact me if you have questions about this submission.

26 June 2025

Suburban Land Agency

SLA INPUT

Subject: Draft Major Plan Amendment 04 (Missing Middle Reform)

Background:

Under section 63 of the *Planning Act 2023* (the Planning Act), the Territory Planning Authority has prepared Draft Major Plan Amendment 04 (DPA-04) for the Missing Middle Reform. We are seeking your comments on this draft amendment.

The DPA-04 proposes to amend the Territory Plan, specifically the Subdivision Policy and the Residential Zones Policy, to implement the Missing Middle Reform. Key changes include:

- Administration and Governance:
    - Part A will be amended to reflect the creation of the MMHDG, its triggers, and consequential amendments to the triggers of the Housing Design Guide.
- Subdivision Policy:
    - changes to the assessment outcomes to ensure blocks which subdivide are suitable for additional development
    - removal of assessment requirements that create barriers to consolidation for co-housing development
    - removal of assessment requirements which create barriers to subdivision and consolidation in RZ1, particularly removing the restriction on subdivision and allowing unit-titling on blocks greater than 600m^2.
- Residential Zones Policy:
    - redefining the naming and policy outcomes for all residential zones to differentiate the zones and better target suitable development and redevelopment outcomes within the zones
    - permitting co-housing to support increased population density
    - permit suitably designed apartments in RZ1 to increase housing choice
    - removal of assessment requirement that limits secondary residence to a block greater than 500m^2 to provide greater housing choice
    - removal of an assessment requirement that limits co-housing to blocks greater than 1050m^2 to facilitate more innovative missing middle development
    - adjusting assessment requirements for heights in metres and storeys across all zones. Height in storeys will be in the Territory Plan with height in metres moved to the technical specifications. This shift will control height while reducing pressure on floor-to ceiling heights of developments. The changes across all zones will support the appropriate scaling of height across zones.
    - standardise site coverage assessment requirements for single dwellings
    - increasing site coverage assessment requirements for multi-unit redevelopment in RZ1 and RZ2 to 50%, and RZ3, RZ4 and RZ5 to 55%. This will allow a wider variety of development on blocks whilst still maintaining adequate space to meet living infrastructure/canopy cover, permeability and private open space requirements.

- removal of block density assessment requirements that limit the number of dwellings and minimum block sizes for redevelopment. This will largely be determined by how a proposal meets the relevant design provisions of the Territory Plan and design guides and supported by the dwelling density targets outlined in the Residential Zones Technical Specification.

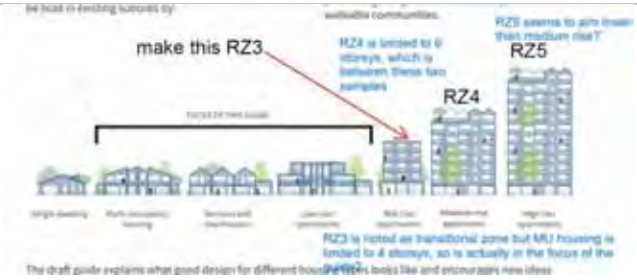
Further detail is provided in the Supporting Report and Sections 5.1–5.6 of DPA-04. Consequential amendments to technical specifications are outlined in Section 7.

Note: Technical Specifications are not part of the Territory Plan and will be amended separately if DPA-04 is approved.

SLA Group	Issue	Proposed recommendation/comments
General Comments		
Built Form	The Suburban Land Agency (SLA) is supportive of the Missing Middle Planning Reforms (MMPR) to enable additional housing supply opportunities from the existing urban area to complement SLA's land release and housing programs and contribute to enabling 30,000 homes by 2030. SLA notes the intent of the MMPR to enable housing supply from RZ1 and RZ2 areas in Canberra's existing suburbs and clarifies that our comments aim to ensure that improved outcomes can also be achieved in new estates.	
Built Form	SLA notes the MMPR has potential impacts on a range of SLA programs including: • acceleration of housing supply from existing leases that could influence market demand and market value of land supply and release in SLA urban developments and suburbs; • planning changes to residential zoned blocks in SLA's subdivisions that could provide opportunities for land purchasers, such as block amalgamation, subdivision, unit titling, lease variation and adding future additional dwellings.	Consideration of further investigations and sharing of findings from market analysis on potential impacts to land values and market demand is desirable.
Built Form	The MMPR could further accelerate housing supply with supporting financial and economic policy changes to enable and incentivise take-up to deliver additional dwellings.	SLA would welcome a review of key government processes, fees and charges; and engaging with industry and

	This will assist to address the complex factors influencing urban renewal and intensification, including: • Internal ACT Government Issues: Leasing and Unit Titles, Land Tax, Lease Variation Charges, Development Application (DA) and Subdivision Design Application (SDA) fees and processes, Building Approval (BA) regulatory fees and processes; • External issues: construction costs, finance access and costs, existing lease conditions, site conditions • Combined effect of internal/external issues: development feasibility and commencement	lessees to ensure optimum market take-up of development opportunities through the MMPR. Furthermore, SLA would appreciate sharing of any related financial feasibility and economic assessments that have informed the MMPR as well as future planning, building, housing and economic policy development. Consider review of Australian and ACT Government fees, charges and financial support, incentives or concessions for greater uptake of MMPR.
Comments on Design Guide		
Built Form	**Housing type diversity** The draft guide defines 'missing middle' housing as multi-occupancy, townhouses, terraces, and low-rise apartments: • Dwellings/ha for RZ1 is 54/ha. For a 1000m2 block this is 5.4 dwellings. • For apartments it is 6.7 dwellings for a 1000m2 block. Two manor houses could fit on an unencumbered 1000m2 block and could provide 8 dwellings but only 6.7 are permitted. • (Note Jacka Micro-lots site is 835m2 with 8 dwellings = a dwelling density/ha of 96 dwellings/ha.) The SLA is demonstrating a range of 'missing middle' housing and buildings in their estates, presenting opportunities for potential partnerships with EPSDD (e.g. the yet to be developed proposed pattern book designs): • low- and mid-rise apartments • manor house	Consider including more efficient missing middle typologies, i.e. Manor House and Micro-blocks, by adding the following to the definition of Missing Middle Housing: **Multiple single dwellings on separate titles, featuring shared common spaces;** and by considering the recommendations and findings of SLA's planning and design report by Gyde and DNA Architects on Micro-Block Housing in the ACT.

	• Modern Methods of Construction / prefabricated panellised standardised 'kit of parts' building components **Micro blocks** - consider including a 'micro-block' housing typology involving multiple single dwellings on separate titles, potentially accompanied with a separate community title. This arrangement aligns with the scope of the draft Missing Middle Design Guide, as it delivers comparable density and shared space outcomes. This model responds to current market demand and trends in Canberra. Including this typology in the design guide would provide additional choice and practical representation of diverse missing middle housing options. Consider including other low-rise missing middle typologies e.g. **Manor House**. Attached to SLA's submission (Attachment A) is a draft planning and design report on 'Micro-Block Housing in the ACT – Key Insights and Recommendations for Replication in Subdivision Design' that was prepared for SLA to capture lessons learnt from the Jacka built form pilot. Its insights are commended to be considered to broaden the Missing Middle typologies.	
Detailed Comments on the MPA	The following comments focus on the proposed changes to the Territory plan that affect Greenfields residential developments relating to apartments and multiunit developments.	
Place Delivery – Commercial Ventures (Adrian and Kirsten)	The application graphic of elevations of apartments refers to mid-rise, medium rise and high rise, however the amendments do not relate to these sketches.	We are requesting consideration of the following to support Government commitments for increased housing for the Territory: RZ3 heights to be increased to 6 storeys with objectives included regarding articulating of heights for precinct planning; That RZ4 zoning could have increased density to 8 storeys rather than the proposed 6 storeys;



Graphic from both Missing Middle Housing Reform Snapshot p11, and Design Guide p8

This graphic is logical and shows usable height gradation that relate to common construction levels but does not relate to the zoning heights in the text e.g. the zones top out at 8 storeys.

Currently, the planning provisions for multi-unit developments do not appear to actively encourage variation in building heights, particularly on sloping sites. This uniform approach may unintentionally limit opportunities to enhance the overall character and functionality of a precinct. In some cases, allowing a mix of building heights—even where certain portions exceed prescribed limits—could result in better interface conditions, improved urban design outcomes, and a more context-sensitive response to topography.

This flexibility could support transitions between different zones and contribute to a more visually and spatially engaging built environment.

In addition, the changes to the names in Residential Zone Policy are identified as **urban** but the heights are not reflective, particularly in RZ4

Existing Residential Zone Names	Proposed Residential Zone Names
RZ1 – Suburban Zone	RZ1 – Suburban Zone
RZ2 – Suburban Core Zone	RZ2 – Suburban Density Zone
RZ3 – Urban Residential Zone	RZ3 – Residential Transition Zone
RZ4 – Medium Density Residential Zone	RZ4 – Urban Residential Zone
RZ5 – High Density Residential Zone	RZ5 – Urban Density Zone

The below statement identified in the documentation seeks to reduce pressure, however, medium rise could benefit from being further addressed or clarified within the documentation.

"...adjusting assessment requirements for heights in metres and storeys across all zones. Height in storeys will be in the Territory Plan with height in metres moved to the technical specifications.

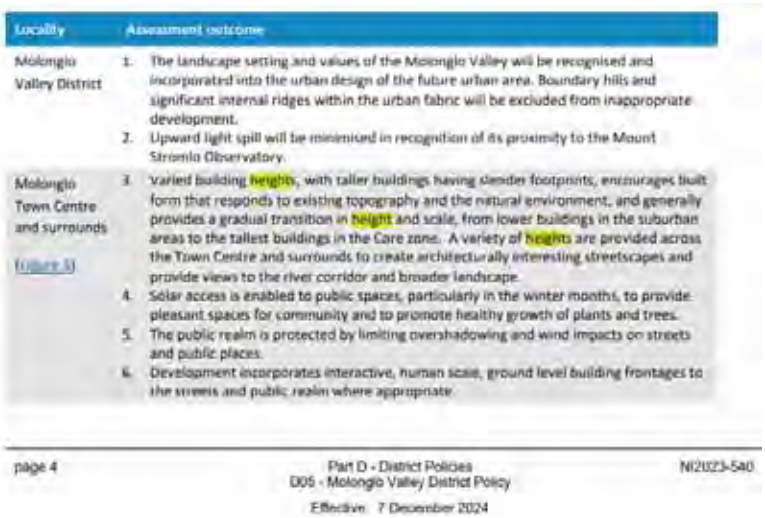
That RZ5 zoning could extend to permitting residential towers up to 48m (i.e. 16 storeys) rather than the proposed 24.5m (i.e. 7 storeys).

SLA recommends that the RZ3 zoning reflect the Mid-Rise element in the graphic to truly be a Transition Zone, RZ4 reflects the Medium-rise apartments and RZ5 reflects high-rise apartments.

This shift will control height while reducing pressure on floor-to ceiling heights of developments. The changes across all zones will support the appropriate scaling of height across zones. (p10 of public consultation version of the draft Major Plan Amendment)"

The comparison table showing the differences between existing TP and Proposed change the measurement from height in m to storeys, however the Residential Zones Technical specification are updated in m high.

Existing TP	**Proposed TP**	**Res Zones tech spec p13**	
RZ3 10.5m	MU housing 4 storeys, text includes mid-rise zone, which is 5 storeys on graphic	MU is 14m which translates as 4.6 storeys	Clarification of graphic required. Term of Transition Zone and proposed heights are presently not equating
RZ4 12.5m	MU housing 6 storeys	MU is 21m Translates as 7 storeys	This is typically categorised as mid-rise, not medium rise. It also does not appear to be Urban Residential Zone
RZ5 21.5m	MU 7 storeys	MU Within 50m of RZ3=14m W/in 40 CFS or open space=14m Within 30m ofRZ4=15.5 (which is lower than RZ4?) Gen 24.5m	8 storeys is still medium rise in graphic. We do not feel this suits the Urban Density Zone name

	In relation to Molonglo Town Centre, there are many zones of RZ3 and RZ4 in the Territory Plan which then have permissible heights adjusted via the district overlay. SLA would appreciate if this Amendment No.4 provided clarity, reduces the confusion and reflects the density required to become a Town Centre. To achieve 7000 dwellings in MTC, the overlays permit higher construction than the zoning implies. The zonings are less dense than on John Gorton Drive in already developed suburbs. The Molonglo Valley District Overlay for Future Urban Areas will also require updating in the assessment outcomes section.  Locality / Assessment outcome Molonglo Valley District 1. The landscape setting and values of the Molonglo Valley will be recognised and incorporated into the urban design of the future urban area. Boundary hills and significant internal ridges within the urban fabric will be excluded from inappropriate development. 2. Upward light spill will be minimised in recognition of its proximity to the Mount Stromlo Observatory. Molonglo Town Centre and surrounds (figure 5) 3. Varied building heights, with taller buildings having slender footprints, encourages built form that responds to existing topography and the natural environment, and generally provides a gradual transition in height and scale, from lower buildings in the suburban areas to the tallest buildings in the Core zone. A variety of heights are provided across the Town Centre and surrounds to create architecturally interesting streetscapes and provide views to the river corridor and broader landscape. 4. Solar access is enabled to public spaces, particularly in the winter months, to provide pleasant spaces for community and to promote healthy growth of plants and trees. 5. The public realm is protected by limiting overshadowing and wind impacts on streets and public places. 6. Development incorporates interactive, human scale, ground level building frontages to the streets and public realm where appropriate. page 4 Part D - District Policies D05 - Molonglo Valley District Policy NI2023-540 Effective: 7 December 2024	
Place Delivery – Molonglo	These following comments relate to the proposed changes to the Residential Zones Specification. 1. **Building Height** (**Residential Zones Specification pg. 13**) We are seeking further clarifications on the new building heights for RZ5 as the height restrictions may lead to outcomes that appear inconsistent with the intended zoning hierarchy. For example, under the new provisions: • An RZ5 block located within 30 metres of an RZ4 zone may be limited to a maximum height of **17.5 metres**, while the adjacent RZ4 zone permits buildings up to **21 metres**. • Similarly, if an RZ5 block is within 50 metres of an RZ3 zone, it is restricted to a maximum height of **14.5**	We are seeking clarification on the proposed changes to ensure consistency with the intent of the zones. SLA suggest considering a more context responsive approach to height restrictions on higher density at the interface with lower density zones.

	metres, which is equal to the maximum height allowed in RZ3. These scenarios could result in RZ5 developments being subject to more restrictive height limits than the lower-density zones they are intended to transition from or buffer. 2. **Primary Front Boundary Setback table (Residential Zones Specification pg. 16)** The table inserts a maximum primary setback of 8m for pre-1993 subdivisions. 1. This may be impossible to achieve on some steep blocks 2. The specification that refers to the table (pg. 14) only refers to minimum dimensions, not maximum dimensions, therefore we would like to highlight that the max 8m setback may be potentially unenforceable.	
Place Delivery – Urban Estates	We are supportive of the measures proposed, particularly around adjustments in parking rates for multi-unit housing across all residential zones and removal of minimum dimensions of private open space of single dwelling developments to support alternative delivery of open space amenity in a more development response approach.	Related to but outside of this reform, SLA would like to flag that the key roadblocks faced with delivering alternative housing to support the missing middle is waste collection and impact requirements for on block movement and turning within 'multi dwelling' sites which can create barriers for innovation.
Detailed Comments on the MPA	**The following comments focus on the proposed changes for Missing-Middle**	
Built Form	**Subdivision Specifications** SS1 - Minimum block areas may limit subdivision potential: 2.2. For blocks created by the subdivision of a currently leased block, minimum block sizes are as follows: Zone: / Minimum block size RZ1 / ~~400 350m²~~ RZ2 / ~~350 300m²~~ RZ3 / ~~325 275m²~~ RZ4 / ~~300 250m²~~ RZ5 / 250m²	SLA supports the removal of minimum block size requirements from zone policies. Removing these requirements would provide more flexibility for a range of housing choices and shift the focus from prescriptive controls to achieving clear policy outcomes.
Built Form	**DA and SDA requirements**: Is it correct that proponents must respond to the Missing Middle Design Guide (MMDG) <u>in addition</u>	Allow DA exemptions

	to existing Design Guides (e.g. Housing Design Guide)? Or can proponents just respond to the MMDG in DAs? If proponents need to respond to multiple design guides, this may be present an unnecessarily complex approach for proponents to navigate. Consider DA/SDA exempt pathways, such as using example building designs, landscape designs or subdivision designs. Attached report "Micro-Block Housing in the ACT" (Attachment A) provides recommendations for a 'Pattern Book" for micro-block typologies that could be more widely applied.	for proponents that respond to the MMDG; allowing zero set-backs based on contemporary free-standing zero lot boundary construction systems (to avoid un-usable small gaps between homes). Consider 'pattern book' for housing typologies to support DA/SDA exempt pathways.
Built Form	**Residential Zone Policy Outcomes - Definitions and terminology** 'Missing Middle' should align with policy intent of relevant ACT policies, as well as NSW and other State/Territory definitions. A three-storey height limit (or adopting density limits that are too low) could limit opportunities for well-designed medium density housing in existing areas from a financial feasibility point of view. The definitions of terms used in the zone policy, such as 'low density', 'medium density', and 'low rise', are unclear in the Territory Plan. It is likely that the community and proponents will be confused by the different building types and densities permitted in: • Missing Middle • Mid-rise • Medium Density The proposed term *'suburban density zone'* in the RZ2 policy outcome title is unclear and it may not widely be understood by the public.	Suggest clarifying current reforms to 'Low-Rise Missing Middle,' and consider a future phase for 'Mid-Rise Missing Middle' - noting the latter would improve housing choice and diversity in RZ3-4 zones – i.e. to be achieved through zoning. To ensure consistent interpretation of policy outcomes, it is recommended that these terms be clearly defined in the Territory Plan Dictionary or Technical Specifications. Suggest using clearer, accessible language that directly communicates the policy's intent such as 'Suburban Low to Medium Density Zone' or 'Suburban Transition Zone', etc.
Built Form	**Financial feasibility** The limited housing typologies outlined in the Missing Middle Housing Design Guide may only be financially feasible in some	Suggested improvements to enable more housing supply from Missing Middle through:

	scenarios. The examples given are understandably of unencumbered sites (i.e. no trees, easements, infrastructure upgrades, cut/fill etc.) which add to the cost of development. In addition, the yields at which developments such as these will be feasible are likely to be greater than the 54 dwellings/ha for RZ1 for attached homes (that would be 5.4 dwellings on a 1000m2 block - noting SLA is piloting a medium density single-residential development of 8 'micro-block' dwellings on an 835m2 block).	further feasibility and economic analysis in consultation with industry to better understand commercial feasibility of missing middle housing developments and threshold criteria for project establishment; address feasibility and economic analysis findings in a policy implementation plan.
Built Form	**Affordability and accessibility** SLA notes that in addition to the 'Missing Middle' of housing types, there is a 'missing middle' of housing that can be afforded by income quintiles 2-4 on the ACT Housing Strategy Housing Continuum (ACT Housing Strategy: 5 Year Snapshot). The MMPR does not explicitly address housing affordability, by considering strategies for financial incentives, home size, cost-effective materials and design (e.g. shared/common facilities), alternative delivery model, ownership/tenure, built form durability and performance.	Consider highlighting strategies for and information on: well-designed lower cost construction and ongoing operation to boost supply of homes that are more affordable over their life cycle; partnerships opportunities with Community Housing Providers to deliver missing middle housing supply; financial incentives for additional dwellings that deliver affordable/ community/ public housing, or homes that meet AS1428 ABCB Standard for Liveable Housing Design.
Built Form	**Micro-Blocks** Single residential subdivided blocks less than 350m2 in area do not appear to be allowed under the missing middle planning reforms (without DA). There is growing interest from the market in greater housing choices, including micro-sized, separately titled blocks. Well planned and designed homes on more sustainable and cost-effective smaller blocks and footprints, including micro blocks, can deliver greater housing choice for a variety of lifestyles and budgets, with greater community and landscape connections, greater liveability and good density.	Please see attached report (Attachment A) "Micro-Block Housing in the ACT" which outlines learnings from SLA's recent Jacka Micro-Lots project as well as recommendations for inclusion of Micro-blocks as a typology for EPSDD's consideration for inclusion in the Missing Middle MPA (section 3 Recommendations

	Homes on separately titled micro blocks can be delivered in groups of 1 (e.g. a second dwelling) to planned groups in dedicated subdivision design of 8+, as demonstrated in a report commissioned by SLA (Attachment A). SLA has worked closely with EPSDD (including the ACT Government Architect and the National Capital Design Review Panel), industry and community representatives to prototype this single-residential product in Jacka. Homes on micro-blocks fill the gap between typical townhouses and apartment living through: • Lower land costs than typical single-residential homes • More private outdoor space than apartments • Lower ongoing costs than many townhouses • Separately titled – no rules or body corporate fees • Opportunities for common spaces for greater community and landscape connection. SLA notes the design outcomes for homes on micro blocks could comply with the majority of the 'Townhouse' and 'Terraces' missing middle typologies in RZ2 with the exception of the leasing and minimum block size controls.	to support Micro Block Housing in the ACT).
Built Form	**Leasing** – the draft guide defines 'missing middle' housing as multi-occupancy, townhouses, terraces, and low-rise apartments only. Limiting RZ1/2 infill to being multi-unit (or unit-titled) is likely to: • cost future residents significantly more over the life of the home in body corporate fees • place additional restrictions/rules on future residents' living arrangements • mean more developments are likely to be done by small to medium developers (as opposed to owner-occupiers or other individuals) due to additional costs and complexity. Note the SLA's Jacka Micro-lot project and the North Wright Sustainable Precinct terrace homes have prioritised separately titled residential blocks to assist with housing affordability over the life of the home by eliminating (or minimising) body corporate fees. Consistent sales feedback has been received	Consider adopting more flexible leasing arrangements for missing middle, including: • permitting subdivision of separate residential blocks/leases • using Community Title for shared land and assets

	that separately titled dwellings are preferred. SLA notes, however, that this may not be suitable for all target densities included in the missing middle reforms.	
Sustainability	**Parking** - The share economy is a growing element of the ACT Circular Economy Strategy, and it is critical to enabling a change in car ownership models and related on-site parking requirements with a shift towards car share spaces and reduced centralised parking spaces.	Consideration of flexible parking requirements to incentivise alternative car-share and ownership models with centralised parking.
Additional notes and suggestions for future consideration		
Built Form	The proposed 'Residential Zone policy outcomes' and the proposed ZS1 Technical Specification amendments may be inconsistent, e.g.: • The proposed RZ1 zone policy outcome states the intent is to "provide for a range of housing choices in a suburban setting which is primarily low density and low rise." • However, the Technical Specification sets maximum densities of 54 / 67 dwellings per hectare for certain multi-unit housing types in RZ1—figures not typically associated with "low density."	SLA supports appropriate densities and managing community expectations of development outcomes. It may be beneficial to review and define density limits, such as the minimum and maximum number of dwellings per hectare for low, medium, and high densities, in the Territory Plan Dictionary or Technical Specifications. This would help better align the density definitions with the intended outcomes of each zone policy, enhancing consistency between policy objectives and technical standards.
Built Form	**Infrastructure capacity –** site servicing investigations and upgrades will likely be needed to support population growth in existing urban areas.	Consider a program of detailed infrastructure site investigations and upgrades to support infrastructure capacity, including community needs assessments, open space, health, recreation, transport, etc.

Built Form	Ensure there is alignment with ACT Building Policy priorities:
	• Construction productivity and competition reforms
	  ○ Modern Methods of Construction (MMC)
	  ○ Embodied carbon
		Consider opportunities for better alignment with ACT Building Policy priorities.
		SLA is looking forward to collaborating with Planning and Building Policy to pilot

	• Reducing the cost of living and improving thermal comfort
	  ○ Minimum energy performance standards in new buildings
	  ○ Energy efficiency rating scheme for existing buildings
		and test innovative missing middle typologies to foster the take up of more innovative industry practices.

Built Form	The intended policy outcomes of the new planning system (e.g. compact and sustainable housing, active travel, living infrastructure) are not able to be fully implemented/realised without a holistic review of the ACT Municipal Infrastructure Standards such as waste, transport, underground service infrastructure and stormwater management.	TCCS MIS– recommend full review of MIS and DA processes to align with new planning system

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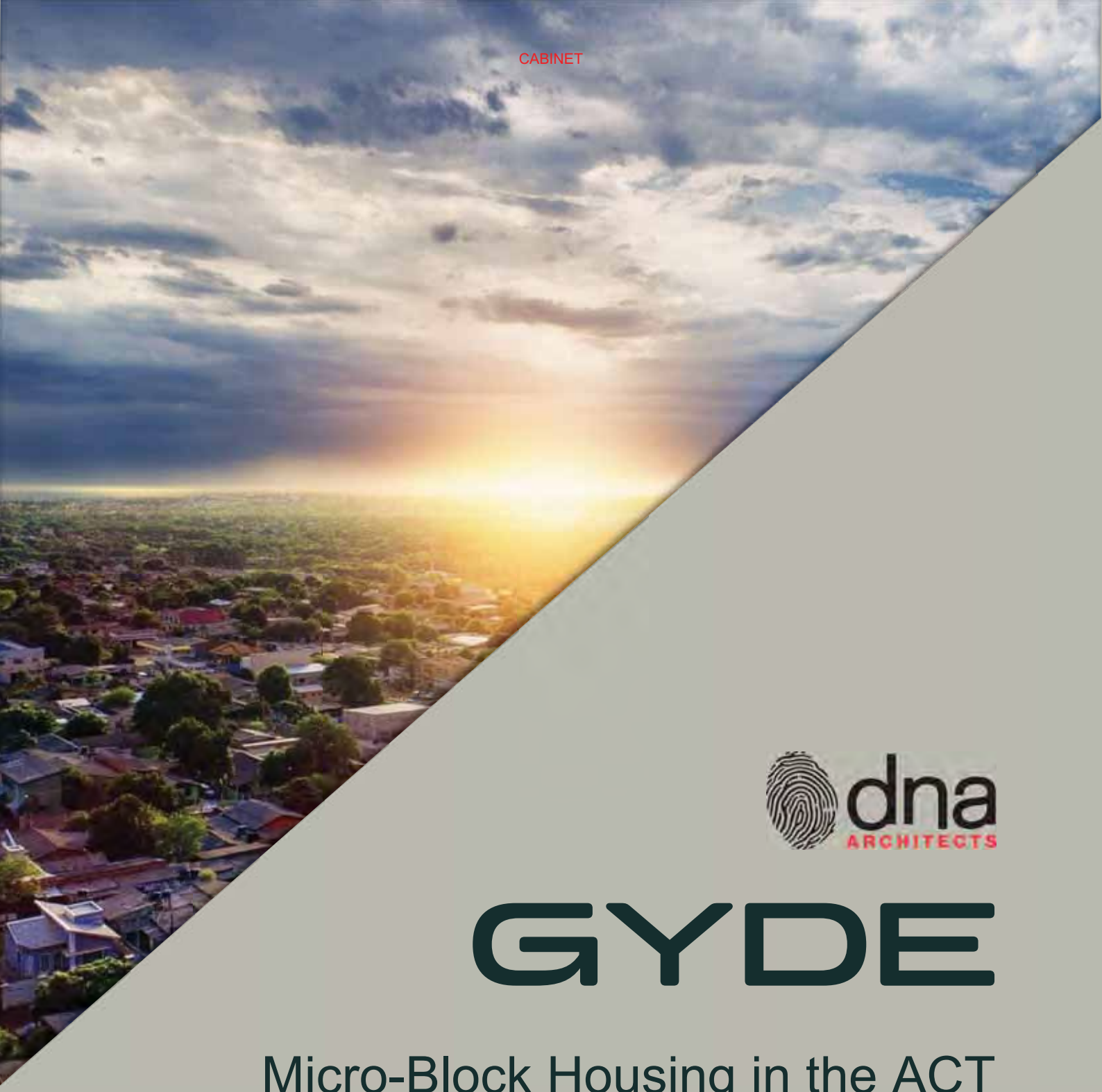

dna ARCHITECTS

GYDE

Micro-Block Housing in the ACT

Submitted to Suburban Land Agency
on behalf of Gyde Consulting

27 June 2025

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Acknowledgment of Country

Gyde Consulting acknowledges and pays respect to Aboriginal and Torres Strait Islander peoples past, present, Traditional Custodians and Elders of this nation and the cultural, spiritual and educational practices of Aboriginal and Torres Strait Islander people. We recognise the deep and ongoing connections to Country – the land, water and sky – and the memories, knowledge and diverse values of past and contemporary Aboriginal and Torres Strait communities.

Gyde is committed to learning from Aboriginal and Torres Strait Islander people in the work we do across the country.



Towards Harmony by Aboriginal Artist Adam Laws

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Disclaimer

This report has been prepared by Gyde Consulting with input from a number of other expert consultants (if relevant). To the best of our knowledge, the information contained herein is neither false nor misleading and the contents are based on information and facts that were correct at the time of writing. Gyde Consulting accepts no responsibility or liability for any errors, omissions or resultant consequences including any loss or damage arising from reliance in information in this publication.

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1. Introduction

1.1. Background

In recent years, cities across the globe have witnessed a surge in population growth, prompting a re-evaluation of traditional land use practices and development strategies. Canberra is no exception, grappling with the challenges of accommodating a rapidly expanding population while preserving environmental integrity and promoting social equity. Within this context, micro block development has emerged as a promising approach to address housing affordability, promote urban infill, and foster sustainable urban growth.

> ***"The fundamental idea behind the micro block is that it gives more street per square mile than larger impermeable building blocks. More street means more opportunity for public space, shared space, communal space, or gardens. It means more entrances onto the street, more activity, more coming and going, more chance of bumping into a neighbour, and safer streets. Dinkier blocks have more frontage on average, more corners and so more opportunities for non-residential uses at ground floor. Critically, they have less deep plans and so more daylight penetration which allows for more flexible spaces for a greater variety of uses"*** **- (Arun Baybars from the firm Architects in Practice, London UK)**

In essence, micro block development represents a pragmatic solution to urban sprawl and housing affordability issues, offering a pathway towards more vibrant, inclusive, and sustainable communities. While the outcome offers a similar residential density to other forms of missing middle housing (such as terraces), there are key benefits to micro block development that are not necessarily realised in traditional "missing middle" housing forms. Specifically, micro block housing provides the opportunity for individual block ownership as opposed to a typical strata title arrangement, which has a key social benefit for housing ownership, affordability and diversity.

Micro block development refers to the practice of subdividing land into smaller, more manageable parcels for the purpose of building homes, businesses, or mixed-use developments. Unlike traditional large-scale projects, micro block development focuses on maximising land use efficiency and promoting urban density in areas where space is limited or expensive. These smaller blocks offer several advantages, including increased affordability for homebuyers, reduced environmental impact through infill development, and fostering a sense of community by promoting walkability and shared amenities. Moreover, micro block development can revitalise underutilised areas, breathing new life into urban neighbourhoods.

There is a growing trend to 'living smaller' throughout the world, as people become more conscious of their footprint and being more intentional about ways of living and environmental impact. While the terminology can be interchanged, the fact is, compact homes, micro homes, or tiny homes, are moving towards a smaller footprint and a more economical offering.

Despite the practical benefits offered by micro block housing, the reduced lot size (compared to conventional detached dwelling lot sizes) means that there are challenges to unravel with respect to ensuring adequate internal and external residential amenity.

The Suburban Land Agency (SLA) has undertaken a micro block development in Jacka. The learnings from this project, and research of other similar case studies, will be used as a form of reference for how best-practice micro block housing can be delivered in the ACT.

To ensure consistency in the ACT context, this report defines micro blocks as:

"Micro blocks as those measuring 130 m² or less"

1.2. Objectives

The key objective of this report is to highlight the insights, learnings and recommendations from the planning and design of the Jacka Micro-Blocks pilot project and other relevant case studies (domestic and international). Crucial to the continuation of this initiative across the ACT is an evidence-base to provide the justification for rolling out this emerging typology in future subdivisions (and potentially, existing urban areas) in the ACT. This report will include both planning and design recommendations to optimise upcoming projects for micro block housing developments.

1.3. ACT Planning Framework

1.3.1. Overview

The ACT Planning Framework is underpinned by three key elements as follows:

1. *Planning Act 2023:* The legal foundation of the planning system. The object of the Act is to support and enhance the Territory's liveability and prosperity, protect its natural environment, and promote the wellbeing of residents by creating an effective, efficient, accessible and enabling planning system.
2. District Strategies: The District Strategies capture the character of each of Canberra's 9 districts, helping guide growth towards 2038 and beyond to 2050. These strategies help manage growth in a sustainable, competitive and liveable manner to ensure change happens gradually and carefully.
3. Territory Plan 2023: Helps guide planning and development in the ACT, outlining what development can take place and where. The Plan also has district and zone policies to help ensure Canberrans can continue to have access to services, transport, employment, health, education and nature.

The key elements of the ACT planning framework are supported by strategic directions (refer Section 1.3.2) and several design guides which help achieve better designed buildings and shared spaces through showcasing examples and methods of good design. These include the Housing Design Guide, Urban Design Guide and Biodiversity Sensitive Urban Design Guide. A draft design guide for Missing Middle housing is currently under consideration by the ACT Government, which seeks to provide best practice guidance for well-designed medium density homes. Changes are intended to the Territory Plan 2023 to ensure alignment with the housing guide and broader missing middle housing reforms in the ACT.

The ACT planning framework recently underwent significant reform. Its implementation in late 2023 saw the introduction of a new "layer" to the framework in the form of district planning, as well as considerable updates to the Territory Plan 2023. With the latter, an intentional shift was made towards a more "outcomes based" planning framework to support merit-based planning in the ACT.

Currently, the ACT planning framework does not include micro blocks or lot housing in the standardised categorisation of blocks. The smallest block currently defined in the Territory Plan 2023 is a compact block (a block with an area of 250m² or less). The Territory Plan 2023 includes assessment requirements for residential development including (but not limited to) site coverage, setbacks and deep soil requirements. The Territory Plan does not have a specific definition for a "micro block" or differentiated assessment requirements. The recommendation for micro blocks, is for a block with an area of up to 130m².

It should also be noted that the ACT planning framework has a relationship that operates concurrently with the *National Capital Plan* (NCP) to ensure consistency in good planning outcomes across the Territory. However, in the event of any inconsistencies, the NCP takes precedence. The NCP also fails to acknowledge micro blocks as a subdivision or housing typology.

While micro blocks are not formally recognised in the ACT statutory planning framework, the typology *does* align with the Residential Zone Policy under the Territory Plan. Specifically, micro blocks, when well-design, can achieve the residential policy outcomes. This includes:

Table 1 Residential Zone Policy Outcomes and Micro Block Alignment

Policy Outcome	Comment
Development should be of a scale and nature that recognises and responds to the zone hierarchy.	Micro blocks can deliver low-rise, compact housing that is respectful of the existing and envisaged future character and scale of an area. In in-fill development, micro blocks can be designed to be compatible with the neighbourhood and respond appropriately to the contextual density.
Facilitate development that is resilient to climate change, is sensitive to biodiversity, has good solar access, is energy efficient and promotes sustainable water use and water sensitive urban design, as well as encouraging active living and active travel.	Micro blocks are a sustainable, climate-responsive development type. They can share infrastructure and services while delivering a built form that has a smaller footprint than larger typologies. Careful subdivision, site planning and design can orientate dwellings to ensure solar access, passive design and water-sensitive urban design. On a large scale, micro blocks can promote active transport and reduce reliance on private vehicles.
Achieve and/or maintain low density residential neighbourhoods in suburban areas.	Micro blocks are a lower density residential typology that is suitable to be integrated into existing residential neighbourhoods. They help increase housing supply while maintaining the character, providing smaller lots that introduce appropriate density.
Provide for a range of housing choices that meet changing household and community needs.	Micro blocks offer a small and more affordable housing choice that can be well-suited to singles, couples and small families that may currently be underserviced in a conventional low-density zone.
Limit the extent of change that can occur particularly with regard to the residential density and original pattern of subdivision.	If micro blocks are delivered in a coordinated / clustered approach this could ensure change is targeted and controlled. Ad hoc subdivisions should be avoided to ensure cohesiveness with the existing block pattern.
Ensure development respects valued features of the neighbourhood and landscape character of the area and does not have unreasonable negative impacts on neighbouring properties.	Identification of site constraints and opportunities early during development will ensure micro blocks can integrate respectfully and seamlessly into neighbourhoods. Site planning, interface treatment and development controls can help preserve amenity features and ensure no unreasonable negative impacts on the site and surrounds.
Facilitate development or redevelopment of sites within reasonable proximity to local services to achieve a mix of low to medium density housing.	Micro blocks should be located near local centres, transport networks or key public infrastructure to ensure future residents are supported.
Provide opportunities for redevelopment by enabling changes to residential density and the original pattern of subdivision.	Micro blocks are innovative, easy to adapt to suite a range of subdivision patterns. They rethink traditional subdivision patterns and promote walkability, shared spaces and communities who are connected.

Policy Outcome	Comment
Provide opportunities for redevelopment by enabling change.	Micro blocks are scalable and a form of low-risk change that can be delivered incrementally into Canberra's existing suburban areas and greenfield sites. They do not require large subdivision changes to enable effective change.

This report considers potential opportunities to include micro block typologies in the ACT planning framework in alignment with the above residential policy outcomes. Micro blocks can support, streamline and optimise the delivery of innovative, responsive and adaptable housing that suits the needs of the growing population, restrictions of existing neighbourhoods and greenfield sites.

1.3.2. Strategic Planning

Canberra is a garden city, a term coined by Ebenezer Howard as a blueprint to a better and brighter civilisation. Originating in early twentieth century England, the garden city movement was developed in response to the Industrial Revolution, aiming to improve quality of life by integrating nature and housing through a series of green belts. The foundational planning principle has shaped Canberra's identify and planning system.

The garden city concept is echoed throughout the statutory and strategic planning framework of the ACT and particularly through the *National Capital Plan* (NCP), which guides the city's built form, green spaces and low-rise character. For instance, the NCP has core principles which establish the desired character of the Territory, including building heights. The NCP has established that buildings in key areas of Canberra should be of a height below mature tree canopy (typically 3-4 storeys) to maintain the garden city. This is particularly relevant in local to group centre suburbs.

Micro block housing adheres to the NCP and built form principles through achieving a similar density to low-rise apartments without increasing the building height. Micro block housing offers a typology pathway that increases housing diversity while being respectful of the city's highly valued landscaped character and scale. Furthermore, the approach supports the ACTs broader housing growth targets while preserving neighbourhood character.

Alongside the NCP, strategic planning in the ACT is underpinned by the *ACT Planning Strategy 2018*, the recently introduced District Plans and the various design guides that support good planning and development outcomes in the ACT.

With respect to the ACT Planning Strategy there are several key land use planning principles and supporting strategic directions and actions that will influence growth in the ACT. The principles seek to ensure development is 1) compact and efficient, 2) diverse, 3) sustainable and resilient, 4) liveable and 5) accessible. District planning and design guides seek to implement these principles in sound land use planning. The draft Missing Middle Housing Design Guide (draft guide) is one of those documents which aims to balance the provision of more housing (volume and diversity) in new release and infill areas, while also ensuring housing is climate conscious, accessible, vibrant and socially responsible.

The draft guide has been prepared to help respond to the housing affordability crisis and enable the delivery of new and diverse housing choices. 'Missing middle' is defined by the ACT Government as "homes that are somewhere between detached standalone houses and medium- to high-rise apartments."

The document provides guidance on how to achieve best practice design outcomes for new 'missing middle' homes built in existing suburbs by supporting building different types of 'missing middle' housing in a way that fits well with existing neighbourhood context and character, and encouraging sustainable building practices, efficient land use and with minimal negative impact on the natural environment.

The draft guide provides design guidelines for site and land use, access and movement, public space and amenity, built form and building design, and sustainability and environment. The draft guide indicates that:

> ***"Missing middle housing, which includes options like duplexes, triplexes and townhouses, can be a key part of urban infill. These types of homes fit well into existing neighbourhoods and provide more affordable housing choices. By adding missing middle housing, communities can enjoy more diverse and vibrant neighbourhoods, better access to amenities, and improved overall housing outcomes."*** **– (ACT Government, draft Guide)**



Figure 1 **Illustrated concept of missing middle infill development in an existing suburb (Source: ACT Government)**

It goes further and indicates that:

> **"*The development of missing middle housing is a unique opportunity to balance feasibility with affordability. By ensuring appropriate density in more locations, we can provide more affordable housing options across the ACT. These types of homes, such as duplexes, triplexes, and townhouses, are less expensive to build than large apartment buildings but offer more variety than traditional single-family homes. Expanding where it can be developed allows not only professional developers but also typical homeowners, such as "mum and dad" developers to participate. This can increase the supply of moderately priced homes, making it easier for people to find affordable places to live and easing the pressure on housing markets."* – (ACT Government, draft Guide)**

The need to accommodate more missing middle housing that is sustainable, lowers carbon emissions and is well-located is paramount to the ACT Government. Micro block housing can contribute positively to this strategic planning vision and contribute to overall housing diversity. It is understood that statutory changes will be required to recognise and better reflect this innovative and emerging housing typology, however, it is clear that micro block housing positively align with the strategic direction for housing in the ACT. This typology can be seamlessly integrated into the Draft Missing Middle Housing Design Guide through the recommendations provided in this report.

1.4. Methodology

This report has been developed with input from DNA Architects, and considers:

- Learnings from local and international case studies on how to deliver micro block housing well. This includes the recent experience of working on the micro block housing project in Jacka with the SLA, and in consultation with Environmental, Planning and Sustainable Development Directorate (EPSDD).
- Best practice principles, guidance and parameters/controls that should inform micro block site suitability and design outcomes, to achieve an appropriate balance between increased density and internal and external amenity.
- Options analysis of different types (dimensions, orientations, configurations) of micro blocks ranging in 63m^2 to 130m^2 in size. These have been undertaken with a view to demonstrating that micro block housing can be delivered in a range of scenarios and in a way that is flexible, adaptable and contextually appropriate.

A multi-disciplinary approach to continued advocacy for micro block housing will help bolster the recommendations for the delivery of the future projects for the ACT.

1.5. Structure, Scope and Limitations

This report is structured as follows:

1. Introduction – introduction to the concept of micro blocks, the ACT planning framework and purpose of the report.
2. Micro Block Housing Precedents and Learnings.
3. Recommendations to Support Micro Block Housing in the ACT including locational, siting, configuration, design and planning criteria.
4. Evaluation of Site and Design Options – testing of options against criteria set out in Section 3.
5. Conclusion – to summarise the findings of this report.

The scope of this report is limited to high level recommendations for how micro block housing (as a concept typology) could be supported within the ACT planning framework. It also considers opportunities for in-fill micro block housing in established urban areas and greenfield (new release) areas of the ACT. It does not extend to detailed planning analysis of each relevant land use zone and those that should and should not support micro block housing.

This report does not incorporate detailed drafting of updates to relevant ACT planning documents or guidelines. Further work, including (but not limited to) consultation with EPSDD, would need to be undertaken in order to prepare such formalised updates/amendments.

The options analysis of different building “types” and block configurations for micro block housing by DNA Architects is conceptual and preliminary in nature. It is intended for the purpose of this report, noting further design analysis and subsequent work would need to be undertaken to prepare detailed concepts or “patterns” to be included as best practice examples of micro block housing in any internal SLA or broader EPSDD design guidelines.

2. Micro Block Housing Precedents and Learnings

2.1. Australian Case Studies - Projects

2.1.1. ACT – Jacka

The suburb of Jacka is in north Canberra, in the district of Gungahlin. It is a new small scale sustainable neighbourhood which will be home to nearly 1,800 people when completed. The suburb of Jacka was

established through the Jacka Estate 1 Estate Development Plan (EDP) with Stage 1 now completed following commencement of the development in 2013. The EDP for Jacka 2 has been submitted to the Environment, Planning and Sustainable Development Directorate (EPSDD) Planning Authority for approval and will facilitate the subdivision layout for the second stage of the suburb. Between both EDPs, 5 initial parcels of land have been identified which have the potential to offer “micro” dwellings, to promote housing affordability on a smaller, more compact scale, and a housing typology is not widely seen in Canberra.

The micro block housing pilot program in Jacka is located at Block 1-3, Section 32. The development is for the construction of 8 new dwellings on micro blocks ranging from 84.77m² to 95.90m². The dwellings will range between 2 and 3 storeys and include 2- and 3- bedrooms. Each dwelling will have its own parking space and there is a central communal area for open space, deep root planting and additional amenity for future residents. Figure 2 and Figure 3 below show the Jacka micro lot pilot program.



Figure 2 **Site Plan of Micro Blocks (Source: DNA Architects)**



Figure 3 **Western Perspective of Micro block pilot program Jacka (Source: DNA Architects)**

The micro block pilot program undertook a meeting with the National Capital Design Review Panel in which the innovative proposal was commended for the high-quality residential amenity outcomes within a compact typology. The panel emphasised the need for the balance of design outcomes for landscaping and canopy cover with functionality, amenity and ongoing management. It was noted that subdivision design is critical to determining landscape outcomes for micro block housing and ensuring broader benefits to future users including on-site green infrastructure, community spaces and stronger biodiversity networks.

Micro block housing in Jacka offers a practice response to urban sprawl and housing affordability issues, creating a pathway towards more community-oriented and sustainable living. As a pilot project, it serves as a valuable demonstration to the broad ACT community, including planners, developers and prospective homeowners, the benefits this typology can provide.

It has the capability of fostering a sense of community through the inclusion of shared spaces that encourage social interaction and promote walkability and improved wellbeing. The community title block centres the Jacka development, providing an innovative solution to housing while reducing infrastructure needs. The shared access and integrated management help provide social interactions and incorporates a flexible design with diverse planting to contribute widely to the biodiversity network.

In a broader context, the site is within a 300-metre (relatively flat) walking distance of a future local centre (north-west), 10 metres from a park (to the east) and 150 metres from a large area of public open and recreational space (i.e. sports courts, further east). It is also located within an area identified for medium density housing. There are good (existing and planned) pedestrian connections to nearby services and facilities and any future built form will be entirely compatible with the surrounding land (identified for medium density housing).

In addition to the key learnings from the project on the importance of proximity to services and facilities, there are learnings that have arisen from the design of the Jacka micro blocks. While the micro blocks proposed in the Jacka development of 84.77m² to 95.90m² provide a good level of amenity, an increase in block size up to circa 110m² would provide more flexibility in adapting layouts, enhancing amenity and the like. Ultimately, if the right performance-based standards are established, there should be flexibility in the block size outcome, providing those standards can be met.

During the initial planning phase and the Pre-DA meetings with EPSDD, there were recommendations for the site to be developed with single dwelling houses as part of an integrated development in order to include the communal open space towards open space, permeability and deep soil planting calculations. It was agreed that a principles-based approach to the design of the development should be taken, rather than trying to retrofit existing or design new planning controls for the typology at the outset. In essence, first establish the key objectives and design principles for the housing development, followed by a design that accords with those objectives and principles.

2.1.2. ACT - Ginninderry

There are a small number of micro blocks in the ACT, namely in Ginninderry in the District of Belconnen to the northwest of the city. Ginninderry have a ‘flexi living’ series which has two offerings, ‘Canvas’ with 1 bedroom, 1 bathroom and 1 car space at 44m^2 of living area on an 80m^2 block and ‘Renew’ with also 1 bedroom, 1 bathroom and 1 car space over two levels at 66m^2 of living area on an 80m^2 block. Both offerings are to a 6-star Greenstar rating.



Figure 4 Canvas floor plan [Ginninderry]

Gyde consulted with Ginninderry (on 24 June 2025) with respect to the abovementioned offerings and experience in delivery. As we understand it, lessons learnt from the process include:

- Ensuring design parameters for building height are flexible. The more flexibility there is to increase building height allowances (say up to 3 storeys), the more opportunities there are to increase amenity on the ground plane (internal and external, private open space, deep soil planting etc) and internal floor to ceiling heights (for improved solar access and overall residential amenity.
- A “pattern book” or design templates with input from relevant entities, including TCCS, Icon Water, and Evoenergy for a standard approach for micro block housing in the ACT would be highly beneficial. It would negate the requirement for DA submissions and could enable a DA exempt pathway to streamline

delivery. It would also further allow for exemption from agency requirements for typical compact housing requirements under RZ3 and RZ4.

- Consider developing two discreet models of delivery for multi micro houses built at the same time (as an integrated housing development) versus individual block development by a landowner. With regard to the latter, there are risks associated with single micro blocks if not managed as an integrated development, with respect to construction and setback requirements on common boundaries. For example, if one dwelling is built with a nil side (common boundary) setback, this may compromise the development of the adjacent block, which is likely to require some form of setback to accommodate building foundations, any footings and the like. Therefore, while a block-by-block development outcome is not necessarily unfeasible, an integrated development is preferred. Both delivery models would need to be considered.
- Reduce parking requirements to only provide up to 1 parking space per dwelling, including 3-bedroom dwellings. Particularly in areas with good accessibility to services, facilities and public and active transport options. This will assist in providing more “space” on the ground plane to internal and external amenity for micro block housing developments and enhance the affordability aspect of the typology.

Micro block housing should be included in the master planning for new subdivisions or can be included in redevelopment of sites close to communal amenities. In developing designs, or patterns/templates for micro block housing, it would be beneficial to seek feedback and coordinate with relevant agencies / entities.

2.1.3. ACT – Other

In the first stages of the emergence of the suburb of Crace, developed by the Canberra Investment Corporation (CIC), terrace housing with varied block sizes ranging between 135m^2 (Micro Blocks) to 240m^2 (Compact Blocks) was delivered. The micro blocks had a width of 4.5m and depth of 30.0m with car parking located in the rear zone via an 8m wide access lane. Dwellings were two storeys, with ground floor living and first floor main bedroom plus multi-use space (bedroom/living/study).

The master planning and individual floor plans of the terrace housing was developed and used across Sections 3, 14-17, 22-25, and 28-31. Architects were commissioned to create different streetscape languages for the different sections and were allowed to modify the street façade with a 500mm tolerance provided for articulation. This outcome is considered to be critical for a micro block housing development to provide opportunities for visual interest and a sense of individuality/place for future occupants.

In addition to the above, the following are examples of where micro blocks have been inserted into subdivisions, they are typically not designed with consideration of typology requirements and have had no design standards or planning principles in place to support a unique outcome. These examples include:

Table 2 ACT Examples of micro block subdivisions

Example	Aerial Image
ACT Taylor – Sections 53, 57, 58 and 120 These are approved 140-150m^2 blocks with terrace housing and rear parking to be constructed.	
ACT Casey – Section 61 and 90 Section 61 is an approved and constructed 140m^2 block development with terrace housing and parking to rear. Section 90 comprises 115-125m^2 blocks with terrace housing, parking to rear.	

Figure 5 Aerial Image of approved micro block subdivision in Taylor (Source: ACTmapi)

Figure 6 Aerial image of Section 61 Casey (Source: ACTmapi)

Example	Aerial Image
	

Figure 7 Aerial image of Section 90 Casey (Source: ACTmap)

ACT – Whitlam Section 47 is an approved and constructed 150m^2 block development with terrace housing and parking to rear.	

Figure 8 Aerial image of Section 47 Whitland (Source: ACTmapi)

Example	Aerial Image
Denman Prospect Section 118 is an approved (circa) 130m^2 block development with terrace housing and parking to rear.	

Figure 9 **Aerial image of Section 118 and 119 Denman Prospect (Source: ACTmapi)**

The key lesson from the implementation of these micro blocks is the importance of design controls and objectives to ensure good quality outcomes. The size of these lots necessitates thoughtful design for both the dwellings and communal spaces. Accompanying guidance and controls are necessary to reduce the risk of poor design outcomes, including amenity, overshadowing and lack of privacy.

An overreliance on market delivery or the assumption that every lot will engage a suitably qualified architect is not a recommended strategy. Planning controls, including built form, setbacks and orientation, help guide development to ensure consistency with the vision for Canberra while providing flexibility to encourage innovation.

Furthermore, a coordinated approach to planning this type of subdivision is recommended, delivering it as a suite or ‘cluster’ rather than an isolated site in a standard subdivision.

2.1.4. Queensland

There is a pilot project titled the ‘Envi complex’ within the Gold Coast that subdivided one larger suburban lot into 10 freehold micro lots. This project has won several awards including the Planning Institute of Australia Queensland Awards for Planning Excellence 2021.

Affordability was at the heart of the development with seven of the 10 dwellings being purchased by first home buyers. One of the main draw cards for this development was the unique facades and articulation of the dwellings. Each dwelling feels individual and not part of a “cookie cutter” development. The articulation of the dwellings maximises visual interest but also enables the site to have improved solar access and privacy between the dwellings. The impact to the overall street is also softened through the differentiation of the facades. This can only be achieved through flexibility within the front articulation zone.

There are many positive learnings from this project, including the importance of providing an appropriate balance between fixed pattern design options (in terms of floor plan/layout/footprint) to ensure an adequate amenity outcome, but also, flexibility in façade design/articulation to provide individual identity and streetscape variation.



Figure 10 Envi Micro Urban 'Village' frontage [DegenhartSHEDD architects]

2.1.5. Western Australia

In Ellenbrook, Western Australia, there are several micro lots/blocks being developed on 80m^2 blocks. These are two storey, 2-bedroom offerings with balconies and courtyards with garage spaces.

The dwellings have a zero setback to the rear boundary with no windows or access to the rear laneway the buildings are also in a straight terrace configuration. The sites focus the primary presentation to the front façade and incorporate a unique design element for each dwelling from the colour and finish to roof shape and landscaping. These designs could benefit from rear windows into the laneway to increase daylight penetration into the dwellings and to improve the passive surveillance of the surrounding public domain. This example demonstrates the importance of ensuring design principles/guides for micro block housing consider a double street frontage arrangement and ensure equal levels of activation and passive surveillance are provided in such circumstances.



Figure 11 Ellenbrook 80m^2 micro lots/blocks frontage [Google Maps]



Figure 12 Ellenbrook 80m^2 micro lots/blocks rear and rear laneway [Google Maps]

2.2. Policy Examples within Australia

Smaller living parcels are not a new phenomenon. There are policies in place in various jurisdictions in Australia which have explored 'smaller living'. Both Victoria and Western Australia have policies or position statements which detail the policy implications of, and provide criteria for, small blocks/lots to increase housing supply.

2.2.1. Victoria

The Victorian Government introduced the Small Lot Housing Code in 2011 and has amended the code over the years. The 2019 version is the current version. This code eliminates the need for planning permits on lots less than 300m^2 where the development meets the standards. The standards cover items such as setbacks, building height, provision of car spaces and private open space, overlooking, overshadowing, building articulation and fences.

These development standards are prescriptive and in direct challenge to the new ACT planning system now in effect, but it does provide a potential blueprint for the implementation of smaller lot development in the ACT. Although the prescriptive nature of the Victorian Code is being reviewed as it can stifle some development as innovation for microhomes and smaller lots is outpacing policy development. There are discussions in Victoria to introduce a new small lot type or definition specifically for micro lots. This would focus on the development standards that micro lot development usually fails to provide a good outcome/response, relation to matters such as setbacks, private open space, solar access and building height.

2.2.2. Western Australia

In June 2019, the Department of Planning, Lands and Heritage in Western Australia released a position statement titled 'Housing on lots less than 100m^2'. This position statement has provided criteria and standards that can be utilised in the development of future policies in relation to micro lots of 100m^2 and below. The focus of this position paper is to assess each micro lot development on its individual merits across a number of considerations. It is also focused on sites where a structure plan is required and not in existing residential lots.

These criteria are focused on two main themes, Location and Siting.

Table 3 Western Australia- Criteria and Direction for Housing on lots less than 100m2

Criteria	Direction
Locational	• applies to land in areas that have approved structure plans in place or the zoning and provisions in a scheme requires a structure plan to be approved prior to subdivision or development occurring. • to be selectively used as an integrating housing type to transition between higher density (urban/multi-storey commercial, mixed use and apartment development) and low density (suburban/single and two-storey single house and grouped dwelling development) residential areas. • not to be the only or predominate lot and development type in any street block. • to be located between 200 metres and 800 metres, using the walkable catchment technique (refer Liveable Neighbourhoods), of the lot boundary of the core or largest commercial land holding in any existing or proposed secondary or district centres. • to be located within 200 metres or 400 metres, using the walkable catchment technique (refer Liveable Neighbourhoods), of the lot boundary of the core or largest commercial land holding in any existing or proposed local and neighbourhood centre respectively • to be located within 150 metres, using the walkable catchment technique (refer Liveable Neighbourhoods), of local or neighbourhood public open space (as defined in Liveable Neighbourhoods), preferably fronting or otherwise overlooking public open space. • not located within 800 metres of the lot boundary of the core or largest commercial landholding in any strategic metropolitan centre.
Siting/Configuration	• fronts wide access streets. The street must accommodate and maximise on street parking for visitors (preferably on both sides of the street), street trees and a minimum 1.5-metre-wide pedestrian footpath. • located and occupies street corner sites or an entire street block end, including any laneway. • a minimum number of two dwellings constructed concurrently within any single development. • minimum two and maximum three-storey building height.

This position statement provides guidance for proponents and decision-makers on the location and development of houses on lots less than 100m^2, to ensure consistent application across Western Australia. No further work appears to have been undertaken in this area; the above criteria give a good basis for undertaking micro lot development in the State.

2.2.3. Queanbeyan-Palerang NSW

There are several jurisdictions in NSW which include development control plan controls for small lot developments. In most cases, these lots are slightly larger than the size of a typical micro block, but the range in size includes blocks smaller than a typical compact block in the ACT. Therefore, there are interesting insights from the overall approach to small lot development.

Queanbeyan-Palerang LGA is one of those jurisdictions. As new urban release areas have been planned (Googong and South Jerrabomberra), so too have development control plan controls for a range of housing types, including small lot developments. Small lots are defined as those of 130m2 – 330m2. Key provisions are summarised below:

- Small lots of 130-170m2 are required to be rear loaded.

- Small lots will be supported providing they do not detrimentally impact the amenity of adjoining residential land (overshadowing, privacy and visual impact).
- Design quality (particularly on corner lots) is a key focus.
- Minimum lot width for a lot between 130-170m2 is 4.5m and 6 metres for 170-250m2.
- For a small lot of any size up to 250m2, the maximum site coverage is 70% (including all ancillary buildings).
- Front setbacks tend to be a minimum of 3 metres, with a 0.9 metre setback allowance. A zero lot line side boundary setback is permitted for no more than 60% of the lot length on the ground floor, with the upper level zero lot line assessed on merit.
- An articulation zone of 1.5m is encouraged on smaller lots of 130-170m2.
- There are no minimum landscaped area requirements for lots 130-170m2. 170-250m2 lots require a 10% landscaped area provision.
- PPOS – 16m2 minimum with a minimum width of 3 metres and directly accessible from living areas for lots 130-170m2. 24m2 for lots sized 170-250m2.
- Parking tends to be more conventional with 2 spaces required for 2+ bedroom dwellings.
- Solar access is a key focus with a minimum 3-hour requirement to 50% of the PPOS.

While Gyde has not directly worked on any small lot housing projects in the abovementioned areas, we are aware of the delivery of smaller lots of circa 130m2 in the Googong village centre. They benefit from rear lane access (rear loaded garage arrangement), multiple levels (appear to be 2+ a partial 3rd storey) and include minimal front setbacks (with facades of a similar style but variation in articulation and materiality), and minimal rear PPOS (that appear to have good solar access). While we would not consider these to necessarily be representative of an optimal small/micro lot arrangement, the site planning/configuration and design have adopted similar principles to examples in other jurisdictions, with a focus on visual interest (articulation, variation in façade treatments) at the streetscape, a small open space but with very good amenity (i.e. solar, privacy) and provision for taller heights to optimise amenity on the ground plane.

Another observation is the proximity of these smaller lots to the village centre. They are located directly opposite the centre which includes a range of services and facilities, a primary school and childcare centre.

It is noted the development controls for this LGA (as with all DCPs) are non-statutory, flexible standards that can be varied if a better planning outcome can be justified.

2.3. International Case Studies

While few international examples explicitly utilise the term “micro blocks”, the concept is emerging globally through innovative approaches to subdivision design and functionality. In both greenfield and in-fill development, small-lot housing continues to be delivered through master planned developments that prioritise walkable block patterns, a mixture of low- to medium-density dwellings and integrated public spaces. These intentional design choices share the same principles as micro blocks, compact urban form balanced with human-scale streets to create liveable and sustainable communities. The flexibility and efficient use of land in micro block subdivisions, or similar, demonstrates how this model can provide a pragmatic response to housing affordability while combating urban sprawl to deliver high-quality neighbourhoods.

2.3.1. Canada – Subdivillage

“The Subdivillage approach is intended for areas where low-density, single-family subdivisions dominate - places with limited transit access and dispersed employment centers. Unlike areas where density is artificially constrained by policy, these locations are inherently car-dependent -at least for long-range travel -

but it does not mean their design must enforce car dependence locally." (The Subdivillage: A Remaking of the Subdivision - Smart Density)

The case study in Canada is a new form of subdivisions to combat denser lots with unchanged suburban street layouts, larger houses on smaller lots, more and larger vehicles, and the decline of local institutions.

This Subdivillage designed three new street typologies; the mews street, through streets, and the green streets. Each new typology and approach cater to a pedestrian and cycling network separated from major roads, and safer arterial crossings.



Figure 13 Subdivillage Approach (The Subdivillage: A Remaking of the Subdivision - Smart Density)

This case study provides valuable learnings for guiding both design and locational recommendations for micro block housing. This includes:

- **Local mobilities to increase accessibility, connectivity and safety –** The key element of this case study is the emphasis on separating pedestrians and cyclists from major roads to ensure safety and continuous connections are at the forefront of design. This is supported through safer arterial crossings to benefit all users, increasing accessibility without relying on cars for short trip and encourage active travel.
- **Adaptable design to promote long-term community benefits –** This form of subdivision is adaptable and provides long-term benefits through decoupling car dependency with street redesign. The subdivillage incorporates elements of low-density subdivision with more effective land uses that reduce infrastructure needs such as signalised intersections and minimises paved areas. The combination of these elements creates more pleasant and quiet streets to benefit all users, including drivers.
- **Greenfield locations –** This subdivillage is better suited to greenfield locations as it can be altered to appropriately manage growth through increased provision of parking or green space while ensuring the quiet and safe enjoyment of shared spaces. This case study also demonstrates how redesigning internal street networks can reduce infrastructure requirements and improve quality of life.

The subdivillage highlights an effective subdivision model that focuses on human-scale neighbourhoods rather than maximising lot yield. The design elements prioritise safety, comfort and connectivity while balancing vehicular access through the location and layout of the block.

2.3.2. Germany – Traumhaus Funari

The Traumhaus Funari is a new approach to suburban development that combines affordability, individuality and diversity while prioritising pedestrians and greenery. MVRDV, the architecture firm explains *"the Funari design expands on this standardised approach, creating a catalogue of dwelling typologies – a huge set of variations on Traumhaus' original design, with a variety of materials, sizes, interior layouts, and connections to the outside with each offering a variety of options that future residents can choose from."*

The case study provides the following key design and locational elements:

- **Car parking is located underground, prioritising pedestrians on the ground floor** – The design encourages sports parks and gardens for biodiversity and residents, bringing vibrancy and colour to the

neighbourhood. The site also included stilt houses to open the ground floor and provide outdoor spaces for a range of users.

- **Adaptative reuse of former sites using prefabricated materials** – the large master planned area went through several design iterations to ensure diversity was promoted in the urban fabric and the network of green spaces was vast and connected.
- **Selecting diverse materials and finishes** – By offering a wide range of designs with bold and individual styles, Traumhaus helped create colour and improve quality of life through the built form.



Figure 14 Traumhaus Funari Masterplan, Mannheim (Source: MVRDV)

The Traumhaus Funari illustrates compact built form in a master planned estate. While the case study is not an example of compact block design, it demonstrates how innovative design choices implemented on a mass scale, using various plan typologies, can create a sense of wellbeing and community.

3. Recommendations to Support Micro Block Housing in the ACT

3.1. Overview

To support the implementation of micro block housing in the ACT, and all of it's respective benefits, it is essential to align planning frameworks with the housing needs of key demographic groups such as first-home buyers, downsizers, and essential workers. These cohorts often face affordability and accessibility challenges in the current housing market, and micro block housing offers a flexible, lower-cost alternative that can promote greater diversity in dwelling types and household composition. By targeting these groups, planning policies can help deliver socially inclusive, compact urban communities that enhance housing choice, support workforce retention, and enable ageing in place—contributing to a more equitable and sustainable housing system in the ACT.

3.1.1. Intended Demography

Micro block housing presents a strategic opportunity to meet the changing needs of Canberra's population. According to the ACT Population Projects 2022-2060, the ACT's population was expected to increase by 330,000 in 2060, with an annual growth rate of 1.4%[1]. This sustained growth underscores the need to deliver diverse, flexible and affordable housing options to reflect the evolving nature of the community.

The population projections indicate that by 2060, the largest cohort for both males and females will be those aged 28 to 29, a demographic that may be likely to seek their first home in close proximity to employment, education and other services. Micro block housing can provide an affordable entry point to home ownership for first-home buyers and young professionals.

The ACT is also expected to experience a moderate ageing of its population, with older age groups expected to downsize with their existing communities. Micro block housing has a small building footprint, minimal maintenance requirements and community-driven spaces which may be a suitable product for downsizers.

Another key driver of population growth is migration, including key workers and skilled professionals who may wish to access affordable, compact and well-located housing. Micro blocks can support essential workers through carefully designed and located subdivisions which have access to transport and services.

Micro blocks help align planning outcomes with social needs through ensuring Canberra grows sustainably and housing is provided that is innovative and responsive to the needs of the current and future population.

3.1.2. Framework for Implementation of Micro Block Housing

The following section provides recommendations to support micro block housing in the ACT and includes locational criteria, site selection and configuration, design criteria, construction strategies, planning considerations and optimal delivery pathways.

In order to successfully deliver micro block housing in the ACT (or any jurisdiction for that matter), it is fundamental to establish:

1. Desirable Locational criteria – to ensure micro block housing is delivered in the right locations.
2. Intended Demography – to ensure micro block housing aligns with the growing population and its needs.
3. Siting and configuration criteria – to ensure the configuration of a micro block subdivision and resultant dwellings offer an adequate level of amenity.
4. Design criteria – minimum design-based requirements to ensure a high level of amenity and end user experience.
5. Construction strategies – to optimise micro block housing delivery outcomes.

[1] Latest ACT Population Projections - Treasury

Separate criteria may be required for in-fill versus greenfield projects given the different opportunities and challenges (i.e., heritage, existing character for in-fill areas). This has been addressed, where relevant, in the following sections of the report.

It is also important to consider relevant changes to the existing planning framework and the Crown leasing system/outcomes (if required) to support this emerging typology as a standard form of missing middle housing in the ACT. Such changes will be important to support implementation of streamlined planning approval processes for micro block housing.

These matters are addressed below, considering the learnings from the Jacka project and other relevant case studies outlined in Section 2 of this report.

3.2. Locational Criteria

3.2.1. Overview

The ideal location for micro block housing typologies depends on urban planning goals, infrastructure, and target residents. At a high level, recommendations for preferred locations in the ACT include:

Table 4 Locational criteria for micro block housing

Criterion	Requirement
	**Transit-Oriented Areas** Micro blocks may appeal to residents who prioritise walkability and public transport over car ownership. As a result, micro blocks should be located near transport stops/hubs, and transport corridors. This location allows for a reduction in traffic and parking demand, supports sustainable transportation and decreases the need for additional parking requirements.
	**High Land-Value Zones** Micro block housing can provide affordable living options in areas where traditional housing is expensive. Placement of micro block housing in Central business districts (CBDs), village centres with good amenities, near universities, high value commercial areas would enable service workers, students, and young professionals to live close to their place of work or study.
	**Mixed-Use Neighbourhoods** Residents benefit from easy access to shops, gyms, cafes, and social spaces. Locating micro block developments in the zones already designated for mixed-use development or revitalisation would encourage a vibrant, pedestrian-friendly lifestyle.
	**Underutilised or Transitional Zones** Micro block housing in former industrial areas or medium-density zones near urban cores would help rejuvenate declining or underdeveloped parts of the city and would spark investment and densification where infrastructure exists but where the land use is inefficient.
	**Near public open space** The provision of micro block housing developments near public open spaces or incorporating them into the design would enhance liveability and compensate for limited private space. Micro units typically have smaller footprints and reduced private outdoor areas. Proximity to public open space such as parks provide essential recreational and social opportunities for residents, improving mental health, community engagement, and overall quality of life. This would encourage physical activity and outdoor leisure for the residents, would add value and appeal to micro

	block housing and would support equitable access to green space, especially for lower-income groups. Encouraging residents to socialise outside of the dwelling is also a potential key social benefit, which can be supported through co-locating micro block housing with or near to public (or communal) open space.
	**In new subdivisions** Locating micro block housing in new subdivisions (SDA applications) provides housing diversity in new developments. Including micro block typologies in new subdivisions ensures a broader mix of housing types, catering to single-person households, students, elderly residents, or first-time buyers. This approach supports more inclusive, adaptable communities and aligns with contemporary demographic and economic trends. The benefits include meeting the growing demand for smaller, affordable units, increasing housing supply efficiently without sprawl and encourage compact, walkable, and socially diverse neighbourhoods.
	**Efficient movement of people** Cars are the predominant mode of transport for Canberrans, but the use of space and the introduction of multi-modal transport networks can encourage people to limit their car use and use the bus or bike around the city. Roads and streets within the subdivision should be well-planned to ensure smooth traffic flow and minimize congestion. This involves thoughtful consideration of road width, intersection design, and traffic calming measures such as roundabouts or speed bumps where necessary

3.2.2. Other Considerations

The following table provides additional requirements for the optimisation for the location of micro blocks developments and their access to facilities.

Table 5 Other Locational Considerations

Criterion	Requirement
Access to Transport	As noted in the table above, to optimise micro block housing in future subdivisions and infill projects, developments should prioritise transit-oriented design. Locating micro blocks within walking distance of public transport stops, such as bus rapid transit corridors, bus stops or train/light rail stations, supports sustainable, active living and ensures accessibility for residents without private vehicles. Reducing parking requirements in these areas and integrating car-share services or mobility hubs can also free up land for more communal or green space. Enhancing active transport infrastructure is essential. Micro housing works best in areas with high-quality pedestrian pathways and dedicated cycling lanes that connect directly to local shops, transport stops, and public open spaces. Secure bike parking and easy access to shared mobility options further reduce reliance on cars and align with the lifestyle of typical micro unit residents. Micro block housing should consider both access to public transport stops such as bus stops and regional nodes including Canberra Railway Station, Kingston and Jolimont Centre. All of the above should be considered in planning new subdivisions, noting that retrofitting this infrastructure can be incredibly challenging.
Access to Services and Facilities	Micro block developments should be located within a comfortable walking distance (400-800m) of bus stops, commercially zoned land, or local shops. These commercial centres should also have a range of facilities and services including, but not limited to, childcare centres, medical practices, and shops. The shops should be accessed via an accessible path of travel via graded footpaths and multi modal roadways for use by bike, scooter and car. Micro

	blocks should generally not be located at the fringes of suburbs (i.e. only accessible by cars). However, with affordability a key consideration in promoting innovative housing typologies, there may be circumstances where micro block housing in fringe areas is appropriate, such as where there remains good, localised access to services and facilities or where transport options (in close walking distance) provide ease of access to such services and facilities. In these instances where other parking solutions are available on-street, distances for micro block housing to essential services and shops could be increased. In essence, accessibility to services and facilities could be via walking distance/mode, or through proximity to regular transport services that provide direct access to those services and facilities.
Proximity to open space	Access to public open space is crucial for micro block developments, where private outdoor space is often limited. Micro blocks should be located within walking distance (ideally 200–400 metres) of parks, community gardens, or recreational areas to support residents' health, wellbeing, and social interaction. Integration near green spaces enhances liveability and can offset smaller lot sizes by providing shared outdoor amenities. Strategic placement of micro blocks near green corridors, neighbourhood playgrounds, or urban plazas also supports broader urban planning goals related to walkability, sustainability, and community resilience.
Pedestrian connections	At the subdivision level, creating a connected internal layout with short blocks, legible pedestrian routes, and integrated green corridors promotes walkability and supports a "15-minute neighbourhood" model.
Road network	Micro block housing must be carefully located within a road network that supports higher residential density and compact urban form. Ideally, micro blocks should be situated along local access streets or rear laneways to minimize traffic congestion and preserve the character of main roads. These smaller blocks benefit from reduced frontage requirements, so well-designed access points and efficient vehicle movement, such as shared driveways or rear-loaded garages, are essential. Proximity to collector or arterial roads should be managed to avoid noise and safety concerns, while still ensuring convenient access to public transport and key services.
Mix of Housing Typologies	Micro block development should be strategically placed within areas that allow for a mix of housing typologies. This would allow for increased social diversity and inclusion by accommodating residents with varying income levels, family sizes, and lifestyles. The introduction of many different products into the market helps address housing affordability issues and ensures that a range of income groups can access housing within the suburb. It also allows for a more efficient use of land by maximising the utilisation of land, while minimising urban sprawl especially in the ACT.
Mixed Land Use	Incorporating mixed land uses within a subdivision promotes a sense of community and reduces the need for residents to travel long distances for daily necessities building upon Canberra's local centre design. Integrating commercial, recreational, and residential zones encourages interaction and creates a vibrant, liveable environment. Mixed-use developments also contribute to a more sustainable lifestyle by reducing commuting distances.

3.3. Site Selection and Configuration Criteria

The development of micro blocks within the ACT context would require several fundamental site compatibility principles to ensure good planning outcomes can be achieved and replicated in the future. A functional layout of a subdivision is one of the key elements of a useable and inclusive neighbourhood and this starts with selecting the "right" site. The below provides a list of preferred site requirements and configuration criteria, to optimise opportunities for development in the micro block housing space.

Table 6 Recommendations for Site Selection and Configuration Criteria

Criterion	Requirement
Land Use Zoning	While micro block housing can, in limited cases, be accommodated within RZ1 and RZ2 zones, these areas are generally not well-suited for widespread implementation due to planning constraints and compatibility concerns. In RZ1, restrictive zoning, lease conditions, and the need to maintain low-density suburban character limit the feasibility of standalone micro blocks. Although secondary dwellings or dual occupancies may offer some flexibility, the broader delivery of micro housing in this zone risks undermining neighbourhood cohesion and liveability without significant planning reform. RZ2 areas present greater potential for grouped micro block housing, such as terraces or townhouses, with a maximum of three storeys. This zoning allows for a slightly denser built form while still respecting suburban scale and character. Micro block housing in RZ2 can increase housing diversity and affordability, making it particularly suitable for key workers, young families, and older residents seeking to age in place. Careful site planning and high-quality design are essential to ensure good amenity, solar access, and active street frontages while maximising the efficient use of urban land. Overall, RZ3 and RZ4 should be prioritized in planning policy for delivering well-located, cost-effective micro block housing across the ACT. Micro block housing is best supported in RZ3 and RZ4 residential zones, which allow for medium to higher-density development and provide flexibility for innovative housing types. RZ3 is ideal in greenfield developments where micro blocks can be planned through the Subdivision Design Application (SDA) process, enabling coordinated infrastructure, appropriate lot sizing, and integration with open space and transport networks. Crown Leases in RZ3 often already permit multiple dwellings, significantly reducing Lease Variation Charges (LVCs) and simplifying the development process. RZ4 also presents a strong opportunity for micro block housing, particularly in inner-urban and renewal areas. As a higher-density zone than RZ3, it supports compact living formats such as terraces, apartments, and townhouses, making it well-suited to small-lot development where infrastructure is already in place. Micro blocks in RZ4 can help increase housing diversity and affordability, especially when located near commercial centres and transit corridors. While some Crown Lease restrictions and LVCs may still apply, RZ4 offers strong planning alignment with the goals of increased density and sustainable urban form. CZ2, CZ5, and RZ5 zones are generally unsuitable for micro block housing due to their primary land use objectives and strategic roles within the urban structure. CZ2 (Business Zone) prioritises commercial and employment-generating uses, and introducing low-scale residential forms like micro blocks may compromise long-term economic capacity and precinct integrity. CZ5 (Local Centre Zone) is intended to support active, mixed-use environments with a strong commercial and community focus at the ground level; micro blocks may reduce activation and undermine retail viability if not carefully integrated. Similarly, RZ5 (High Density Residential Zone) is designed for larger-scale apartment developments that optimise proximity to major centres and transport corridors. Allocating land in RZ5 to low-density micro

	housing would underutilise valuable urban land and conflict with strategic density targets.
Consolidation	Where an adequately sized block is not available, block consolidation is appropriate to ensure adequate size and/or appropriate streetscape frontage and access.
Block Depth and width	Micro blocks can be varied in width and length to provide a diverse streetscape. Minimum widths could be as follows: • 7.5 metre minimum with for blocks with car parking • 4.2 metre minimum width for blocks without car parking
Orientation	Block orientation should support good solar access into the dwelling and P.P.O.S. Preference for frontage to a street or public right-of way. The street or public right-of-way must accommodate and maximise on street parking for visitors (preferably on both sides of the street), street trees and a minimum 1.5-metre-wide pedestrian footpath.
Block size (overall)	There is no optimal maximum development size in terms of block numbers. However, there is more cost efficiency if a developer/builder builds multiple dwellings together. This cost efficiency is driven through both bulk material supply costs and ease of construction. Singular block release should also be considered as viable. To ensure design quality control, singular block land release could be supported with a design guide or pattern book to assist purchases understand design strategies for smaller sites. Design requirements may suit some micro block developments, but a pattern book will be far better at articulating design intent on the micro blocks. An ideal lot size for micro block housing ranges between 85 and 150 square metres, striking a balance between affordability, liveability, and efficient land use. This size enables the delivery of compact, low-maintenance dwellings that support housing diversity and cater to smaller households such as first-home buyers, key workers, and downsizers. Within this range, well-designed homes can provide essential private open space, adequate solar access, and functional internal layouts, while allowing for increased density in appropriate locations without compromising neighbourhood character. This scale also encourages walkable, sustainable urban forms and supports the viability of infill development in both established and emerging suburbs.
Block arrangement	Avoid battle-axe blocks which restrict access opportunities and do not provide opportunities for streetscape activation. Corner sites and sites with dual (or more) street frontages should be prioritized as there are more opportunities for streetscape activation and connection. Micro block developments are best designed in small clusters that are attached to either a public open space or which use community title private open space. Open space can be used to reduce bulk and scale of developments.
Easements	Avoid sites with easements where feasible. Where an existing easement exists, ensure it is suitably located (i.e., at the rear of the block) to not have an impact on development potential, noting the smaller block size to work with.
Environmental features	When planning for micro block housing, it is critical to avoid environmentally constrained sites that could compromise safety, livability, or development feasibility. Flood-prone areas, including

	floodplains and overland flow paths, should be excluded due to the limited capacity of small lots to manage stormwater effectively. Similarly, steep or unstable slopes can lead to costly engineering solutions and limit accessible layouts, making them unsuitable for compact housing types. Sites within bushfire-prone areas are also problematic, as micro blocks often cannot accommodate the required asset protection zones or meet the bushfire construction standards necessary for resident safety. In addition, land containing significant native vegetation, threatened species habitats, or biodiversity corridors should be avoided or treated with high sensitivity, as these may impose legal protections or offset obligations. Former industrial or contaminated sites may also be unsuitable due to the complexities and costs of remediation, which are harder to manage on small lots. Finally, sites with poor solar access, airflow, or overshadowing should be avoided, as micro block housing depends heavily on passive design principles to ensure comfort and energy efficiency in compact living environments.
Servicing	Micro block developments can occur in existing streetscapes and in new subdivisions. It is more efficient to insert micro blocks into precincts with road networks that support a greater number of driveway crossovers, and which can support on-street visitor parking within proximity to the development. Digital connectivity plays an increasingly important role. Ensuring access to high-speed internet and integrating digital tools for mobility and remote work can increase the functionality of small living spaces. Developments should include provisions for communal Wi-Fi and smart transport information systems. Utility Infrastructure should be collocated in shared trenches, where possible, and contained at the edges of roadways and verges. This will ensure development does not infringe on essential infrastructure and that infrastructure does not affect development potential. Co-ordinating the utility requirements into the design phase and building in space for new Infrastructure will ensure utility growth and maintenance can be undertaken with minimal disturbance to future residents.

3.4. Design Criteria

To ensure that micro block housing delivers high-quality, liveable, and sustainable outcomes, it is essential to establish clear and tailored performance-based and in some cases, development standards. Due to the compact nature of micro blocks, conventional residential standards may not always apply or may require adaptation to suit smaller lot sizes and higher densities. The following table outlines key design considerations and minimum requirements specific to micro block developments, covering aspects such as site layout, access, amenity, open space, and environmental performance.

These criteria aim to guide developers, planners, and decision-makers in achieving micro housing that is functional, well-integrated into its surrounding context, and responsive to the needs of future residents. Flexibility in application may be considered where innovative solutions demonstrate compliance with overarching planning objectives and enhance overall housing quality

Table 7 Recommendations for design criteria

Criterion	Requirement and/or Strategy
Yield	Micro block developments should not be seen as a means to maximise site yield, which can lead to reduced amenity. An appropriate level of open space is required and can be either provided on each block or through shared spaces.

Housing mix	Dwellings with a mix of bedrooms (predominantly 2 and 3) should be provided to ensure provision of housing diversity within micro block housing developments.
Open space (private)	Community Title Private Open Space (C.T.P.O.S.) provides appropriately scaled outdoor space for residents whilst also optimizing deep root planting area and tree canopy cover. It is an efficient way to detach Principle Private Open Space (P.P.O.S.) requirements from an individual block and combine them to deliver greater amenity for residents. C.T.P.O.S. also encourages interaction between neighbours and fosters community building. A preference for C.T.P.O.S. to have a 5m minimum width to allow for various uses, and suitable planting including deep root zone for appropriately scaled trees. C.T.P.O.S. can be expanded by linking it with individual block's P.P.O.S. A preference for all dwellings to have a direct connection with C.T.P.O.S. An allowance of 20% of the development site area should be allocated to C.T.P.O.S. where blocks have all driveways provided directly off streets. An allowance of 27.5% of the development site area should be allocated to C.T.P.O.S. where blocks have a mixture of driveways directly off street and via a common driveway within the site. An allowance of 35% of the development site area should be allocated to C.T.P.O.S. where blocks have an entirely common driveway within the site. All allowance of 40% of the development site area should be allocated to C.T.P.O.S. where blocks have parking not linked to the dwelling.
Deep Soil	To ensure environmental quality and landscape integration in micro block developments, a minimum area of deep soil planting must be provided on each site. Deep soil zones are unencumbered areas without structures, impermeable surfaces, or underground services, allowing natural infiltration and root growth. A minimum of 15% of the total site area should be dedicated to deep soil zones on micro block sites. For lots between 85–130 m², this equates to approximately 13–22.5 m² of deep soil area. Deep soil areas should be consolidated where possible (rather than fragmented), preferably located at the front or rear of the lot to allow for meaningful vegetation, including small to medium canopy trees. These areas must have a minimum dimension of 1.5 metres in any direction to qualify.
Landscape	Micro block housing by its nature features smaller blocks with minimal setbacks. As a result, landscaping must be efficient and multifunctional. To introduce landscaping and soften the built form without compromising the site's usability, vertical elements of landscaping are encouraged such as green walls, vertical gardens, rooftop gardens and narrow planter beds. These elements enhance the visual amenity of the site while also improving overall building performance through reducing urban heat island effects. Where possible, permeable surfaces should be used, including ground coverings and gardens beds to support water sensitive urban design, reduce stormwater runoff and hard surfaces. Soft landscaping in

	courtyards and on-site boundaries help improve visual amenity and environmental impacts. In denser micro block formats, communal open space becomes essential for social interaction, passive recreation, and mental wellbeing. Town planning policy should require shared landscaped areas for groups of dwellings, which may include seating, shade trees, and productive gardens. The landscaping should continue to comply with urban tree canopy targets and allow for deep soil zones to support long-term tree growth. Deep soil planting areas allow for trees to reach maturity, improving microclimatic conditions, biodiversity and connectivity to surrounding green infrastructure. Water sensitive urban design should also be incorporated into the design and include stormwater strategies that respond to the site's topography, slope and local soil types. This would help alleviate pressure on broader stormwater systems through an integrated landscaping strategy.
Parking (quantity)	Micro block housing should be supported by planning policies that allow for reduced or zero on-site parking minimums, especially in areas well-serviced by public transport. These compact housing types typically cater to residents—such as students, young professionals, and single-person households—who are less reliant on private vehicles. By removing blanket parking requirements, developers can reduce construction costs, improve affordability, and use space more efficiently for housing, landscaping, or community amenities. This approach also aligns with sustainability goals and helps discourage unnecessary car ownership.

Parking (arrangement)	Rather than assigning individual parking spaces to each unit, micro block developments can incorporate shared parking facilities that serve multiple buildings or land uses. For example, a nearby commercial centre, co-working space, or residential complex could share a single parking structure. Shared facilities are particularly effective in mixed-use areas where peak parking demand varies throughout the day. This reduces overall parking supply needs, avoids duplication of infrastructure, and encourages collaboration between property owners and developers. Unbundling parking means selling or leasing parking spaces separately from housing units, allowing residents to choose whether they want to pay for a parking spot. This market-based approach discourages unnecessary car ownership and increases housing affordability, as buyers or renters who don't need parking aren't forced to pay for it. For micro housing, where units are smaller and more affordable by design, unbundled parking supports the core demographic—often low-income or car-free households—while still offering flexibility for those who occasionally need vehicle access. Instead of providing on-site parking within every micro block development, parking can be directed to nearby off-site or district parking facilities. This approach centralises vehicle storage and frees up valuable land within the development for open space, communal areas, or additional housing. Off-site parking is particularly suitable in high-density, transit-accessible locations where frequent car use is low. A well-managed district parking model can serve multiple developments efficiently while reducing the visual and spatial impact of parking on individual building sites. Where on-site parking is necessary or temporarily required, it should be designed to be adaptable for future uses. This can include surface parking areas that can later be converted into landscaped plazas, playgrounds, or community gathering spaces as car usage declines. Parking structures can be built with flat floors and higher ceilings to allow for future conversion into offices, retail, or residential space. This "future-proofing" ensures that developments remain resilient and can respond to shifting mobility trends, especially as cities move toward car-light futures. Where individual blocks include car parking, orientation can be in either north/south or east/west direction. Where individual blocks have car parking separated from the dwelling, and the built form is similar to terrace housing, an east/west direction is preferential.
Density	A maximum density of 90 dwellings per hectare is recommended. This would allow flexibility in design while ensuring suitable open space is provided. However, further work is required is required to be undertaken to determine whether a greater density could be achieved in certain circumstances, subject to block size, orientation, layout et cetera. This number supports a variety of built forms, from small detached homes to terraces, while maintaining a human scale and enabling high-quality public realm outcomes in micro block developments. Some smaller developments, with suitable block orientation and parking arrangements, may be able to have a higher density.
Layout	Site layouts need to be considered on a case-by-case basis and would be subject to financial feasibility analyses as various site typologies can work for micro block developments. This is best explained in the design

	studies completed by DNA Architects for both existing blocks scenarios and new subdivision layouts being used in the ACT. A cluster approach to site layout is recommended with a preference for up to 4 dwellings in a row. This recommendation is based on both design and streetscape considerations. When dwellings are built with a 0m side setback on both sides (as common for compact housing), a monotonous façade is created with no visual break along the streetscape, similar to typical terrace development. Without deliberate articulation, this can negatively impact the character of the streetscape, particularly in lower-density suburban contexts. The pilot program in Jacka strategically utilised a carport with decking above to provide a visual break and vertical interest. This approach helps prevent the appearance of a wall of buildings and reflects a more human-scale development. If these features are not possible to be integrated into the design and façade treatment, limiting the number of dwellings per row can help mitigate the visual bulk of the development, supporting a better integrated neighbourhood.
Individual block size (after subdivision)	Where blocks include car parking, a minimum site area should be 90m2 where there is no access to community title open space. This assumes that P.P.O.S. can be designed above carport structures, as a counterbalance to requiring additional site area. If P.P.O.S. is located on ground level, a minimum site area of 110m2 is recommended. This calculation has been done assuming a site coverage of 65m2 (40m2 dwelling plus 25m2 carport/store). 65m2 / 90m2 = 72.2% *(70%) 65m2 / 110m2 = 59.1% *(60%) Where blocks exclude car parking, and parking is associated with community title area, a minimum of 60m2 is recommended. This calculation has been done assuming a site coverage of 65m2 (40m2 dwelling and excludes the car parking area). 40m2 / 60m2 = 66.7% *(65%)
Building height	Building height should not be constrained by metres. Storeys may be identified (i.e. 3 storeys to maximise opportunities for open space at the ground plane) as a guide but recommend that flexibility be applied to height based on compatibility with the context (desired future character of the site and surrounds) and amenity controls.
Setbacks	0-1m front setbacks are encouraged, where appropriate in site context. 0m side setbacks are encouraged, where adjacent to other blocks of the same typology, or compact/mid-sized sized blocks with terrace housing. Dwellings should be constructed in a manner that allows for future demolition and reconstruction without impacting neighbouring dwellings. Rear setbacks should be tailored to P.P.O.S. requirements and can be reduced where a block directly connects onto C.T.P.O.S or public open space.
Building Separation	A minimum of 8m between built forms is suitable as an interface of blocks adjoining front/rear boundaries. A zero setback is suitable for side boundaries at the ground plane. An upper level zero setback should only be supported on merit.
Dwelling considerations	Where multiple sites are being planned together, dwellings with common party walls are typically more energy efficient. Consideration should be given to ensuring P.P.O.S. on upper levels have adequate privacy, both visual and noise.

	Upper level living areas typically enhance opportunities for solar access, as proximately to adjacent dwellings can reduce sun ingress to lower levels for certain dwelling orientations.
Waste arrangements	In micro block housing, where private outdoor space is minimal, waste bin storage must be carefully integrated into the building or site layout. Provide compact, well-ventilated bin enclosures (either communal or individual) located close to building entries or laneways. These areas should be designed to minimise odours, visual clutter, and obstruction in tight spaces, using screening, fencing, or built-in cabinetry. Micro block developments must be designed to accommodate kerbside collection or, if located on laneways or tight infill blocks, alternative access solutions such as shared rear lanes or designated bin zones.
Built form and massing	New micro block housing should respond sensitively to the surrounding built form, especially in established suburban areas. Maintain consistent street setbacks, align roof forms with neighbouring buildings, and limit height to 2–3 storeys unless the site context supports increased scale (e.g. near centres or transit corridors). Micro blocks require construction that is vertical to ensure the block size is 'micro'. The only way to achieve a 3-bedroom house on a micro block is to permit three storeys as evident by the typologies indicated in this report in Section 4. The design should include architectural articulation (e.g. recesses, changes in material or colour, modulated rooflines) to reduce perceived bulk, especially on narrow blocks. Avoid long, blank facades. Design semi-detached or terrace-style homes with identifiable entries and a human-scaled rhythm. The design should maximise northern orientation for living spaces and minimise overshadowing on adjacent properties. Building forms should be compact but designed to allow natural cross-ventilation and solar access. Consider stepped massing or upper-storey setbacks to reduce overshadowing and visual dominance. Sloped, pitched, or flat roof forms can help reduce visual height and allow for solar panel placement. Use variation in roof pitch or orientation to add visual interest and reinforce a low-rise appearance. Ensure roof forms are designed to allow water to be managed on site. Dwellings should be designed with the use verandas, porches, and visible front doors to establish a welcoming residential character. Avoid high blank walls at the street edge. Form and massing should allow for meaningful deep soil zones to support tree planting and rainwater infiltration. For larger micro block developments, use repeating forms (e.g. terraces or townhouses) with subtle variation in colours, materials, or detailing to avoid visual monotony. Compact modular designs can also reduce construction time and costs.
Articulation	It is encouraged to have a 1 metre front setback that is defined as an articulation zone. This allows for 'elements' of the front façade to be incorporated to create diversity of streetscape and built form language. To restrict the articulation zone being used entirely for additional GFA, a maximum of 20% of the articulation zone can be used as site coverage.
Site coverage	The current site coverage requirement of 70% is suitable for micro blocks that include car parking on the block. A site coverage of 65% should be used for micro blocks that exclude car parking on the block.
Permeability	Individual dwelling design should be encouraged to provide built form separation in a streetscape. This could be done through a design guide,

	pattern book, and by adding restrictions to side setbacks for developments with more than 3 dwellings in a row.
Solar access	The same standards for solar access to living areas of a dwelling should be maintained. Solar access to principal private open space. requirements could be relaxed if the dwelling has direct access to community title public open space.
Cross Ventilation	All dwelling designs should consider cross ventilation and maximise opportunities for natural ventilation over mechanical ventilation
ESD	Building design must reasonably incorporate roof top solar panels. Designed to be “net zero ready”. Water management systems must be considered. Explore opportunities to enable Passivhaus or other sustainable or healthy homes accreditations.
Accessibility / inclusivity	Micro block housing should be well-integrated into Canberra’s sustainable transport network, with strong connections to public transit, walking and cycling infrastructure. This enhances mobility for all residents and reduces car dependency, particularly important for older adults and those without private vehicles. Flexible, adaptable internal layouts should be encouraged, allowing residents to reconfigure spaces as household needs evolve, supporting ageing in place and ensuring housing stock remains resilient and responsive to demographic shifts.
Environmental performance	Orientate buildings to maximise solar access for living areas and outdoor space. Use design features such as eaves, shading devices and window placement to allow winter sun in and reduce heat gain in summer. Cross-ventilation and thermal mass (e.g., concrete floors, masonry walls) should be leveraged for passive temperature regulation. Designs should use landscaping for climate moderation and amenity. Tree placement can provide shade, reduce the urban heat island effect, and support biodiversity. Integrate green roofs or vertical gardens. Maintain deep soil zones even on small blocks.
Easements / ROW	In the right circumstances, pedestrian connections with a public right of way or community title arrangement for communal open space should be adopted to foster community engagement and social outcomes. This should not displace the requirement to ensure each dwelling is provided with principal private open space. A balance between the 2 is critical to ensure adequate residential amenity.
Neighborhood Character	In greenfield areas, designs should consider suburb/precinct design standards/guides to assist in the creation of a neighborhood character. In in-fill areas, street facades are to contribute to the existing neighborhood character, with active street frontages at ground and the street address. Façade modulation and articulation should be adaptable to create a dynamic streetscape.

3.5. Construction Strategies

Delivering micro block housing at scale requires construction approaches that are not only space-efficient but also economically viable for builders, developers, and individual owners. The small footprint and tight site constraints inherent to micro blocks create unique challenges in construction logistics, access, and cost

management, particularly when compared to standard suburban lots. However, these constraints also present opportunities for innovation in design, construction methods, and project delivery models.

To support broader adoption of micro housing across the ACT, it is essential to identify construction strategies that enhance replicability, reduce costs, and promote sustainable outcomes. This includes leveraging modular or prefabricated systems, standardised design templates, efficient sequencing of trades, and coordinated infrastructure delivery. These strategies can help address key economic barriers, such as high per-square-metre costs, limited economies of scale on single blocks, and fragmented delivery models, while improving the quality and speed of housing supply.

Economic feasibility is highly sensitive to land cost, meaning that if the cost per square metre for micro blocks is equal to or lower than prevailing market rates, micro housing can provide a significantly more affordable and accessible entry point into the housing market.

The following table outlines key opportunities within the construction process to enhance the feasibility, efficiency, and sustainability of micro block housing, both for individual lot development and consolidated delivery models.

Table 8 Construction strategies

Criterion	Preferred Strategy
Modular and prefabricated construction	Modular and prefabricated systems offer fast, high-quality construction for micro blocks, with reduced waste and minimal site disruption. Prefabricated modules or flat-packed panels can be manufactured off-site under controlled conditions, ensuring high-quality finishes while reducing material waste and construction delays. By leveraging modular systems, builders can accelerate project timelines, improve sustainability outcomes, and maintain cost control, making it an ideal strategy for compact urban infill projects. Modular and prefabricated construction in the ACT can provide cost efficiency when used on multiple dwellings within one development. Consideration should be given in subdivisions for land releases of larger micro block parcels (20 plus blocks) to developers to use prefabricated technology. Modular and prefabricated construction aligns strongly with the ACT Government's sustainability goals and development incentive frameworks by promoting resource efficiency, reducing construction-related emissions, and accelerating delivery of high-quality, affordable housing. These systems support compact urban infill strategies by minimizing on-site disruption and enabling faster build times—key objectives outlined in the ACT Housing Strategy. When integrated into larger micro block subdivisions, particularly those exceeding 20 dwellings, modular approaches can enhance affordability and consistency in design, supporting both environmental and economic sustainability targets. Encouraging the use of prefabricated technology through targeted land release policies or incentives could further streamline development, reduce embodied carbon, and contribute to a resilient and efficient housing market across the Territory.
Lightweight construction materials	Using lightweight materials like timber or steel frames with efficient cladding enables quick, cost-effective builds. Timber and light steel framing systems, combined with cladding materials such as fibre cement, metal sheeting, or recycled timber, allow for streamlined assembly without the need for heavy machinery. These materials are well-suited to Canberra's variable climate, offering excellent insulation properties when correctly detailed. The use of lightweight construction principles should consider fire separation construction techniques that allow for future demolition of an individual dwelling without impacting its neighbour.

Sustainable systems integration	Incorporating solar panels and efficient appliances early in construction supports long-term savings and environmental performance, aligning with ACT's sustainability goals. Rainwater tanks should not be made compulsory and should be at the owner's discretion. The tanks remove space available for the dwelling and provide little measurable benefit. A small roof footprint would yield little opportunity for capturing of rainwater. Further, as the block size would only allow for a small garden space, it would be more waterwise. Where the development includes community title private open space, there is opportunity to provide rainwater harvesting from individual blocks into a community title rainwater tank to support the landscaping within that communal space. Where the development includes community title private open space, there is opportunity to provide communal garden and organic waste composting.
Regulatory Compliance	Construction on micro blocks must align with the ACT's planning framework, including the Territory Plan, the National Construction Code, and specific local zoning requirements. Custom solutions should ensure compliance with setbacks, solar access, and open space while optimizing the block's potential.
Affordability-First Approaches	Simplified designs, prefabrication, and durable materials help keep construction costs low. Energy-efficient systems reduce ongoing bills which support long-term affordability. Materials and systems should be chosen for durability and low maintenance, ensuring long-term savings for occupants. Designing for thermal efficiency and low operational costs is equally important in Canberra's climate, helping to keep utility bills manageable for diverse household types.
Adaptive and Incremental Construction	Construction strategies could allow for future modifications or expansions, such as adding a second storey, a rear studio, or additional bedrooms. This would be achieved through reinforced foundations, modular construction elements, or easily accessible utility connections. Planning for adaptability ensures the dwelling can meet changing needs over time, adding long-term value

3.6. Key Planning and Leasing Considerations

3.6.1. Land Titles and Zoning Recommendations

3.6.1.1. Community Title

In circumstances where there is a communal area of open space within a micro block housing development, comparable to that such as Jacka, a community title would need to be created/registered on title.

Community Title Schemes are established under the *Community Title Act 2001* and allow separately owned blocks to share communal spaces or amenity that are maintained by the owners through a body corporate. This community title will allow for a cohesive community feel to be fostered through the maintenance of communal space in the development.

Any concerns in relation to landscape upkeep and maintenance of any such communal space will need to be considered and addressed in a plan of management that will be required to be lodged future development applications.

3.6.1.2. Crown Leases and Community Titling

RZ3 Zoned Multi-Unit Sites

For land parcels zoned RZ3 with existing Crown Leases that specify a permitted number of dwellings, the development of micro homes presents a practical and financially efficient opportunity. Provided that the total

number of proposed dwellings does not exceed the entitlements outlined in the Crown Lease, the development can proceed with minimal Lease Variation Charge (LVC) implications.

The primary requirement in these scenarios is the submission of a subdivision application to create individual blocks, each with its own Crown Lease. The current per-block contribution fee is $7,500. Dwelling entitlements from the original lease are then distributed proportionally across the newly created micro lots.

RZ1–RZ2 Zoned Standard Residential Blocks

In contrast, standard residential blocks zoned RZ1 or RZ2 often face more restrictive lease conditions. These blocks typically either lack a “residential purposes” clause or are limited to a single dwelling under the existing Crown Lease. In such cases, any proposal to increase the number of dwellings would trigger a significant LVC.

The landowner must pay this charge to vary the lease and gain approval for any additional dwellings. These charges are calculated based on the increase in development rights and can pose a considerable financial barrier to micro home development on these blocks.

RZ2 zones should indeed remain part of the conversation around micro block housing in the ACT. While LVC costs pose practical challenges, RZ2 zoning is inherently aligned with the ACT’s strategic intent to promote low-rise, medium-density housing in established suburbs. Excluding RZ2 altogether may overlook opportunities to address housing diversity and supply within walkable, well-serviced areas—key goals of the Territory Plan and the Missing Middle housing objectives.

To strike a balanced approach, it is recommended that RZ2 be identified as conditionally suitable for micro block housing, particularly in locations where lease conditions support redevelopment or where planning mechanisms (e.g. LVC waivers, precinct codes) can reduce financial barriers. This more nuanced position allows flexibility for targeted interventions while maintaining consistency with broader planning goals. Clarifying this would better reflect the potential of RZ2 zones to contribute meaningfully to housing choice and gentle density across Canberra’s urban fabric.

Leases with General ‘Residential Purposes’ Clause

Where a Crown Lease includes a general-purpose clause stating ‘residential purposes’, but no explicit dwelling entitlements, the landowner is required to purchase dwelling rights, beginning with the right for the first residence. Charges can range from $30,000 to $140,000 per additional dwelling, depending on the suburb and specific location within the suburb.

These costs are determined on a sliding scale, where the cost per additional dwelling typically decreases as more rights are purchased. However, this varies by locality and may not always provide cost efficiency for small-scale developments.

Strategic Considerations for Micro Block Implementation

The integration of micro home developments offers significant strategic benefits, particularly in the context of new suburbs and greenfield developments where Crown Leases have not yet been issued. In these areas, subdivision and micro-home configurations can be embedded into the Subdivision Design Application (SDA) stage, streamlining approval processes and reducing later-stage lease amendment requirements.

Conversely, in areas where Crown Leases have already been registered, implementing micro block development may result in substantial LVC costs and processing delays. These factors can impact project viability and timelines, particularly where entitlements need to be increased or lease purposes modified.

3.6.2. ACT Planning Policy

3.6.2.1. ACT Housing Design Guide (HDG)

The Housing Design Guide contains design guidance that relate to residential developments at a block and building scale and refers to the Urban Design Guide for specific guidance where there is overlap between

the two design guides at a block scale. The HDG also contains design guidance for seven themes, which are:

- Country and Place
- Urban structure and natural systems;
- Site and land use;
- Access, movement, and place;
- Public space and amenity;
- Building design and built form;
- Sustainability and environment

There are individual design elements within the HDG which are designated as ‘elevated weighting’ whereby they are considered more impactful than other items in the HDG; these are:

- visual privacy and building separation,
- solar and daylight access,
- common circulation and spaces,
- apartment size and layout,
- ceiling heights,
- private open space and balconies, and
- natural ventilation.

To effectively accommodate micro block housing as a new typology within the ACT Housing Design Guide, a series of targeted updates and additions are recommended. These changes aim to ensure that the unique spatial, functional, and environmental characteristics of micro housing are appropriately addressed, while maintaining the guide’s broader objectives of quality, liveability, and sustainability.

The main recommendation is the introduction of micro block housing as a recognised typology. This includes adding “Micro Block Housing” as a distinct typology alongside detached houses, townhouses, and apartments. Further, defining key attributes such as lot size (typically <130m²), built form (single or dual-storey compact dwellings), and intended purpose (affordability, infill, urban diversity). Lastly, include visual examples and scenarios demonstrating how micro housing fits into different contexts (greenfield, infill, mixed use).

The dedicated section will include tailored design benchmarks for setbacks and site coverage appropriate to smaller lot sizes, private open space alternatives, such as rooftop terraces or communal courtyards, daylight access, ventilation, and privacy in high-density conditions, and minimum internal floor areas and efficient layout standards for compact living.

Lastly the micro block section will provide adapted existing performance standards, incorporate block and subdivision design guidance, and guidance on crown lease requirements.

By embedding these changes into the ACT Housing Design Guide, the Territory can actively support the delivery of diverse, compact, and affordable housing, while maintaining high standards of design, amenity, and environmental performance.

3.6.2.2. Missing Middle Housing Design Guide

The draft Missing Middle Housing Design Guide is detailed at Section 1.3.2 above. The draft guide has been prepared to respond to the housing affordability crisis and enable the delivery of new and diverse housing choices.

One key recommendation of this report is to amend the draft guide to include the micro block housing typology. While micro block housing may not fully align with the definition of missing middle housing, being medium density typologies, they serve a similar function in providing diverse forms of housing in infill areas.

Including micro block housing into the guide is both a logical and timely policy step, particularly as the guide is currently open for feedback. There are several components of the draft guide that could be amended to include references to micro blocks and encourage this form of housing.

To integrating micro block housing into the ACT planning system, inclusion in the design guide is a simple yet effective mechanism to ensure clear direction and greater confidence for planners and developers pursuing the micro block housing development as part of the delivery of diverse housing.

Practical methods of integration into the draft guide are detailed at **Error! Reference source not found.** below. In summary, an overarching inclusion and reference to micro blocks as a missing middle housing typology is recommended. This also crucially includes listing micro blocks under Part 3 of the draft guide as a Building Typology. To demonstrate what this could look like, a preliminary mock-up of this listing is provided below at **Error! Reference source not found.**. It should be noted that is only an initial mock-up and any inclusion in the housing guide would require a detailed description of the micro block housing.

Table 9 Recommendations to implement into the draft Missing Middle Housing Design Guide

Section and Page (pg.)	Current draft component	Suggested inclusion
Throughout	General description of missing middle types of homes	Amend to include micro blocks and description listed as shown below in mock-up.
How to use this design guide – pg. 8	"Missing middle housing includes" "What building typologies does this design guide apply to"	Amend text and graphics to include micro blocks
Understanding Your Site – pg. 25	Site scenario matrix	Typology: Micro block Block size: ≤130 sqm Suggested site conditions: Block consolidation, limited block depth or width, irregular shaped blocks, corner sites, open space interface, laneway access, pedestrian connections, transport corridors, easements.
3.1 Building Typologies – pg. 30 onwards	Identification for appropriate building typologies for different site locations and conditions	As per Table 8 below, include design guidance, characteristics, benefits, "where to use" and typical layouts for the micro block housing typology.
3.3B Non-Residential Uses – pg. 53	Includes appropriate non-residential land uses	Include mingle community spaces to the list of appropriate non-residential uses.
3.3C Block Consolidation and Sub-Division	Provisions for strategic block consolidation and subdivision to optimise land use outcomes.	Potential to add some recommendations/principles relating to community block title arrangements in the design guide in micro block housing developments in appropriate circumstances.
4.1 Site Access and Connectivity	Design guidance for well-integrated development outcomes that are connected and accessible.	Most of these provisions would be relevant to micro block housing development.
5.1 Communal Open Space	Design guidance for provision of high-quality COS for missing middle living.	Most of these provisions would be relevant to micro block housing development. A 5-6m C.T.P.O.S. width supports high quality landscape area, including deep root zone.

5.2 POS and Balconies	Design guidance for open space to ensure adequate amenity for future residents	Opportunity to identify a reduced provision of PPOS at the ground plane where elevated PPOS with better sunlight access and/or community title open space is provided in an integrated micro block housing development.
6.2 Orientation and Street Interface	Design guidance to create active and vibrant street edges.	Building setback and separation guidelines should recognise in micro block arrangements, reduced (or nil) side setbacks and building separation may be appropriate where certain performance-based criteria are met.
Glossary	Add micro block housing as a defined typology of missing middle housing.	
General comment	It would be beneficial to include in the design guide "exemplar" case studies of micro block developments in the various sections above and throughout the guide, to show how micro block housing can be done well.	

Table 10 Mock-up of Building Typology Insert

3.1F MICRO BLOCK HOUSING

Micro block housing is similar to a terrace or townhouse arrangement, but where each individual dwelling is located on a single block of land smaller than a compact block. Depending on the number of dwellings across the broader housing development, there are many possible layouts to achieve good design and amenity.



Figure 15 Typical 2-3 storey micro block housing (Source: DNA)

Other Names:

Small-lot housing, Super-compact blocks, Micro-lots, Single residential blocks, micro block development, missing middle housing.

Key Characteristics:

Height:

1-2 storeys. On larger sites or where there are opportunities for additional height with no adverse environmental impact, up to 3 storeys.

Open space provision:

Typically, private yards, with common landscaping including common open space areas and/or facilities as well as around a shared driveway.

Parking arrangement:

Individual car parking associated with each dwelling. Front parking access is generally to be avoided as it creates inactive frontages and many

	vehicular crossovers. If front parking access is required, it should be well integrated into the design of the micro dwelling.
Where to use Micro block housing is especially appropriate in low to medium-scale, well located and serviced areas where medium density building volumes are appropriate. Block Characteristics: Typically suited to small, regular blocks. Block size: 130qm or less Zone: RZ1 – Suburban Zone RZ2 – Suburban Core Zone RZ3 – Urban Residential Zone RZ2 – Suburban Core Zone* RZ4 – Medium Density Residential Zone **The Suburban Core Zone may be suitable in certain targeted locations where lease conditions allow where panning mechanisms can mitigation financial constraints.*	**Benefits** These developments can be designed to provide significantly higher dwelling density with high level of shared amenity and convenience Can offer more affordable housing options compared to single-family homes, making it easier for people to live in the suburbs they want Provide more diverse living arrangements, catering to different family sizes and lifestyles within the same neighbourhood.

Built examples of micro block houses



Figure 16 **Façade treatment provides visual interest and screening provides privacy (Source: Realestate.com.au)**



Figure 17 **Ground floor interface contributes to the safety and vitality of streets (Source: Realestate.com.au)**

Typical layouts for micro block housing

There are a range of alternative siting layouts for terrace houses that may be used depending on specific conditions such as planning controls, solar

orientation, site slope, adjoining buildings, block dimensions and shape.

Some typical layout examples for micro block buildings are outlined below and on the following pages. These examples may not be compliant with zoning specifications and regulations such as

MID-BLOCK

This design utilizes the 9.0m wide block (Type D), which allows for setbacks to front and side boundaries that are consistent with the current technical specifications for RZ1 blocks. Dwelling entry is via the community title side driveway/landscaped zone. This is a relatively inefficient layout but does provide high quality C.T.P.O.S. for residents.

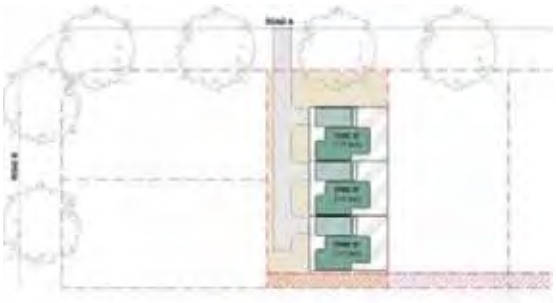


Figure 18 **Mid-block typology**

MID-BLOCK THROUGH SITE

This design utilizes the 7.5m wide block (Type A), which allows for a singular driveway down one side to centrally located parking to rear loaded blocks. Residual block area provides a narrow C.T.P.O.S for residents. A slightly wider block type would improve the useability of this space. Dwellings have good separation, providing opportunity for deep root landscape zones.

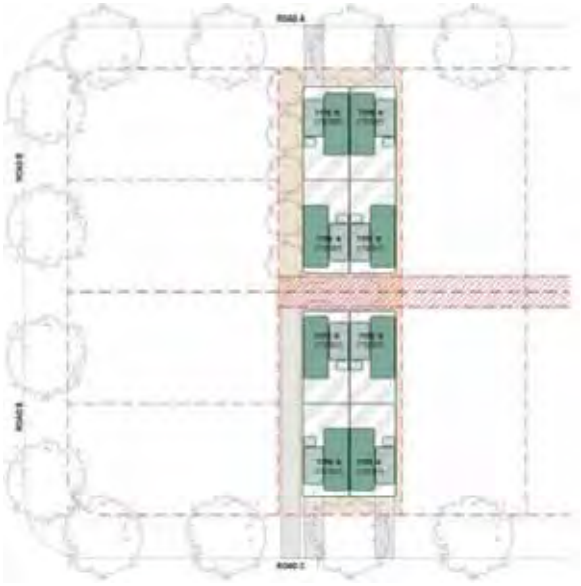


Figure 19 **Mid-Block Through site typology**

CORNER-BLOCK

End sections offer excellent opportunities for more community focused developments. Centrally located parking is more efficient and enhances C.T.P.O.S.. In this design dwellings are accessed through a central landscaped spine. The design offers large front setbacks for high quality streetscape integration.

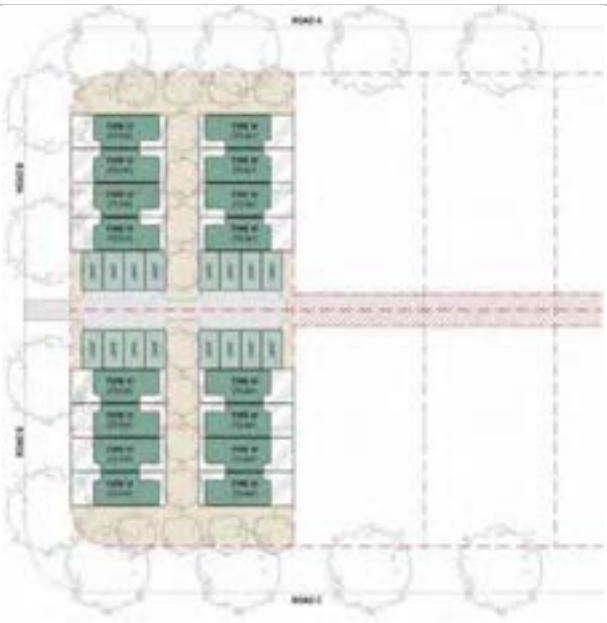


Figure 20 **Corner block typology**

IRREGULAR BLOCKS

The design works with the site geometries to provide micro blocks to the edges and a central driveway access. Whilst it would have been desirable to have more dwelling directly facing public pathways, it was less efficient. One benefit to irregular blocks is it typically creates more ‘left over’ area for C.T.P.O.S.



Figure 21 **Irregular block typology**

3.6.3. ACT Territory Plan - Block Dimensions and Layout Flexibility

Under the new Territory Plan, blocks fall into three size categories, large, mid-size and compact. The Dictionary to the Territory Plan states:

> ***Large Block*** *means a block with an area greater than 500m^2,*
>
> ***Mid-sized Block*** *means a block with an area greater than 250m^2 but less than or equal to 500m^2,*
>
> ***Compact Block*** *means a block with an area of 250m^2 or less.*

Therefore, any block that is proposed below 250m^2 would be defined as a compact block. The Territory Plan has some Policy Assessment Requirements in the Residential Zones Policy that are related to the size of blocks, such as site coverage. A compact block has a maximum site coverage of 70%. For a block at 250m^2 this allows 175m^2 of developable area while a block of 80m^2 would only allow 56m^2.

If the micro block typology is successful, the SLA should consider advocating for a new block size definition which allows for micro blocks. This definition could read as:

> **Micro Block** means a block with an area of 130m^2 or less
>
> This would also amend the compact block definition where it changes to:
>
> **Compact Block** means a block with an area greater than 130m^2 but less than or equal to 250m^2

The 130m² figure referred to above could be adjusted to suit the appropriate maximum size for a micro block. Further, consideration may be given to including a minimum block size (of say 75m² or so) in the definition of a micro block, to provide EPSDD with certainty that micro blocks will only be delivered to a minimum size that permit an adequate amount of internal and external amenity.

3.6.4. Greenfield Vs Infill Development Considerations

Micro blocks are most effectively designed within new suburbs undertaken through a Subdivision Design Application (SDA) where their location, functionality and integration within the suburb can be best accommodated. However, micro blocks are not limited to new suburbs. There is growing potential for their delivery in infill contexts, particularly as a means to increase housing diversity and density in established areas.

While infill presents challenges, such as Crown Lease constraints, fragmented land ownership, infrastructure limitations, and neighbourhood character concerns, many of these can be addressed through careful planning and urban design.

However, micro block principles could also be applied to dual- and tri- occupancy development on existing residential blocks, particularly within RZ1 zones. Similar to unit titling secondary dwellings in the RZ1 zone against dual occupancies, micro blocks could also be integrated into existing urban areas through the *Unit Title Act 2001.* Existing dual- or tri-occupancy blocks could be paired with micro block housing to provide greater in-fill housing options in the ACT. Micro blocks are similar to secondary dwellings, emphasising efficient land use and high-quality design to create compact yet functional dwellings.

Key strategies for in-fill include:

- Targeting large or dual frontage lots for subdivision.
- Using rear-lane or battle-axe access solutions.
- Ensuring privacy, amenity, and solar access.
- Aligning with planning controls or pilot programs to facilitate implementation.

While greenfield sites offer the most straightforward pathway for micro block development, a principle-led approach can enable successful integration in infill areas, supporting broader goals around housing affordability, diversity, and urban renewal across the ACT.

3.7. Optimal Delivery Approaches

The following table provides a comprehensive framework of policy recommendations that support both individual block delivery (e.g., small-lot infill by private owners or small developers) and consolidated block delivery (e.g., grouped micro lots released by the Suburban Land Agency or developed in partnership with Community Housing Providers). These models represent distinct yet complementary pathways for increasing housing diversity, affordability, and sustainability in the ACT.

Table 11 Supplementary Recommendations for Optimal Delivery Approaches

Policy Area	Individual Block Delivery	Consolidated Block Delivery
Design Standardisation	Use adaptable pre-approved templates suited to site constraints (e.g. setbacks, orientation).	Develop lot-based pattern books or design guidelines / criteria with façade and material variations to reduce repetition.
Planning Approvals	Promote code-assessed pathways for compliant builds using pattern templates.	Enable bulk or precinct DA approvals for grouped lots using standardised designs.
Construction Strategy	Use lightweight or modular systems for efficient, low disruption builds on tight urban sites.	Scale modular or panelised systems for grouped delivery; leverage economies of scale.
Delivery Pathways	Encourage turnkey design-build or owner-builder pathways with pre-vetted templates.	Support house & land packages, turnkey delivery by developers, and CHP partnerships.
Infrastructure & Services	Use consolidated or modular service pods to simplify utility connections on tight blocks.	Coordinate infrastructure delivery across lots (e.g., shared waste, solar, drainage systems).
Affordability & Accessibility	Incentivize simple designs with high energy efficiency and optional accessibility features to reduce upfront and ongoing living costs, making homes more attainable and comfortable for a broader range of residents.	Tie land sales to the inclusion of affordable and adaptable dwellings—such as through partnerships with Community Housing Providers (CHPs) or by setting clear delivery targets—to ensure that new developments contribute meaningfully to meeting diverse housing needs. Additionally, promoting adaptable design standards supports ageing in place and improves long-term housing flexibility, while integrating energy-efficient features aligns with broader sustainability goals and reduces environmental impact.
Buyer/Occupant Engagement	Enable personalisation through selectable finishes or modular add-ons.	Provide choice through pre-approved designs with façade/material options; allow for staged delivery.
Education & Tools	Use GIS-based platforms to show block-specific build envelopes and design tools.	Offer interactive platforms with pattern book previews and planning overlays.
Demonstration Projects	Fund pilot projects on individual blocks in infill areas to showcase feasibility and quality.	Deliver grouped showcase projects on SLA or government land, possibly with CHPs.

Stakeholder Partnerships	Encourage partnerships between homeowners and small builders/design firms.	Facilitate collaborations between SLA, CHPs, volume builders, and developers.

By aligning strategies across planning, construction, infrastructure, and approvals, the recommendations aim to:

- Accelerate housing delivery through streamlined approvals and replicable design solutions.
- Promote quality and choice via endorsed pattern books and flexible delivery pathways.
- Support social outcomes through integration of affordable and accessible housing.
- Encourage innovation and collaboration across the public, private, and community sectors.

This integrated approach will help position micro block housing as a viable and replicable component of Canberra's broader housing strategy—delivering compact, liveable homes in well-connected urban areas.

3.8. Planning Pathway Options

There is an option to allow for a more streamlined approval process between the developer and EPSDD. To accelerate the delivery of high-quality, compliant housing, a *pattern book* approach offers a practical tool for developers, designers, and planning authorities. By providing a curated set of pre-approved design templates and design typologies that are tailored to meet local planning controls, block sizes, and performance standards, helps to reduce uncertainty and delays in the development process. It enables faster assessments, improves design consistency, and lowers the risk of costly redesigns or planning rejections. This would support quicker approvals, encourage better design outcomes, and increase the delivery of housing in Canberra.

The pattern book could include a range of high-amenity, affordable and sustainable designs that are suited to Canberra's conditions and pre-approved against the new (and future) design guides and planning policies.

An example of this is the NSW Government Housing Pattern Book, which is in the final stages of development to accelerate the delivery of low- and mid-rise housing. The NSW Housing Pattern Book will contain designs and guidelines to support the construction of more high-quality housing including terrace houses, dual occupancy homes, low-rise apartments (up to 2 storeys) and mid-rise apartments from 3 to 6 storeys. The patterns will be modest, adaptable, sustainable, affordable and beautiful designs. The homes will suit our community's needs through all stages of life, from raising children to working from home through to ageing in place. The pattern book will create the opportunity for more housing where it's needed and promote greater use of low- and mid-rise housing in our neighbourhoods.

The NSW Housing Pattern Book and the way in which it is being developed is suitable for the NSW context. It is not necessarily directly replicable to the ACT context, but the concept can be applied to ensure an outcome relevant to the ACT. A "cookie cutter" approach is not likely to be feasible in the ACT given it's unique planning and leasing system and block typologies. Pattern designs that include flexibility to respond to differing contexts (i.e., new release versus in-fill) and typical block configurations could be appropriate in this context to provide a level of certainty on good planning, amenity and sustainable outcomes.

4. Evaluation of Site and Design Options – Patternisation

Taking into consideration the recommendations and criteria identified in the section above, DNA Architects has developed a series of site configuration and design options/types. These options demonstrate how a micro block housing development could be practically implemented in a range of site scenarios and configurations relevant to the ACT context.

However, not all block types and layouts tested were successful, particularly in existing block sizes. A key limitation was that some micro blocks did not fit comfortably or appropriately within the dimensions or constraints or traditional blocks in existing residential areas. Contrastingly, if streetscapes are designed specifically to accommodate micro block housing, the typologies can seamlessly integrate without design compromises.

In some instances, configurations were too dense and did not provide a good design outcome. They lacked sufficient open space or visual relief from the bulk, which could potentially negatively impact amenity and neighbourhood character.

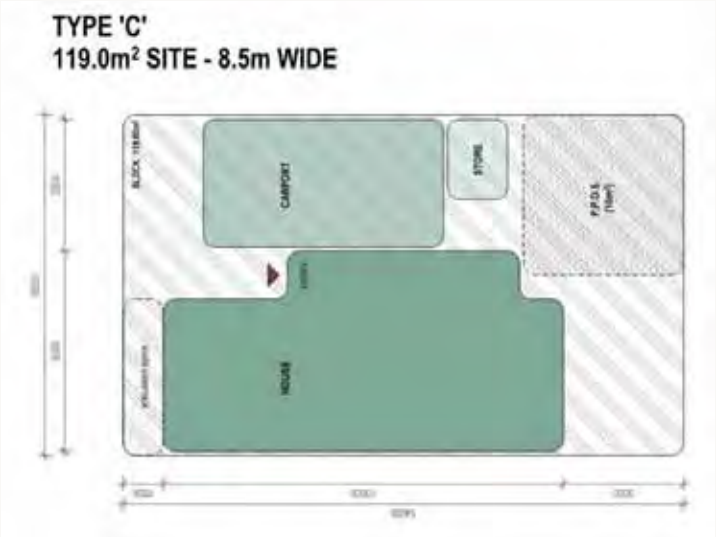
In contrast, where streetscapes are specifically **designed to accommodate micro block housing**, these typologies integrate more effectively and without significant design compromise.

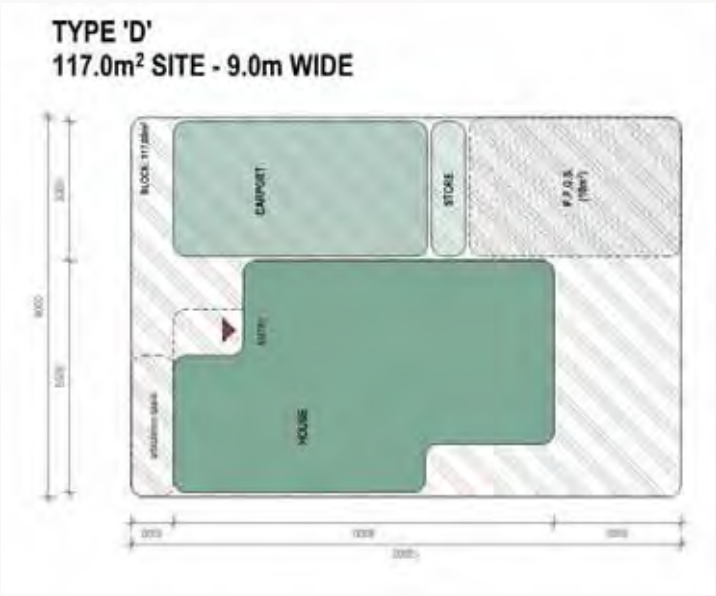
Annexure 1 includes a complete assessment of the housing typologies tested for micro block housing.

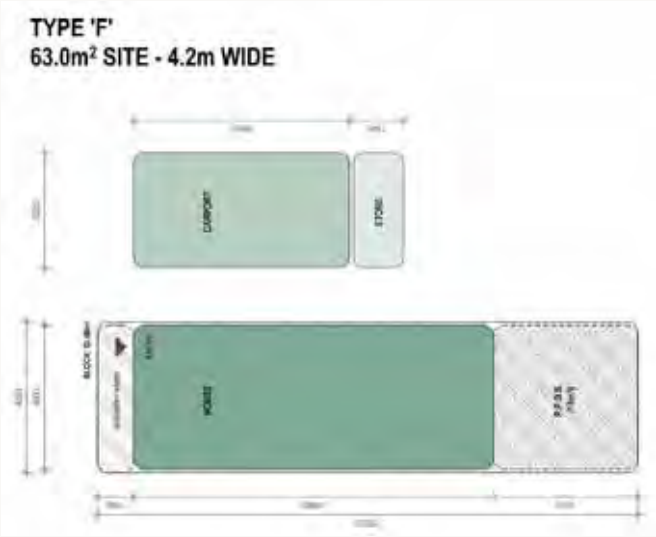
Table 12 below shows the typology options that have been prepared. In Table 13, these typology options have been inserted into different block scenarios to show layout and configuration options.

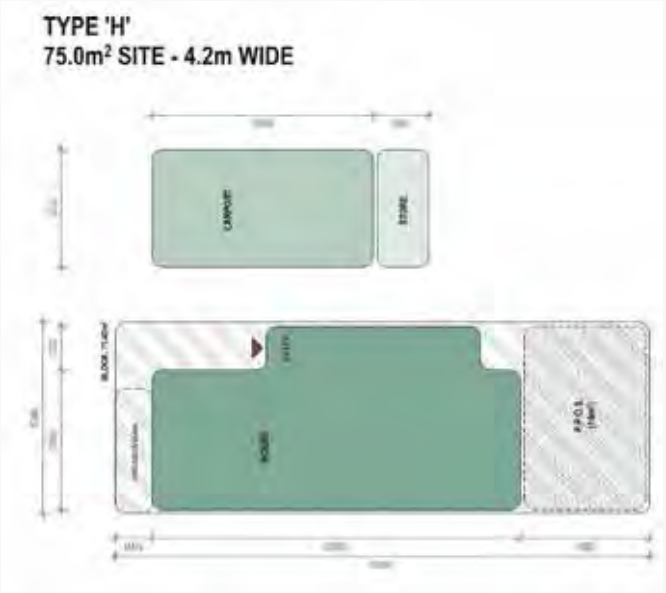
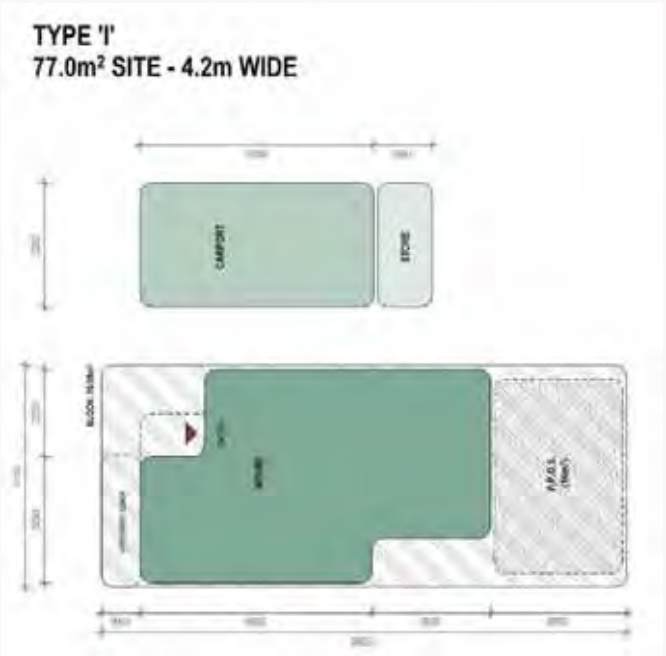
Table 12 Micro Block Housing Typology "Types"

Typology Image and Description (Source: DNA Architects)	Planning Controls and Outcomes
Block Types (with car parking on block)	
 Narrower longer block configuration. Two-storey two-bedroom dwelling with entry via the side. Carport with services store to rear. Potential for additional P.P.O.S. above the carport.	Block Area: 112.5m² Site Coverage: 55.3% Min. P.P.O.S: 16.0m² Soft Landscape: 35% 2-3 storey dwelling footprint with side entry, and carport with deck above. • North to Front, Side or Rear • 1m Front Setback • 0m Side Setback • 4m Rear Setback • 55.3% Site Cover • 16m2 Min P.P.O.S. • 35% Soft Landscape Area

Typology Image and Description (Source: DNA Architects)	Planning Controls and Outcomes
	Block Area: 112.0m² Site Coverage: 57.6% Min. P.P.O.S: 16.0 m² Soft Landscape: 28% 2-3 storey dwelling footprint with front entry, and carport with deck above. • North to Front, Side or Rear • 1m Front Setback • 0m Side Setback • 2m Rear Setback • 57.6% Site Cover • 16m2 Min P.P.O.S. • 28% Soft Landscape Area
	Block Area: 119.0m² Site Coverage: 56.4% Min. P.P.O.S: 16.0 m² Soft Landscape: 30% 2-3 storey dwelling footprint with front entry, and carport with deck above. • North to Front, Side or Rear • 1m Front Setback • 0m Side Setback • 3m Rear Setback • 56.4% Site Cover • 16m2 Min P.P.O.S. • 30% Soft Landscape Area

Typology Image and Description (Source: DNA Architects)	Planning Controls and Outcomes
	Block Area: 117.0m² Site Coverage: 54.7% Min. P.P.O.S: 16.0 m² Soft Landscape: 32% 2-3 storey dwelling footprint with front entry, and carport with deck above. • North to Front, Side or Rear • 1m Front Setback • 0m Side Setback • 3m Rear Setback • 54.7% Site Cover • 16m2 Min P.P.O.S. • 32% Soft Landscape Area
	Block Area: 130.0m² Site Coverage: 64.7% Min. P.P.O.S: 16.0 m² Soft Landscape: 26% 2-3 storey dwelling footprint with front entry, and carport with deck above. • North to Front, Side or Rear • 1m Front Setback • 0m Side Setback • 0m Rear Setback • 64.7% Site Cover • 16m2 Min P.P.O.S. • 26% Soft Landscape Area

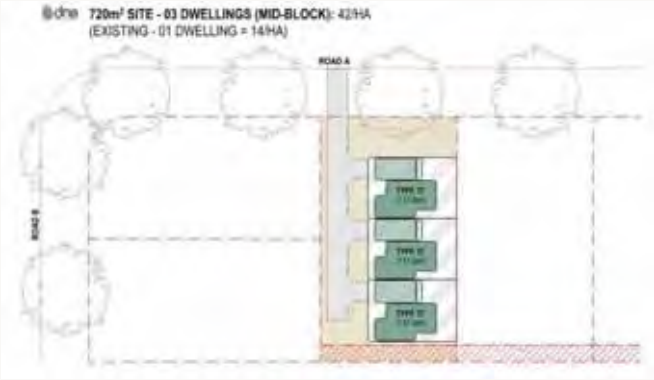
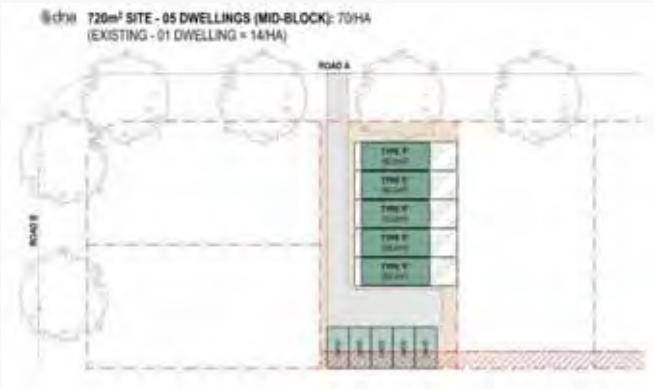
Typology Image and Description (Source: DNA Architects)	Planning Controls and Outcomes
Block Types (with car parking on community-title)	
	Block Area: 63.0m² Site Coverage: 63.5% Min. P.P.O.S: 16.0 m² Soft Landscape: 33% 2 storey dwelling footprint with front entry. Carport/store in community title area. • North to Side, Rear • 1m Front Setback • 0m Side Setback • 4m Rear Setback • 63.5% Site Cover • 16m2 Min P.P.O.S. • 33% Soft Landscape Area
	Block Area: 73.0m² Site Coverage: 58.0% Min. P.P.O.S: 16.0 m² Soft Landscape: 29% 2 storey dwelling footprint with front entry. Carport/store in community title area. • North to Side, Rear • 1m Front Setback • 0m Side Setback • 4m Rear Setback • 58.0% Site Cover

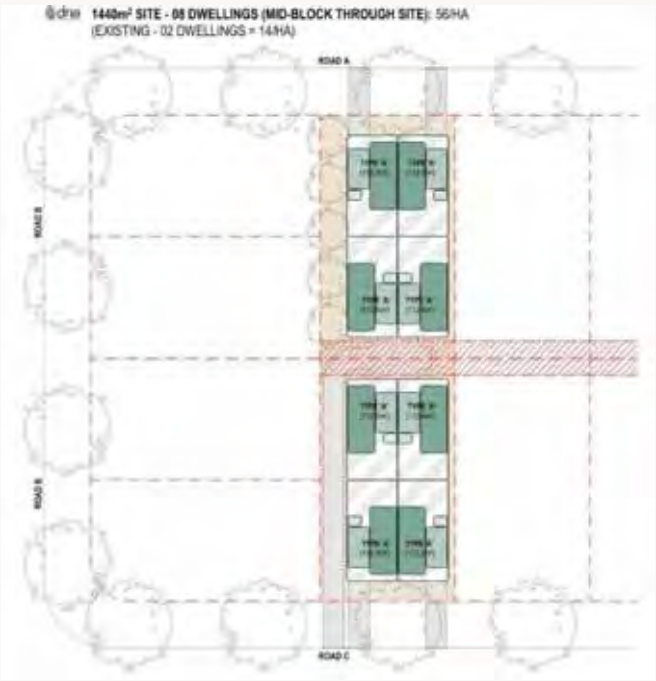
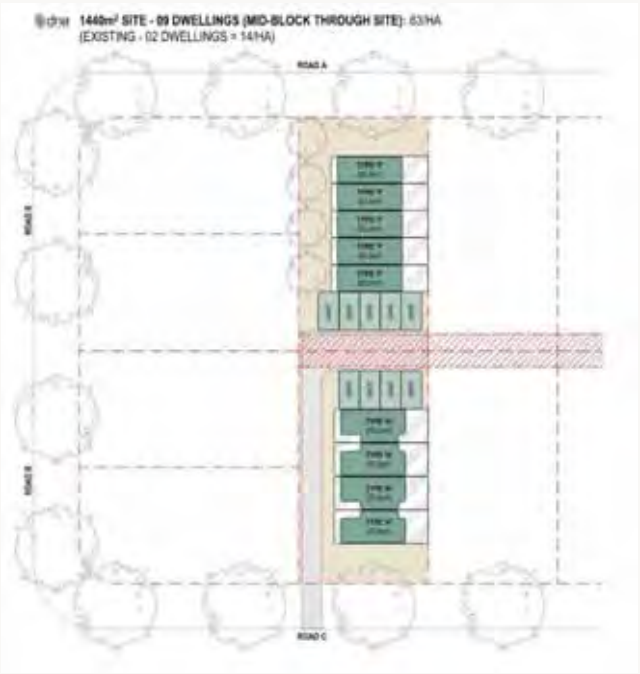
Typology Image and Description (Source: DNA Architects)	Planning Controls and Outcomes
	• 16m2 Min P.P.O.S. • 29% Soft Landscape Area
	Block Area: 75.0m² Site Coverage: 60.0% Min. P.P.O.S: 16.0 m² Soft Landscape: 29% 2 storey dwelling footprint with front entry. Carport/store in community title area. • North to Side, Rear • 1m Front Setback • 0m Side Setback • 4m Rear Setback • 60.0% Site Cover • 16m2 Min P.P.O.S. • 29% Soft Landscape Area
	Block Area: 77.0m² Site Coverage: 54.9% Min. P.P.O.S: 16.0 m² Soft Landscape: 30% 2 storey dwelling footprint with front entry. Carport/store in community title area. • North to Side, Rear • 1m Front Setback • 0m Side Setback

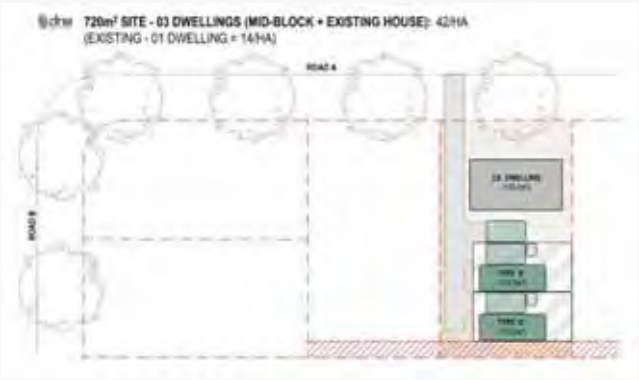
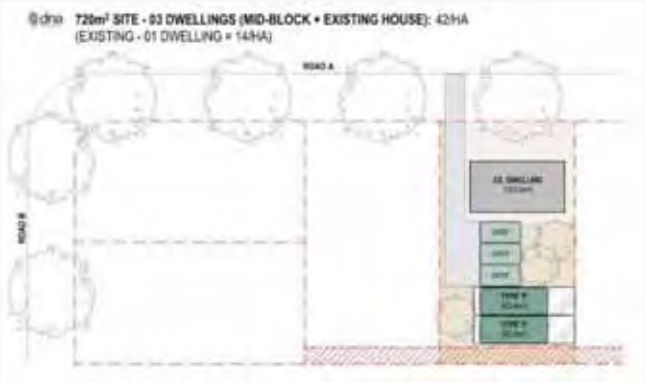
Typology Image and Description (Source: DNA Architects)	Planning Controls and Outcomes
	• 3.5m Rear Setback • 54.9% Site Cover • 16m2 Min P.P.O.S. • 30% Soft Landscape Area

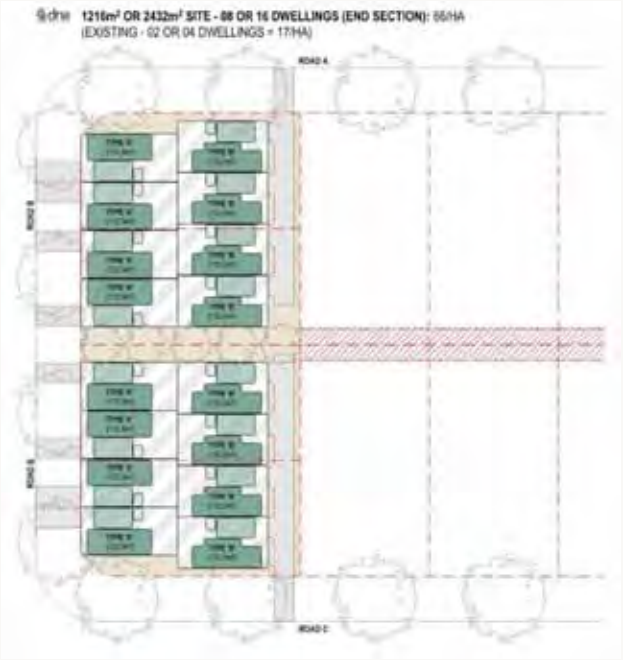
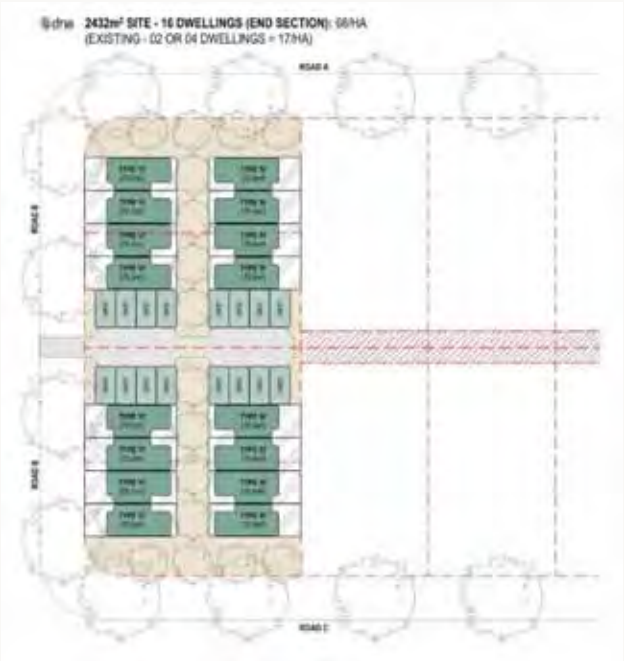
Table 13 Layout/ Site Configuration Options

Layout Options and Description (Source: DNA Achitects)	Planning Requirements and Controls
Existing Suburban Street Corner Block	
 600m² Existing Suburban Street Corner Block 4x Type 'A' Blocks This design utilizes the 7.5m wide block (Type A), which allows for setbacks to front and side boundaries that are consistent with the current technical specifications for RZ1 blocks. Dwelling entry is off the street, allowing rear courtyards to be private. This layout fits well into existing streetscapes.	Site Area: 600m² Blocks Area: 450m² Comm. Title: 150m² / 25% Dwelling/Ha: 67
 600m² Existing Suburban Street Corner Block 1x Type 'H' Block 4x Type 'F' Blocks	Site Area: 600m² Blocks Area: 327m² Carports Area: 111m² Comm. Title: 162m² / 27% Dwelling/Ha: 84

Layout Options and Description (Source: DNA Achitects)	Planning Requirements and Controls
This design utilizes the 4.2m wide block (Type F) and locates parking together off a singular driveway. The rear of the site acts as a community title private open space (C.T.P.O.S.) area for access to dwelling entries. Front courtyards can be screened from the street. This layout fits well into existing streetscapes.	
Existing Suburban Street Mid-Block	
 720m² Existing Suburban Street Mid-Block 3x Type 'D' Blocks This design utilizes the 9.0m wide block (Type D), which allows for setbacks to front and side boundaries that are consistent with the current technical specifications for RZ1 blocks. Dwelling entry is via the community title side driveway/landscaped zone. This is a relatively inefficient layout but does provide high quality C.T.P.O.S. for residents.	Site Area: 720m² Blocks Area: 351m² Comm. Title: 369m² / 51% Dwelling/Ha: 42
 720m² Existing Suburban Street Mid-Block 5x Type 'F' Blocks This design utilizes the 4.2m wide block (Type F) and locates parking at the rear of the site (in easement zone). Entries are off the driveway, and the front setback is further forward than typical. The outcome is achievable but doesn't offer high quality C.T.P.O.S. so proximity to public open space would be beneficial.	Site Area: 720m² Blocks Area: 315m² Carports Area: 111m² Comm. Title: 294m² / 41% Dwelling/Ha: 70

Layout Options and Description (Source: DNA Achitects)	Planning Requirements and Controls
 1440m² Existing Suburban Street Mid-Block 8x Type 'A' Blocks This design utilizes the 7.5m wide block (Type A), which allows for a singular driveway down one side to centrally located parking to rear loaded blocks. Residual block area provides a narrow C.T.P.O.S for residents. A slightly wider block type would improve the useability of this space. Dwellings have good separation, providing opportunity for deep root landscape zones	Site Area: 1440m² Blocks Area: 900m² Comm. Title: 540m² / 38% Dwelling/Ha: 56
 1440m² Existing Suburban Street Mid-Block 5x Type 'F' Blocks	Site Area: 1440m² Blocks Area: 615m² Carports Area: 258m² Comm. Title: 567m² / 39% Dwelling/Ha: 63

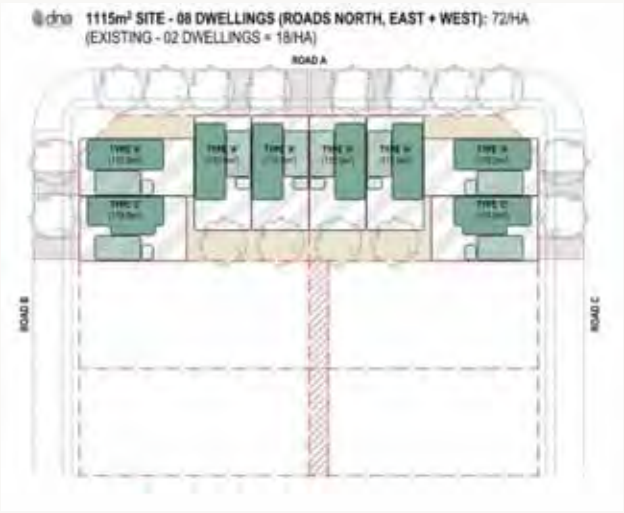
Layout Options and Description (Source: DNA Achitects)	Planning Requirements and Controls
4x Type ‘H’ Blocks This design utilizes a combination of the 4.2m wide block (Type F) and 5.2m wide block (Type H) and locates parking in the centre of the site in the easement zone. Entries are accessed through the side C.T.P.O.S. areas. Front setbacks are consistent with the Technical Specifications allowing good streetscape integration.	
 720m² Existing Suburban Street Mid-Block with Existing Dwelling 2x Type ‘A’ Blocks The ACT has many sites with existing ‘ex govie’ homes at the front of a typical generous block. This design integrates two micro blocks into the rear yard, utilizing an existing driveway down the side of the existing residence. New parking is provided to the existing residence, which would utilize the front of the site for P.P.O.S..	Site Area: 720m² Blocks Area: 225m² Comm. Title: 198m² / 28% Dwelling/Ha: 42
 720m² Existing Suburban Street Mid-Block 2x Type ‘F’ Blocks By using a narrower 4.2m wide micro block (Type F), a larger C.T.P.O.S. is afforded in the middle of the site which provides greater separation between the existing residence and new blocks.	Site Area: 720m² Blocks Area: 126m² Carports Area: 45m² Comm. Title: 352m² / 49% Dwelling/Ha: 42

Layout Options and Description (Source: DNA Achitects)	Planning Requirements and Controls
Existing End-Section Block	
 2432m² Existing End Section Blocks 8x Type 'A' Blocks 8x Type 'B' Blocks End sections offer a great opportunity for larger micro block communities to be developed. The design breaks the site into groupings of four dwellings in a row, with a generous central C.T.P.O.S providing opportunity for deep root zone. Larger developments can utilise various block types to create diversity.	Site Area: 2432m² Blocks Area: 1796m² Comm. Title: 636m² / 26% Dwelling/Ha: 66
 2432m² Existing End Section Blocks	Site Area: 2432m² Blocks Area: 1200m² Carports Area: 355m² Comm. Title: 877m² / 36% Dwelling/Ha: 66

Layout Options and Description (Source: DNA Achitects)	Planning Requirements and Controls
16x Type ‘H’ Blocks End sections offer excellent opportunities for more community focused developments. Centrally located parking is more efficient and enhances C.T.P.O.S.. In this design dwellings are accessed through a central landscaped spine. The design offers large front setbacks for high quality streetscape integration..	
Irregular Block	
 1781m² Existing Irregular Blocks 10x Type ‘A’ Blocks The design works with the site geometries to provide micro blocks to the edges and a central driveway access. Whilst it would have been desirable to have more dwelling directly facing public pathways, it was less efficient. One benefit to irregular blocks is it typically creates more ‘left over’ area for C.T.P.O.S..	Site Area: 1781m² Blocks Area: 1125m² Comm. Title: 656m² / 37% Dwelling/Ha: 57
Terrace Blocks	
 3130m² New Terrace Type Subdivision with Roads to All Sides	Site Area: 3130m² Blocks Area: 2925m² Comm. Title: 205m² / 06% Dwelling/Ha: 83

Layout Options and Description (Source: DNA Achitects)	Planning Requirements and Controls
26x Type ‘A’ Blocks This design looks to provide the highest block yield for the site. Pocket parks have been provided at corners where block geometries make prohibit the use of modularized block types. It is recommended that the 45-degree chamfers at the ends of sections be reconsidered when planning a micro block development. Whilst this design is efficient in use land, it does not provide any high-quality communal area and would therefore require a public open space directly adjacent to the site. This design could also result in a very built form intensive streetscape, so it is recommended that certain planning guidelines be in place to offer streetscape relief, such as mandatory breaks in built form every 3-4 blocks.	
 3130m² New Terrace Type Subdivision with Roads to All Sides 8x Type ‘A’ Blocks 8x Type ‘C’ Blocks 6x Type ‘D’ Blocks This design looks to enhance the amenity of the site by ensuring every block has direct access to suitable C.T.P.O.S. reducing the dwelling per hectare ratio allows for high quality landscape zones, reducing the need for the development to rely on adjacent public open space. The design breaks the development into groupings of four dwellings to ensure permeability in the streetscape. Different block types have been used to ensure every block has rear access into the common areas. These areas offer deep root planting zones that deliver high quality tree canopy cover to the precinct. There is opportunity for each communal area to have a different character through its landscape treatment.	Site Area: 3130m² Blocks Area: 2554m² Comm. Title: 576m² / 19% Dwelling/Ha: 71
Terrace Mid-Section Block	
 1680m² New Terrace Type Subdivision with Roads to North + South 4x Type ‘A’ Blocks	Site Area: 1680m² Blocks Area: 1402m² Comm. Title: 278m² / 17% Dwelling/Ha: 71

Layout Options and Description (Source: DNA Achitects)	Planning Requirements and Controls
8x Type ‘C’ Blocks This design looks at using a mid-section in the same section typology as the previous designs. It showcases how a diversity in the streetscape can be provided by using the terrace housing block typology alongside micro blocks. A singular C.T.P.O.S. is accessible from all blocks through the use of different block types. Each block opens into a landscaped pathway through to a wider open space. The number of micro block can be varied. For this example, we have used clusters of 4 blocks.	
 960m² New	Site Area: 960m² Blocks Area: 780m² Comm. Title: 180m² / 19% Dwelling/Ha: 63
Terrace Type Subdivision with Roads to North + South 6x Type ‘E’ Blocks This design also utilizes a mid-section in the same section typology as the previous designs. It illustrates how a communal driveway network can be used, which may be suitable for some sections where multiple driveways off a street are not appropriate. The driveway could be either one way in and out, as shown here, or a one-way through road. A suitable width between blocks needs to be maintained to allow for driveway access, pedestrian access, and high-quality landscape areas with opportunity for deep root planting zones.	
Terrace End-Section Block	
 365m² New	Site Area: 365m² Blocks Area: 351m² Comm. Title: 14m² / 04% Dwelling/Ha: 83
Terrace Type Subdivision End Section 3x Type ‘D’ Blocks End sections are also suitable for micro blocks. In this design, one end section provides the opportunity for three micro blocks, significantly increasing the density whilst achieving a similar site bulk and scale. It is recommended that the 45-degree chamfers at the ends of sections be reconsidered when planning a micro block development. Various block types could be used to suit length of the street.	
Single Residential End-Section Block	

Layout Options and Description (Source: DNA Achitects)	Planning Requirements and Controls
 1115m² New Single Residential Type Subdivision End Section 6x Type 'A' Blocks 2x Type 'C' Blocks In this design two end-section blocks have been combined to deliver a micro block housing precinct. However, a singular block would also provide a similar outcome. Through the use of different block types, a generous and private C.T.P.O.S. is accessible from all blocks. Driveways have been placed to avoid being close to street intersections.	Site Area: 1115m² Blocks Area: 913m² Comm. Title: 202m² / 18% Dwelling/Ha: 72
 1955m² New Single Residential Type Subdivision End Section 6x Type 'A' Blocks 8x Type 'D' Blocks In this design four end-section blocks have been combined to deliver a micro block housing precinct. A central shared driveway makes use of an area typically designated as an easement zone. The removal of 45-degree chamfers to ends of sections would allow for either greater block density or increased C.T.P.O.S. in the centre.	Site Area: 1955m² Blocks Area: 1611m² Comm. Title: 344m² / 16% Dwelling/Ha: 72

Layout Options and Description (Source: DNA Achitects)	Planning Requirements and Controls
 1955m² New Single Residential Type Subdivision End Section 12x Type 'D' Blocks An alternative configuration for the four-block end-section is to introduce a laneway. This is a suitable development type where main roads do not provide opportunity for a higher level of driveways. A suitable width between blocks needs to be maintained to allow for driveway access, pedestrian access, and high-quality landscape areas with opportunity for deep root planting zones.	Site Area: 1955m² Blocks Area: 1404m² Comm. Title: 551m² / 28% Dwelling/Ha: 62

5. Conclusion

In conclusion, micro block development is emerging as a unique medium density housing typology which may offer a range of benefits to the ACT housing market in both in-fill and new release areas. Firstly, the typology addresses the pressing issue of housing affordability by providing more accessible entry points into the property market for residents. Secondly, micro block housing promotes sustainable urban growth by maximising land use efficiency, reducing sprawl, and fostering more walkable communities, supporting diverse and inclusive neighbourhoods. Furthermore, micro blocks offer opportunities for innovative design and housing typologies, catering to diverse lifestyles and preferences. While the overall density of a micro block development (done “well”) is not too dissimilar to typologies such as townhouse/terrace developments, the environmental and social benefits are well recognised. Overall, in the face of population growth and urbanisation, micro block development emerges as a viable solution to meet the housing needs of ACT residents while promoting sustainability and liveability in the region. Home (and block) ownership is more accessible to future residents, as opposed to other forms of *missing middle* housing which are typically governed by a strata title arrangement.

Another key benefit of micro block housing for the Canberra context is its potential replicability due to compact size and efficient use of space. The standardised design and construction methods would enable mass production, streamline the building process and reduce costs. While preliminary in nature, the various “patterns” developed by DNA Architecture for a range of block configurations demonstrate adaptability throughout several scenarios in the Canberra context. The growing interest in minimalist lifestyles and sustainable living further enhances the replicability of micro homes, driving innovation and investment in this housing typology.

In the context of the infancy of the new District Plans for Canberra, the new Territory Plan 2023, the draft Missing Middle Design Guide (currently under development) and the broader policy reforms around missing middle housing and outcomes-focused planning, there is a unique opportunity for micro block housing to be integrated into planning, design and construction frameworks in the ACT. The SLA and broader government entities can leverage from the past experiences of micro block housing delivery to implement what has worked well, and areas of improvement.

Further work could be undertaken in this space, to develop 1) sound planning principles and guidelines on micro block housing development for infill versus greenfield areas, 2) integrate these as amendments into the existing statutory and non-statutory planning documents that guide development in the ACT and 3) internal design guides and requirements for the SLA to ensure optimal delivery outcomes.

Annexure 1: Micro Block Drawing Presentation (DNA Architecture)

GYDE

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MICRO BLOCK TYPOLOGY STUDIES

THIS DOCUMENT SHOULD BE READ IN CONJUNCTION WITH THE MICRO-BLOCK HOUSING IN THE ACT REPORT BY AUTHORED BY GYDE CONSULTING PTY LTD IN COLLABORATION WITH DNA ARCHITECTS.

THE FOLLOWING DRAWINGS HAVE BEEN COMPLETED TO TEST MICRO BLOCK TYPOLOGIES AND THEIR CONFIGURATIONS ON SECTIONS OF LAND WITHIN THE ACT.

THESE DRAWINGS ARE NOT TO BE USED FOR OTHER PURPOSES BEYOND THE MICRO-BLOCK HOUSING IN THE ACT REPORT.

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Images:
Jacka Micro-Block Demonstration Project: DNA Architects in association with Plot Design Group and Yellow Architecture for the A.C.T. Government Suburban Land Agency

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BLOCK TYPES (WITH CAR PARKING ON BLOCK)

In order to test micro block configurations, a series of base designs were developed. These designs looked at suitable plan configurations that would achieve high quality amenity for residents. Designs had to deliver energy efficiency, good solar access, connectivity to outdoors, and be constructable with opportunity for modularization to address affordability. Different block widths and lengths were tested, with the Type ‘A’ block typology being a variation of the design used for the A.C.T. Government Suburban Land Agency’s Jacka Micro-lot Demonstration Project.

MICRO BLOCK HOUSING IN THE ACT

This collection of micro block types were designed to provide car parking, services storage and Principle Private Open Space (P.P.O.S.) requirements within each block. Blocks range from 7.5m wide to 10.0m wide.

TYPE 'A'
112.5m² SITE - 7.5m WIDE



2-3 storey dwelling footprint with side entry, and carport with deck above.

- North to Front, Side or Rear
- 1m Front Setback
- 0m Side Setback
- 4m Rear Setback
- 55.3% Site Cover
- 16m² Min P.P.O.S.
- 35% Soft Landscape Area

TYPE 'B'
112.0m² SITE - 8.0m WIDE



2-3 storey dwelling footprint with front entry, and carport with deck above.

- North to Front, Side or Rear
- 1m Front Setback
- 0m Side Setback
- 2m Rear Setback
- 57.6% Site Cover
- 16m² Min P.P.O.S.
- 28% Soft Landscape Area

TYPE 'C'
119.0m² SITE - 8.5m WIDE



2-3 storey dwelling footprint with front entry, and carport with deck above.

- North to Front, Side or Rear
- 1m Front Setback
- 0m Side Setback
- 3m Rear Setback
- 56.4% Site Cover
- 16m² Min P.P.O.S.
- 30% Soft Landscape Area

TYPE 'D'
117.0m² SITE - 9.0m WIDE



2-3 storey dwelling footprint with front entry, and carport with deck above.

- North to Front, Side or Rear
- 1m Front Setback
- 0m Side Setback
- 3m Rear Setback
- 54.7% Site Cover
- 16m² Min P.P.O.S.
- 32% Soft Landscape Area

TYPE 'E'
130.0m² SITE - 10.0m WIDE



2-3 storey dwelling footprint with front entry, and carport with deck above.

- North to Front, Side or Rear
- 1m Front Setback
- 0m Side Setback
- 0m Rear Setback
- 64.7% Site Cover
- 16m² Min P.P.O.S.
- 26% Soft Landscape Area

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BLOCK TYPES (WITH CAR PARKING ON COMMUNITY-TITLE)

MICRO BLOCK HOUSING IN THE ACT

To further test the micro block opportunities, a series of designs were developed that utilised a community-oriented planning approach where car parking, storage and private open space was shifted to a communal area within the site. Individual block areas are smaller, with the requirement for Community Title Private Open Space (C.T.P.O.S.) directly adjacent to their individual block. The plan types are similar to the Type 'A' – 'D' options illustrated on the previous page, but work on a zero-side setback to both sides of the block, forming a typology similar to terrace housing.

This collection of micro block types were designed to provide car parking in a community title area. Suitable P.P.O.S. has been provided on site, which is enhanced by C.T.P.O.S. Blocks range from 4.2m wide to 5.7m wide.

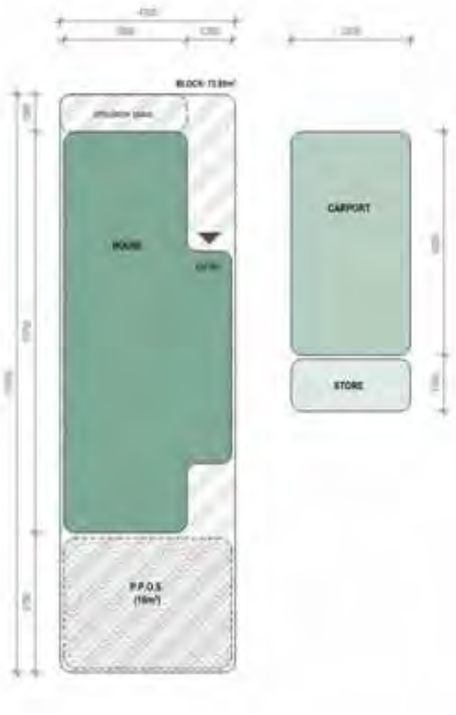
TYPE 'F'
63.0m² SITE - 4.2m WIDE



2 storey dwelling footprint with front entry. Carport/store in community title area.

- North to Side, Rear
- 1m Front Setback
- 0m Side Setback
- 4m Rear Setback
- 63.5% Site Cover
- 16m² Min P.P.O.S.
- 33% Soft Landscape Area

TYPE 'G'
73.0m² SITE - 4.2m WIDE



2 storey dwelling footprint with front entry. Carport/store in community title area.

- North to Side, Rear
- 1m Front Setback
- 0m Side Setback
- 4m Rear Setback
- 58.0% Site Cover
- 16m² Min P.P.O.S.
- 29% Soft Landscape Area

TYPE 'H'
75.0m² SITE - 4.2m WIDE



2 storey dwelling footprint with front entry. Carport/store in community title area.

- North to Side, Rear
- 1m Front Setback
- 0m Side Setback
- 4m Rear Setback
- 60.0% Site Cover
- 16m² Min P.P.O.S.
- 29% Soft Landscape Area

TYPE 'I'
77.0m² SITE - 4.2m WIDE



2 storey dwelling footprint with front entry. Carport/store in community title area.

- North to Side, Rear
- 1m Front Setback
- 0m Side Setback
- 3.5m Rear Setback
- 54.9% Site Cover
- 16m² Min P.P.O.S.
- 30% Soft Landscape Area

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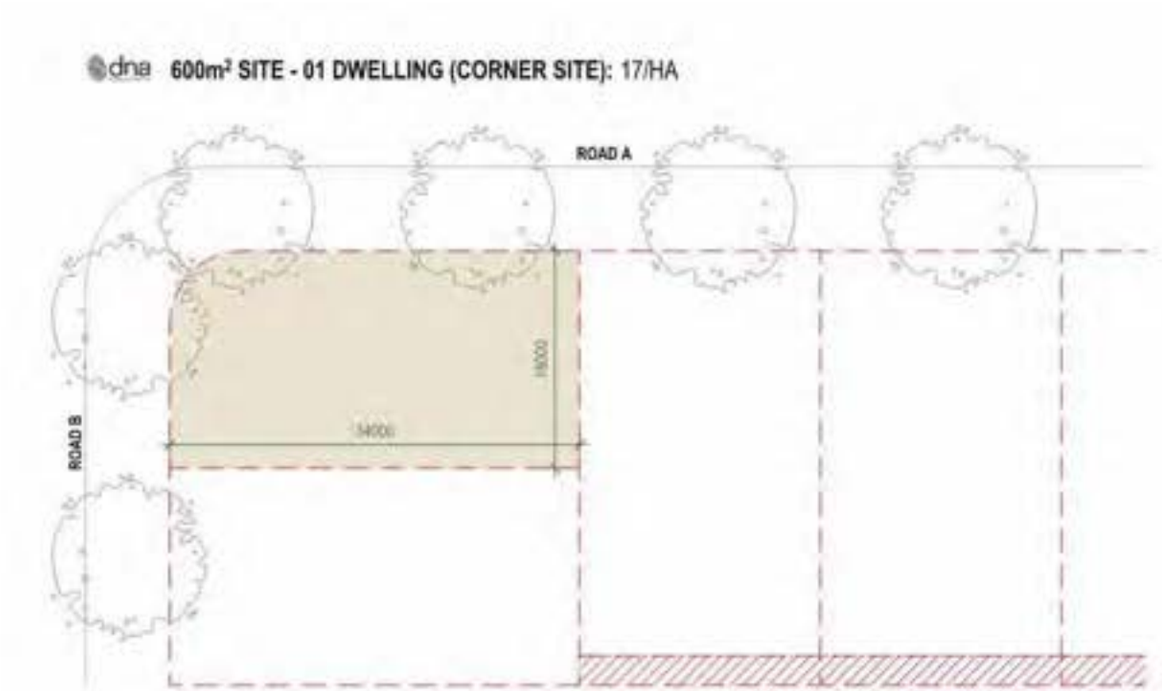
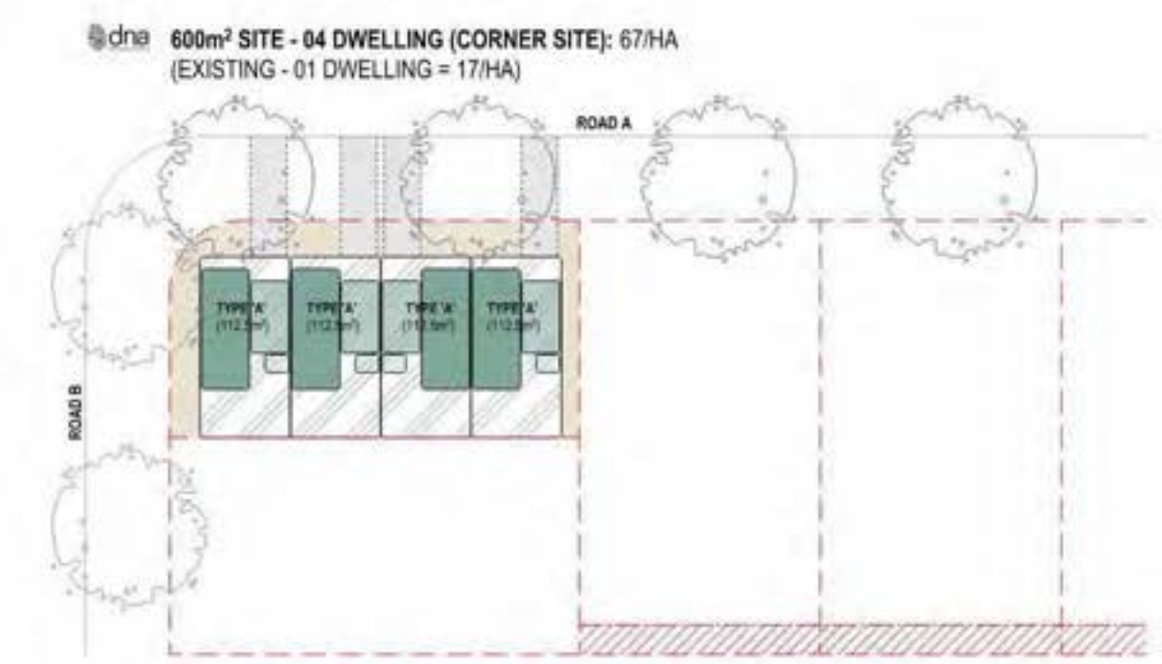
CORNER BLOCK CONFIGURATION

CABINET



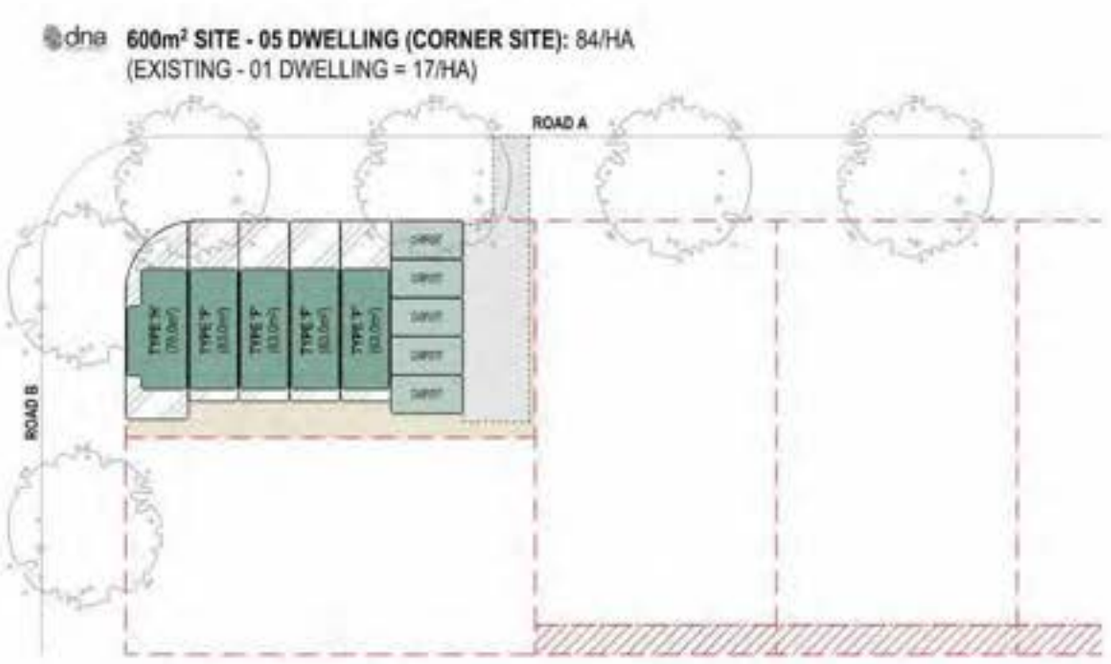


This design utilizes the 7.5m wide block (Type A), which allows for setbacks to front and side boundaries that are consistent with the current technical specifications for RZ1 blocks. Dwelling entry is off the street, allowing rear courtyards to be private. This layout fits well into existing streetscapes.

CABINET

MICRO BLOCK HOUSING IN THE ACT

This collection of designs directly reference the typologies tested in the ACT Government's Missing Middle Housing Design Guide. Micro blocks are a suitable missing middle option.



This design utilizes the 4.2m wide block (Type F) and locates parking together off a singular driveway. The rear of the site acts as a community title private open space (C.T.P.O.S.) area for access to dwelling entries. Front courtyards can be screened from the street. This layout fits well into existing streetscapes.

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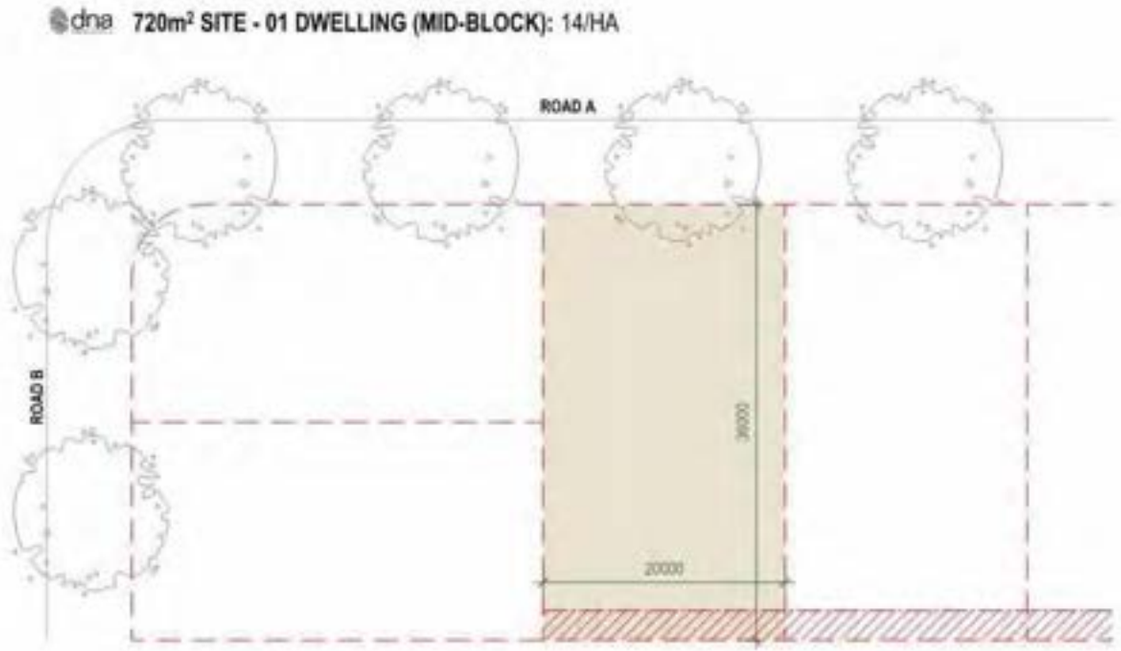
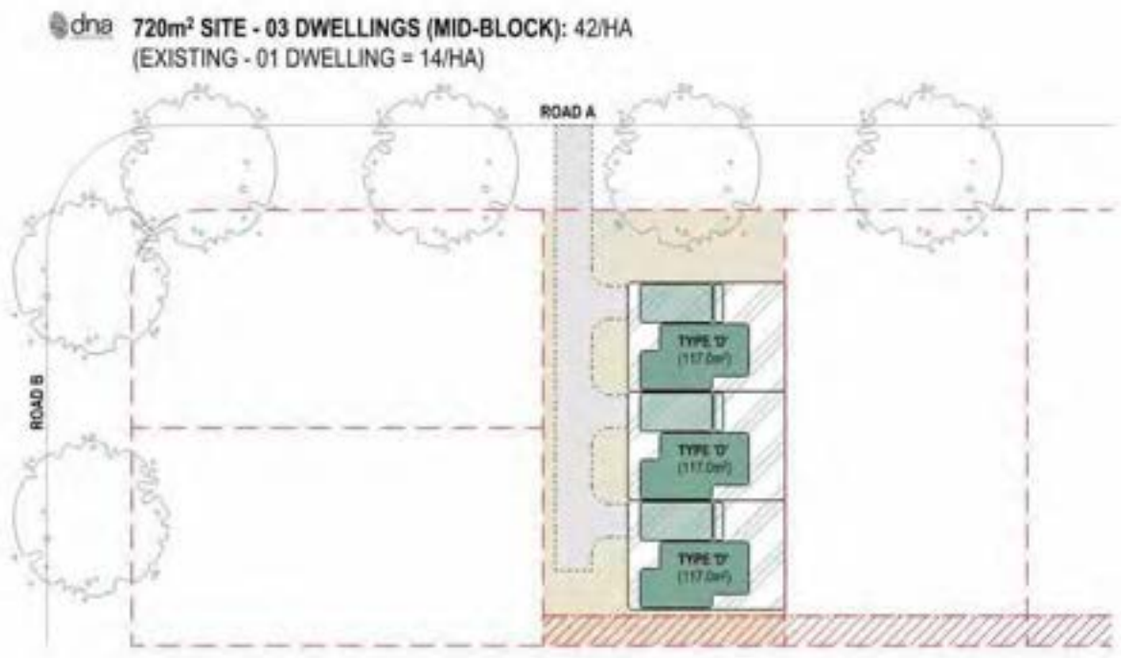
CABINET

MID-BLOCK CONFIGURATION



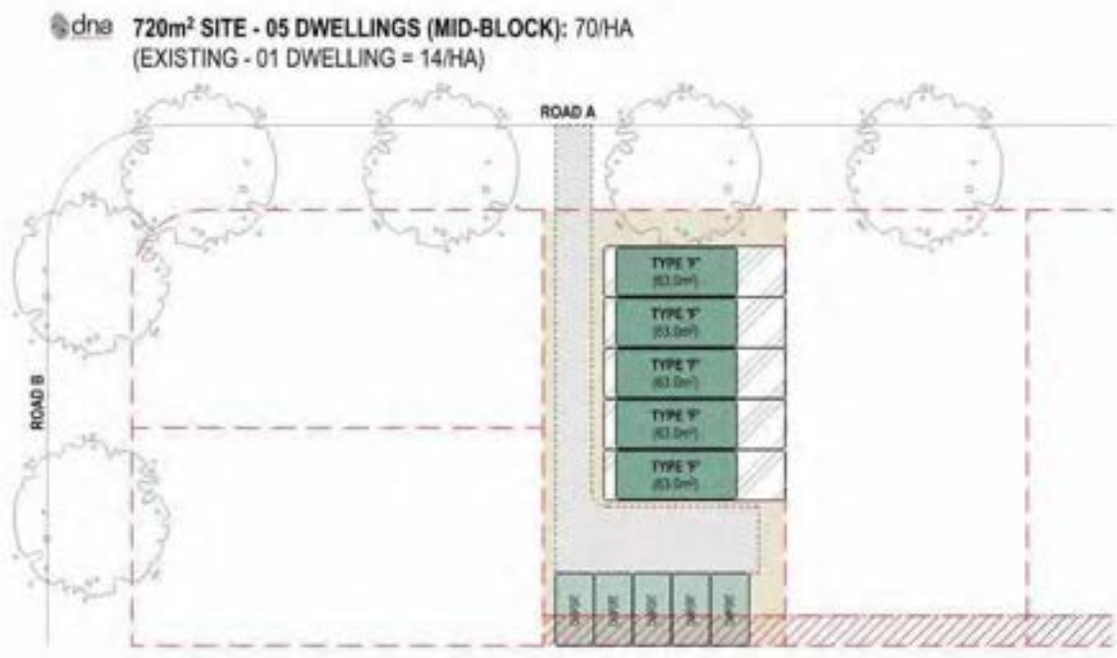


This design utilizes the 9.0m wide block (Type D), which allows for setbacks to front and side boundaries that are consistent with the current technical specifications for RZ1 blocks. Dwelling entry is via the community title side driveway/landscaped zone. This is a relatively inefficient layout but does provide high quality C.T.P.O.S. for residents.

CABINET

MICRO BLOCK HOUSING IN THE ACT

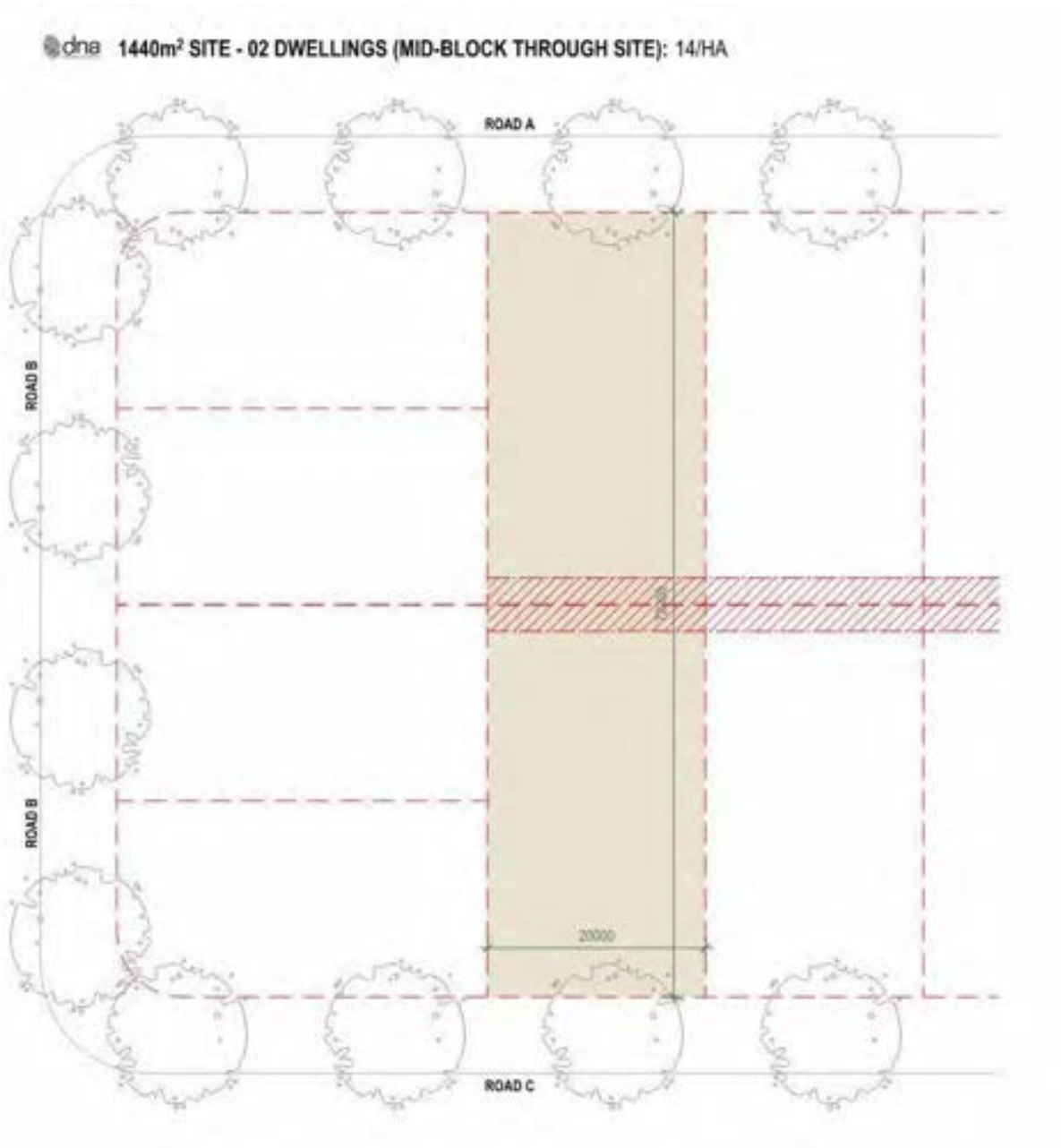
This collection of designs directly reference the typologies tested in the ACT Government's Missing Middle Housing Design Guide. Micro blocks are a suitable missing middle option.



This design utilizes the 4.2m wide block (Type F) and locates parking at the rear of the site (in easement zone). Entries are off the driveway, and the front setback is further forward than typical. The outcome is achievable but doesn't offer high quality C.T.P.O.S. so proximity to public open space would be beneficial.

dna ARCHITECTS

MID-BLOCK THROUGH SITE CONFIGURATION



MICRO BLOCK HOUSING IN THE ACT

This collection of designs directly reference the typologies tested in the ACT Government's Missing Middle Housing Design Guide. Micro blocks are a suitable missing middle option.

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MID-BLOCK THROUGH SITE CONFIGURATION



This design utilizes the 7.5m wide block (Type A), which allows for a singular driveway down one side to centrally located parking to rear loaded blocks. Residual block area provides a narrow C.T.P.O.S for residents. A slightly wider block type would improve the useability of this space. Dwellings have good separation, providing opportunity for deep root landscape zones.

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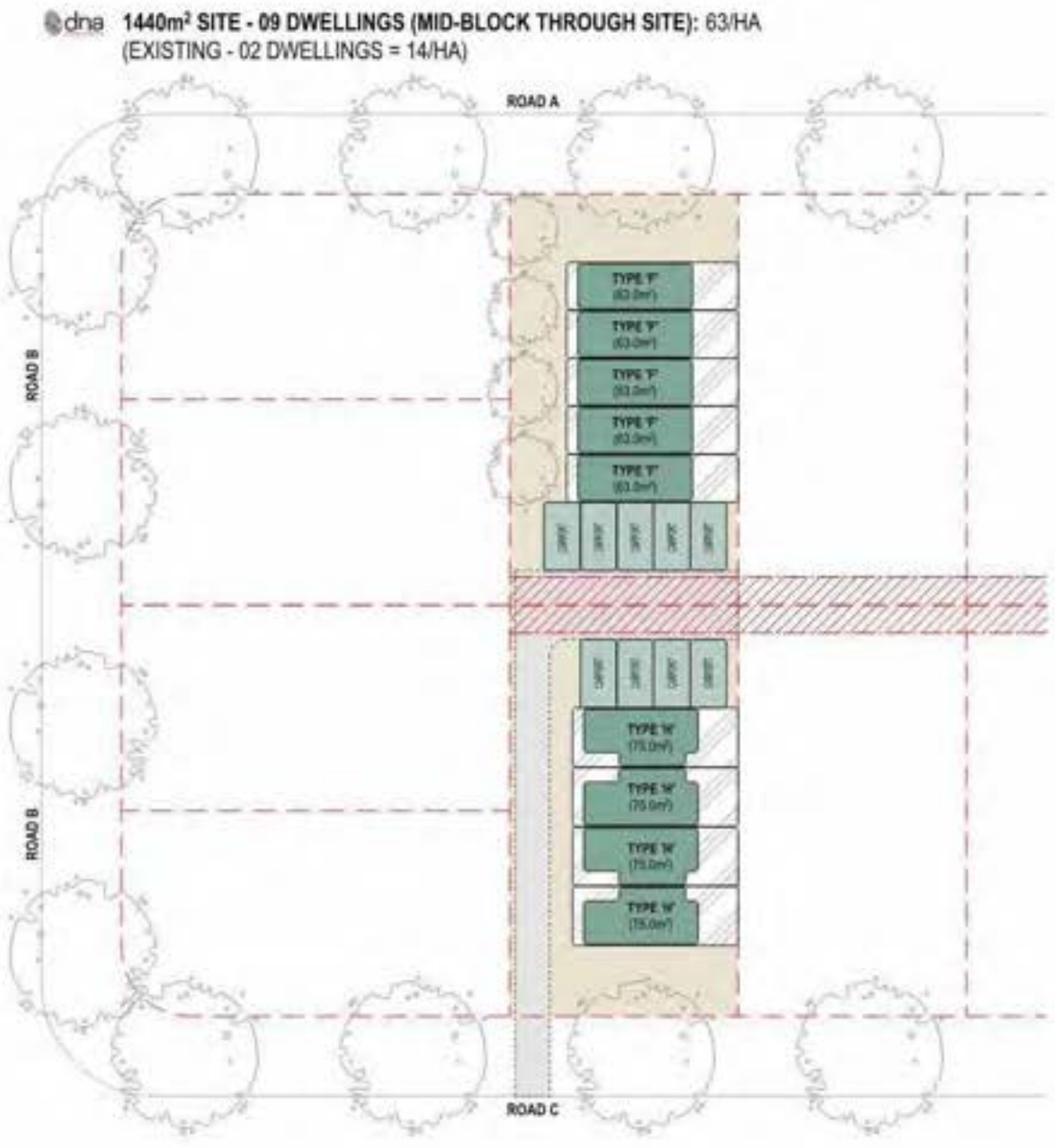
MICRO BLOCK HOUSING IN THE ACT



This design utilizes a combination of the 4.2m wide block (Type F) and 5.2m wide block (Type H) and locates parking in the centre of the site in the easement zone. Entries are accessed through the side C.T.P.O.S. areas. Front setbacks are consistent with the Technical Specifications allowing good streetscape integration.

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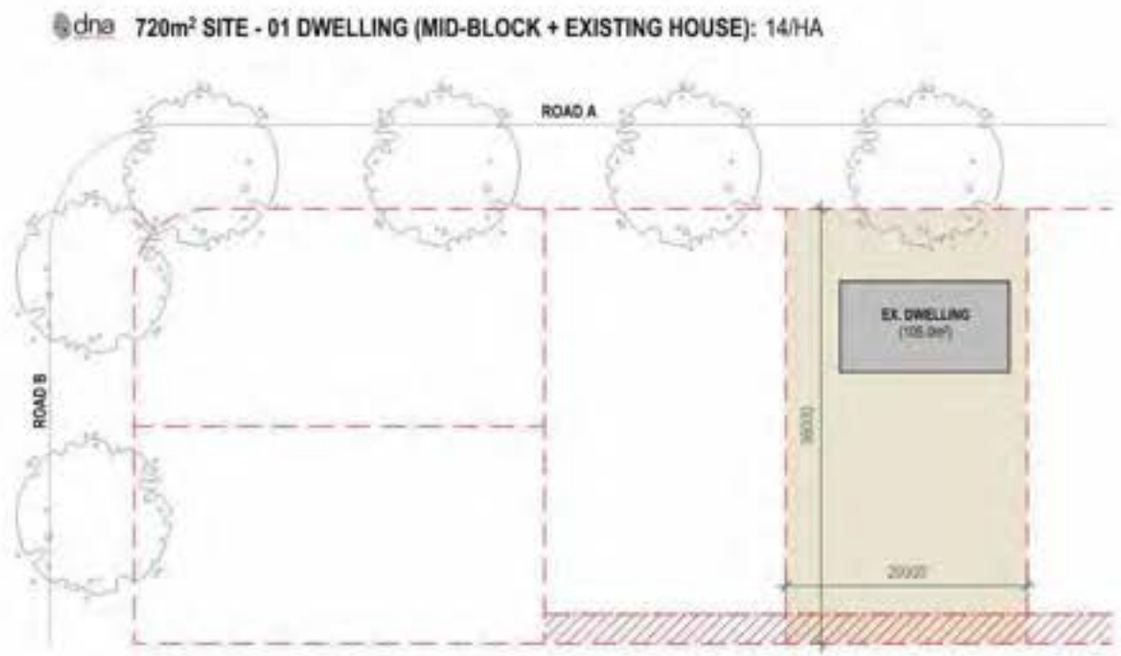
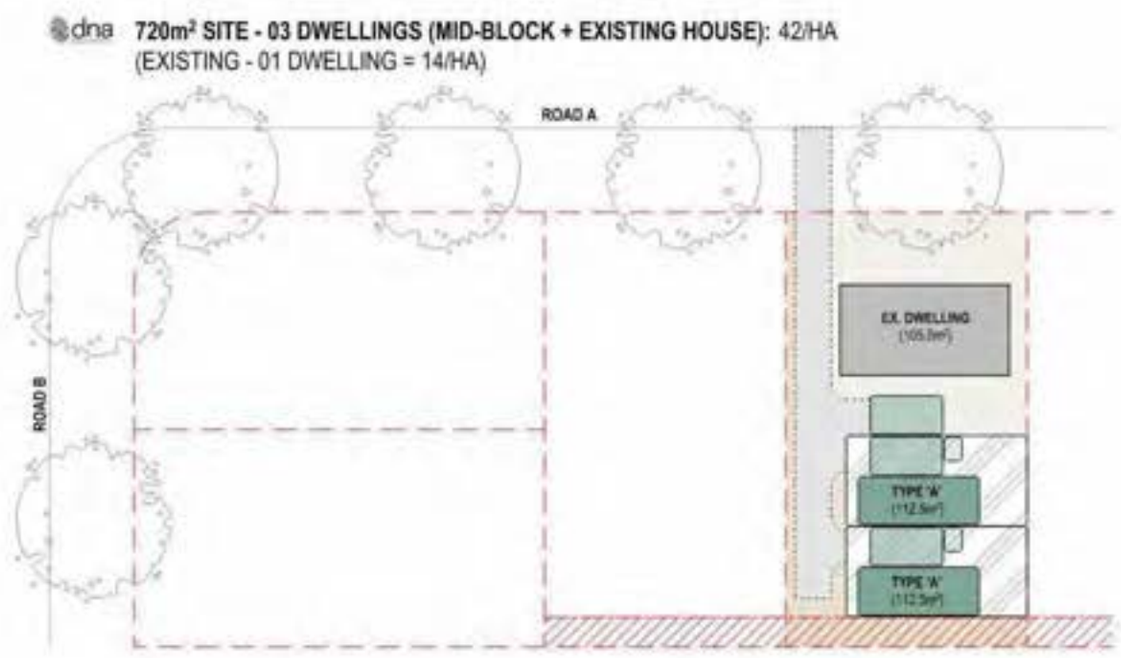
MID-BLOCK + EXISTING DWELLING CONFIGURATION



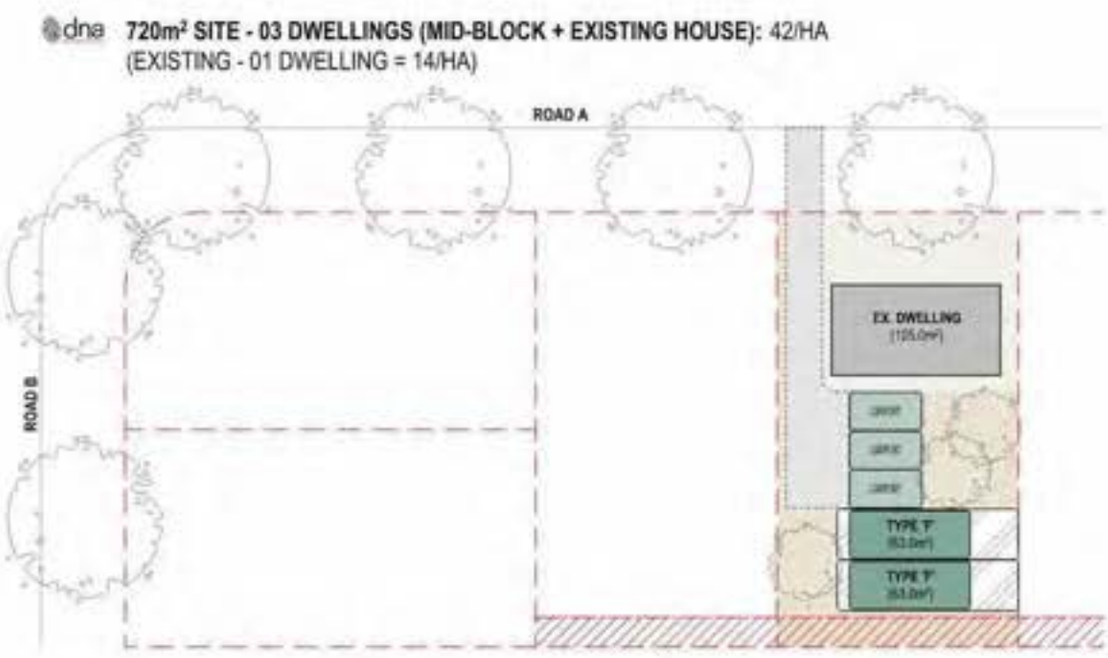


The ACT has many sites with existing ‘ex govie’ homes at the front of a typical generous block. This design integrates two micro blocks into the rear yard, utilizing an existing driveway down the side of the existing residence. New parking is provided to the existing residence, which would utilize the front of the site for P.P.O.S.

CABINET

MICRO BLOCK HOUSING IN THE ACT

This collection of designs directly reference the typologies tested in the ACT Government’s Missing Middle Housing Design Guide. Micro blocks are a suitable missing middle option.



By using a narrower 4.2m wide micro block (Type F), a larger C.T.P.O.S. is afforded in the middle of the site which provides greater separation between the existing residence and new blocks.

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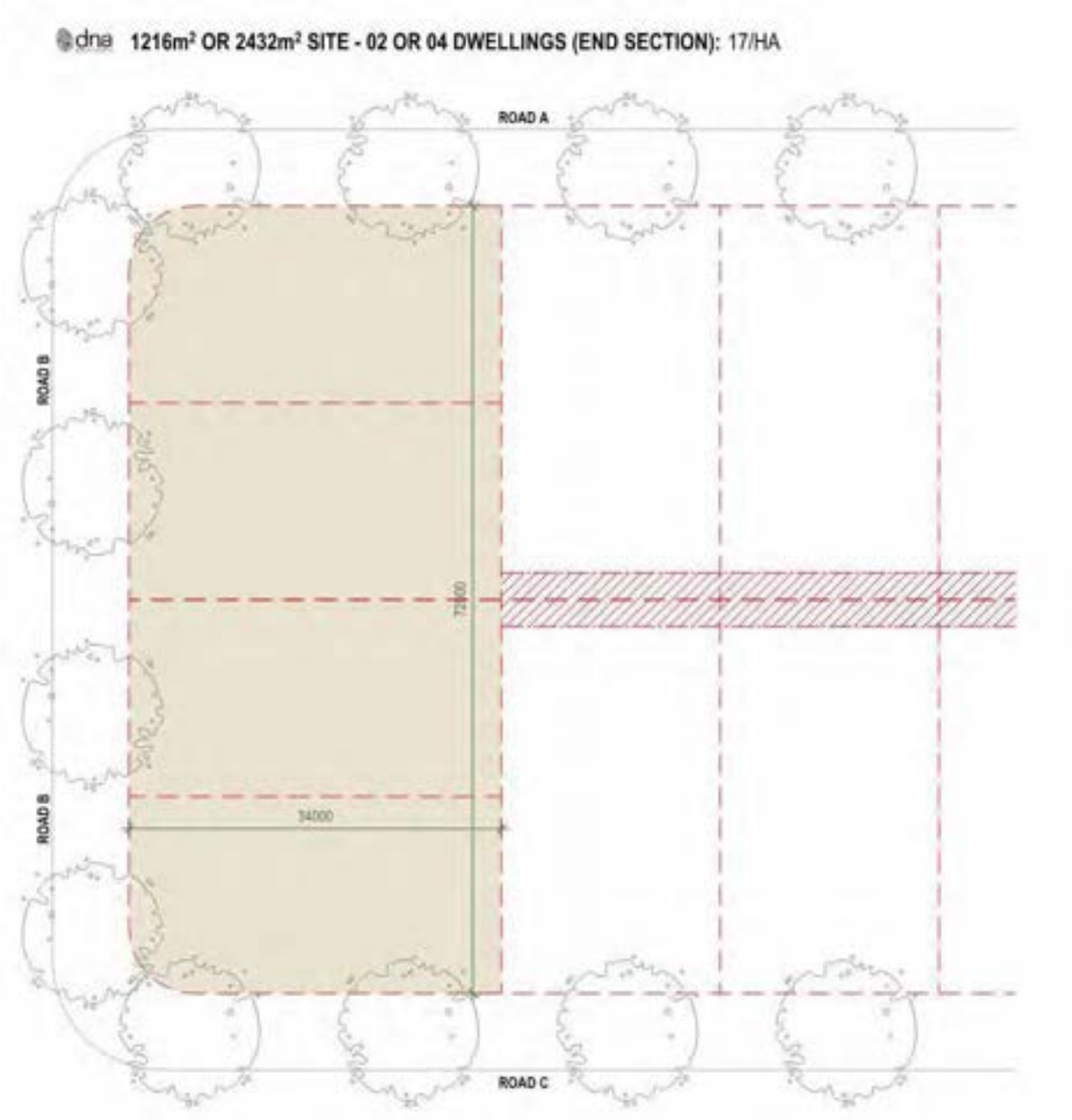
END SECTION CONFIGURATION



MICRO BLOCK HOUSING IN THE ACT

This collection of designs directly reference the typologies tested in the ACT Government's Missing Middle Housing Design Guide. Micro blocks are a suitable missing middle option.

CABINET

END SECTION CONFIGURATION

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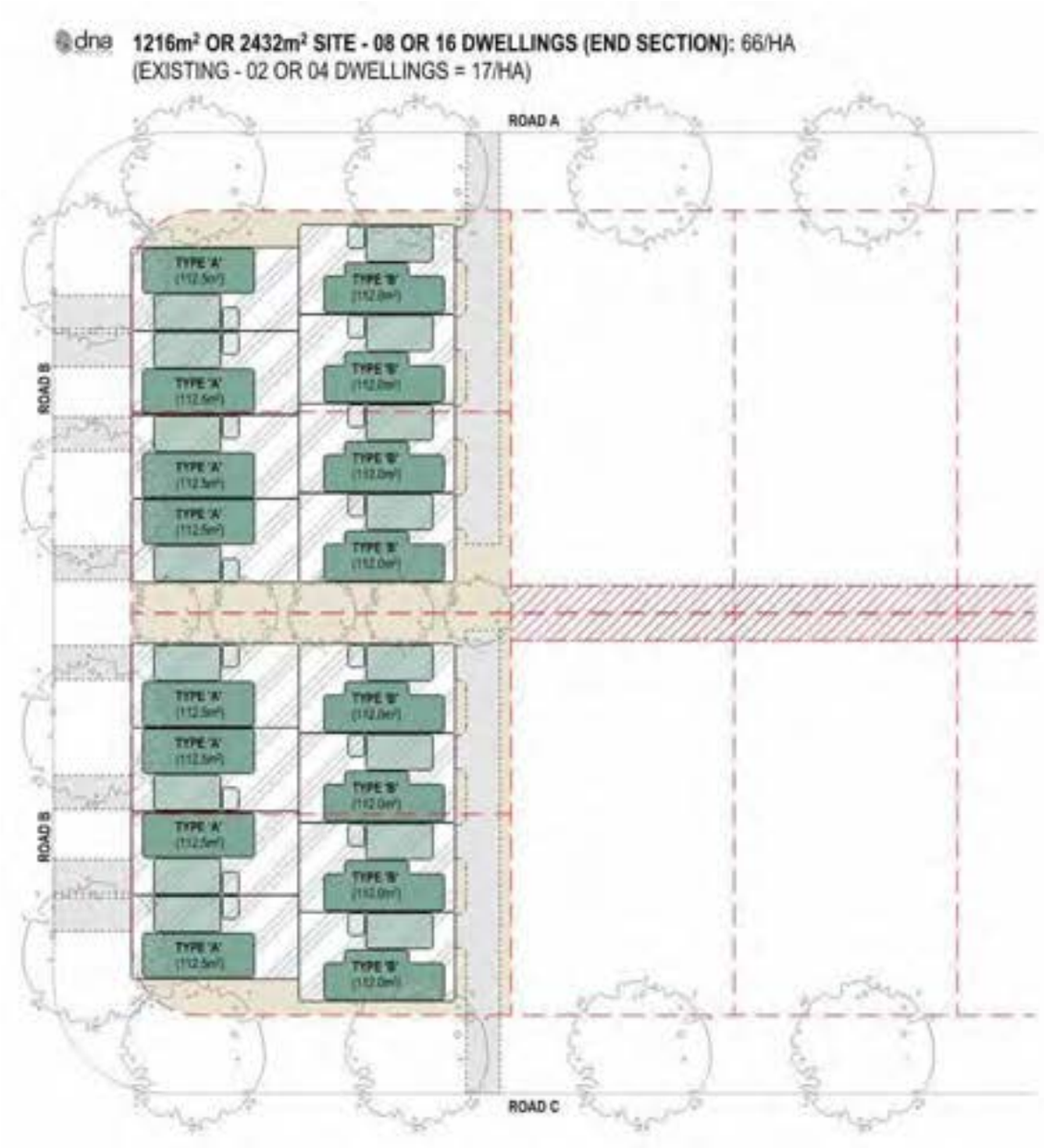
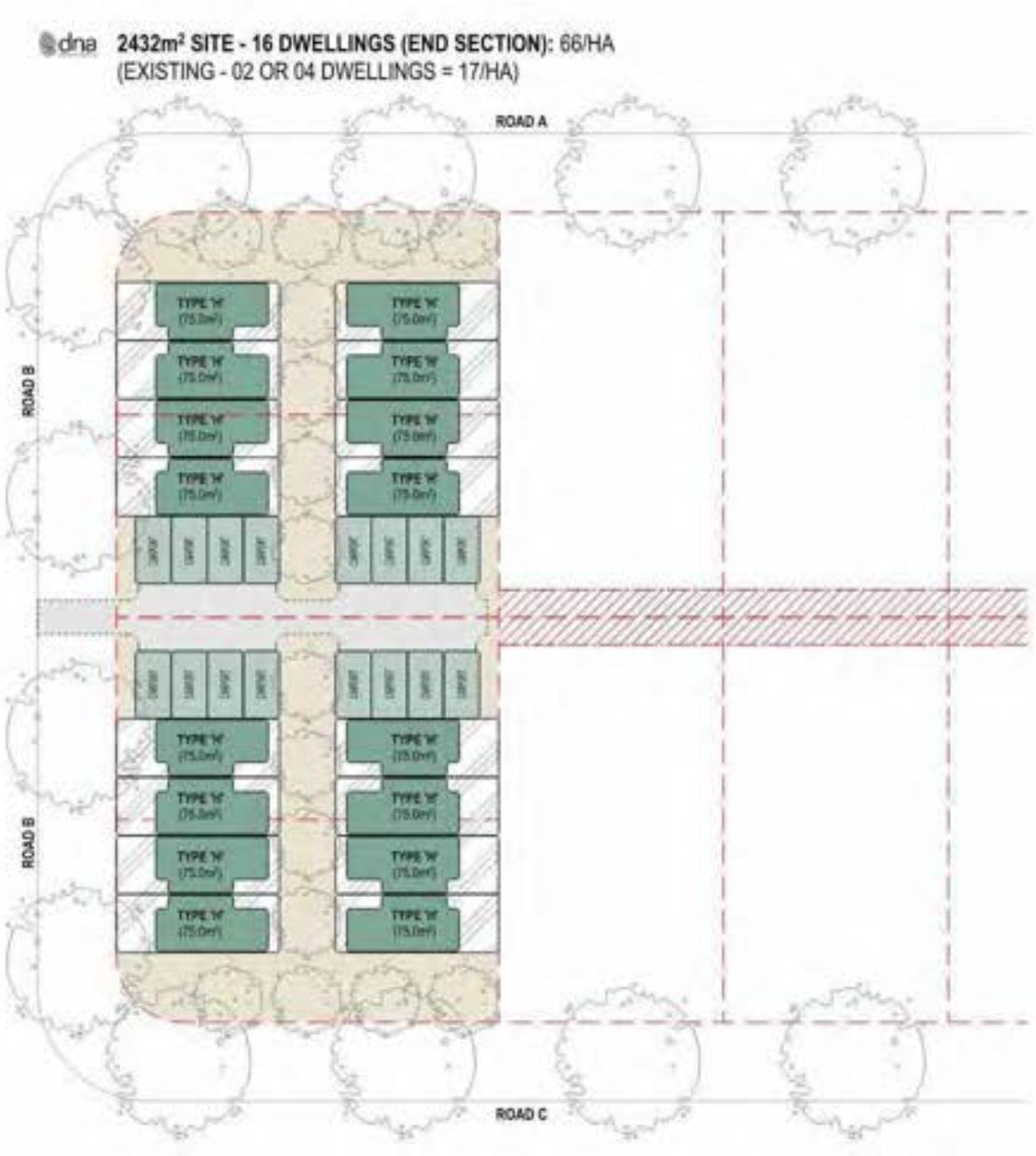
MICRO BLOCK HOUSING IN THE ACT

This collection of designs directly reference the typologies tested in the ACT Government's Missing Middle Housing Design Guide. Micro blocks are a suitable missing middle option.





End sections offer a great opportunity for larger micro block communities to be developed. The design breaks the site into groupings of four dwellings in a row, with a generous central C.T.P.O.S providing opportunity for deep root zone. Larger developments can utilise various block types to create diversity.

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End sections offer excellent opportunities for more community focused developments. Centrally located parking is more efficient and enhances C.T.P.O.S.. In this design dwellings are accessed through a central landscaped spine. The design offers large front setbacks for high quality streetscape integration.

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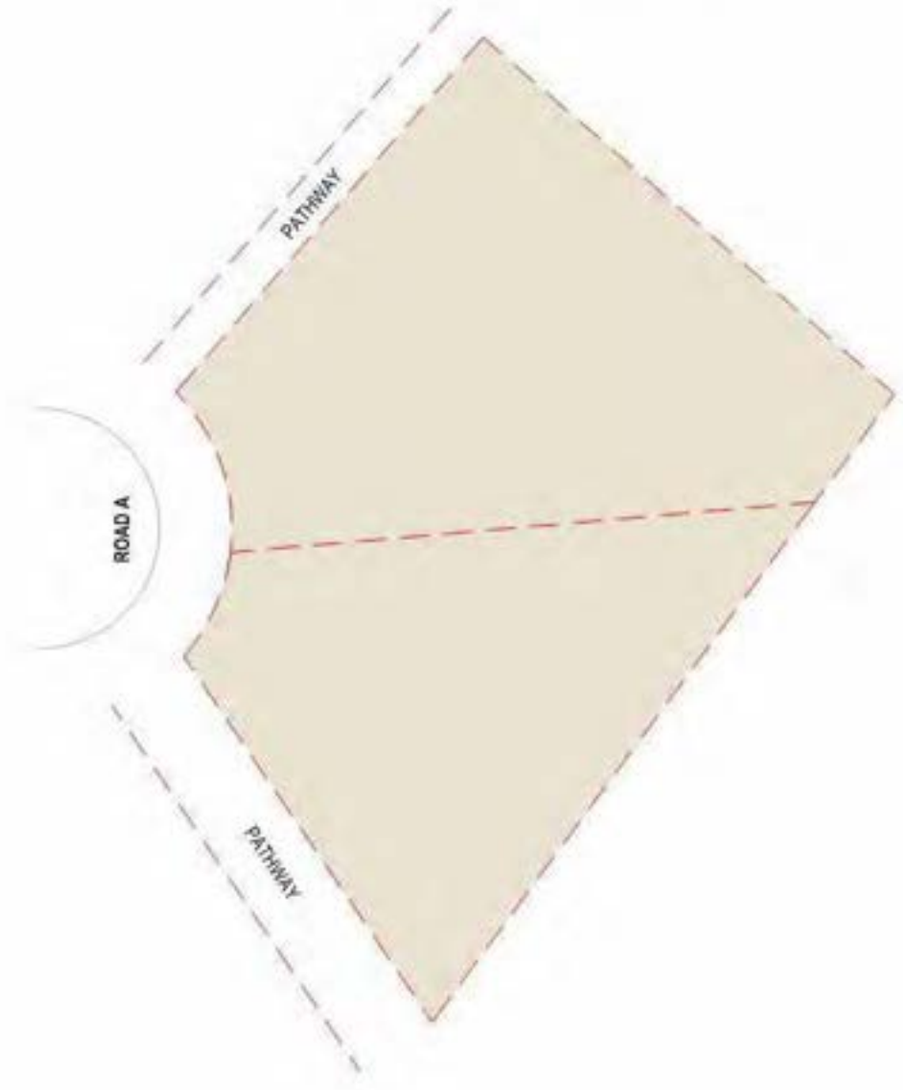
IRREGULAR BLOCK CONFIGURATION

MICRO BLOCK HOUSING IN THE ACT

This collection of designs directly reference the typologies tested in the ACT Government's Missing Middle Housing Design Guide. Micro blocks are a suitable missing middle option.

dna **1781m² SITE - 02 DWELLINGS (IRREGULAR BLOCK):** 11/HA



dna **1781m² SITE - 10 DWELLINGS (IRREGULAR BLOCK):** 57/HA
(EXISTING - 02 DWELLINGS = 11/HA)



Irregular blocks require more design consideration to work effectively as their geometries don't always suit modularized micro block types. This site was found to be not conducive to micro blocks without car parking on the block.

The design works with the site geometries to provide micro blocks to the edges and a central driveway access. Whilst it would have been desirable to have more dwelling directly facing public pathways, it was less efficient. One benefit to irregular blocks is it typically creates more 'left over' area for C.T.P.O.S..

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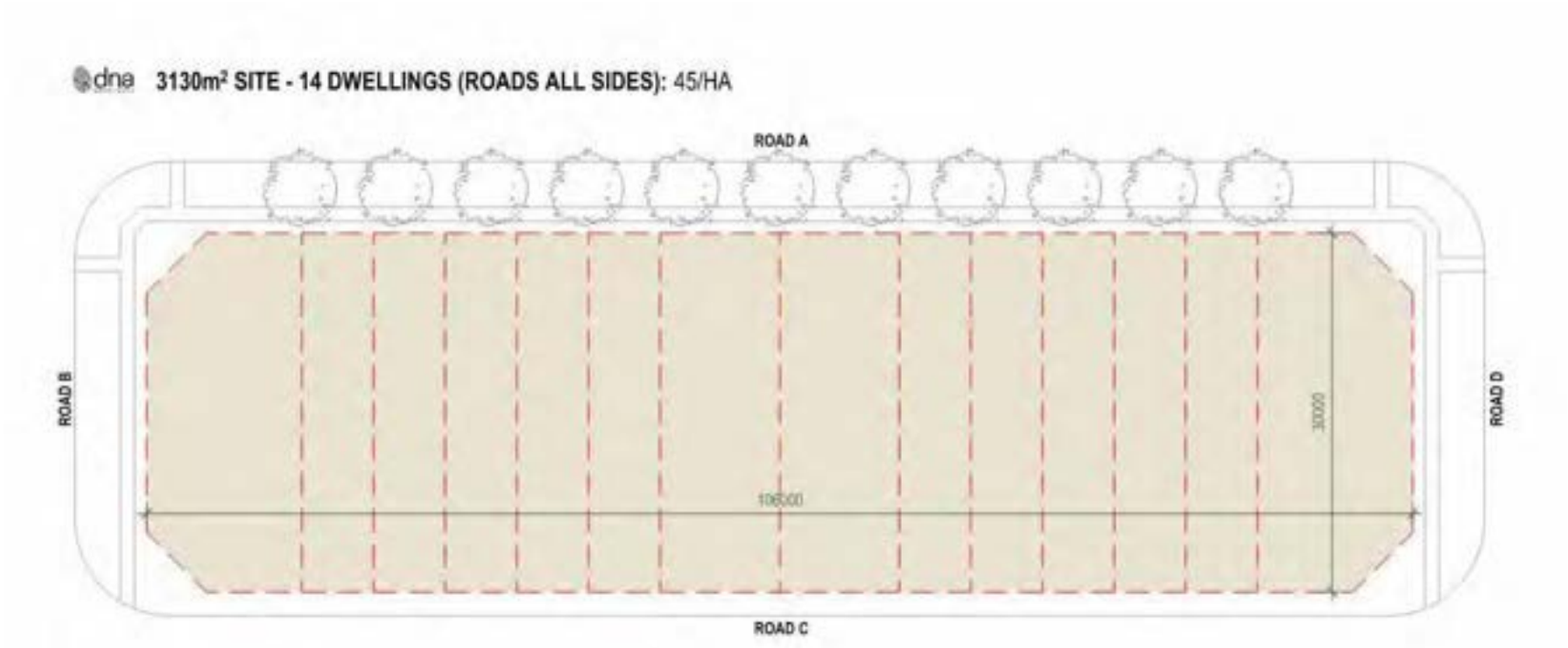
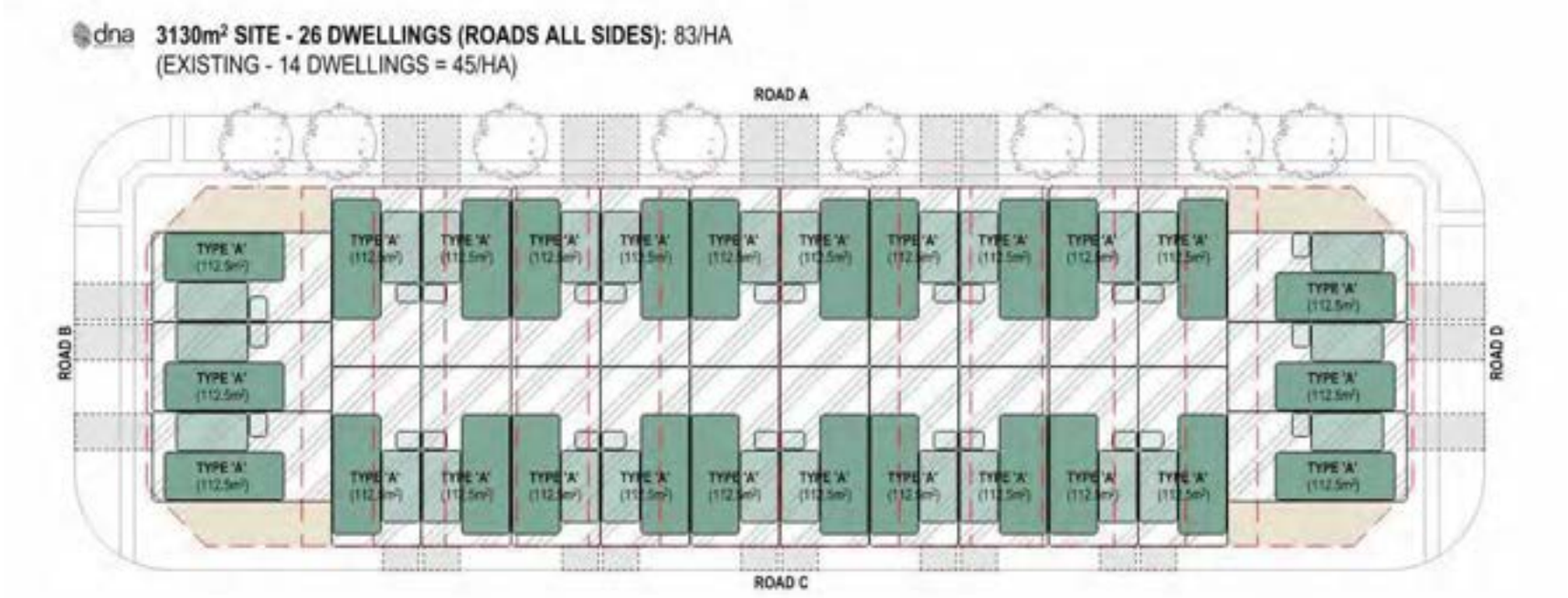
TYPICAL TERRACE SECTION CONFIGURATION 1





MICRO BLOCK HOUSING IN THE ACT

This collection of designs directly references section typologies used in greenfield subdivisions in the ACT by the Suburban Land Agency. Seen in suburbs such as Whitlam and Jacka, the terrace section is typically zoned RZ3 or RZ4 and provides a variety of block widths, predominantly with a dwelling entry on ‘Road A’ and car parking on ‘Road C’.

This design looks to provide the highest block yield for the site. Pocket parks have been provided at corners where block geometries make prohibit the use of modularized block types.
It is recommended that the 45-degree chamfers at the ends of sections be reconsidered when planning a micro block development.
Whilst this design is efficient in use land, it does not provide any high-quality communal area and would therefore require a public open space directly adjacent to the site. This design could also result in a very built form intensive streetscape, so it is recommended that certain planning guidelines be in place to offer streetscape relief, such as mandatory breaks in built form every 3-4 blocks.

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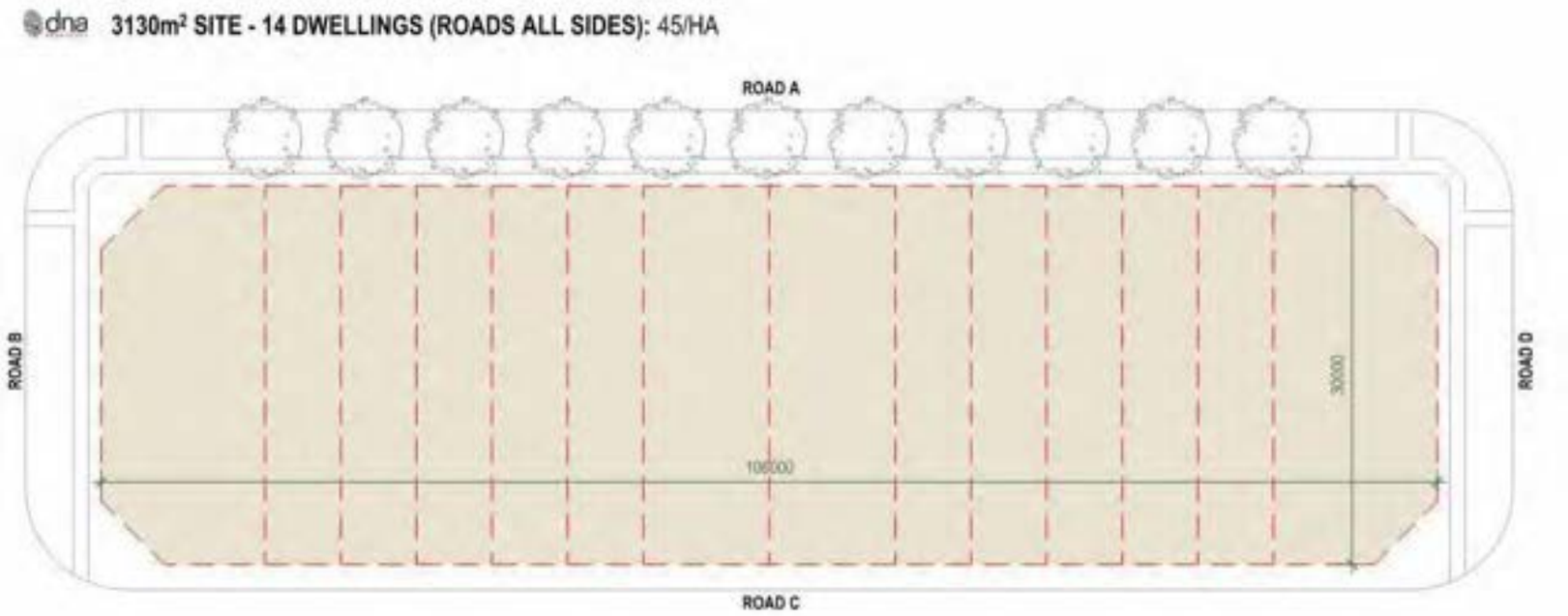
TYPICAL TERRACE SECTION CONFIGURATION 2





MICRO BLOCK HOUSING IN THE ACT

This collection of designs directly references section typologies used in greenfield subdivisions in the ACT by the Suburban Land Agency. Seen in suburbs such as Whitlam and Jacka, the terrace section is typically zoned RZ3 or RZ4 and provides a variety of block widths, predominantly with a dwelling entry on ‘Road A’ and car parking on ‘Road C’.

This design looks to enhance the amenity of the site by ensuring every block has direct access to suitable C.T.P.O.S. reducing the dwelling per hectare ratio allows for high quality landscape zones, reducing the need for the development to rely on adjacent public open space.
The design breaks the development into groupings of four dwellings to ensure permeability in the streetscape. Different block types have been used to ensure every block has rear access into the common areas. These areas offer deep root planting zones that deliver high quality tree canopy cover to the precinct. There is opportunity for each communal area to have a different character through its landscape treatment.

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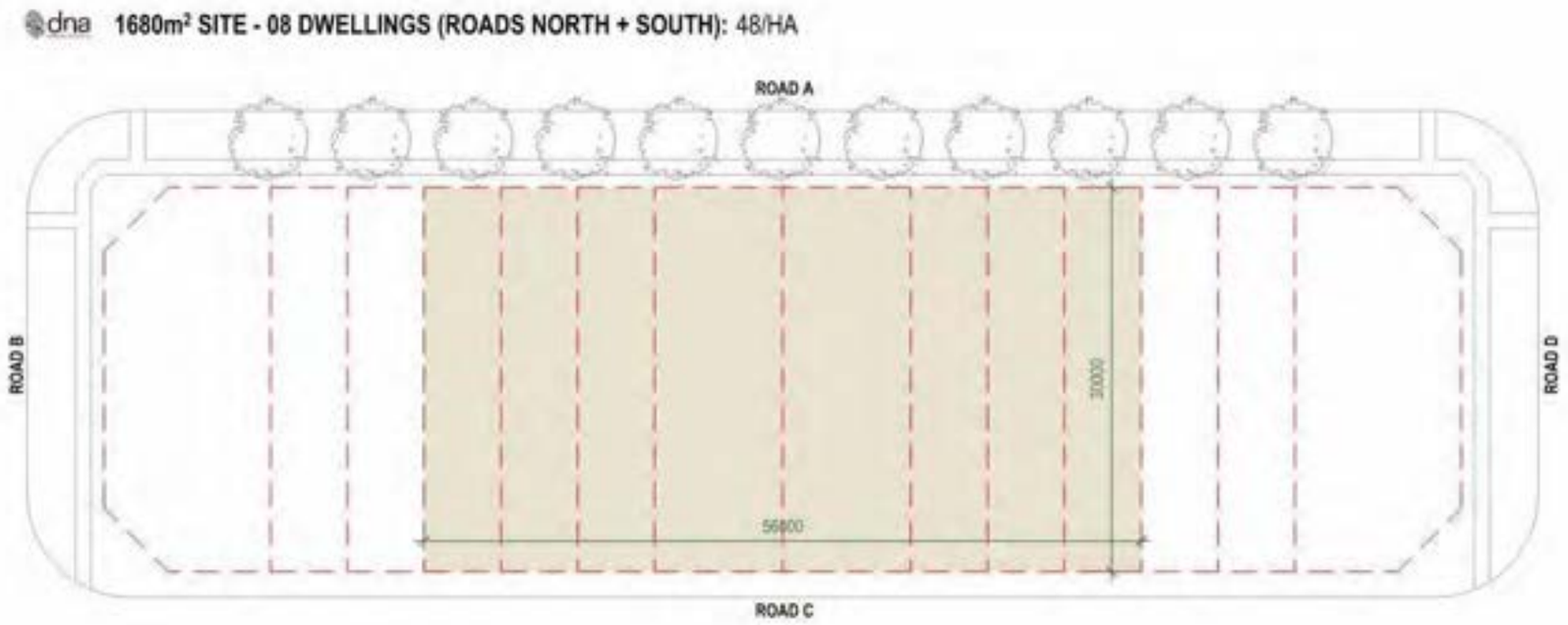
TYPICAL TERRACE MID-SECTION CONFIGURATION 1





MICRO BLOCK HOUSING IN THE ACT

This collection of designs directly references section typologies used in greenfield subdivisions in the ACT by the Suburban Land Agency. Seen in suburbs such as Whitlam and Jacka, the terrace section is typically zoned RZ3 or RZ4 and provides a variety of block widths, predominantly with a dwelling entry on ‘Road A’ and car parking on ‘Road C’.

This design looks at using a mid-section in the same section typology as the previous designs. It showcases how a diversity in the streetscape can be provided by using the terrace housing block typology alongside micro blocks.
A singular C.T.P.O.S. is accessible from all blocks through the use of different block types. Each block opens into a landscaped pathway through to a wider open space.
The number of micro block can be varied. For this example, we have used clusters of 4 blocks.

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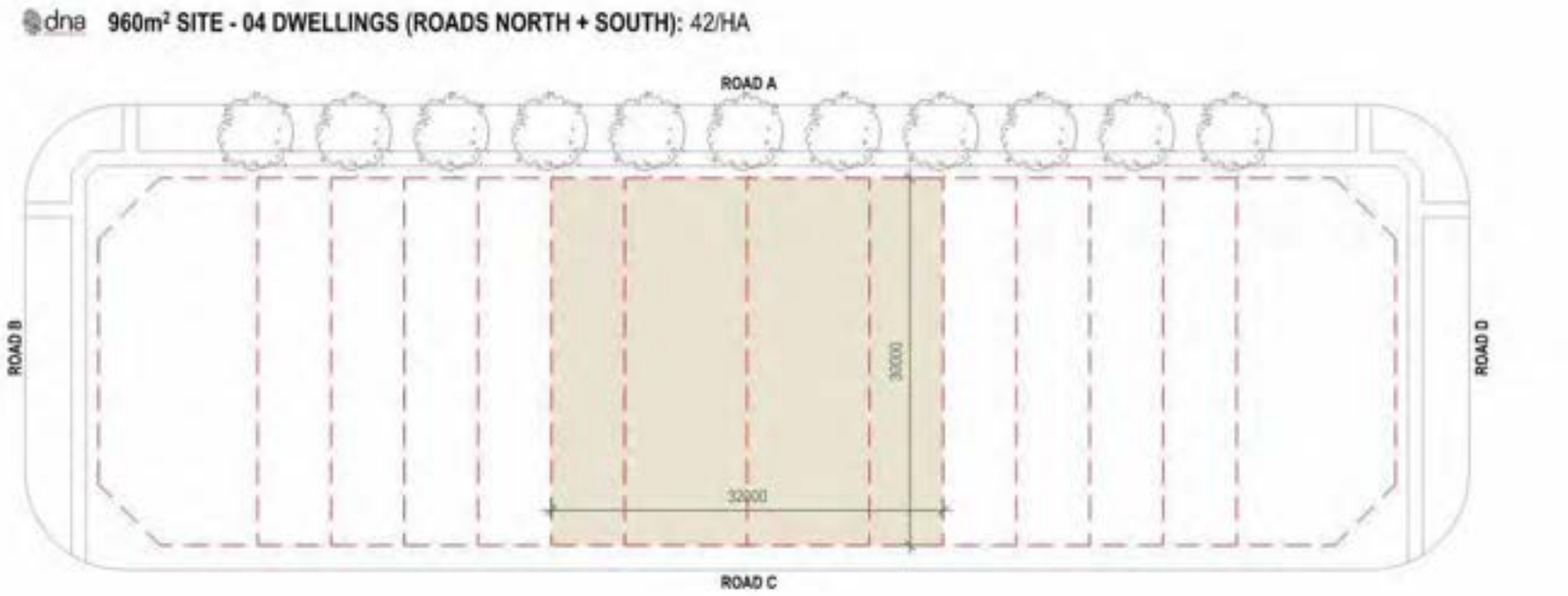
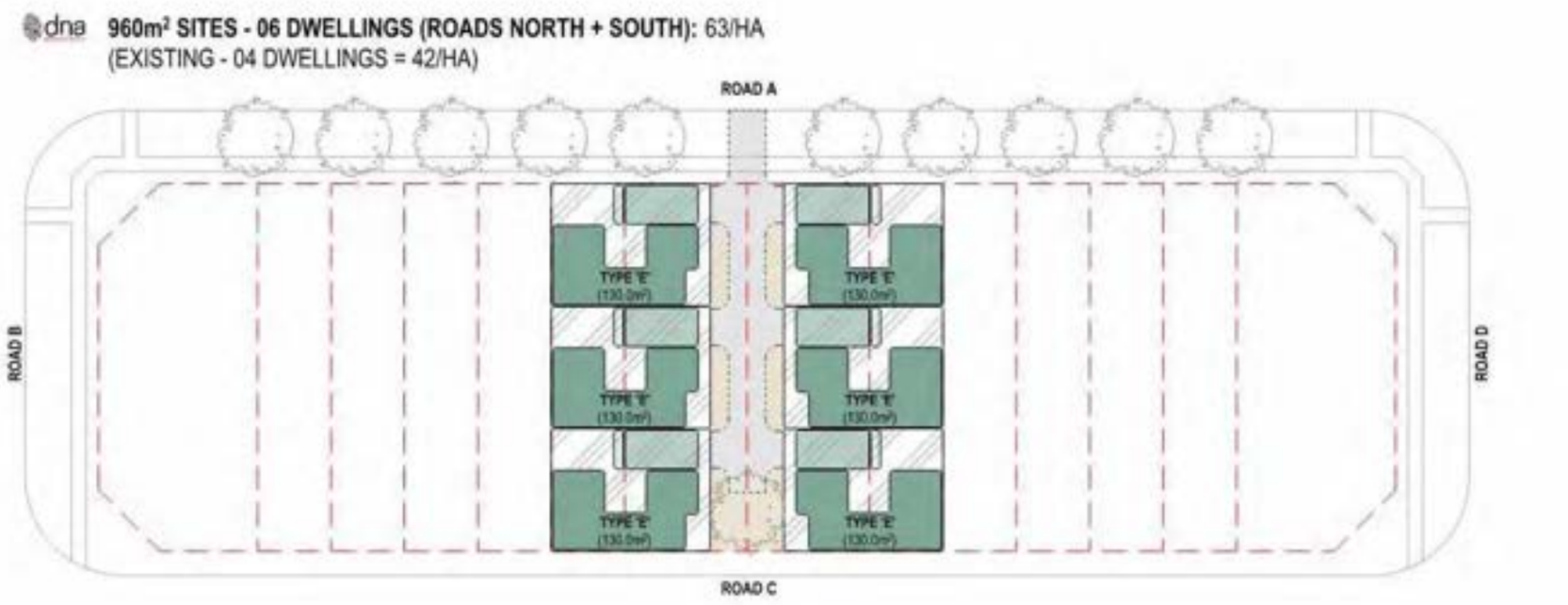
TYPICAL TERRACE MID-SECTION CONFIGURATION 2





MICRO BLOCK HOUSING IN THE ACT

This collection of designs directly references section typologies used in greenfield subdivisions in the ACT by the Suburban Land Agency. Seen in suburbs such as Whitlam and Jacka, the terrace section is typically zoned RZ3 or RZ4 and provides a variety of block widths, predominantly with a dwelling entry on ‘Road A’ and car parking on ‘Road C’.

This design also utilizes a mid-section in the same section typology as the previous designs. It illustrates how a communal driveway network can be used, which may be suitable for some sections where multiple driveways off a street are not appropriate. The driveway could be either one way in and out, as shown here, or a one-way through road. A suitable width between blocks needs to be maintained to allow for driveway access, pedestrian access, and high-quality landscape areas with opportunity for deep root planting zones.

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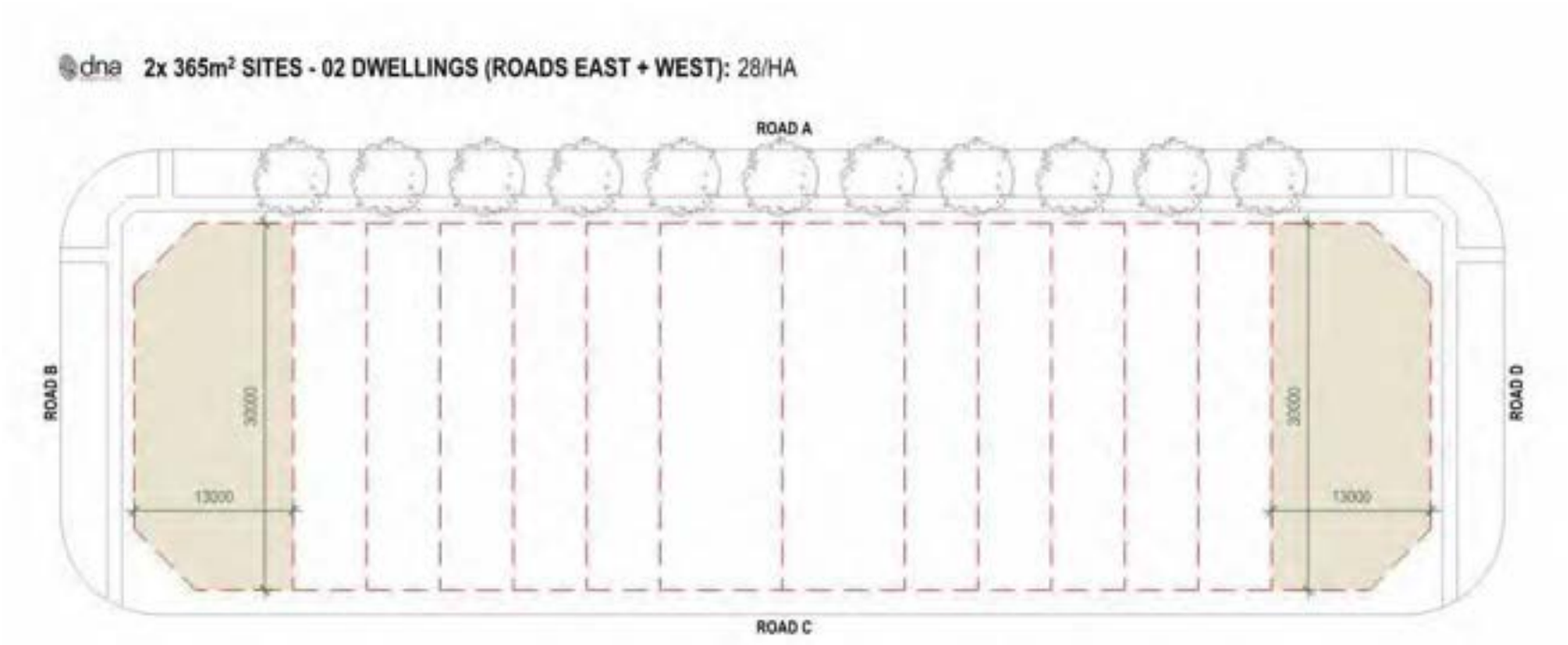
TYPICAL TERRACE END-SECTION CONFIGURATION





MICRO BLOCK HOUSING IN THE ACT

This collection of designs directly references section typologies used in greenfield subdivisions in the ACT by the Suburban Land Agency. Seen in suburbs such as Whitlam and Jacka, the terrace section is typically zoned RZ3 or RZ4 and provides a variety of block widths, predominantly with a dwelling entry on ‘Road A’ and car parking on ‘Road C’.

End sections are also suitable for micro blocks. In this design, one end section provides the opportunity for three micro blocks, significantly increasing the density whilst achieving a similar site bulk and scale.
It is recommended that the 45-degree chamfers at the ends of sections be reconsidered when planning a micro block development.
Various block types could be used to suit length of the street.

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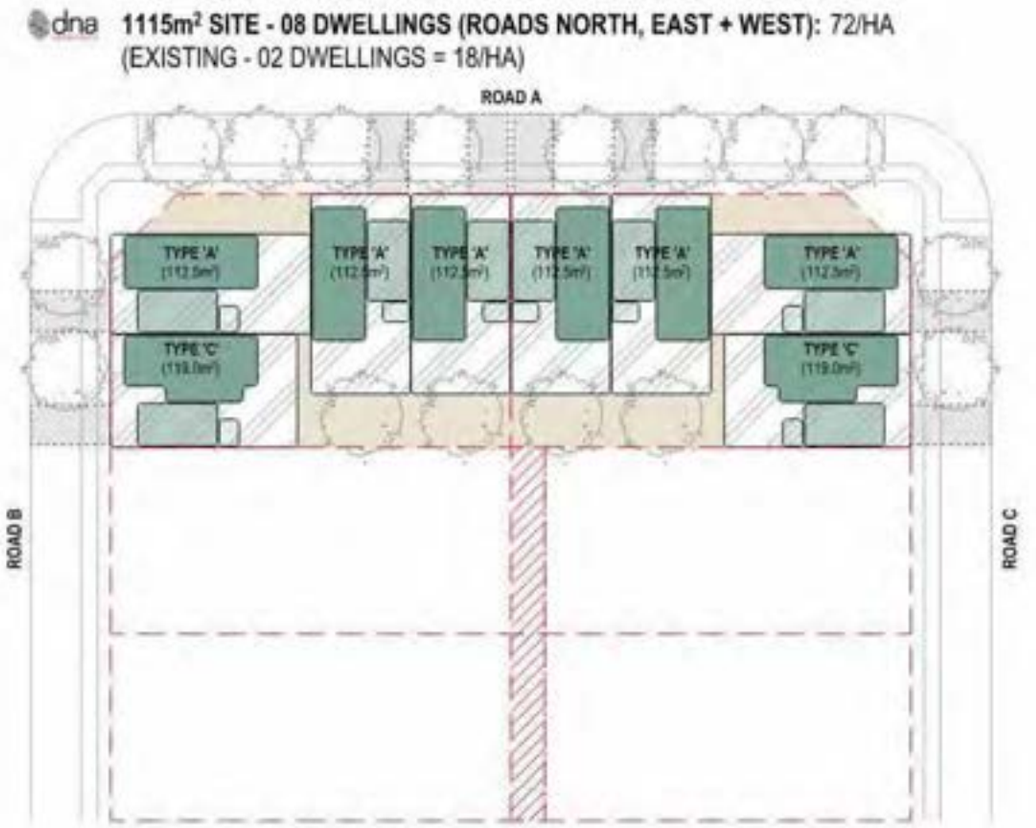
TYPICAL SINGLE RESIDENTIAL END-SECTION CONFIGURATION 1

MICRO BLOCK HOUSING IN THE ACT

This collection of designs directly references section typologies used in greenfield subdivisions in the ACT by the Suburban Land Agency. End sections of RZ1 blocks offer a great opportunity to increase density as they provide three street frontages.





In this design two end-section blocks have been combined to deliver a micro block housing precinct. However, a singular block would also provide a similar outcome. Through the use of different block types, a generous and private C.T.P.O.S. is accessible from all blocks. Driveways have been placed to avoid being close to street intersections.

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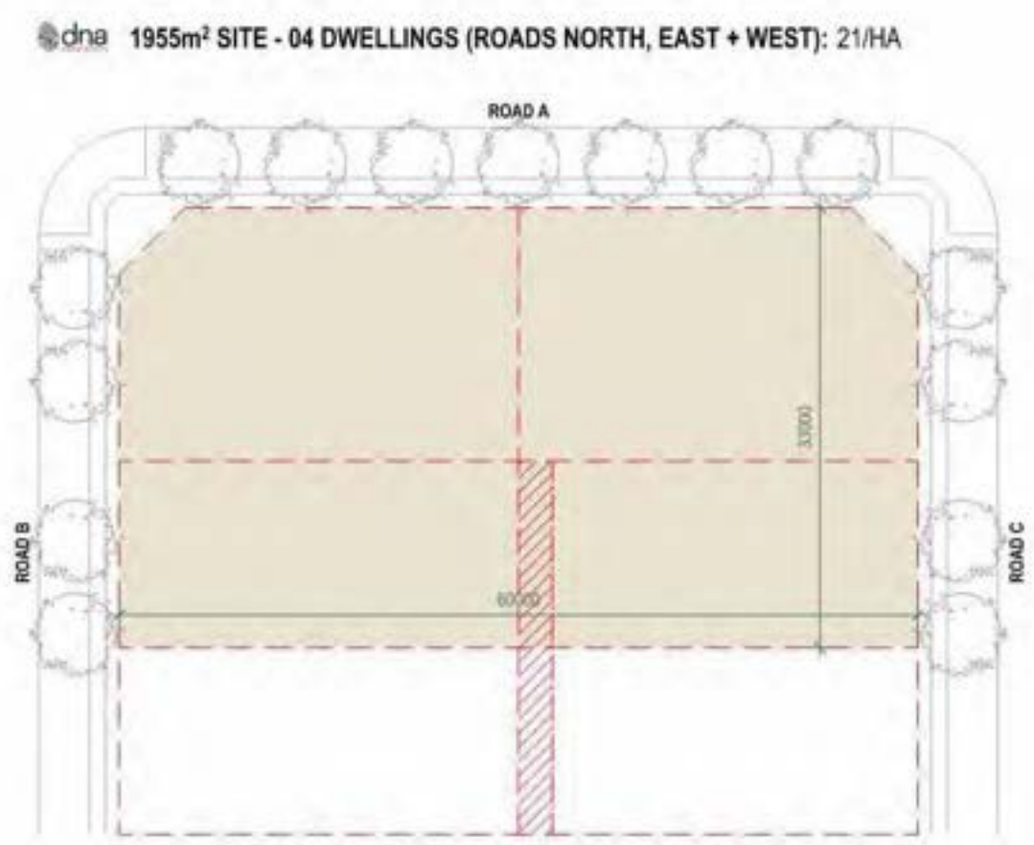
TYPICAL SINGLE RESIDENTIAL END-SECTION CONFIGURATION 2

MICRO BLOCK HOUSING IN THE ACT

This collection of designs directly references section typologies used in greenfield subdivisions in the ACT by the Suburban Land Agency. End sections of RZ1 blocks offer a great opportunity to increase density as they provide three street frontages.





In this design four end-section blocks have been combined to deliver a micro block housing precinct. A central shared driveway makes use of an area typically designated as an easement zone.
The removal of 45-degree chamfers to ends of sections would allow for either greater block density or increased C.T.P.O.S. in the centre.

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TYPICAL SINGLE RESIDENTIAL END-SECTION CONFIGURATION 3

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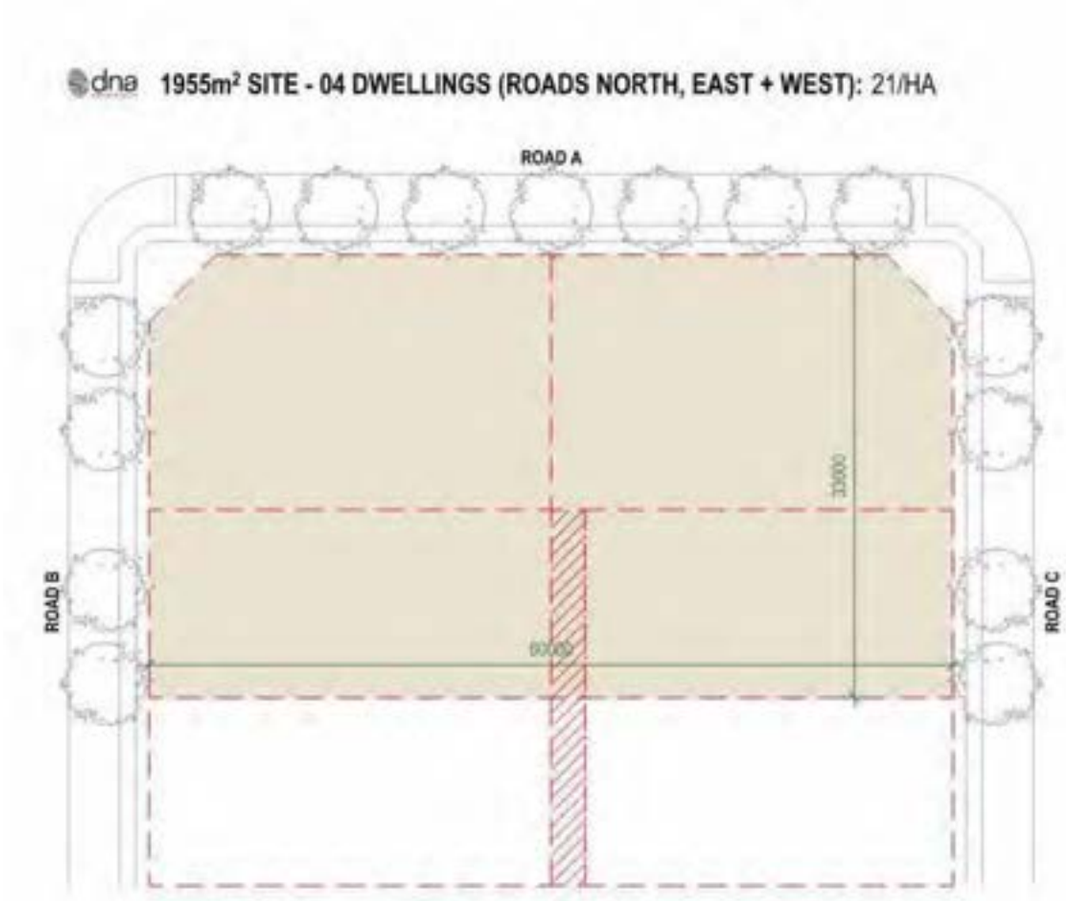
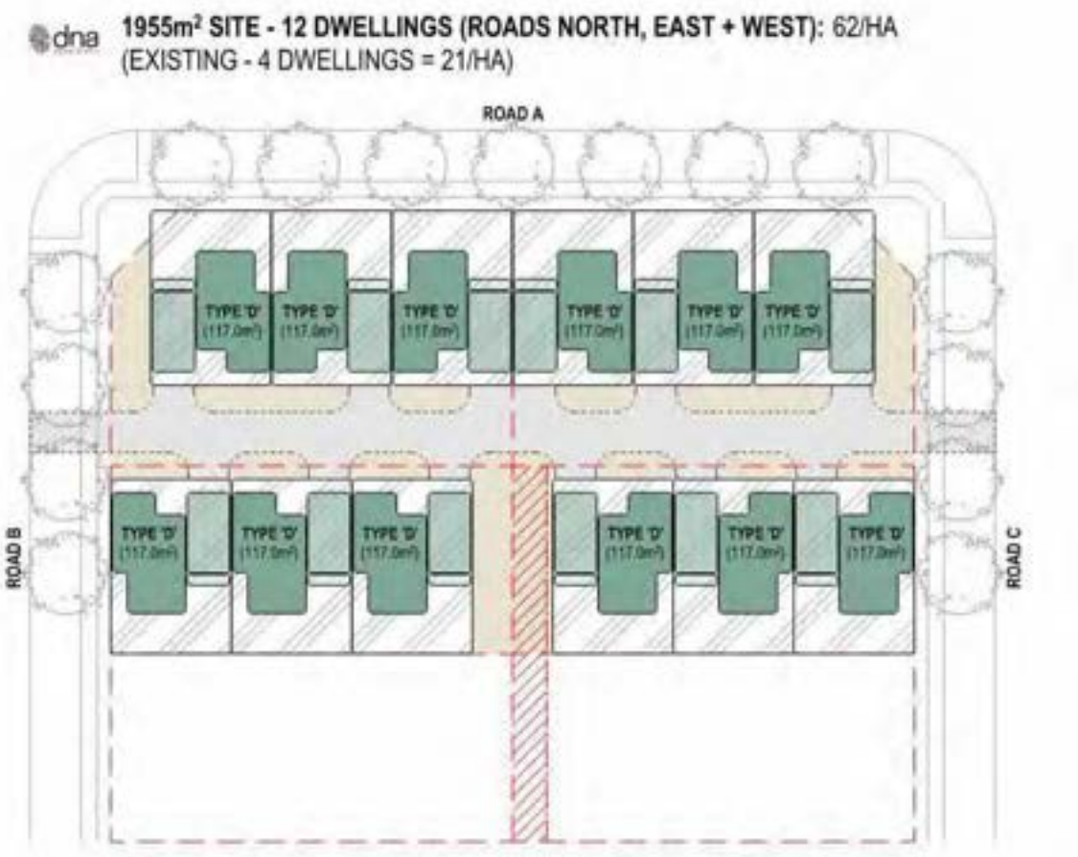
MICRO BLOCK HOUSING IN THE ACT

This collection of designs directly references section typologies used in greenfield subdivisions in the ACT by the Suburban Land Agency. End sections of RZ1 blocks offer a great opportunity to increase density as they provide three street frontages.





An alternative configuration for the four-block end-section is to introduce a laneway. This is a suitable development type where main roads do not provide opportunity for a higher level of driveways. A suitable width between blocks needs to be maintained to allow for driveway access, pedestrian access, and high-quality landscape areas with opportunity for deep root planting zones.

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Listening Report

Missing Middle Housing Reform

prepared by JUDD studio
for ACT Government, City and Environment Directorate

September 2025

JUDD STUDIO

Acknowledgement of Country

We acknowledge the Ngunnawal people as traditional custodians of the ACT and recognise any other people or families with connection to the lands of the ACT and region.

We acknowledge and respect their continuing culture and the contribution they make to the life of this beautiful city and this region.



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Executive summary

The proposed Missing Middle Housing Reform (MMHR) presents an ambitious new planning reform, designed to increase the supply of housing across Canberra and contribute to greater housing choice.

The reform comprises two key components: *Draft Major Plan Amendment 04 - Missing Middle Housing Reform* (DPA-04), which proposes amendments to the Territory Plan's Residential zones and Subdivision policies (and their associated technical specifications), and the draft *Missing Middle Housing Design Guide* (MMHDG), which provides design guidance for achieving best practice outcomes in 'missing middle' housing development. The amendments proposed in DPA-04 aim to reduce barriers to the development of missing middle housing, including changes that would apply across all residential zones.

The reforms have been developed in response to calls for more housing choice across Canberra, for a planning environment that enables flexible design responses, and for better guidance on quality design outcomes for medium density housing. Previous community feedback has highlighted a need for greater variety in housing types that would meet the needs of various life stages and personal preferences, including for young people, families and older Canberrans.

Consultation on the Missing Middle Housing Reform has sought to test the proposed realisation of this policy change with the Canberra community. This has meant that the engagement approach has needed to provide clear information to the public (so that the community could have an opportunity to provide their feedback on the new direction for Canberra's existing suburbs, even if they were not 'planning experts') as well as offering the full suite of technical planning documents for detailed review and comment.

The consultation was undertaken in accordance with section 63 of the *Planning Act 2023*, inviting the public to provide written submissions to the planning authority about the draft amendment, while also seeking broader feedback through engagement events and online comments. Agency consultation has occurred concurrently with public engagement, involving statutory entities as required under the Act.

Community engagement was conducted between 20 May and 22 July 2025, with written submissions accepted until 5 August 2025. The consultation incorporated multiple engagement formats including face-to-face and online community information / Q&A sessions, pop-up information stalls and listening spaces, community workshops, an online survey, opportunity to submit 'quick comments' online, and an option to provide a detailed written submission.

During the engagement period, Canberrans made **more than 1,100 contributions** on the Missing Middle Housing Reform. People have asked questions, made comments, raised concerns and provided statements of support.

The community's levels of participation and thoughtful feedback shows a clear and strong interest in the future of housing choice in the ACT.

During consultation, the ACT Government heard strong messages of support from the community, while some people raised concerns about the proposed reforms, indicating their opposition to changes to the Territory Plan. Others offered constructive suggestions for implementation, including recommendations for potential future government action.

This Listening Report provides an overview of the engagement approach and key themes raised by the community during consultation, as well as a record of the detailed feedback provided at engagement events, in written submissions and survey responses.

What we heard - key themes

Overall, the majority of Canberrans have indicated that they support an increase in missing middle housing and greater housing choice across Canberra. However, the community feedback also identified specific areas requiring further consideration and potential refinement of the Territory Plan amendments.

The following table provides an overview of the community's feedback on the Missing Middle Housing Reforms, noting key themes related to areas of support, concerns raised, and recommendations.

Feedback themes	Community comments
Housing choice and diversity	• General support for more housing diversity in Canberra, including for young people and older Canberrans. The community has largely welcomed the opportunity for increased housing options and reduced 'urban sprawl'
Affordability	• Mixed comments on whether missing middle housing will deliver affordable housing. Some suggested that new homes will not be affordable. Others have commented that more missing middle housing means more affordable older homes will become available • Questions raised about the impact of the changes on affordable rentals with potential reduction in supply of affordable family homes available for rent, particularly impacting low-income Canberrans • Call for public housing to incorporate missing middle housing
Increased density and location of urban infill	• Mixed support for increased density, with many people indicating they would be happy for more 'missing middle' housing • Some concerns about application of proposed density calculations creating negative outcomes for existing suburbs, particularly where intense subdivision is allowed • Suggestions that missing middle housing should ideally be located within walking distance of local centres or public transport connections
Local character and heritage	There was division in responses about how local character will be retained: • some members of the community are deeply concerned about the loss of Canberra's unique character and 'Bush Capital' aesthetic, particularly in older suburbs and heritage areas • some suggested a need for clarity in defining 'local character' and enforcing clear heritage requirements • others look forward to an evolving neighbourhood character and increased vibrancy for local communities
Sustainability and climate resilience	• General agreement that new infill development should be designed to maximise good landscape outcomes that reduce the impacts of urban heat island effects, water loss, or damage to biodiversity

Feedback themes	Community comments
Green space and tree canopy	• Mixed community views expressed • General support for increasing tree canopy to 20%, although some have argued it is not sufficient and should be higher to mitigate urban heat island effects. Others have expressed concern about inappropriate species selection and potential for large trees to drop limbs or have invasive roots, and potential overshadowing of open space or solar panels from large neighbouring trees • Some concerns about the proposed reduced planting area and the adequacy of proposed minimum areas for outdoor communal spaces / gardens and in particular, loss of private outdoor areas where children can play without being overlooked • Others have welcomed the reduction in planting area / increased canopy to allow more area for useable and flexible outdoor private space • Calls for a greater focus on landscape design and sustainability planning to ensure the impacts of increased urban density can be appropriately mitigated
Carparking	Divergent views were provided on proposed reduced mandatory carparking rates: • some expressed significant concern about the flow-on impacts of reduced site parking, and on-street and verge parking, with particular concerns about the impact on neighbourhood street character and the safe operation of narrower suburban roads • there was also tentative support for reductions in required parking on the basis that public transport and on-street parking infrastructure is designed to meet the demand of increased density • those who fully supported the reduction in parking welcomed the shift to sustainable transport choices, commenting that it should be up to the market to drive demand for parking, not regulation
Public transport and active transit network	• General agreement that Canberra's public transport and active transit network (and associated bus stop / footpath and cycleway infrastructure) will need to be managed strategically to anticipate and meet increasing demand caused by more density in outer suburbs • Concern that existing network does not currently provide adequate support to outer suburbs (particularly in Tuggeranong and Belconnen), with high reliance on car use
Infrastructure planning (transport, utilities and community amenity)	Calls for coordinated infrastructure planning to support increased density: • for community amenity (parks, recreation areas, and local shops) as well as for roads and public transport • to avoid utilities capacity issues, including water, sewer, electrical capacity • need for strategic government planning and coordination to support density increases proactively, rather than relying on ad hoc, single developer upgrades
Housing for older Canberrans / accessible housing	Clear demand for single-level housing options (townhouse with small garden) for older Canberrans and people with disabilities. There is an opportunity to: • create specific incentives for designing missing middle housing for older Canberrans looking to downsize or age in place, including guidance for quality single level townhouses • incorporate specific guidance in MMHDG for single level housing and dementia enabling design • incentivise more liveable / accessible housing to create more housing choice for people living with disability

Feedback themes	Community comments
Design and build quality	• Some people were concerned about the quality of new missing middle housing design, and the potential impact on existing neighbourhood character • Will be important for government to ensure (and enforce) quality construction
Subdivision and block consolidation	• General support for subdivision flexibility, particularly as an alternative to unit titling • Some people suggesting relaxing the requirement for an approved structure before sale (to improve viability of missing middle projects) • Concerns raised about impact of subdivision in older suburbs, and suggested preference for large block consolidations (working with community on appropriate local parameters) • Some qualified support noting the need for good public transport connections, infrastructure capacity, character preservation, and ensuring against negative impacts on neighbour amenity
Neighbour amenity: solar access and privacy	• General agreement on the importance of new missing middle homes to be 'good neighbours', balancing the need for new housing with preserving neighbour amenity and good local urban outcomes (including noting the importance of solar access and considering appropriate setbacks) • Concerns raised about the potential negative result of proposed changes to solar envelopes and reduced building setbacks, with potential for poor results for neighbours' amenity, access to sun and privacy
Building height and setbacks	• Some community concern about increased height / reduced setbacks and impact on overshadowing / overlooking of neighbours • Others appreciated the removal of technical barriers to achieving missing middle housing, allowing for site based consideration of setbacks from boundaries and building height to achieve more flexible design outcomes while still taking into account neighbours' amenity and local character • Recommendations to reconsider setback requirements to enable potential for larger, useable front gardens • Potential for removal of requirement for street frontages to enable retention of existing homes
Health and wellbeing	• Supporters noted the potential for infill development to contribute to a healthier lifestyle, with increased active transport (people walking and riding) and potential for more vibrant community • Opposing views were concerned about poor mental health and well-being outcomes associated with living in higher density environments, and poorly designed buildings with inadequate private and communal open space
Strata / body corporates	• A number of comments were made that the complexity and costs associated with strata management / body corporates can make it expensive and frustrating to live in unit titled properties • Subdivision provides a welcome alternative to unit-titling
Access for 'mum and dad' investors	• Some comments about the complexity of the planning approval system, potentially acting as a barrier to development for non-industry investors • General support for making it easier for 'mum and dad' investors by providing clearer guidance on how to navigate the planning process

Feedback themes	Community comments
Not really missing	• Some expressed doubt that the missing middle housing typology was 'missing', questioning what data was being used to justify the proposed reforms
Development process and approval pathways	• Some calls for a need for greater clarity on how competing requirements will be assessed - need to provide greater certainty to the community and potential developers about how decisions will be made (applying the outcomes-based assessment), and more specific guidance for varied site conditions • Planning assessment capacity concerns about whether the planning authority has adequate resources to manage increased demand for approvals and provide timely, consistent assessment • Comments about the application of third-party appeal rights - some arguing appeals are important safeguards against poor design outcomes, others suggesting thresholds for exempt developments to reduce delays while maintaining appropriate oversight
MMHDG as a guidance document	• General appreciation for the Missing Middle Housing Design Guide as a practical guidance tool to help ensure quality design outcomes • Some concerns raised about the lack of objective guidance in the reforms, and how the guidance in the MMHDG will be 'enforced'
Tiny homes and granny flats	• Suggested that there should also be targeted guidance on tiny houses and granny flats as a potential alternative housing option
Technical	• A number of technical suggestions were provided, including removal of certain building regulation duplications to avoid inconsistency with the National Construction Code, ensuring alignment of existing District Strategies and the proposed changes, and various drafting corrections to improve clarity and consistency within the documents
Data, evaluation and reporting	• Calls for accurate data collection and evaluation of the implementation of the Missing Middle Housing Reform • Feedback highlighted the need for robust data collection systems and regular coordinated evaluation to track uptake, monitor outcomes, and enable adaptive management of the policy over time
Barriers to implementation	• A number of comments that various fees and charges (including stamp duty and the lease variation charge) have significant impact on development feasibility, including for industry and non-industry developers, and for older Canberrans thinking about downsizing, with potential to act as a barrier to implementation • Strata / body corporate fees were also noted as deterrents for potential buyers from choosing multi-unit developments • Construction industry constraints (including critical shortages in plumbing, carpentry and electrical trades and rising costs) also have significant impact on development feasibility and delivery capacity, with recommendations for targeted skills pipeline development and apprenticeship support
Innovation and leadership	• Several submissions identified opportunities for government leadership, including demonstrating best practice through buy-back of suitable blocks for innovative missing middle housing projects, enabling community-led cooperative housing initiatives, and showcasing construction / prefabrication methodology innovations • Some calls for the establishment of a dedicated coordination unit within the Directorate to facilitate missing middle development, manage demonstration projects and address implementation barriers as they arise.

Section 1

Engagement overview

Introduction

Background

The population of the ACT currently stands at approximately 470,000, with projections indicating an increase to nearly 700,000 by 2050. In order to accommodate this anticipated growth, it has been estimated that the Territory will need 30,000 new homes by 2030. The ACT Planning Strategy 2018 aims to manage this growth by delivering 70% of new housing within the existing urban footprint, ultimately seeking to create a compact and efficient city.

The ACT Government has identified that, at the moment, new homes in Canberra are typically low-density, detached housing in the suburbs and high-density apartments in town centres. This does not align with the community's expectation for broader housing choices and creates a shortfall—commonly referred to as the 'missing middle'. Previous community feedback has generally highlighted a need for greater variety in housing types suitable for various life stages and preferences, including for young people, families and older Canberrans.

In the ACT context, 'missing middle' housing encompasses multi-occupancy dwellings (dual or tri-occupancy), townhouses, terrace homes, and low-rise apartments up to three storeys. While these housing types exist in some suburbs across Canberra, they are not widely available and are limited to areas where current zoning permits medium density development.

The Missing Middle Housing Reform aims to provide greater housing choice across Canberra by identifying and removing barriers in the planning system that prevent or limit the construction of well-designed, diverse housing options, including allowing for subdivision and consolidation of residential blocks in RZ1 residential zones.

The MMHR includes a Draft Plan Amendment 04 (DPA-04) proposing amendments to the Residential and Subdivision Policies in the Territory Plan and their associated technical specifications. The reform also includes a new draft Missing Middle Housing Design Guide, to provide best practice design guidance for these targeted typologies.

To enable this reform, the ACT Government has asked for community feedback on both the proposed Draft Plan Amendment to the Territory Plan and the draft Missing Middle Housing Design Guide.

Engagement objectives

The Missing Middle Housing Reform represents a significant change to the ACT Planning System, with potential implementation across the whole of Canberra. It has been important to give the community an opportunity to review the full details of the proposed changes, so that they can ask any questions and provide their considered feedback.

The Missing Middle Housing Reform communication and consultation has aimed to:

- **inform the Canberra community** of the Government's intention to introduce more opportunities for missing middle housing across Canberra, and to provide clear information about the details of the proposed changes, including how the changes compare to the existing planning requirements
- **provide examples** of missing middle housing design across our city, including how the delivery of housing reform could take place over time
- **consult with the community**, allowing for feedback on the proposed specific reforms, to consider any concerns or recommendations for changes and to identify elements that are supported
- **reach out to a diverse range of the Canberra public** and stakeholders including community representatives, the building industry and design professionals, and local community members

How and when we engaged with Canberrans

The engagement strategy for the Missing Middle Housing Reform offered a range of options for public participation. Engagement included passive and active feedback options, ranging from **online surveys, 'quick comments' and written submissions to face-to-face interactive as well as online events** - ensuring that community members could provide feedback in ways that suited their preferences and availability.

Events were held across Canberra and scheduled at various times including on weekdays, weekends, and outside work hours to maximise accessibility. ACT Government representatives with detailed understanding of the proposed reforms were available at all events to answer questions and provide information.

Copies of the Missing Middle 'snapshot' document, comparison tables and printed copies of the Missing Middle Housing Design Guide were also available at the events.

For those people unable to attend any of the scheduled sessions, a recording of the online community information session, including the interactive Q&A session, was made available on the website.

Timing for engagement

Public consultation for the Missing Middle Housing Reform ran for 11 weeks from **20 May 2025 to 5 August 2025** with online consultation closing on 22 July 2025 and written submissions accepted until 5 August 2025.

Timing for the engagement program was extended beyond the Statutory requirements and YourSay best practice requirements to take into account a number of long weekends which occurred during May / June, and the July school holiday period, ensuring that Canberrans had full opportunity to attend events and consider the online information.

Details of engagement event location and timing

			# of people we spoke with
Environment and Planning Forum	Thurs, 22 May	4.30pm - 6.00pm	15
Workshop - Community representatives	Tues, 3 June	4.30pm - 7.30pm	12
Workshop - Industry representatives	Thurs, 5 June	4.30pm - 7.30pm	22
Pop up - CIT	Tues, 10 June	11.00am - 2.00pm	32
Community presentation / Q&A - Southside	Weds, 11 June	4.30pm - 7.30pm	11
Info presentation - Online	Thurs, 12 June	6.30pm - 8.00pm	17
Pop up - Barton Grocer	Thurs, 12 June	11.00am - 2.00pm	68
Pop up - Dickson shops	Fri, 13 June	3.00pm - 6.00pm	48
Pop up - Kippax Fair	Sat, 14 June	9.30am – 12.30pm	44
Listening space - Woden	Fri, 20 June	10.00am - 7.00pm	7
Meet the Govt Architect - Woden	Fri, 20 June	10.00am - 12.00pm	7
Pop up - Curtin	Sun, 22 June	9.30am – 12.30pm	51
Pop up - Mawson	Sun, 22 June	2.00pm - 5.00pm	41
Listening space - Belconnen	Sat, 28 June	10.00am - 4.00pm	41
Meet the Govt Architect - Belconnen	Sat, 28 June	10.00am - 12.00pm	3
Pop up - Cooleman Court	Sat, 28 June	9.30am – 12.30pm	51
Pop up - Kambah Village	Sat, 28 June	2.00pm - 5.00pm	42
Community presentation / Q&A - Northside	Tues, 1 July	4.30pm - 7.30pm	27
Listening space - Online	Fri, 4 July	10.00am - 7.00pm	0*

** An open invitation was provided for the public or organisations to book a time online anytime between 10am and 7pm on 4 July for discussion / questions about the proposed reforms. No bookings were received.*

Engagement events across Canberra

3 public info / Q&A sessions

55 people attended

8 pop ups across **6** districts

377 people spoke to us

18 total events held across Canberra

539 total number of people we spoke to at events

2 workshops

34 people represented community & industry

2 ‘meet the govt architect’ sessions

10 people visited

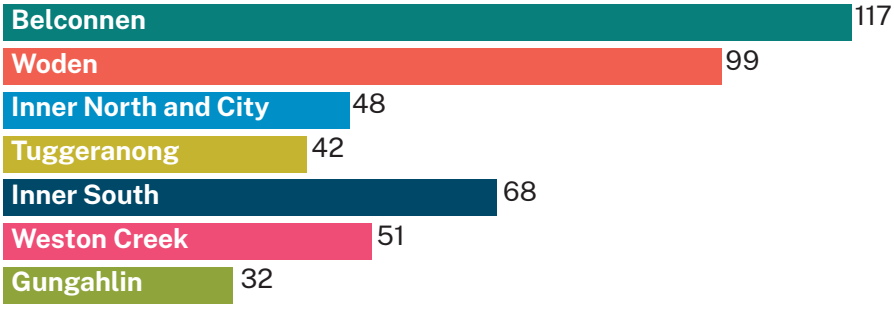
2 listening spaces

48 people attended

1 environment & planning forum

15 people visited

People participated in events located in...



Engaging on YourSay

YourSay was the central digital platform for the community to find out about the Missing Middle Housing Reform and provide feedback. The website allowed people to access various levels of information, depending on their time and interest.

Information available on YourSay

- **Summary information** about the reforms and the reasons for the proposed changes
- **Details about the proposed Missing Middle Housing Reform and changes to the Territory Plan** (including links to a 'snapshot' document, the relevant MMHR explanatory documents, the draft Missing Middle Housing Design Guide and the amended Territory Plan)
- An **information video**
- **Imagery** depicting what new missing middle housing might look like (people were able to use a pointer on images of typical existing Canberra streets to show the potential change, 'sliding' the image between the typical street now, and with some new 'missing middle' housing included)
- **Diagrams** showing how missing middle might be enabled within a suburb over time and how 'living infrastructure' could be delivered together with missing middle housing
- **Information about residential 'zones'** in Canberra and a link to map information for people to better understand what zone they live in
- A link to the new **interactive 'Housing Map'** website that showcases successful missing middle housing case studies throughout the ACT
- A link to find out more **information about the Territory Plan** generally
- **Frequently asked questions**

How to 'Have YourSay'

On the website, people were able to view upcoming engagement activities across different districts, and register for events.

People could provide their feedback on the Missing Middle Housing Reforms online by completing a survey, making a 'quick comment' or submitting a written submissions.

The Canberra community was directed to the website via a range of communications channels.

YourSay contributions

16k

16,053 people visited YourSay

downloads via YourSay

6.4k

547

YourSay contributions online

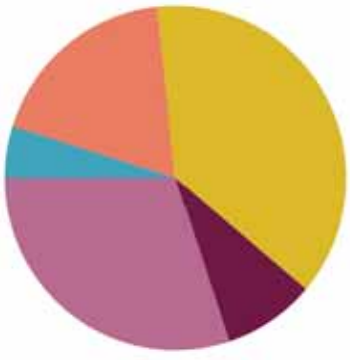
398 surveys

149 'quick comments'



74 written submissions

A quick poll on YourSay asked the community how they felt about the missing middle housing reforms engagement. 103 people completed the poll.



56% of people said they were satisfied or very satisfied with the engagement experience

39% said they were not satisfied or very unsatisfied with their engagement experience

5% said they were neither satisfied nor unsatisfied

Communication reach

The CED Communications, Engagement and Media team developed a comprehensive and integrated Communications Strategy to promote the Missing Middle Housing Reform engagement.

A range of communication channels were used to ensure that the Canberra community and key stakeholders were aware of the Missing Middle Housing Reform engagement process and understood how to access information and provide feedback.

The consultation was promoted through:

- ACT Government-owned social media channels
- The June edition of the OurCBR newsletter mailout
- Promotional articles
- A paid digital advertising campaign to increase awareness and encourage participation
- Direct stakeholder communications
- Proactive media
- Reactive media

Shared Promotion

A diverse range of key stakeholders and interest groups actively supported the engagement by sharing information across various social media platforms. This promotion helped to broaden reach and encourage community participation in the engagement.

Missing Middle in the media

Details about the proposed Missing Middle Housing Reform and the engagement program were also shared across Canberra via various media, including:

- 51 online media articles
- 42 mentions on radio
- 25 print news articles
- 7 television reports

YourSay interaction

The newsletter and social media reach across Canberra and the number of media mentions across the engagement period suggest that the broad community had opportunity to hear about the proposed reforms during the engagement period, and how they might be able to provide their feedback.

- The Missing Middle Housing Reform page on YourSay was accessed by 16,053 people
- Documents on the website were downloaded 6,400 times
- 398 surveys were submitted
- 149 ‘quick comments’ were submitted online
- 74 written submissions were received.

Recording public feedback

During consultation events, community feedback was collected in a number of ways.

- During discussions with the public at 'pop ups', City and Environment Directorate (CED) staff kept notes of each interaction using a template record sheet. This included recording whether or not that person supported the reforms and any feedback they provided.
- Visitors to pop ups could write feedback on 'post-it' notes or comments sheets. They could also indicate by 'sticky dots' whether they would like to see more housing choice in their community. (Throughout the consultation period, there were zero dots left in the 'no' box on the panels).
- At community information / Q&A sessions and workshops CED staff and JUDD.studio recorded all questions and comments made by participants.

On the YourSay website, the community could provide their written feedback by:

- leaving a 'quick comment'
- completing an online survey
- uploading a written submission. Written submissions could also be provided by direct email to the Directorate.





Speaking with the community at a 'pop up' and comments left by the public during the event.

Section 2

Record of engagement

This section includes information about each engagement event

- environment & planning forum
- public information / Q&A sessions
- workshops
- pop-ups
- listening spaces
- YourSay ‘quick comments’
- written submissions
- online surveys

Environment and Planning Forum

17

people from **13** organisations

Thursday, 22 May 4.30pm – 6.00pm
ACT Government Office Building, Dickson

In the first week of the engagement program, members of the Environment and Planning Forum (EPF) were offered a direct briefing about the proposed reforms, and the engagement program.

EPF members who were able to attend the session were:

- Australian Institute of Architects
- Belconnen Community Council
- Conservation Council
- Environmental Defenders Office
- Greater Canberra
- Inner South Canberra Community Council
- Living Streets Canberra
- Molonglo Community Forum
- National Trust ACT
- North Canberra Community Council
- Pedal Power ACT
- Tuggeranong Community Council
- Woden Valley Community Council

At the session, senior representatives of the City and Environment Directorate provided a detailed presentation on the proposed reforms and took questions from the group.

Following the session, all EPF members were provided, by direct email, with:

- a copy of the EPF Missing Middle Housing Reforms presentation
- a link to the YourSay Missing Middle engagement events
- the registration link for the online public information and Q&A sessions

Information about the engagement program with direct links to the YourSay website was also included in EPF Bulletins emailed to all members in May, June and July.

Public information / Q&A sessions

55 people at **3** sessions

Southside:	Wednesday, 11 June 4.30pm – 7.30pm Tuggeranong Community Centre
Northside:	Tuesday, 1 July 4.30pm – 7.30pm '59 Cameron Avenue' Conference and Event Centre
Online via zoom:	Thursday, 12 June 6.30pm – 8.00pm

Community information sessions were held offering a detailed presentation about the proposed Missing Middle Housing Reform, including information about proposed amendments to the Territory Plan and technical specifications, followed by time for questions and answers.*

The sessions were attended by senior representatives from the City and Environment Directorate. The Minister for Planning and Sustainable Development was also present at both face-to-face sessions.

Community participants were able to view full copies of the proposed Missing Middle Housing Design Guide, summary information panels and the 'Snapshot' information document.

The online session was recorded and subsequently posted on the YourSay website for public viewing.

This presentation was also used at the community and industry interactive workshops.



Northside community information / Q&A session (Belconnen)

* The location and times for the information sessions were scheduled to maximise potential for people to attend during the week, at the end of a typical work day. Each face-to-face session offered two sittings: 4.30pm – 6pm and 6pm – 7.30pm. For both locations, only the initial 4.30pm session was attended.

Questions / comments raised by the community:

Community members asked a range of questions about the proposed reform including on issues related to:

- The scope of the planning changes
- Housing affordability
- Timing for implementation and levels of government support
- Impacts of potential financial barriers (such as LVC)
- Likely impacts on neighbourhood character
- Development application processes and neighbour appeal rights
- What assistance would be provided to people who want to redevelop but aren't familiar with the planning system
- Transport infrastructure and utilities infrastructure capacity
- Future planning reforms (and upzoning)
- Solar access (for neighbours and to public spaces)
- Tree canopy cover and tree plantings
- Housing typologies and appropriate housing for people down-sizing
- Application of new block subdivision / consolidation arrangements
- Enforcement of design and building standards
- Positive experiences with missing middle housing

Workshops

34

people across
2 workshops

Community workshop: Tuesday, 3 June 4.30pm – 7.30pm
ACT Government Office building, Dickson

Industry workshop: Thursday, 5 June 4.30pm – 7.30pm
ACT Government Office building, Dickson

Two workshops were held for representatives from community organisations and from the development industry. The workshops were designed to provide detailed information about the proposed reforms, to answer any questions, and to explore how the reforms might work 'in real life'.

Both sessions were attended by senior members of the City and Environment Directorate planning and policy team. The industry representatives' workshop was also attended by the Minister for Planning and the ACT Government Architect.

Participants and agendas

The community representative workshop (12 attendees) including representatives from:

- Belconnen Community Council
- Woden Valley Community Council
- Deakin Residents Association
- Inner South Canberra Community Council
- SeeChange
- Public Transport Canberra
- Greater Canberra

The industry representative workshop (22 attendees) including representative architects, planners, builders, certifiers and building valuers.

The workshop agendas included:

- a presentation providing background information to the proposed Missing Middle Housing Reform, and detail about the proposed reforms
- Q&A session
- Two interactive sessions and a plenary discussion on the outcomes / feedback



Industry workshop table group discussion

Community members were asked to consider a development proposal on an imagined site from the perspective of various 'personas', with a view to offering an opportunity to explore the detail of the draft Missing Middle Housing Design Guide document and how missing middle developments might be approached by a community land holder. The session also provided an opportunity for feedback on the application of the draft Missing Middle Housing Design Guide document and proposed planning reforms generally.

Outcomes from community workshop Q&A and group discussion

The Community Workshop session provided mixed responses, with participants appreciating design flexibility while raising concerns about implementation, infrastructure and community input. While the reforms' focus on character-responsive design and removing arbitrary dwelling limits was welcomed, questions emerged about affordability outcomes and development processes.

Support for whole of Canberra approach

Welcomed the removal of arbitrary zoning limits and the shift from regulating building use and dwelling numbers to instead regulating building footprint and street interface. Support for block consolidation and territory-wide application (rather than selective 'upzoning') to enable better design outcomes.

Subdivision with approved dwelling

Concern that uncertainty related to whether individual titles will be granted upon construction completion (for subdivision) will make it difficult to secure financing.

Character and context

Recognition that each missing middle application will need to be considered (in its design and the assessment of any proposals) based on the site's context, including thinking about how to be a 'good neighbour', depending on the circumstances. Clearer guidelines for heritage and neighbourhood character would be useful.

Enforcement

Heritage areas were raised as positive examples of how planning certainty could contribute to community. However, it was suggested that there had been recent lack of lease compliance and rule-breaking, particularly with regard to asbestos redevelopment blocks, undermining heritage requirements. Lack of enforcement generally could erode the potential beneficial impact of the design guidelines.

Community vs developer driven / revenue raising

Concerns that proposed reforms would benefit developers and government revenue rather than communities. Individuals won't be able to compete with developers so need to consider opportunities to work as a collective to achieve quality, affordable housing.

Feasibility

Development proponents may not have adequate certainty early in projects when commissioning architects and planning sites. Subjective/discretionary assessment elements in the design guide may make projects 'hit-and-miss' or cause delays that render projects unviable.

Affordability

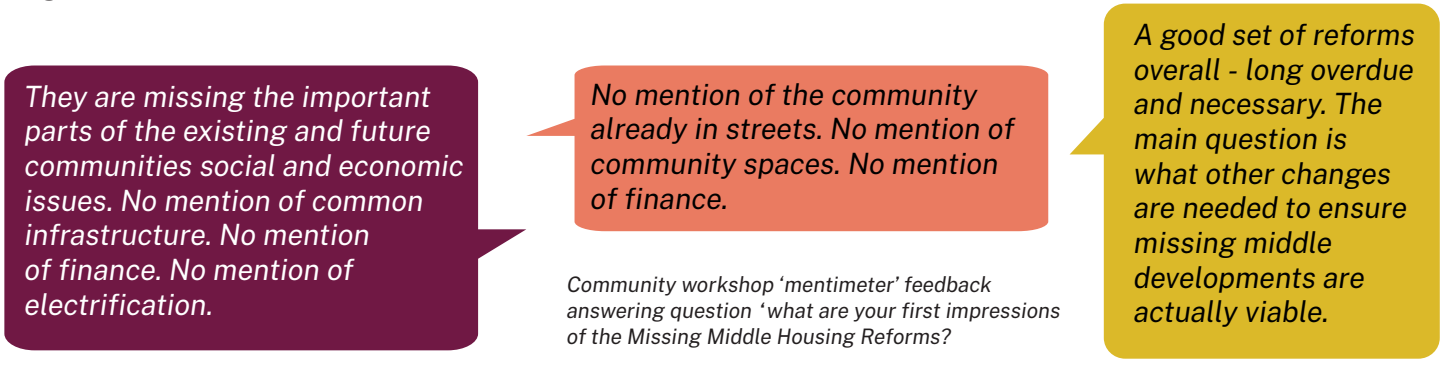
Discussion about whether reforms will succeed in reducing housing costs, or if new housing, even if more expensive initially, would have a "filtering" effect where buyers stopped competing for other properties, helping to suppress rents / housing prices.

Technical implementation

Questions about exempt development pathways, community right to appeal, and building height definitions.

Benefits of flexible system

Suggested that the flexibility of the system will allow for different uses for land depending on circumstances. Financial viability will likely largely determine what development occurs, with the market responding accordingly.



Community workshop 'mentimeter' feedback answering question 'what are your first impressions of the Missing Middle Housing Reforms?

Industry representatives were invited to review the scenario analysis work done in preparing the reforms and to undertake an imagined 'back of the envelope' feasibility on various sites.

The aim of the session was to:

- test how well various missing middle typologies could be applied to a site
- assess whether a typology would be feasible when the relevant design and context considerations were applied
- allow for questions and general feedback on the proposed reforms.

Outcomes from industry workshop Q&A and group discussion

Feasibility heavily dependent on each site

Balancing site cover, set backs, easements, solar access and tree canopy will all impact on whether or not a development is feasible. Works well on some sites and not feasibly on others.

Potential to minimise driveways

The location and potential duplication of driveways might create issues. To avoid multiple verge crossings / driveways then might be useful to consider community title or right of access to share a single driveway (if blocks are subdivided).

TCCS requirements for driveway turning radius / 3-point turn allowances impact the amount of tarmac required onsite with poor design outcomes.

Impact of easements

Existing easements on a site may make redevelopment more difficult.

Incentives to retain dwellings

At the moment the changes seems to promote the demolition of existing dwellings. Ideally there would be feasible options that allow for retaining the existing house, rather than having to knock down rebuild every time.

Laneway access

The ability to have homes with entries from existing laneways can lead to great terrace housing outcomes

LVC

Taking into account LVC will impact on whether or not a project is feasible. The application of LVC is a disincentive to more homes – seems to encourage less homes but more bedrooms. LVC deferral is not always appealing to financiers / lenders.

Building heights

Restriction to 2 storeys may make it harder for developments to be feasible in RZ1.

Preference for subdivision

Consumer preference is for single title (eg through subdivision) rather than unit titling, so opening up the potential for subdivision in RZ1 is positive.

Project certainty

Some concern about assessment uncertainty and how proposals will be considered against outcomes – scope for arbitrary assessment / difference of opinion.

Consider a Practice Note to provide clarity on what the thresholds for 'character' will be (to provide some certainty) and how the density calculations will be applied

Communities may be opposed to block consolidations with concerns about changes to street character (creating uncertainty about whether proposals will be approved), although there is changing community sentiment that is becoming more optimistic about this type of housing.

Entity constraints

Entities can often be an impediment to development. Needs to be a move towards a more responsive, outcomes focused process.

Requirements for waste collection can have a significant impact on site planning and design (if it has to be accommodated onsite).

Definitions and flexibility

Would be good to adjust the definition of attic to make it more feasible for a habitable roof-space. Should reconsider the requirements for deep soil zones / allow a more nuanced approach to create potential to have trees growing 'on-structure' (eg. to allow for basements in constrained sites) dependent on the context.

Zoning and District application

The Inner North District Policy may clash with consolidation policies – need to ensure they align.

Perhaps consider a prohibition on new single dwellings for RZ2.

Assessment of parking

Street parking – without clarity on what is allowable on each street there will be a 'first mover' advantage (ie. the cumulative impact of street parking will apply rather than strategic planning).

Pop-ups

Face-to-face ‘pop up’ information stalls were offered across Canberra at a range of times during the week, including weekday as well as weekend sessions. Each pop up ran for 3 hours and was advertised on the YourSay website.

The pop ups included information displays about the proposed Missing Middle housing reform, with spaces to leave quick comments and feedback. The displays (and associated information fliers) also included a QR link to the YourSay website. Printed copies of the draft Missing Middle Housing Design Guide and Snapshot / comparison booklet were also available.

‘Interactions’ and feedback

Visitors to pop-ups could speak to a member of the City and Environment Directorate team, or could leave ‘post-it’ and written comments. *(The collection of comments are at Appendix A.).*

Staff members recorded the number of people that were spoken to at each pop up and any feedback those people provided, and noted whether or not people supported the proposed missing middle housing reform.

Feedback provided at the pop-ups is summarised on the following pages, together with the comments made at the listening spaces.

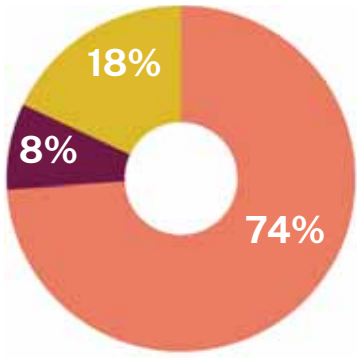
377 people spoke with us

8 pop ups across **6** districts

68 written comments received (@ pop-ups + listening spaces)

Pop-up locations

- CIT, Bruce (Belconnen)
- Barton Grocer, Barton (Inner South)
- Dickson shops (Inner North)
- Kippax Fair (Belconnen)
- Curtin shops (Woden)
- Mawson ‘Southlands’ (Woden)
- Cooleman Court (Weston Creek)
- Kambah Village (Tuggeranong)



74% people at pop-ups told us they support the reforms

18% were unsure

8% said they didn’t support them

Pop-ups at Kambah Village and Dickson Group Centre



Listening spaces

‘Meet the Government Architect’ sessions

Southside: Friday, 20 June 10.00am – 7.00pm
Woden Library

Northside: Saturday, 28 June 10.00am – 4.00pm
Capital Food Market, Belconnen

7 people visited the Woden listening space (**7** met with govt architect)

41 people dropped into the Belconnen space (**3** saw the govt architect)

Face to face ‘listening spaces’ were offered at two locations during the engagement period, with opportunities for members of the public to visit at any time during the day, or to book specific sessions with the Government Architect.

Feedback provided at the listening spaces is summarised on the following page, together with the comments made at pop-ups.

‘Meet the Government Architect’ sessions were run at each of the listening spaces from 10am – 12pm as small group sessions, to discuss the proposed Missing Middle Housing Reform. Pre-registration was required.

The Woden ‘Meet the Government Architect’ session included a round table discussion about a number of issues, including those related to character and heritage; environmental issues, parking, development feasibility, unit-titling and affordability generally. Not all attendees agreed with each other, and there was robust general discussion.

The Belconnen ‘Meet the Government Architect’ session was attended by only 3 people. There was some discussion about the proposed reforms, including the potential for innovation in transport such as using car share to augment residential parking. One of the attendees was interested in discussing the potential for their specific development opportunity.

Summary of discussion with the Government Architect

Environmental impacts were discussed, including those related to potential canopy loss, lack of deep soil for trees, concerns about significant blue gums in backyards not being protected, potential verge tree removal, and urban heat island effects from increased density.

Parking requirements for missing middle housing, including potential extra strain on street and verge parking, and public transport limitations were raised. Some attendees expressed that they thought the reforms meant no parking requirements at all, requiring clarification from the Government Architect about the outcomes-based assessment system.

Creative solutions were suggested, including formalised parking on one side of streets and allowing corner shops on residential blocks to support local viability.

Merit-based assessment and how this would apply was questioned. The Government Architect noted that the outcomes-based system would mean each development will be assessed individually based on its merit and location, including consideration of available street parking.

Heritage and neighbourhood character was discussed, with some participants worried about disrespectful treatment of heritage buildings, and the need to better protect Mid-Century Modern architecture. Some expressed concern that missing middle housing would threaten existing character / what makes Canberra distinctive, while others disagreed that new homes should reflect existing character, arguing that quality diverse development should be enabled.

Intergenerational housing stress was discussed, including the urgent need for housing supply, with housing insecurity and affordability pressures affecting different generations, and particularly young people and older generations.

Throughout the discussion, the Government Architect was able to respond to specific queries, confirm how the outcome-based assessment would apply, and clarify the specific elements of the proposed planning reforms.

Overview of feedback provided at pop ups and listening spaces

People who indicated support for the proposed Missing Middle Housing Reform

The majority of pop-up consultation participants expressed support for the Missing Middle Housing reform, viewing it as a necessary response to Canberra's housing crisis and a positive way to support younger people finding a place to live, and also for older people to age in place.

A number of people said they were interested in potentially subdividing their own blocks or purchasing townhouses to live in or downsize. Some said they thought the changes would bring an increased sense of community and revitalisation of local suburban centres.

Supporters also raised implementation concerns around public transport network and utilities infrastructure capacity and costs associated with development (such as Lease Variation Charges and stamp duty), and the need for enforcement of design and building quality to ensure good outcomes. People also noted they would like to see more focus on single level townhouses in the market to provide more accessible housing options (particularly for older Canberrans).

People who indicated they did not support the proposed Missing Middle Housing Reform

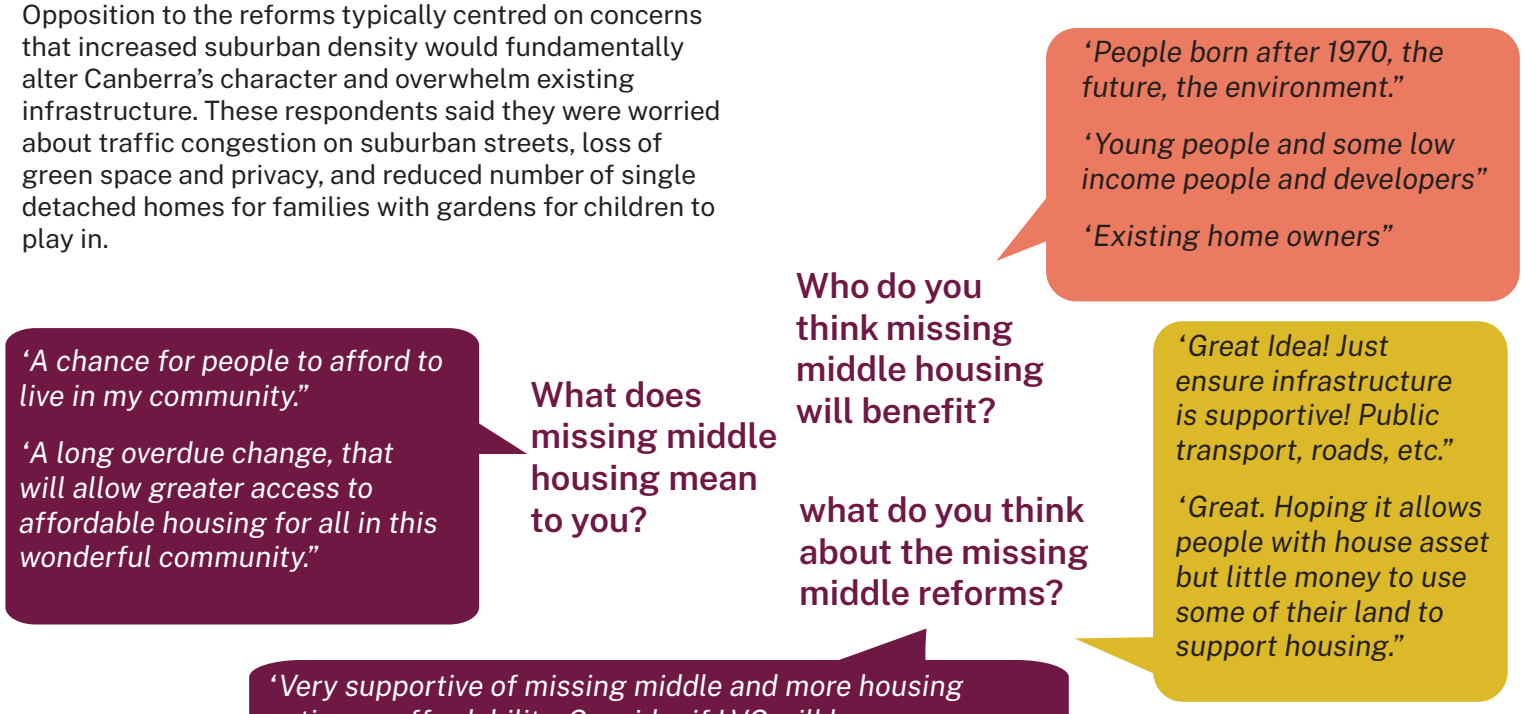
Opposition to the reforms typically centred on concerns that increased suburban density would fundamentally alter Canberra's character and overwhelm existing infrastructure. These respondents said they were worried about traffic congestion on suburban streets, loss of green space and privacy, and reduced number of single detached homes for families with gardens for children to play in.

Some said they thought denser housing would lead to mental health and well-being problems, particularly in poor-quality development outcomes.

A number expressed opposition to the principle of suburban infill entirely, arguing that density should be concentrated in centres rather than residential neighbourhoods, and expressing skepticism about the government's ability to enforce quality standards or prevent developer-driven outcomes that prioritise profit over community wellbeing.

People who were unsure about whether or not they supported the proposed reform

Participants who were uncertain about the reform typically supported the concept of housing diversity but had reservations about implementation (more so than those that supported the proposed reforms). Their concerns focused on ensuring adequate infrastructure upgrades occur alongside density increases, maintaining building quality standards, and protecting neighbourhood character through effective design controls. A number of people in this group expressed conditional support, indicating they would accept the reform if specific issues around parking, public transport, construction quality, and planning processes were adequately addressed.



Selection of written comments left at pop-up locations / listening spaces. The full collection of comments is provided in the Appendix.

YourSay 'Quick comments'

149

comments received online via YourSay

Through the YourSay website, 110 people submitted 'quick comments' (13 of those people left more than one comment, with a total of 149 comments submitted).



Nearly 50% of people indicated they **supported the reforms** (some including comments about how to improve implementation)

Around 30% left people left **general comments**

Around 25% of people raised **concerns** in their comments or indicated that they **did not support** the proposed reforms

The full collection of submitted 'quick comments' is available online on YourSay for public viewing, and is included as an appendix to the DPA-04 Consultation report.

- Indicated support
- General comments
- Indicated they did not support
- Raised concerns

Summary of comments made / issues raised

Housing choice and affordability

A number of people indicated support for more housing choice in Canberra, including for young people. Others were concerned that missing middle housing would not actually deliver affordable homes.

'Missing Middle Housing is essential: our ageing population find that they cannot garden comfortably and need access to better bus services"

'An excellent much needed reform. Will reduce the growth of rents and give residents more options to live close to work and transport."

'With good design, incorporation of environmental technologies and sensitive use of open space this could really help the housing crisis"

'Any consideration of 'The Missing Middle" must include thorough consideration of the of [sic] Affordable and social housing."

'I strongly oppose this policy. This will not solve housing problems but will drive up prices for cheap, flimsy shoeboxes."

'Housing affordability has been overlooked in these reforms and the terraces being built currently cost as much as houses."

Density and urban sprawl

There was mixed support for increased density as an alternative to urban sprawl.

'These reforms are a much needed step in densifying our city, catering for demand in established areas. Fully supported. Well done!"

'Yes, infilling existing suburbs is a better idea than the eye sore of new development. We also need to stop unending growth mentality."

'I think this is the right move. It creates the opportunity for more efficient use of urban space while not causing places to change too fast"

'This is not the answer, not everyone wants to live packed in like sardines."

'As soon as this happens I'm leaving ACT"

Subdivision

Support was indicated for subdivision flexibility with some people suggesting relaxing the requirement for an approved structure before sale. Some expressed concern about consolidation.

'Allow subdivided vacant land for sale before construction"

'Subdivision is good and allowing townhouses the same size as houses is fine. RZ1 block consolidation is an unacceptable change to character."

'Impossible to fit 3 abodes on single block. No views, no plants, no space, expensive"

Single-Level Housing Demand

There was clear demand for single-level housing options (townhouse with small garden) for older Canberrans and people with disabilities.

'Need more single level townhouses with a small yard for oldies. Then we can free up our big houses on big blocks for the next generation"

'The guide is too biased towards two-storey developments"

Tiny houses

Suggested that there should also be guidance on tiny houses, with potential for the typology to help in addressing housing needs.

Neighbour amenity, solar access and privacy

Comments noted the importance of ensuring good solar access and amenity for existing properties and neighbours.

'I support the concept of MM. However, the proposals need re-working to guarantee solar access in winter to avoid building cold homes etc"

'I'm paying back a $15000 solar loan. What happens when a townhouse overshadows my panels? How is this fair?"

'I don't have a problem with it as long as existing residents' concerns are taken into consideration such as proximity, noise and shading."

Design quality and local character

Some people were concerned about the quality of new missing middle housing design, and the potential impact on existing neighbourhood character, and how government could ensure (and enforce) quality construction.

'I am all fo [sic] the missing middle however great design, quality & good regulation is vital. Canberra is filled with poorly designed apartments"

'New developments have no fit with existing character under the present guidelines. What is there in these new ones to imply different now?"

'You are ruining Canberra. The impact of these extra infill programs are compromising the way we live and our quality of life."

'What if builders ignore the MM design guide and maximise the number of units that can be placed on a block? Any neighbour protection?"

Development process and approval pathways

Some people left comments about the complexity or length of the planning approval process, particularly for 'mum and dad' investors.

Car parking and transport infrastructure

A range of views were provided on proposed car parking, with some expressing concern that reduced mandatory parking would lead to problematic on-street parking, while others argued that parking mandates should be eliminated entirely to support car-free living near public transport.

'Bring back the car space rules, mate. The proposed reform's slashed the number of car spaces needed per home. We need two car space per home"

'Wish list: all parking mandates abolished (eg NZ) - taller demand-responsive homes allowed by public transport, services and Inner Canberra."

Tree canopy cover

While some comments indicated concern about reduced planting area, a number questioned the value of older trees and raised issues about limb dropping and root damage to buildings.

'We want more trees, we want more houses, you cannot have both."

'flexibility for the removal of old trees on big blocks to enable better housing. I wont buy a block with a big old tree, i dont feel safe."

'5% increase in tree canopy is just a 5% increase on something falling on my house without any greater benefit."

Infrastructure planning and community services

Calls for coordinated infrastructure planning to support increased density, particularly for community amenity (parks, recreation areas, and local shops) as well as for roads and public transport.

'Better planning of parking, street width, town centres, roads and general infrastructure is seriously needed."

'areas of population increase must address public amenity EG community garden, playspace, skatepark, bike path"

Financial feasibility

Some comments suggested that development feasibility will be impacted by government costs and charges, particularly Lease Variation Charges (LVC) for subdivision redevelopment. Strata / body corporate fees were also noted as deterrents for potential buyers from choosing multi-unit developments.

'I'd happily sell my home and live in a unit, however the body corporate fees are too high with little value."

Written submissions

74

written submissions received

The Missing Middle Housing Reform consultation received 74 written submissions relating to the reforms. Submissions were received online via YourSay and also by email.

More than half of the submissions (57%) demonstrated support for the reforms (supported, or supported with comments), around one quarter of total submissions (26%) opposed the reforms, and 18% provided general commentary / feedback.

All submissions are available online on YourSay for public viewing, and are included as an appendix to the DPA-04 Consultation report.

Key takeaways

The **supportive submissions** welcomed the proposed reforms, with the majority also providing general feedback and recommendations for adjustment / improvements. Some also raised areas of concern about perceived barriers to successful implementation of the reforms, and some provided qualified support, noting elements of the reforms that they did not agree with (although they did not oppose increased density).

Submissions which did not support the Missing Middle Housing Reform voiced concerns about potential negative implications of the proposed reforms, and generally opposed the proposed changes.

Of note, a number of **common issues were raised** in both the supportive and non-supportive submissions indicating some shared feedback on areas for further consideration by Government.

The submissions offered well-considered positions on the proposed reforms, demonstrating a strong commitment to quality outcomes for Canberra and its growing population.

The written submissions revealed diverse perspectives on the Missing Middle housing reforms. The range of support and issues raised indicate some divisions in community views, but also some areas of shared recommendations for further consideration.

The feedback reveals that while there are clear divisions in community perspectives, many shared concerns exist across support levels relating to implementation, infrastructure capacity, and the need for strategic planning to accompany the reforms. The consultation has highlighted both the importance of these reforms for housing choice and the complexity of ensuring successful implementation that maintains community amenity and character.

Supporting submissions

Submissions expressing support for the missing middle housing reforms included the following comments.

More housing choice

Appreciated the potential benefits for housing diversity and choice, welcoming the opportunity for increased housing options and reduced 'urban sprawl'.

> *'In general, I support the proposed changes. There are many housing blocks, particularly around the older suburbs, with quite small houses but enormous gardens. Provided tree canopy can be maintained, it would make sense to accommodate 2 or 3 dwellings on the sites. And every dwelling needs to get good solar access and must accommodate solar panels and batteries." (Private submission)*

> *'I've been shouted down at community meetings, bullied online and in person, and told I should wait my turn. But what turn? The housing ladder has been pulled up - and DPA-04 attempts to bring it back down to the ground.*
>
> *This reform is about justice. It's about the nurse who wants to live near her hospital. The teacher who can't afford to live near the school. The young family in a two-bedroom rental who dream of something more stable. The retiree who'd downsize if only there was something nearby." (Private submission)*

> *'They have the potential to absorb much of Canberra's population growth for a long time to come without just concentrating it into high-rise apartments in town centres, or pushing further out into the countryside around the urban fringe, while still retaining the leafy green feel of the city."* (Member of architecture community)

Guidance for good design outcomes

Welcomed the practical guidance in the draft Missing Middle Housing Design Guide and the focus on good design outcomes.

> *'We found the Missing Middle Design Guide to be clear in outlining the overarching goals and design principles and particularly effective in illustrating various housing typologies across a range of block types, making early-stage feasibility assessments easier and more consistent."* (Architecture community)

Reduced parking, sustainable and healthy outcomes

Supported the sustainable and healthy outcomes associated with infill development, in particular the reduced car parking requirements as encouraging sustainable transport / allowing market response to parking demand, the focus on tree canopy cover rather than low-scale garden plantings, and the potential for the reforms to contribute to greenhouse gas emission reductions by enabling people to live closer to where they work, shop and play. They also highlighted the potential good health outcomes from a more walkable / active transit based living.

> *'where access to community services, everyday destinations and other amenities are located within proximity to residential areas, there are increased opportunities for physical activity and resulting heart health through walking, wheeling, and bike riding, as well as use of public transport"* (Heart Foundation)

> *'spreading housing growth across the city is the best way to manage infrastructure loads. It avoids the costly bottlenecks and upgrades required when growth is concentrated in only a few zones. Many inner suburbs already have spare capacity in schools, pipes, and public transport. Gentle density makes better use of existing assets, delivering more efficient urban infrastructure outcomes."* (Greater Canberra)

Removal of barriers

Appreciated the removal of technical barriers to missing middle housing, allowing for site based consideration of setbacks from boundaries to achieve more flexible design outcomes while still taking into account neighbours' amenity and local character.

> *'There will be nuances in existing suburbs and a new development may not be able to integrate seamlessly with 50-year-old homes. Instead, consideration to impacts on existing amenity on adjoining blocks could be a more important and achievable guideline, with allowances for how much impact could be permissible."* (Property Council of Australia ACT)

Submissions that did not support the missing middle housing reform

Non-supporting submissions typically expressed concerns about the following issues.

Impact on local character

Concerns were raised about the potential for negative impacts on local character, heritage areas and Canberra's 'bush capital' aesthetic. Submissions suggested that the lack of clarity regarding definitions for 'local character' and 'site context' or objective guidance in the draft Missing Middle Housing Design Guide would lead to uncertain outcomes related to design quality (due to outcomes-based assessment). Questioned how building quality will be ensured, and whether the community's right to appeal will be retained.

> *'The cost of the proposed changes would be quite steep, even if not borne by the Government. The apparent abandonment of any commitment to Walter Burley Griffin's Garden City, a touchstone for Canberra planning for over half a century, surely calls for some public debate before embarking on such a significant and irreversible change. Once inner Canberra's Garden City character and its constituent streetscapes have been destroyed these would be very difficult to reconstitute."* (Griffith Narrabundah Community Association)

> *'If such higher-density redevelopment occurs, this must have enormous impacts on older suburbs in particular, with loss of their-long established streetscape character and many mature trees, the intrusion of much more traffic and parking overspill, neighbourhood conflicts and infrastructure supply issues. Heritage housing precincts may not be adequately protected – heritage controls only affect advice from the ACT Heritage Council, which can be ignored by the planning authority."* (Inner South Canberra Community Council)

Reductions in required carparking

Raised concerns about the reduced mandatory car parking requirements and the potential for increased on-street parking, with particular concerns about the impact on neighbourhood street character and the safe operation of narrower suburban roads.

> *'The proposed changes reduce on-site parking requirements, and there can be no confidence this will be 'effectively mitigated" when approval is given. Haphazard development is particularly likely to cause traffic and parking problems in older suburbs with narrow streets, as can already be seen in Narrabundah. More illegal parking on nature strips can be expected."* (Inner South Canberra Community Council)

Housing affordability and need for missing middle

Concern that the proposed reforms would not improve housing affordability, and doubt that the missing middle housing typology was even 'missing' (questioning what data was being used to justify the proposed reforms).

> *'Under this single-plan proposed solution, the sector most in need, public housing, will be relatively neglected: the suburbs most favoured by the private sector for development will be those of the Inner North and South, where the size of blocks will attract developers and the prohibitive values of land will automatically exclude the young, the less wealthy and the homeless from access even to the more modest housing envisaged in the proposed Draft Amendments."* (Private submission)

> *The Government has supplied no assessment based on building construction data, dwelling sales information or demand studies to assess whether the construction industry is likely to build the target supply of dwellings. There is no information on whether the dwellings built will be affordable. There is no information whether they will be missing middle dwellings. There is no market research on whether the homebuyer is demanding more townhouses, terraces or low-rise apartments compared with other choices. The proposed Housing Reform is lacking rigor and feels as a stab in the dark and unlikely to produce the much needed liveable and affordable housing. The Reform Program is dictating the type of housing the home buyer will be getting whether they want it or not.* (Private submission)

Building heights and setbacks

Highlighted the perceived negative result of proposed changes to solar envelopes and reduced building setbacks on neighbours' amenity, access to sun and privacy. Raised concerns about the potential for 3 storey buildings in RZ1 and potential for disregard for neighbour solar access or privacy.

> *Regulation should be a balance between the individual and collective good; it shouldn't favour the individual to the detriment of the community.* (Private submission)

Tree canopy and planting areas

Disputed the appropriateness of the proposed reduction in planting area, requirements for deep soil zones, and whether 20% tree canopy would be sufficient to mitigate issues of increasing heat island effects and allow for adequate protection of biodiversity and local habitats.

Challenged the adequacy of proposed minimum areas requirements for outdoor communal spaces / gardens, including for shared spaces.

'Old Canberra is known for its wide, tree lined streets and domestic gardens. These, particularly the latter, contribute significantly to temperature mediation across the city. With increasing extremes in temperature a likely consequence of climate change, stabilising the temperature in built up areas is becoming a priority in cities world wide. In addition, green spaces, including domestic gardens, provide vital spaces for local wildlife. This includes birds, reptiles, small animals and beneficial insects like butterflies, bees and dragon flies." (Private submission)

Density and infrastructure

Some submissions raised concerns about the potential for broad density calculations to achieve a negative outcome for existing suburbs, particularly where intense subdivision or tall buildings are allowed.

Some of these submissions did support greater RZ1 density but qualified this with concerns about public transport connections, infrastructure capacity, character preservation, and neighbour amenity impacts.

'...government often approves new development without first assessing whether supporting infrastructure is fit for purpose. As a result, public expectations about the benefits of growth go unmet. Density is promoted with improvements to public spaces, streetscapes, and services. When those improvements fail to materialise, community support for infill development weakens... Residents want to see the benefits of thoughtful planning: walkable neighbourhoods, green streetscapes, accessible transport, and high-quality public spaces. These outcomes require both good design and effective delivery. The BCC remains committed to working with government and the community to help realise these goals in Belconnen and across the ACT." (Belconnen Community Council)

Concerns were raised about whether existing utilities infrastructure will have capacity to meet demands from increased density and a need for continued commitment to community infrastructure and amenities (such as quality green spaces, footpaths and local centres.

'The ACT Government has noted there may be consideration in the assessment of the development application if the development does not meet the character of the district or overextends the infrastructure and services of the local area. This seems subjective and it is unclear how and when this will be determined in the development process. Open engagement with local residents can help avoid conflicts and undesirable consequences." (Tuggeranong Community Council)

Subdivision and consolidation

There was some suggestion in the non-supportive submissions that there is potential for consolidation of blocks to be a more appropriate approach in older suburbs, allowing for a better design response and more green space / tree canopy. Some argued that this should be in consultation with the community and may only be appropriate in some areas.

'The Missing Middle Housing Reform should be paused while a more holistic planning framework for infill in residential areas is developed. This planning framework would cover scales substantially larger than individual blocks in order to address the issues arising from fragmented, piecemeal, small-lot subdivision. Comprehensive negotiation with all stakeholders, including the surrounding community, and agreement on concept development plans early in the development process should be part of this new planning framework." (Curtin Residents Association submission)

There was mixed feedback on whether subdivision should be allowed, with some submissions noting that subdivision should be allowable without a building (to make it more viable for non-developer landholders).

'...it is hard to generally argue that a serious loss of amenity would occur if a block of over 1,200m^2 is redeveloped as a dual occupancy, although occasional cases might have problems. Some blocks of 2,000m2 or more could probably permit triple occupancies. Although not common, blocks of this size exist in Belconnen, Woden, Weston Creek, and Tuggeranong, but not obviously so in Gungahlin or Molonglo (using ACTmapi to identify examples). The GNCA believes that with appropriate safeguards on what was built, subdivision and redevelopment of such large sites could be permitted in RZ1." (Griffith Narrabundah Community Association)

Shared issues raised for further consideration

Regardless of their overall position on the reforms, many submissions raised the same issues, predominantly related to the need for clear guidance on how the reforms will be assessed, how best to achieve good design outcomes, and the implications of perceived implementation barriers.

Solar access, amenity and open space

- A number of submissions raised the need for careful consideration of solar envelope and solar access requirements, to ensure removing barriers to missing middle housing does not lead to poor suburban outcomes for neighbouring properties
- Consideration of building heights to provide certainty for community and developers, and allowing for responsive good design outcomes
- Re-examining setback requirements to better enable site based design outcomes, including potential for larger, useable front gardens.

Missing middle housing for older Canberrans

There is an opportunity for the reform to create specific incentives for designing missing middle housing for older Canberrans looking to downsize or age in place, including guidance for quality single level townhouses.

Make it easier for 'mum and dad' investors

Submissions noted that there is a need to make the way easier for 'mum and dad' investors by providing clearer guidance how to navigate the planning process, and removing barriers.

> *'The success of this reform, and indeed, the delivery of more diverse housing typologies for Canberrans, will ultimately depend on the decisions made at the kitchen table – whether that is to do nothing, develop themselves, or sell to a professional developer or builder. These landowners will have different levels of understanding, different levels of motivation, and different levels of financial capacity."* (Property Council of Australia)

Infrastructure planning to meet demand

Public transport infrastructure planning will need to respond proactively to new demand.

> *'The city's public transport network, despite expansions like the light rail, does not yet provide the coverage or frequency needed to replace car use for most residents. Without robust alternatives, residents will continue to rely on cars, and the lack of on-site parking will simply shift the problem to the streets, increasing congestion and potentially leading to safety hazards."* (Private submission)

> *'To simply 'set and forget" without delivering corresponding improvements to services and infrastructure is to consign Canberra to all the downsides of a 'compact city" with none of the benefits articulated in documents such as the 2018 ACT Planning Strategy."* (Public Transport CBR)

Infrastructure capacity concerns were raised, extending beyond parking to include water, sewer, electrical capacity, and the need for strategic government planning and coordination to support density increases effectively, rather than relying on ad hoc, single developer upgrades.

Submissions noted the need for planning for community infrastructure needs, including strategic forward planning for schools, shops, community facilities, and quality public realm/green space to ensure community amenity as density increases.

Landscape and sustainability

There is an opportunity to increase the focus on landscape design and sustainability planning to ensure the impacts of increased urban density can be appropriately mitigated.

> *'...the Cons Council urges proactive implementation of other key policies relating to urban planning, transport, water sensitive urban design and urban forests in parallel with the Missing Middle. Much of this policy framework exists, meaning that the challenge is to ensure the application of best practice rules to both public and private land as well as adequate investment by the government in implementation and enforcement."* (Conservation Council)

Feasibility and barriers to implementation

Development feasibility challenges, particularly relating to Lease Variation Charges (LVC) were described as potentially making missing middle housing unviable, with submissions calling for LVC exemptions, discounts, or a moratorium to monitor impacts on housing delivery.

> *'While the Missing Middle reforms will increase the scope of what developments can occur, and where they can be located, the current lack of this type of development in the city is not a planning issue alone. It is due to a number of systemic taxation, approval and legal issues that must also be addressed if the benefit of the Missing Middle changes are to be realised."* (Housing Industry Association)

Submissions suggested that there is a need for a coordinated and cooperative approach across Government for implementation (and to mitigate any barriers).

> *'PIA ACT acknowledges that the Government's fiscal policy is not the responsibility of the Planning Authority, however, if the Missing Middle Housing Reforms are to achieve over-arching Government objectives, there needs to be a 'whole-of-Government' approach, not just a change to development controls. In addition to changing the planning framework, the overall success is contingent upon the financial viability of the types of development proposed through these reforms"* (Planning Institute of Australia ACT)

Implications of construction industry constraints were als0 raised, including critical shortages in plumbing, carpentry and electrical trades, with recommendations for targeted skills pipeline development and apprenticeship support.

> *'Done well, the policy could achieve an increase in urban density within Canberra's existing urban footprint, with the kind of vibrant mixed used suburbs such as the Inner North areas such as Braddon, O'Connor and Dickson. Done badly, there is the risk of cramped, poor-quality developments, isolated from shops, facilities and workplaces, exacerbating the worst of urban sprawl."* (Conservation Council)

Process and assessment considerations

A number of submissions raised issues about how the reforms would be assessed, including:

- Planning assessment capacity concerns about whether the planning authority has adequate resources to manage increased demand for approvals and provide timely, consistent assessment.
- The application of third-party appeal rights - some arguing appeals are important safeguards against poor design outcomes, others suggesting thresholds for exempt development to reduce delays while maintaining appropriate oversight.
- Greater clarity on how competing requirements will be assessed, clearer objective standards, and more specific guidance for varied site conditions.
- A need for accurate data collection and evaluation of the take up and implementation of the missing middle housing reform.

> *'These changes are manageable but requires investment in monitoring the effects of the reforms, preparedness to review the policy and co-ordination with other planning policy and strategic initiatives."* (Australian Institute of Landscape Architects)

> *'Any planning reforms risk falling short if not backed by clear implementation pathways, real-time monitoring, and adaptive management. To ensure the Missing Middle reforms translate into meaningful housing outcomes, institutional accountability, data transparency, and consistent industry engagement are essential. Without these mechanisms, any well intentioned policy may result in limited delivery and results on the ground."* (Master Builders Association)

Opportunities for innovation and demonstration

- Several submissions identified opportunities for government leadership, including demonstrating best practice through buy-back of suitable blocks for innovative missing middle housing projects, enabling community-led cooperative housing initiatives, and showcasing construction methodology innovations.
- Some called for establishment of dedicated coordination units to facilitate missing middle development, manage demonstration projects and address implementation barriers as they arise.

Specific technical recommendations

- A number of detailed technical suggestions were provided, including removal of certain building regulation duplications to avoid inconsistency with the National Construction Code, ensuring alignment of existing District Strategies and the proposed changes, and various drafting corrections to improve clarity and consistency within the documents.

Survey

398

surveys submitted

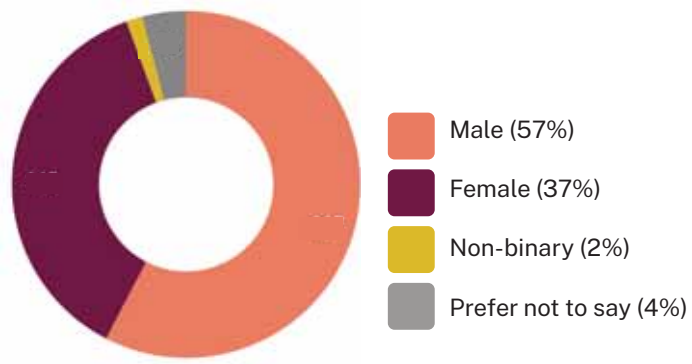
In addition to the option for people to leave short comments on YourSay, a survey was also offered, inviting more detailed feedback from the community on specific elements of the DPA-04 and draft Missing Middle Housing Design Guide. The survey was open for the duration of the engagement period.

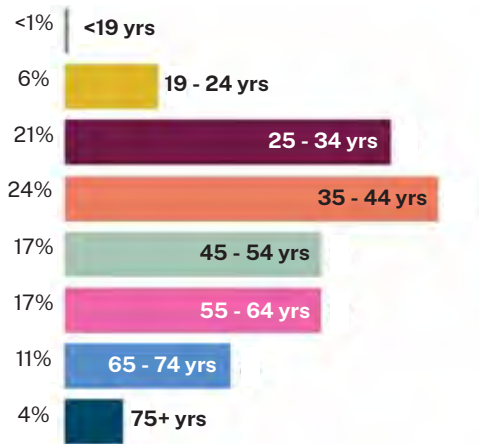
398 surveys were submitted. Responses were received from people living across Canberra and included input from people representing a range of ages, with various experiences in terms of home ownership. Not all people completing the survey provided responses to all the questions.

Rather than seeking broad comments on the proposed policy, the survey was primarily designed to enable Canberrans to provide detailed feedback on specific elements of the reforms, including sections of the draft Missing Middle Design Guide.

Survey demographics: gender and age

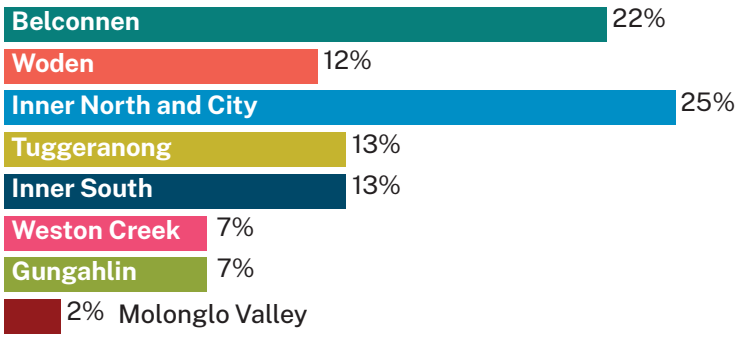
The majority of respondents were men (56%) and 37% were women. There was smaller representation from people identifying as non-binary (2%) and those who preferred not to specify. The age distribution showed strong participation from working-age adults, with the largest groups being 35-44 years (24%) and 25-34 years (21%), followed by equal representation from 45-54 and 55-64 age groups (both 17%). While they were also represented, there was less engagement through the survey by young people, with only 6% of respondents aged 24 or under.

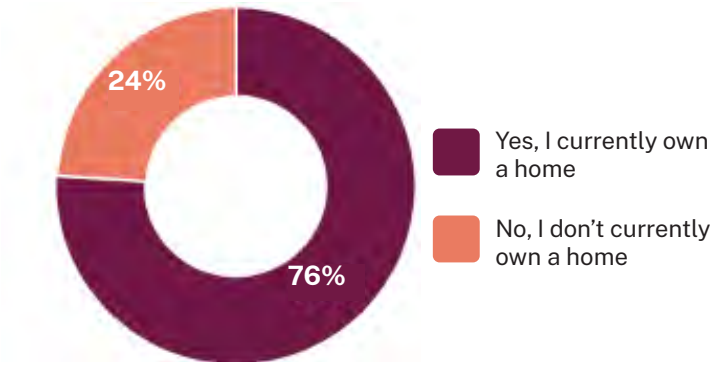




Geographic distribution and home ownership

The majority of people who completed the survey lived in the Inner North and City districts and the Belconnen district. 76% of respondents said they currently own their homes, while 24% did not, indicating strong engagement from established homeowners.



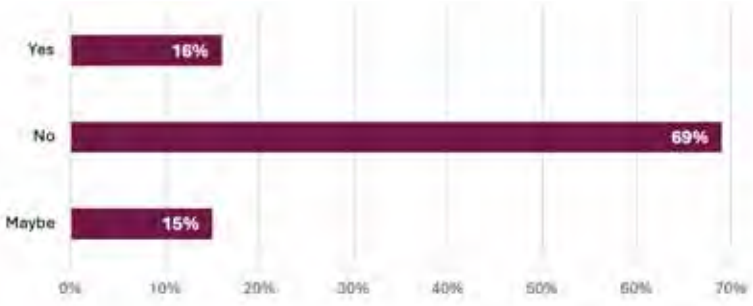


Purchase appeal of Missing Middle housing

Just over half of respondents (52%) said the proposed changes to enable 'Missing Middle' developments made purchasing a home, or an additional home, more appealing. For those who said 'no', key concerns included:

- Concerns about **losing Canberra character** citing Canberra's "bush capital" character as something they wish to preserve.
- Some mentioned wanting **large backyard space** for children to play, pets, vegetable gardens, and outdoor entertaining areas that they felt would be compromised by smaller, denser housing.
- **Financial and practical concerns** were also raised, with respondents worried about strata fees and body corporate costs. Many noted that these ongoing fees make smaller properties financially unattractive compared to standalone homes. Participants also expressed concern about property value impacts, fearing their investments could be diminished if Missing Middle developments appeared next door.
- **Inadequate infrastructure** (parking, schools, roads) to support increased density.
- Respondents also worried about **privacy loss, overshadowing, increased noise, and reduced acces**s to **natural light.** Several participants were concerned about the transient nature of higher-density housing affecting community cohesion.
- Some older residents specifically mentioned wanting **single-level housing options** that they felt weren't being adequately addressed in the proposals.

Are you considering redeveloping your block in the future for a type of 'missing middle' housing?



31% of respondents said they are considering redeveloping their block (16% definite yes, 15% maybe), whilst 69% are not interested.

How well do you think the proposed changes allow for more diversity in housing and housing choice?

The survey responses reveal broad conceptual support for the Missing Middle Housing reform as a mechanism to deliver more housing choice in Canberra, though in some cases this was conditional on how the reform was implemented.

Supporters noted that current zoning restrictions limit housing diversity and that reforms are necessary to address demographic changes and population growth, emphasising that the changes will create much-needed options for different life stages - from townhouses for first home buyers to single-level housing for downsizers.

> *'Canberra is obviously missing the type of housing the missing middle plan would provide. We should do all we can to avoid the disfunction of sprawl and allow more dense housing to ensure all Canberrans are close to services. We need much more diversity of housing - more studio apartments and more three-bedroom units for families. I strongly support more density and a limit to the addition of more new suburbs sprawling us away from each other."*

> *'Excellent approach to better utilising existing facilities such as shopping centres, and refreshing the use of schools and similar facilities that are subject to suburban ageing."*

> *'Almost by definition, any initiative that increases supply will allow for more diversity in housing and housing choice. The main limit on housing choice is affordability; Canberrans can only choose to live in housing they can afford. By increasing supply, all housing should become more affordable in the long run, meaning more choice."*

> *'Fantastic. Long over due. This is needed. Everyone wins. People can subdivide, move on, and increase housing supply for everyone. There will be no losers. Young people can get a cheaper start. Its just a fabulous outcome."*

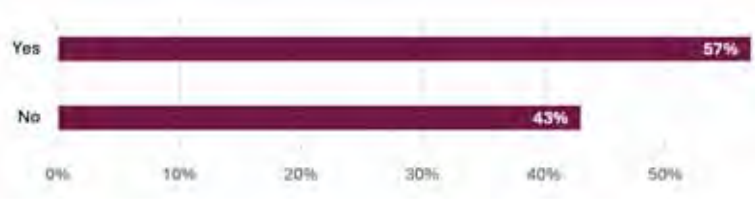
Other responses raised concerns about whether the proposed changes would genuinely provide meaningful choice, particularly given the potential for smaller housing options still being unaffordable. Comments also noted that although the reforms might increase diversity and choice, this may come at the cost of losing more affordable older rental properties currently being relied on by lower income households which may be redeveloped.

> *'I get that government is about the good of the many. And I know that supply has to increase in order for there to be any kind of affordability - ... but it does have real-life extreme impacts on those of us renting old homes when it will take years to a decade to realise the benefits in supply."*

A number of responses specifically mentioned the need for single-level housing options for older residents. Others worried about development quality and neighbourhood character, expressing frustration with recent medium-density developments that they felt feature poor design, cheap materials, and inadequate outdoor space. Financial barriers emerged as another concern, with respondents highlighting that Lease Variation Charges in particular make small-scale development financially unviable for many property owners.

> *Will create slum area with lots of cars parked in streets as there is never enough parking, it's not safe to walk. The areas are not prepared to cope with increases in students in schools, not enough hospitals or medical services with this fast population increase. Public Transport in Canberra is mediocre at best, tram development is too slow and the car is required by every person who lives here.*
>
> *'I think this is a very poor move and oppose it completely. It will not allow for diversity but see a huge rise in shabby shoe box 'homes' that will not last and will destroy everything that is good about Canberra."*
>
> *'Changes are great but LVC and Tree charges not to mention the dozens of other related charges and imposed requirements which cost money make new development un-economic"*
>
> *'There is a huge gap in single level accessible dwellings, or double level dwellings with a lift for people with mobility issues. I hope these proposals will go some way towards that but fear we will end up with more double level townhouses that remain inaccessible for the cohort above."*

Does the draft MMHDG provide adequate guidance to deliver quality, site-specific outcomes where there is block consolidation / sub-division and why?



The majority of respondents (57%) said, yes – the guide does provide adequate guidance. None of the positive answers provided reasons for their response.

For those who didn't think it provided adequate guidance there were concerns that the **guide uses 'vague' language and is not enforceable**, and thus will be open to open to broad interpretation and manipulation. Some people felt the document is **not 'user-friendly' for landowners who are not developers**.

General comments were also provided in response to the question of subdivision generally including concerns about:

- loss of Canberra's 'bush capital' / Garden City character
- inadequate infrastructure provision for reduced parking requirements leading to parking on narrow streets
- negative impact on the environment leading to increased urban heat island effect
- lack of mechanisms for community appeal and consultation
- poor construction and design quality
- risk of "fence-to-fence" development
- the requirement for subdivision with a lawfully constructed dwelling creates a financing risk for developers or property owners who have no guarantee they will be able to subdivide or have to finance that construction.

How well does the draft guide encourage appropriate transition in building height and scale?

Responses show a mixed but generally positive view of the draft guide's approach to height and scale transitions. Nearly half of respondents expressed positive views ranging from "very well" to "good", with many supporting the contextual design approach and flexibility for different housing types. Just over one-third appeared critical of the approach, with some expressing concerns about implementation and enforcement, and others worried that the guidance is too vague and subjective, potentially leading to inconsistent outcomes that don't respect neighbourhood character.

The supportive responses generally framed the reforms as a measured approach that could increase housing supply while maintaining neighbourhood amenity through good design principles.

- **Housing Supply Benefits:** Respondents appreciated that the reforms could "significantly enhance housing availability" and provide "more housing choice and appropriate living options" while still preserving suburban character.
- **Logical Height Transitions**: Many supported the transition between and found that appreciated the tapering of height limits across different typologies makes a lot of sense. The additional storey in RZ2 was seen as enabling better use of blocks in that zone.

- **Balanced Approach**: Positive responses noted the reforms strike a good balance between providing more flexibility in dwelling types and retaining the amenity of residential areas.
- **Design Guidance Quality**: Supporters found the guidelines clear, and enabling good design outcomes for solar access, parking and liveable spaces.
- **Contextual Responsiveness**: Several responses appreciated that the guide requires developments to respond to the existing context and desired character.
- **Incremental Change**: Some viewed the approach as appropriately conservative, allowing for "gentle infill" and gradual change over time rather than dramatic transformation.

'The tapering of height limits across different typologies makes a lot of sense (ie: missing middle vs house vs secondary dwelling). The additional storey in RZ2 encourages a better use of blocks in that zone than currently occurs and helps distinguish it from RZ1."

'At the same time, raising height limits in RZ3, RZ4, and RZ5 complements this approach by supporting greater density where it's most appropriate, ensuring a smooth and logical transition between zone types."

'It is very important to retain the character and feel of exisitng [sic] suburbs and areas. I think the new drafts address this point quite clearly whilst still allowing for applicable and relevant construction."

The following concerns were raised by some respondents:

- Concerns about **solar access and overshadowing** including concerns about loss of solar access to existing homes and to solar panels, with opposition to changes from 31° to 45° solar angle (to account for winter sun access).
- **Character preservation vs. housing suppl**y (with tension between maintaining 'local character' and increasing density.
- **Technical specification issues** raised including comments about ceiling heights, floor-to-floor measurements, the feasibility of attic spaces and the relationship between building envelope and setback relationships.
- **Contextual design assessment** raised some concerns about the potential for subjective interpretation of "appropriate" transitions and the need for clearer, more objective standards.

'I dont agree that 2 or 3 storey buildings should be built in peoples backyards, right next to the fence where it will invade peoples private backyards."

'Building height is fine but I think scale of development that is allowed doesn't protect neighbours from negative consequences well enough. Multi-unit development allows setbacks to be closer on both side and rear boundaries and overshadow neighbours more which I think is a bad outcome particularly in RZ1. Maybe a reduction in front setback rather than rear would work better and requiring the side setbacks to total 3m rather than allowing 0m to both sides."

'To help maintain streetscape, privacy and human-scale buildings without wind exacerbation, and to help cool our cities, ensure that buildings are not taller than street trees or the majority of nearby private trees (whichever is taller)."

'fails to comply with PRINCIPLE 3: minimize impact on natural environment. RZ1 single and dual-occupancies currently support sufficient green space/natural environments for existing native animals to thrive - birds, possums etc. Allowing infill more dense than single & dual-occupancies, simply eliminates whatever climate mitigating greenery existed before being allowed."

Have we got the balance right between solar access and privacy for neighbours and enabling right-sized missing middle housing?

Responses reveal both supportive and non-supporting opinions on whether the balance between solar access, privacy and housing density is appropriate, with roughly equal numbers expressing satisfaction and concern.

Comments of support included:

- Appreciation for **more flexible solar access** provisions. View that the guide strikes a fair balance between competing interests.
- Recognition that the **balance enables right-sized housing** while maintaining appropriate standards.
- **Appreciation for guidance** on natural light, building orientation and passive solar design.
- Considerate of value of increased canopy cover to **maintain neighbourhood character.**
- **Support for focusing on housing supply** over aesthetic concerns and suggestion that some compromise is necessary for housing outcomes.
- Call for **deciduous shading and adjustable outdoor structures** to manage seasonal sun and shade.

'I think these are well specified and will maintain amenity for both existing residents of neighbourhoods and future occupants of the new housing"

'I think more flexibility is generally warranted for higher-density homes, as people have different needs (e.g. some people prefer less sunlight) and are willing to make appropriate trade-offs"

'I am not an expert on this topic, but my initial view of the draft design guide is that is strikes a fair balance between the issues of solar access/privacy and enabling missing middle housing"

'Mostly, although again, i think we need to be cautious about how much importance we place on solar access and overshadowing compared to other goals. The fact that a house might cast some shade on a neighbour's house on the winter solstice is a bad reason to make a home illegal to build. Generally, ACT planning norms place too much attention on preventing shade - especially when shade is far from a bad thing in our urban environment during summer."

Key issues of concern raised include:

- **opposition to reducing solar access protections**, particularly the change from 31° to 45° envelope and the impact on winter sun access.
- **Privacy concerns** about overlooking from multi-storey developments into existing single-storey properties.
- Concerns about **impacts on existing solar panel** installations and passive solar design.
- Calls for **clearer, measurable standards** rather than subjective language.
- Support for design flexibility but **worries about enforcement** and developer compliance.
- **Tree planting vs. solar access conflicts** and perceived contradictions between tree canopy requirements and solar access.
- Concerns about **appropriate transitions** between zones.

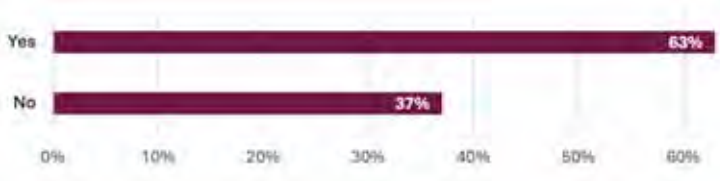
'Solar access and privacy is not always achievable on the older blocks. It may require mediation measures and definitely promote sustainable energy if possible, but not enforced if it's unaffordable for the elderly downsizers"

'A three story dwelling next to an established house will reduce all privacy in the backyard of the house, especially for a family with young children playing outside. The three stories will also greatly reduce the solar on the house. Some of my family members have undergone significant costs to pur [sic] the solar on and this could greatly reduce the sun the solar gets."

'The Govt should not be removing solar access and privacy for existing residents in existing houses in existing suburbs. If the govt wants new rules, then build new suburbs in new areas or acquire the race courses, horse paddocks, golf courses parks and the govt actually build the diverse forms that they believe are required (not sell to developers and blindly hope)"

'I think solar access should be really carefully considered, especially as canberra gets so cold in the winter. I think solar access should also be a priority for any new middle housing. Only south facing apartments and townhouses really shouldn't be a thing in Canberra expect for when there is great views or communal areas where residents can still get north facing aspect."

Do the diagrams provide clear descriptions of good design outcomes related to setbacks and building separation?



The majority (63%) of people taking the survey said they thought the diagrams in the design guide provided clear descriptions of good setback / building separation outcomes. 37% of respondents did not agree.

Supporters provided the following feedback:

- Support for **flexibility in design outcomes** and appreciation for articulated setbacks allowing design variation and **more efficient land use.**
- **Clear diagrams** showing possible layouts with good demonstration of solar access and privacy considerations.
- Recognition that good outcomes will **depend on how the new guidelines are implemented** and good design is enforced during assessment.
- Some responses acknowledged that the diagrams are clear even if they disagree with the design outcomes shown.

'I like the reduction in setbacks, however, the articulated nature of this is something I am not sure is important. I do not believe aligning setbacks along a street is an important factor, and different setbacks could give a street interesting diversity."

'It does a good job, but could be improved to eliminate frontage setbacks to the street and sides of residential buildings to make developments more feasible for developers and land owners, and achieve more housing in the same land space."

'This could be problematic and sensitive assessment of any proposals must be undertaken. Any substantiated objections from affected neighbours must be addressed."

'Need also to give sufficient room for pragmatic and sensible design approaches that meet the desired outcomes, however that dont [sic] end up in endless ACAT challenges"

'While setbacks between existing buildings and property is needed, the setback from public land should be relaxed so that the land is more usable and not wasted."

'The diagrams are clear; however, obviously designed to avoid mention of the slew of problems that will follow. They all show ONLY one block at a time and all photographs are carefully chosen to not show the shade these buildings provide."

Critical feedback included the following concerns:

- **Diagrams are too general**, lack specific guidance for varied site conditions and transitions and don't show real impacts like overshadowing or loss of privacy.
- **Privacy and density concerns** - current setbacks are already inadequate and the proposed new setbacks will result in overcrowding and loss of solar access and privacy.
- Concerns about the **flexible guidelines being exploited** to maximise building coverage.
- Examples only show individual blocks, **not cumulative neighbourhood impacts**.
- Reduced setbacks will result in **loss of suburban character**.

'can we be clearer on maintaining existing setbacks and tree coverage. In Curtin for example, it is the consistent tree coverage and setbacks that gives the suburb its character, not the buildings."

'The specified setbacks are totally inadequate. They should be increased back to their old minimums of eight metres at the back and three metres at the side."

'There needs to be clear 2 metre building separation. Don't make people live on top of each other. It's not good for social cohesion."

How comfortable are you with the option for articulated front setbacks (where one building is slightly in front of the another and closer to the street-side boundary)?

The majority of respondents were comfortable with the option for articulated setbacks.

More than half of those surveyed indicated they were 80 – 100% comfortable with the proposed articulated setbacks. Around one fifth were moderately comfortable (with rates between 50-70%). Just over one quarter (28%) of respondents indicated less than 50% comfort with the proposed setbacks.

Have we got the balance right between the provision of car parking spaces onsite and allowing for more missing middle homes?

The responses reveal a divide in public opinion on parking provisions, with more than half of the responses voicing concerns while others supported the reduced parking requirements or seemed neutral or uncertain. Critics argued the proposals are unrealistic given Canberra's car-dependent culture and inadequate public transport, warning of street congestion, safety hazards, and neighbourhood amenity loss. Supporters welcome the flexibility to reduce car dependency, viewing street parking as acceptable and appreciating that the changes still allow for parking to respond to market demand.

Key issues raised by supporters:

- **Market should determine parking needs** - not all households need multiple car spaces and those who don't want parking shouldn't have to pay for it
- Reduced parking requirements help to **encourage public transport use** with environmental benefits
- Parking requirements (including building basements) increase construction costs and impact on housing affordability / project viability
- **Street parking is normal** urban practice in many cities worldwide
- Future city planning shouldn't cater to a car dominant approach
- Support for **location-based assessment** considering proximity to public transport and local street widths / verge parking infrastructure

'I am happy to see a reduction in car parking rates. But I would argue these should be market driven and not be a rule in the first place, it's not necessary regulation. Developers aren't going to make car parkless developments if there was no demand."

'Like many Canberra households, we are a one car household, don't want provision for more than one carpark and don't want to pay increased prices for unnecessary parking provision."

'... obviously dependent on developments geographical location, availability of public transport, walking distance to amenities, etc."

'As Canberra's public transport system grows there will be less need for personal cars. Reducing requirements for car parking future proofs communities and reduces wasted space and expenses related to building more housing."

'Parking on streets is normal. You have the balance right."

'You should abolish parking minimums entirely and leave this to the market. Like many Canberra households, we are a one car household, don't want provision for more than one carpark and don't want to pay increased prices for unnecessary parking provision. The outcomes based planning system would still enable ACTPLA to require increased parking for specific developments if there is a particular need for this. The harmful impacts of parking requirements in planning are widely documented in Australia."

Key issues raised by opponents:

- On street and unregulated verge parking will significantly **impact on street character**
- Current **inadequate public transport network** leads to car dependency, particularly in outer suburbs
- **Street parking creates safety hazards** for pedestrians and cars, and restricts access for emergency vehicles
- **Multi-car households** are already the norm with people living in share housing
- Existing **narrow streets can't accommodate** safe on-street parking
- **Onsite parking is important for older people or people living with disabilities**, impacting on visiting carers and support workers

'Parking is a nightmare in new suburbs and there are so many hazards. Need to think more about how people need to share house even in their 30s and you simply need a car to survive in Canberra. This isn't great, but it's not changing any time soon."

'Existing roads and pavement infrastructure in older suburbs does not allow for on street parking. Instead cars are parked all over the pavement and fronts of houses and it is up to pedestrians to dodge. If cars are the most important thing this is fine - if pedestrians are important - this is not a desirable outcome."

'More car spaces required. We are in a share house currently in Denman with 6 cars and 2 car spaces. We clog the street and create a bottleneck. This experience is not uncommon among friends. If the requirement for car spaces is less, there must be an on street parking provision"

'The problem with on street parking is that people might buy less parking than they need and then park on the street. This should be remedied by adoption of Japanese style reforms that require that people that own cars demonstrate they have rights to a permanent storage spot."

'If you look at dense suburbs like Gungahlin, Franklin and Harrison, it is clear that developments were built without adequate parking for RESIDENTS let alone visitors and delivery personnel. The older suburbs have much larger, wider streets than these new suburbs which can therefore accomodate street parking."

Younger respondents (under 34 years) appeared to be more supportive of reduced parking requirements, advocating for car-free living and market-driven solutions, whilst older respondents (55+ years) were more critical, emphasising safety concerns and infrastructure limitations.

Answers also seemed to reflect the area that people lived in, with younger inner residents strongly supporting reduced parking whilst older inner residents were more critical based on existing parking problems in their areas.

Outer suburb residents across all age groups expressed concerns, raising issues related to inadequate public transport and viewing Canberra as inherently a car reliant city. Younger respondents in those areas also acknowledged needing more parking due to share housing arrangements driven by affordability constraints, suggesting that support for reduced parking correlated not just with age but with proximity to public transport and urban amenities.

How well do you think the draft guide provides for car parking that supports a pleasant landscape outcome?

While there are a number of responses supporting reduced car dependency and seeing street parking as acceptable, there is also strong concern from other respondents about the draft guide's ability to deliver pleasant landscape outcomes while managing car parking, with many respondents worried that reduced parking requirements will force cars onto streets and verges, ultimately degrading rather than improving landscape quality.

While some supporters appreciate the guide's efforts to minimise visual clutter and integrate parking sensitively, critics argue that the reality of Canberra's car dependency means inadequate on-site parking will create "streets littered with cars" that undermine any landscape benefits.

Key concerns raised:

- On street parking will degrade landscape quality if not done well, or with adequate planning. Some streets (such as wider streets in older suburbs) are more able to take parking on one or both sides, but in other suburbs with narrower suburban roads on street parking will create, or is already, a significant problem for car and service vehicle access.
- Verge parking – mixed responses, some concerned about potential for damaging trees (impacting on tree canopy targets) and compacting soil (resulting in poor water infiltration), or creating a cluttered and unattractive landscape environment.
- Responses included a number of specific examples where people consider on street or verge parking has created a poor urban outcome.

'Not well at all. The streets become littered with cars (on street parking or on nature strips). This is not a family friendly environment for children to play around or safely walk to school, shops, friends etc."

' Landscape is paramount to support the garden city concept."

' All of the Governments policies seem to be car hating policies - paid parking, removing car parks to replace them with buildings with next to no parking, registration changes, tiny roads in newer suburbs, no parking for visitors... You seem to want us to all just use public transport to get around and don't seem to realise that in the suburbs people often have multiple people over at different times of the day and night where using a car is necessary and there is almost nowhere to park."

'Older trees need to be maintained! You are making everything hotter. How do garbage trucks and emergency vehicles manage narrow roads."

'I think you're thinking single family occupancy still, with one car. That's not how we're all living. Not sure how to fix, but on street parking needs to be good, available, and not create an issue where you can't drive down the road or let your kids out to play."

'The guide gives no consideration the true impact of additional vehicles parking on the streets, how people will use neighbouring streets and walkways if they can't park in front of their own homes and how that will greatly impact people with limited mobility who depend on access to the footpaths and walkways especially if visibility is greatly reduced due to increased traffic and parking (on the street or across footpaths)."

Positive comments included a number of the areas of support raised for the previous questions about carparking rates, and also noted:

- less parking allows more space for landscaping and green areas.
- appreciation for guidance on concealing parking from street view
- there is an opportunity for increased verge parking, but with proper landscape guidance, to reduce on-street parking
- potential for underground (basement) /hidden or shared parking solutions
- need aligned investment in active transit networks and infrastructure to support a shift to public transport, walking and cycling
- it would be useful to have better technical guidance on sustainable parking surfaces (eg permeable paving)

'Current restrictions on parking on the median strips and in front of homes leads to everyone cluttering our streets by parking on the roads. Most people don't have time for gardening anymore so the question is - do you want cars parked on the street (ugly) or allow more freedom to design appropriate parking bays on median strips and in front of homes?

'In general, less parking = better, and this is accomplished by the draft plan. This will encourage public transport use rather than the current status quo of everyone and their dog gets a car.

'I think flexibility is important for effective site based design (and assessment) should be used to ensure the landscape provides for good outcomes. I think the guide provides options that could enable this.

'I think the options will provide good car parking amenities on the site. BUT, the guidelines need to set minimum standards for the number of off-street car parks - ie at least one for each residence. To avoid clogging streets. To avoid preventing rubbish collection trucks and buses passing through. While we should all aim to reduce the number of cars per household, that is unlikely to happen in the short to medium term."

'I think as long as the road design supports roadside parking (as it does in most older suburbs) then this is a good option."

'Unfortunately, green space often is put second to providing the required parking places. I am hoping that by reducing (or preferably removing) car parking minimums developments will better manage this conflict and hopefully favour more green spaces over car parking."

Does the draft MMHDG offer clear guidance on good design outcomes? If no, what would you add / what's missing?

The responses reveal mixed views on the clarity of the Guide, with roughly equal numbers finding it clear and helpful versus unclear or inadequate. Supporters appreciated the visual diagrams, practical guidance, and flexibility, while critics argued the guide relies too heavily on subjective elements, lacks enforceable standards, and fails to address practical implementation challenges. A recurring concern was that the guide provides aspirational guidance without clear mechanisms for enforcement, leading to fears that people can ignore design principles in favour of profit maximisation.

'Overall, there are a LOT of requirements in the MMHDG, and most of them I think are 'good', but it's not clear which elements are considered high priorities"

'It's all lovely, but what will make developers actually adhere to it? Everything in it will cost more money (to build and then to maintain) so what's in it for them? It's not like these principles are not well known already, but clearly the often just don't want to, with a very obvious correlation between the sale price of the product and how many of these nice design principles they take on board."

'I think the design guide lacks clarity through the lack of quantitative controls. However, the guide does a good job of providing design suggestions that can be used to address the relevant assessment outcomes."

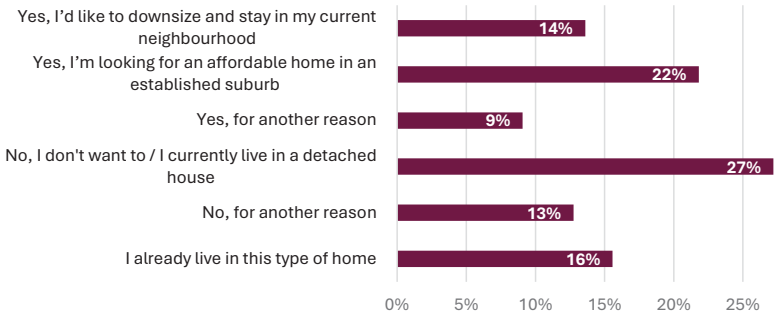
'The draft Missing Middle Housing Design Guide provides a solid and thoughtful foundation for achieving good design outcomes. It is structured around clear principles, integrates sustainability and amenity considerations, and supports context-sensitive development."

'It is good to see guidance rather than strict rules."

'The less we restrict, the more we allow creativity."

Do you think you would like to live in missing middle housing?

People responding to the survey were evenly divided between thinking they would, or wouldn't, like to live in missing middle housing - 44% of respondents said they would (14% to downsize, and 22% to live affordably in an established suburb), while 40% they wouldn't. 16% said they already live in 'missing middle' type housing.



The positive responses revealed consumer demand from two key demographics:

- downsizers seeking to remain in familiar neighbourhoods while reducing maintenance responsibilities
- first-home buyers looking for affordable access to established suburbs with good amenities and transport links.

Those who were not interested in living in missing middle housing noted concerns about building quality, with multiple respondents citing poor construction standards in current medium-density developments, describing them as "built with minimum specs" and "feeling like trash." Privacy and density concerns were prominent, with many respondents preferring the space and lifestyle that detached housing provides, particularly for families with children who need outdoor play areas.
Strata and body corporate arrangements were viewed negatively, with respondents citing increasing levies and poor management as deterrents.

There was strong resistance to what some saw as "forced densification" that would compromise Canberra's character as a spacious, low-density city. Many respondents expressed concerns that missing middle housing would be inadequately sized for family needs and would result in compromised living standards, with several noting that infrastructure pressures and parking problems in existing medium-density areas had created undesirable living conditions.

> *'In Canberra every house I have been in that is medium density is built with minimum specs. Doors, corridors, eaves. Everything is done to be cheap and they feel like trash that will date and be knocked down as land fill in twenty years"*

> *'I hate living so close to others, there is no privacy and people are terribly inconsiderate about noise, parking and access"*

> *'Very happy where I am, I tried apartment living and couldn't stand living so close to my thoughtless neighbours. And the ever increasing strata levies were a problem"*

> *'I do not want to live in a situation where the suburb I am in was not designed for the population it has"*

> *'We live in Canberra for the space and lifestyle, we don't want it to become like a big city"*

Many respondents appreciated the potential for multi-generational living arrangements, with some specifically wanting to accommodate ageing parents or provide affordable housing options for adult children.

Several respondents who already lived in missing middle housing reported positive experiences, particularly valuing the community aspects and the balance between having more space than apartments while maintaining access to urban amenities. There was notable enthusiasm for the potential to upgrade from apartment living to townhouses with small gardens without the prohibitive cost of detached houses in inner suburbs.

> *'I'd downsize into a missing middle home to live in an established inner suburb with better access to amenities, transport, and community"*

> *'I intend to demolish...and replace it with a multi-generational main house with a smaller dual occupancy at the rear"*

> *'I have 5 children...It is imperative broader options are available, otherwise they look to cities elsewhere to live"*

> *'This sort of housing is the best for building community, and supports a level of density that would allow me to live in a suburb with good access to transport and amenities"*

Appendix A: pop up 'post it' comments

What does Missing Middle housing mean to you?

A chance for my community to stay around and not be driven out

Closer housing to transport, greater accessibility, a more affordable liveable city!

A chance for people to afford to live in my community.

I want a city my kids can afford to live in! Build the missing middle. Do not water down the reforms!

Hopefully more housing closer to the action to help reduce congestion

Cheaper + more accessible housing for young people!

More housing that maintains open spaces (with community oversight)

More housing in areas that are in demand + issues with noise and parking and other issues

Fewer evil giant apartments

Definitely a great idea, allowing more opportunity in housing

A long overdue change, that will allow greater access to affordable housing for all in this wonderful community.

Who do you think Missing Middle Housing will benefit?

Young people!

People born after 1970, the future, the environment.

Young people and some low income people and developers

Existing home owners

People on lower incomes and young people

I agree strongly

What do you think about Missing Middle Reforms?

Sounds like a good plan

Support Change. Would like to stay in current suburb to downsize into step-free accom.

I think this would be us great option and I hope this housing will be nice in the future most affordable housing and for the elderly

Single Level sunny - garden small. Public transport for older persons in existing areas

We need some choices for multi generational living - all on one block with good transport, close to shops etc

Option of smaller housing options, free-standing that do not involve strata arrangements /payments

Land tax is always an issue even if renting to family

Consider corner blocks 1,000+ sqm size separately

Lease variation charges and subdivision charges

Multigenerational opportunities

Strata fees is discouraging for going towards buying an apartment. I would rather see more higher rises versus spreading more on land for low rises.

From what i've heard sub-dividing land to create more affordable housing would really benefit middle- income earners

Prioritise accessibility to jobs, school, transit

Agree with housing but public transport needs to be improved / increased.

greater choice is a wonderful idea, how soon can it / will it happen? Why isn't LVC a part of these reforms?

Opportunity to create more connection to our older community

Very supportive of missing middle and more housing options + affordability. Consider if LVC will become a new barrier

More housing choice is a great idea! Reform to RZ1 is long overdue

RZ1 subdivision without building on 1,000 sqm block

For RZ1 blocks, not having the minimum size for future rebuild will benefit families

Please include sustainability thanks!

More high-quality housing!! :)

My children's friends keep being forced away. This can help them stay. Think the LVC could be altered from a lump sum to higher rates in perpetuity.

People need it... you are representing people. Pls don't let Australia be America

This will be great for young people & families :)

BUILD MORE HOUSES! (and APARTMENTS)

Love these changes. Great for housing affordability and for our community

Yes to closer transport, cheaper rents, more walkable Canberra for all

Choice, opportunity and sustainability are key and essential for our growing population

Great design and less cars :)

Looking forward to seeing more townhouses available

Not too sure about it

More architects who understand the area

Design around existing valuable trees

Parking to cater for growing families as they have more cars

Increase frequency of public transport shorter routes to town centres

Please more Torrens Title townhouses!

More units in suburbs

Fantastic 'Build baby build'

Supportive of medium density

Unit living near the shops and city 4 public transport is great!

We need more medium density houses!

Great Idea! Just ensure infrastructure is supportive! Public transport, roads, etc.

Density from the lentil belt outwards. To do otherwise is yet another war on the working class who have no choices in the far north / south

Yes please! But not all body corp.

We will have to minimise impacts like parking and noise and environmental issues otherwise they should be ok.

Living in a townhouse can be great if its well designed and there are good shared amenities

Great. Hoping it allows people with house asset but little money to use some of their land to support housing.

Thank you for the opportunity to hear of the possibilities in housing reform

Missing Middle Consultation

[redacted] - 5th June 2025

The Positive Benefits of Permanent Asset Markets

The Missing Middle project presents a rare opportunity for the ACT Government to reaffirm Canberra's founding ideals as a planned, prosperous, and inclusive city — one built for people, not speculation.

Permanent Asset Markets (PAMs) provide the financial foundation to achieve this vision. Rather than relying on interest-bearing debt, PAMs use a cooperative shareholding model to fund housing and infrastructure. This creates a cycle of community reinvestment, long-term affordability, and shared prosperity — all within the existing financial framework.

PAMs offer a practical, voluntary, and non-disruptive way to achieve the ACT's goals: more diverse housing, electrification, affordability, rewilding, and resilience, with the added benefit of national leadership in sustainable finance.

Canberra's Founding Principles and the Opportunity Ahead

Canberra was founded on the principle that increases in land value should benefit the public. Inspired by Georgian planning ideals, the city's finances were designed not for speculation but for public purpose, coordinated development, and shared prosperity.

Over time, speculative finance and auto-centric planning have eroded that vision. The Missing Middle is an opportunity to return to those founding values by making housing accessible, walkable, energy-efficient, and grounded in community ownership.

Context and Objectives of the Missing Middle

The ACT Government has committed to enabling **infill housing, promoting affordability, enhancing climate resilience, and fostering equitable growth**. The objectives of the Missing Middle **should include**:

- Encouraging gentle densification in established suburbs
- Delivering lower-cost housing without reducing property values
- Enabling electrification and environmental upgrades
- Increasing community cohesion and neighbourhood resilience
- Creating a scalable, financially sustainable housing economic model

Permanent Asset Markets directly support all of these objectives.

What Are Permanent Asset Markets?

PAMs are a financial structure where homes and infrastructure are owned by a community trust or cooperative, and residents own shares in the houses they occupy. Residents pay regular service fees and gradually purchase equity shares. Each payment supports maintenance, services, and community investment.

Instead of taking out a mortgage with interest, residents become co-owners of their homes through shareholdings. This structure ensures stability, long-term affordability, and local stewardship. Homes are managed as part of a permanent, non-speculative system.

A home remains the occupier's castle, while the neighbourhood becomes a commons. PAMs blend private control with collective resilience, giving communities the tools to fund their future together.

How PAMs Support the Goals of the Missing Middle

PAMs directly advance the ACT Government's Missing Middle priorities:

- Housing Affordability: Removes capitalised interest, cutting long-term costs
- Neighbourhood Character: Locally led, context-sensitive adoption
- Electrification: Enables shared investment in upgrades
- Infrastructure: Financed over time through service fees
- Public Value Capture: Returns rising values to the community
- Community Choice: Entirely voluntary and opt-in
- National Leadership: A fairer and more scalable model for Australia

Why PAMs Are More Productive and Less Inflationary

Traditional housing finance typically involves borrowing capital as debt. Interest extracts wealth from communities and locks funds in external static pools. PAMs reverse this by:
- **Eliminating interest costs**
- **Circulating capital via share resale and reinvestment**
- **Embedding money in productive assets, not financial speculation**

Governments gain repayment revenue directly, without relying on taxes. **The system aligns with Modern Monetary Theory** by ensuring money creation supports the public good and self-extinguishes as assets depreciate, avoiding inflation and promoting continuous renewal.

All investors in a PAM must sell 10% of their shares annually through monthly sales. All investors receive 5% extra shares each year in monthly increments. All occupiers pay 25% of their disposable income to purchase shares and pay for operating costs. Any payment above 25% buys more shares, and the additional funds are invested. There are no fees for share transactions.

The Reserve Bank can specify the number of shares each investor must sell and adjust the amount of money in circulation. A PAM will move towards a stable state where the value of new money coming in can match the depreciation and appreciation of asset values.

Why PAMs Can Begin Immediately

There is no need to wait for new legislation. PAMs utilise existing legal tools, including cooperatives, community land trusts, and not-for-profit structures, and can start today.

- **Current homeowners join voluntarily**
- Retrofits and electrification can be funded via PAMs
- Mortgage-stressed households can transition to shared equity
- Infrastructure and governance structures can be set up in advance

Pilot programs can begin immediately, without disrupting the current planning system. This enables learning, trust-building, and incremental scaling.

Next Steps and Implementation Pathway

Permanent Asset Markets (PAMs) can be implemented immediately at a community level, and they also benefit from the creation of an **overarching coordinating body—a meta-level Permanent Asset Market of Permanent Asset Markets.**

This coordinating structure does not own local assets but provides consistency, guidance, and a common financial and legal framework for participating communities. It allows local PAMs to operate independently while benefiting from shared investment tools, reporting standards, and pooled services and **the seamless transfer of people and dwellings between PAMs.**

This higher-level PAM body could:
- Manage revolving community investment funds
- Provide legal and governance templates
- Coordinate with the government on infrastructure and electrification programs
- Help scale successful local models by documenting and sharing learnings
- Serve as a trusted interface with investors seeking low-risk, mission-aligned returns

In this system, banks do not lend money (via interest-bearing loans) to individuals or developers. **Instead, they sell newly created money to the Permanent Asset Market system.** The PAM trust or cooperative becomes the point of capital issuance, deploying funds to build, retrofit, or purchase homes. Residents repay the cost over time through service fees and equity purchases, not interest.

Let’s compare the two approaches using an indicative example:

Illustrative Comparison: Traditional Loan vs Permanent Asset Market

Assume a house has a $400,000 mortgage.

In a traditional mortgage system with a 5% interest rate over 25 years:
- Total repayment: ~$700,000
- Interest paid: ~$300,000
- **Monthly payment: ~$2,333**
- Interest payments go to the bank, and little capital is available for reinvestment

In a PAM model with the same $400,000 investment:
- Total repayment: $400,000 (no interest)
- **Monthly payment: ~$1,333 (split 50/50 between services and equity)**
- Equity purchases transfer shares to the resident, creating long-term stability
- Service payments maintain the asset and fund local improvements
- Money circulates through the community and can be reused in future projects

The PAM model reduces total household costs by approximately 60%, while increasing public value and avoiding inflationary debt cycles. It aligns with the ACT's climate, affordability, and governance goals in a way that is measurable and scalable.

Financial Flows: Traditional Loan vs PAMs

To understand the financial implications, it's helpful to break down where the money goes under each model. The following compares a $400,000 mortgage to $400,000 provided to a PAM for a single dwelling.

In the traditional mortgage model (25 years, 5% interest, $400,000 loan):
- Total repayment: ~$700,000
- Interest paid: ~$300,000
- The bank collects this interest.
- Around 50% of the interest is bank gross profit (~$150,000) and the other $150,000 is a bank capital gain.
- Assuming a 30% corporate tax rate, ~$45,000 goes to the federal government in tax
- The remaining ~$255,000 is either used to repay wholesale funding, retained as bank profit, or distributed as dividends. All the interest is new money that stays in the economy.
- The original $400,000 is destroyed upon repayment as under modern banking systems, loan repayments remove the principal from circulation

This structure creates high repayment burdens and diverts funds from communities, while also contributing capitalised interest to inflation.

In the Permanent Asset Market model:
- Total repayment: $400,000 (no interest)
- 50% of each monthly payment covers maintenance, management, and local services

- 50% purchase equity shares, transferring ownership to the occupant
- No money is destroyed as all funds remain in circulation within the community.
- Bank costs decrease since banks are no longer responsible for repayments, which now fall to the community.
- The repayments are used for asset upkeep, new projects, or returned to local investors and government partners

Instead of feeding speculative markets or bank profits with capital gains, **PAMs create closed-loop funding** that retains value locally and supports the ACT Government's social, environmental, and economic goals. The approach reduces inflation pressures and provides multiple ways for the Reserve Bank to control the money supply.

Typical Financial Outcomes of the PAM Model

In the Permanent Asset Market model, the structure of money creation and revenue flow is fundamentally different, and beneficial to both the ACT Government and local communities, including local suppliers. The division of the revenue is negotiated with the local PAMs, the ACT government and a local community bank.

- The ACT Government receives approximately 60% of the repayments, or $240,000. The Bank gets about 20% or $80,000, of which it pays $24,000 to the Federal government. The PAM receives the other 20%, or $80,000, which is used to operate the PAM.
- The bank that supplies the funds receives 20% as a gross profit (instead of interest). This reflects a fair return for enabling money creation without any risk.
- Of that 20%, roughly 30% is paid as tax to the Commonwealth Government, equivalent to 6% of the total repayments or $4,800.
- The government determines how much of the $240,000 will remain in the local PAM to facilitate shared amenities, local services, and upgrades to public resources.

Summary

The ACT Government will get $240,000 compared to a fraction of the $35,000 in tax collected by the Commonwealth.

The occupier of the property pays less than half the cost of a regular loan.

The community bank and developers earn about the same profit, but do not receive capital gains.

Private **community investors get a 10% indexed annuity for twenty years**. This compares to a 10% indexed annuity for ten years from the average superannuation fund. PAMs ensure that money circulates through real productivity and shared ownership, rather than being siphoned off as speculative profit. Every participant—the resident, the

community, the Territory, and the Commonwealth—gains from the system's operation. The losers are private banks, external speculators and developers.

Builders, Architects, and service providers benefit as they deal directly with the community and bypass developers.

Beyond Housing: A New Approach to Infrastructure Funding

The principles of Permanent Asset Markets (PAMs) extend beyond the housing sector. They can be applied to the **funding of all community infrastructure, including roads, shared transportation, renewable energy systems, energy networks, water networks, and public amenities**.

By applying the same structure, **the ACT Government can replace debt-based capital funding with equity-based shareholding approaches**. Rather than borrowing to build infrastructure and repaying with interest, the Territory can request a community bank, with the Reserve Bank's agreement, to issue new money to fund public assets. The value created remains within the community through cooperative or trust-based ownership structures. Consumers who pay for services receive shares in public infrastructure and must sell a percentage of their shares each month while receiving additional shares instead of dividends. The consumers need to reinvest their purchases, and they exit the system by selling their shares to another community investor.

This approach removes the speculative finance layer from public investment. It allows the same infrastructure to be completed with around half the capital requirement, as there is no interest cost. Over time, this leads to greater economic efficiency, enhanced fiscal resilience, and reduced reliance on external lenders.

Importantly, this applies to the **capital side** of infrastructure, not to operational budgets. Operating costs, such as salaries, maintenance, and energy use, remain and must still be funded through taxes, user fees, or service revenue. However, capital expenditure—often the most significant and debt-heavy part of government budgets—can be transitioned to a PAMs system that is regenerative and debt-free.

This shift promotes a circular economy. Since value is linked to the long-term use of infrastructure, there is an incentive to maintain and renew assets rather than discard or replace them prematurely. The longer an asset lasts and the more it is used, the more cost-effective it becomes under a PAM framework.

Over time, this system can make **Canberra **financially sovereign**—meaning it can fund essential infrastructure internally and retire all government debt,** without relying on private banks or federal debt arrangements. This offers greater stability, self-reliance, and resilience in the face of economic shocks, political shifts, or global market disruptions. It ensures that **Canberra's growth is driven by the long-term well-being of its residents**, not by the imperatives of speculative finance.

Why Governments Should Introduce PAMs

Governments can introduce money into society through loans or the sale of new money. With loans, banks lend money, whereas in the case of sales, they sell it. Nowadays, most new money is made available to the public through loans, even though banks buy it from the government.

Loans are provided to generate a profit for the bank and the borrower. The profit is taxed, and the resulting funds are then used for community purposes.

If money were sold to communities, including the government, the cost of introducing new money would decrease by the amount of interest. When the money is sold into a Permanent Asset Market (PAM), it circulates immediately. It is available for further investment, whereas with loans, the money remains with the borrower and circulates slowly.

With PAMs, the productivity of finance more than doubles, and inflation can be controlled. PAMs are compatible with loans, allowing both to coexist.

PAMs dramatically increase the productivity of capital.

From: [redacted]
To: EPSDD Communications
Subject: Missing Middle housing reforms
Date: Friday, 6 June 2025 4:00:11 PM

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Comment on Missing Middle housing reforms

I'm a big fan of the missing middle housing reforms. They have the potential to absorb much of Canberra's population growth for a long time to come without just concentrating it into high-rise apartments in town centres, or pushing further out into the countryside around the urban fringe, while still retaining the leafy green feel of the city.

To get the full benefit though, the planning reforms need to be matched with corresponding reforms to other development-related processes that have the potential to hobble them. If 'mum and dad' investors and small-scale builders are expected to get involved, then the amount of delay and red tape they face in getting their development approvals must not be too onerous. Three culprits particularly come to mind:

1. Excessive public consultation
2. ACAT appeals
3. Electricity network upgrades

1. Excessive public consultation
As one of the intentions is to allow blocks to be consolidated in the RZ1 zone for small scale townhouse and apartment developments, the current classification of all block consolidations as 'significant developments' must be removed. Significant development status triggers a two-stage public consultation process which is time-consuming and costly for proponents.

I would argue that the usual single period of public consultation given to normal DA's should be sufficient for these small-scale residential developments. The community still get to have their say and have a reasonable opportunity to comment. The definition of a 'significant development' should be changed accordingly.

2. ACAT appeals
It's inevitable that these planning reforms will unleash an avalanche of ACAT appeals as existing residents, particularly of the RZ1 & RZ2 zones, try to stop change from happening in their area. Many of the appeals will likely be founded on traffic and parking concerns, as these always seem to be front of mind and are already the first go-to for opposing any new development.

I can see proponents facing delays and hefty consultancy fees for preparing unnecessary traffic and parking reports. These would be a waste of time and money, because particularly in the RZ1 zone, the reports will all come up with exactly the same findings – that there is more than enough spare capacity on residential streets to absorb the impact of a new development. It will be rivers of gold for the civil engineering consultancies that write traffic reports. They will be able to sell effectively the same report over and over again for a large fee each time.

The planning reforms, in recognition that residential streets in the RZ1 zone (and probably RZ2 as well) have abundant spare traffic and parking capacity, must not require traffic reports to be submitted with DA's, and must explicitly remove traffic and parking impacts as a grounds for ACAT appeals for missing middle developments in the RZ1 & RZ2 zones.

3. Electricity network upgrades

The increasing number of customers in redevelopment areas, coupled with the general push towards electrification, is already pushing the electricity network up against capacity constraints in some parts of Canberra. With a general densification, the network will need to be upgraded to meet increased demand.

Evo energy are currently taking a piecemeal approach, by which the unfortunate developer who happens to reach the capacity limit for a particular section is required to host a new substation on their block and pay its full cost, or pay for upgrading an existing substation or conductors. They are affectively saddling a single private developer with the $100k+ cost of upgrading the network that serves an entire section, which subsequent developers will get the benefit of for free. The costs and delays are so onerous that they would effectively stop any further missing middle redevelopment in any section once the existing capacity limit was reached.

The planning reforms need to be coupled with a corresponding rethink of how the electricity network is to be upgraded, so that it is better prepared for densification and fairer in its execution.

Cheers



From: [redacted]
To: EPSDD Communications
Subject: Missing middle
Date: Friday, 6 June 2025 9:03:09 PM

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While supportive in principle of the need to densify Canberra - like all policy how good it is depends on the implementation.

While strata increases rates revenue and adds more choice of accommodation (in theory) it also increases infrastructure costs for inner suburban sewerage, school upgrades, better integrated street planning and parking which are not as well integrated into a market based densification program.

There are also growing concerns around the costs associated with strata whether A or B class strata. While it can appear a low cost option initially the associated annual ongoing costs of strata can make it prohibitive for many. Particularly older Australians whose superannuation holdings for historical reasons are often low.

Densification via strata requires stricter adherence by builders to code. Perhaps even enhancement of the code re sound proofing. The high defect rate in newer developments in Canberra's strata sector is lowering confidence in strata as a long term option. From non compliance with fire walls to shoddy workmanship there is limited recall on developers and sinking funds escalate over time to address these issues.

Annual costs for strata including rates, body corporate and, sinking funds are ranging up to 12,000 per annum for &400,000 2 bedroom units! This is not helped by escalating insurance costs that totally lack transparency. There needs to be review of the insurance practices and greater transparency about what is covered and what is not. This would just bring practices up to normal household insurance standards.

Property managers and committees do not understand the strata legislation and that owners cannot adapt a unit or townhouse as they can a stand alone home. More needs to be done to educate the public as strata provides an increased proportion of housing.

Costs cannot always be attributed to individual units. While ICoNs 'free the poo' campaign is a great initiative I am aware that one complex expended $80,000 recently in rectifying blocked plumbing full of wipes and other non flushable products. Because you can't attribute this to a single unit or group of units everyone pays the costs for the few that don't comply. Raising individual costs of strata not of your own making - makes people think strata can be a poor option especially for those on fixed incomes.

Increasing design choice is great in theory but the current lack of choice in medium density doesn't make one hopeful. The current preoccupation with extremely small one bedroom appartments is a case in point. For an older person , try to find a 3 bed 2 bath unit with a master bedroom on the ground floor is impossible. That's what older residents told the Featherstone development consultation recently but developers at planning meetings keep telling us no we want one bedroom dog boxes with balconies that may as well beJuliet balconies they are so small. True consultation requires listening not just lip service and a process of paper collection.

I recently downsized to a strata in Lyons. I have 3 addresses for this strata property. My street address, my electricity utility address and my gas address! It was a nightmare getting utilities connected. Future stratification of blocks needs to do better.

Further I can barely get out of my driveway midweek for cars parking right up to the edge of my drive as all day free parking allowed except garbage day. If you put 10,000 houses in north curtain what enhancements are you making to the existing schools that needs to accommodate those families plus the families in the densification of Phillip? What is on the plan to accommodate this? it's not listed in the missing middle document other than very broad statements that it will be taken into account.

Canberra is blessed with great sporting facilities but you can't take public transport on sports Saturday when you have more than one child and car parking to get your kids to events in suburbs with small streets is a nightmare. This may seem like minutiae or negativity but it is an essential part of livability and these issues are not being taken seriously enough by planners or integrated adequately.

A tram network like Melbourne has is great - a single point to point tram or buses that take 3 times as long to get you to your destination when you live in Tuggeranong is not a viable option for everyone.

Planners have to design cities for how people live not how they would like them to live. Single households or double income no kids are not the only demographic in Canberra. Getting a family to daycare, school, afterschool activities and parents to work more often than not requires a car not just for the family members but all the associated equipment that goes with all these activities.

In summary for the missing middle to work we must have:

Better integration of densification with supporting social and physical infrastructure;
Greater adherence to building standards;
Greater education around strata for owners committees and property management teams;
Greater transparency around strata insurance and how the industry calculated costs and what is and is not covered and finally
Actual real choice in design, not duplicated design and devote as we currently experience



From: [redacted]
To: EPSDD Communications
Subject: Submission on DPA-04 – Missing Middle Housing Reforms
Date: Wednesday, 11 June 2025 7:09:33 PM

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Submission on DPA-04 – Missing Middle Housing Reforms

To EPSDD Communications,

I write in **strong support of Draft Plan Amendment 04 (DPA-04),** which proposes **long-overdue reforms to enable missing middle housing** across Canberra's suburbs.

For too long, our planning system has been bent around protecting the imagined "character" of low-density suburbs at the cost of affordability, diversity, and sustainability. While the old guard clings to quarter-acre nostalgia, young people are locked out of their own city. DPA-04, finally, signals a shift – not just in policy, but in values.

Supply and Policy – How DPA-4 fixes long-term issues

Canberra faces a housing crisis that has been years in the making. Prices and rents have soared. The dream of a home – let alone one near your job, your school, or your support networks – is increasingly out of reach for the people who make this city run.

I'm a young person in this city – and I'm starting to think about what life after schooling may look like. Right now, it looks grim. Not because I don't work hard or care about my future – but because **our planning system, and the NIMBYs that have exploited it – has locked generations like mine out of well-located neighbourhoods to preserve their status quo** privilege.

Let's be blunt: **DPA-04 is not radical.** It merely begins to legalise the kind of diverse housing that was always possible in older suburbs – duplexes, terraces, triplexes, small-scale apartments. These aren't "high-rise monstrosities" nor "neighbourhood wreckers." **They're homes. And right now, Canberra needs a hell of a lot more of them.**

Design that eases into our existing infrastructure

I welcome the fact that DPA-04 is accompanied by the Missing Middle Housing Design Guide. This ensures that **infill development will be well-designed, sustainable, and integrated with the existing urban fabric**. Those who fear "ugly" buildings should take

heart: this is not a free-for-all. It's a **carefully calibrated reform informed by evidence and best practice.**

Conversely, design must not be used as a pretext to block density. **We've seen this happen before – vague notions of "neighbourhood character" are weaponised to veto change –** Woden Pool, Ainslie Oval, Goodwin Farrer. Let's not let history repeat.

Choose housing over obstruction – reject NIMBYism

We know what's coming. Faux-concerned residents will write in with "legitimate concerns" about parking, shadows, and privacy – all while living in the very homes they now want to ban others from accessing. But let's be honest: these aren't concerns. They're excuses. And they come from a place of entitlement.

I've experienced this opposition firsthand. I've been shouted down at community meetings, bullied online and in person, and told I should wait my turn. But what turn? The housing ladder has been pulled up – and DPA-04 attempts to bring it back down to the ground.

Planning for a more accessible, equitable Canberra

This reform is about justice. It's about the nurse who wants to live near her hospital. The teacher who can't afford to live near the school. The young family in a two-bedroom rental who dream of something more stable. The retiree who'd downsize if only there was something nearby.

The planning system cannot remain a fortress for the privileged. With DPA-04, the ACT Government is taking a brave step toward a city that welcomes, rather than excludes.

How could DPA-4 be stronger?

- Ensure density is doable: We need to monitor and refine the Technical Specifications to ensure they do not become de facto barriers to development.
- Support equitable outcomes: Prioritise missing middle **housing near schools, jobs, services, and public transport** – especially in the Inner North, Inner South, and Woden Valley, where exclusion has been most entrenched. Places such as the new triplex on Gluyas Street in Farrer, the court of apartments at the intersection of Marshall and Lambrigg Streets – also in Farrer, and the development surrounding Griffith Shops provide fantastic examples of what DPA-4 can enable.

Continue to back it with action: DPA-04 must be followed – as it has been pretexted – by meaningful rezoning, streamlined approvals, and firm resistance to backsliding under political pressure – **and I commend the government for its ACAT Tribunal legislation, to ensure real delivery of public housing and health facilities, but wish it was extended to include all community facilities and affordable housing.**

In summary, **I welcome this reform. It's bold, necessary, and grounded in reality.** And to those who oppose it on the basis of nostalgia, selfishness, or worse 'character' – it's time to get out of the way, and let the Canberra of tomorrow bloom.

For a liveable, affordable, and inclusive Canberra – approve this amendment.

Kindest of regards,

[redacted]
he/him | Year 11 student | Woden Valley resident
2/[redacted], Farrer ACT, 2607

From: [redacted]
To: EPSDD Communications
Subject: Missing Middle Housing Reform Submission
Date: Wednesday, 11 June 2025 7:45:43 PM

You don't often get email from [redacted] Learn why this is important

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Dear EPSD Comms

The ACT Government's Missing Middle Housing Reforms, as outlined on the YourSay Conversations website, aim to address Canberra's housing shortage by promoting medium-density housing such as townhouses, duplexes, and low-rise apartments in existing suburbs. While the reforms seek to enhance housing choice and affordability to accommodate a projected population of nearly 700,000 by 2050, the proposal to reduce mandatory car parking requirements is a significant flaw that undermines the reform's objectives and risks negative impacts on Canberra's inner suburbs.

Critique of Reduced Car Parking Requirements

The Missing Middle Housing Reforms propose reducing mandatory parking requirements across all residential zones. This change is intended to support sustainable housing designs and reduce costs for households with fewer or no cars. However, this policy fails to account for the practical realities of car ownership in Canberra, a city where public transport options, while improving, remain limited compared to car-dependent suburban lifestyles.

Risk of Street Parking Overflow

Reducing parking requirements ignores the fact that many Canberra households own multiple vehicles. According to the Australian Bureau of Statistics, the average number of motor vehicles per household in the ACT is approximately 1.8, with many families in suburban areas owning two or more cars. By allowing new medium-density developments to provide only one parking space per dwelling, the reforms will likely lead to an overflow of vehicles onto already congested streets. This is particularly concerning in inner suburbs like those in RZ1 and RZ2 zones, where narrow streets and limited public parking are common.

The resulting street parking chaos would exacerbate tensions among neighbours, as residents compete for limited kerbside spaces. This risks transforming well-planned, liveable neighbourhoods into cluttered, stressful environments, undermining the reform's goal of creating sustainable and community-focused suburbs. Instead of fostering vibrant, connected communities, the policy could turn inner suburbs into areas resembling overcrowded slums, where parking disputes become a daily nuisance.

Defeating the Purpose of the Reforms

The Missing Middle Housing Reforms aim to deliver "high-quality, sustainable" housing that integrates seamlessly into Canberra's suburbs while maintaining their character. However, the reduction in parking requirements contradicts this vision. Insufficient on-site parking will lead to cluttered streetscapes, reducing the aesthetic and functional appeal of

neighbourhoods. This directly conflicts with the draft Missing Middle Housing Design Guide's emphasis on well-designed, liveable spaces that enhance community connection and environmental sustainability.

Moreover, the policy overlooks the needs of the very demographics it aims to serve—first home buyers, growing families, and those ageing in place. These groups often rely on multiple vehicles for work, school runs, or accessibility needs, particularly in suburbs with limited public transport. Forcing residents to park on the street due to inadequate on-site provisions undermines the affordability and practicality of these new housing options, defeating the reform's purpose of improving housing choice and liveability.

Environmental and Social Impacts

While the reduction in parking requirements is framed as a step toward sustainability by encouraging reduced car ownership, this assumption is flawed in the context of Canberra's current infrastructure. The city's public transport network, despite expansions like the light rail, does not yet provide the coverage or frequency needed to replace car use for most residents. Without robust alternatives, residents will continue to rely on cars, and the lack of on-site parking will simply shift the problem to the streets, increasing congestion and potentially leading to safety hazards.

Additionally, the policy risks disproportionately affecting lower-income households, who may not have the means to secure alternative parking solutions or access public transport. This could exacerbate inequality, as wealthier residents may afford off-street parking solutions, while others are left to navigate overcrowded streets. The resulting strain on neighbourhood cohesion could erode the social fabric that the reforms aim to strengthen.

Recommendations

To address these issues, the ACT Government should revise the parking requirements in the Missing Middle Housing Reforms to mandate a minimum of two car spaces per dwelling in RZ1 and RZ2 zones. This aligns with the practical needs of Canberra households and prevents the negative externalities of street parking overflow.

Conclusion

The reduction of car parking requirements in the Missing Middle Housing Reforms is a misguided policy that risks flooding Canberra's inner suburbs with excess vehicles, degrading neighbourhood quality, and undermining the reform's goals of affordability, sustainability, and liveability. By failing to account for the city's car-dependent reality, this proposal threatens to turn well-planned suburbs into overcrowded, slum-like environments. A minimum of two car spaces per dwelling, coupled with strategic investments in public transport, is essential to ensure the reforms deliver on their promise of creating vibrant, equitable, and sustainable communities.

Kind regards



From: [redacted]
To: EPSDD Communications
Subject: Comment on DPA-04 proposed changes to the Territory Plan
Date: Tuesday, 24 June 2025 12:09:31 PM

You don't often get email from [redacted]. Learn why this is important

Caution: This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

I offer the following comment on the proposed changes to the Territory Plan, detailed in the Subdivision Policy section of Draft Major Plan Amendment 04, part of the Missing Middle Housing reforms.

In particular I wish to support the removal of restrictions on block subdivision in RZ1. Many more owners of houses in the RZ1 would be prepared to build an extra dwelling or two on their RZ1 block if they could subdivide the block and sell each one separately, without unit titling their own and the new dwellings.

Similarly, potential buyers would be far more likely to buy one of these second or third dwellings if they owned both the house and its land, and did not have to operate via a body corporate to run their dwelling and manage 'their' land.

I commend this proposed change to the ACT Planning Act 2023.

sincerely,

[redacted]

Inner South Canberra Community Council

To: EPSDDComms@act.gov.au

SUBMISSION - 'MISSING MIDDLE HOUSING REFORM'

Summary:

Learning from our history

The ISCCC appreciates the opportunity to comment on the Government's "missing middle" proposals. However, our analysis indicates that the proposed changes, particularly with a focus on individual block redevelopments, are unlikely to meet the government's aims, which are stated to be – "To achieve greater housing choice and supply within existing areas" [Executive summary, supporting report]. It has been shown from elsewhere that in single block redevelopment: "*Net housing yields and density gains…are small. Small-lot infill subdivision of single properties typically results in loss of private green space due to more area dedicated to buildings and car space. Loss of green space has multiple negative impacts.*" ['*Greening the Greyfields – New Models for Regenerating the Middle Suburbs of Low-Density Cities'* – Prof. Peter Newton et al] Likely outcomes also include excessively large single houses, which can avoid the need for a DA and lease variation.

The proposed changes are intended to deliver "Dual or tri-occupancies, townhouses and terrace homes and low-rise apartments". As the 'Snapshot' says: "*This isn't a new concept for Canberra—we already have some examples of this type of housing in some of our oldest (as well as newest) suburbs*". There are indeed many examples in Inner South Canberra. However, it is necessary to understand the factors which led to these good outcomes before considering whether to reduce planning requirements for the RZ1 zone and, to some extent, the other Residential Zones.

An important factor in these successful earlier redevelopments was that they were on sites of sufficiently large scale to allow for the provision of diverse housing types and generous communal open spaces with good tree cover. As the book quoted above says: "*land assembly is a prerequisite. This…is a step that planning systems need to recognise as being the missing step in creating the missing middle."* Larger scale projects also allow comprehensive negotiation with all stakeholders (including neighbours), and early agreement on concept development plans. This, together with other DA system improvements implemented in good faith, could in turn provide the justification for 'fast-tracked' approvals.

Dwelling density 'targets'

The proposed Territory Plan changes take no account of differences in location, existing character and suitability for redevelopment, simply setting "dwelling density targets**"** which are 5 to 7 times the average density of the older suburban areas, and more **i**f basement parking is provided. The related "outcome" provision is: "***Appropriate number*** *of dwellings is guided by* ***site context*** *and dwelling density targets in the Residential Zones Technical Specifications*". There appears to be no description of '***site context'*** in the proposed Plan Amendments and no useful '*Design Guidance' a*bout this in the (non-statutory, non-mandatory) Draft *Missing Middle Housing Design Guide*.

If such higher-density redevelopment occurs, this must have enormous impacts on older suburbs in particular, with loss of their-long established streetscape character and many mature trees, the intrusion of much more traffic and parking overspill, neighbourhood conflicts and infrastructure supply issues. Heritage housing precincts may not be adequately protected – heritage controls only affect advice from the ACT Heritage Council, which can be ignored by the planning authority.

NZ experience

There have been media reports claiming great success for residential 'upzoning 'in Auckland in support of the ACT Government's proposed changes. It is clear from the available literature, however, that the new policies in Auckland have had little impact on the rate of 'dwelling consents 'and even less on dwelling completions. It is also notable that most new residential development in Auckland has been occurring in outer, rather than inner areas, contrary to intentions and expectations [see Attachment to this submission].

A better approach to reform

We propose that, rather than a "one size fits all" planning policy for RZ1 zones, a more sensitive and nuanced planned approach should be applied, including:

- **Special Character Zones** to protect particular high-quality residential areas, including Heritage housing precincts, similar to the Auckland "*Single House Zone—to maintain and enhance the amenity values of established residential neighbourhoods in a number of locations…based on special character informed from the past, spacious sites with some large trees*" (etc.)
- **Block "consolidation**" to encourage more efficient redevelopment, with more dwellings in higher amenity settings including open space and trees—for example, a minimum of four adjoining existing house blocks, with a development plan to be negotiated with stakeholders and potentially subject to a 'fast-tracked' approval process. Block consolidation could be achieved in a number of ways: through a "collaborative housing" model involving the existing owners directly; by private developers; or by a government redevelopment agency charged with assembling and packaging projects in appropriate locations for on-sale to developers.

Our detailed submission follows.

‘MISSING MIDDLE HOUSING REFORM’

Detailed Submission by the Inner South Canberra Community Council (ISCCC):

THE MOST SIGNIFICANT CHANGES FOR RZ1 ZONE

We have the following **questions** and **comments** [in bold] on the Government’s proposals:

Policy Outcomes:

The *Proposed Territory Plan provision* refers (para. 1.) to a “*suburban setting which **is primarily low density***…”

Q1: What does this mean? Are only some higher density redevelopments going to be permitted in particular areas?

The Proposed para. 4: “*Development respects valued features of the neighbourhood and landscape character of the area and does not have unreasonable negative impacts on neighbouring properties”* is generally the same as the *Current Territory Plan provision.*

Q2: But this ‘Policy Outcome ’is not given effect to in the Territory Plan policies or the Residential Zones Specifications, which actually reduce “standards” in a number of areas (see below). Presumably, complete reliance is therefore being placed on the non-statutory, non-mandatory “*Missing Middle Housing Design Guide”* and on the faithful consideration and design response to it by developers and assessment officers? How likely is this?

Assessment Outcomes:

No changes are proposed to these. So, the following will continue to apply:

“*The proposed use and scale of development are **appropriate** to the site and its zone.”*

Q3: How will this be assessed and what weight will be given to this “outcome”, given the hugely increased ‘*dwelling density target*‘ of 54-67 dwellings per hectare - 5 to 7 times the average density of the older suburban areas, depending on dwelling type), plus some unspecified amount more “*if parking is contained within a basement*” in the *Residential Zones Technical Specifications?*

“*14. The height, bulk and scale of development is **appropriate**, noting the desired zone policy outcomes and the streetscape*.”

The *Residential Zones Technical Specifications 14.2* say that the building envelope plane is proposed to be set 500mm higher. Also, in *15.1*, the slope of the *“solar building envelope”* for multi-unit housing is increased from 31 degrees to 45 degrees, with potential serious effects on neighbouring properties. In *Table 4: ‘Multi-unit housing front boundary setbacks’* are proposed to be reduced for *Secondary street frontages*. The minimum ‘*side boundary setback’ ’*is also proposed to be reduced to ZERO (*Table* 9).

Q4: How do these detrimental changes satisfy the intended ‘outcomes’ ?

*“19. **Sufficient** planting area, canopy trees, deep soil zones and water sensitive urban design measures are provided to enhance living infrastructure, support healthy tree growth and minimise stormwater runoff.”*

Q5: How is “sufficient” to be assessed for a particular project?

"20. Urban heat island effects are reduced through limiting impervious surfaces and provision of canopy trees and plants." '*Tree canopy cover'* is proposed to be marginally increased, from 15% to 20% (19.3), but this is not necessarily additional to '*Planting area'* [which is proposed to be reduced from 35% to 30% of block area] and no additional specific tree planting requirements are proposed. Note that the Auckland Unitary Plan has a limit of 60% 'impervious area' in most residential zones.

Q6: **How will the *heat island effect* reduction be achieved, given the hugely increased 'dwelling density target 'and the proposed reduction in 'Planting Area', as well as the lack of any limit on 'impervious area'?**

"*27. Vehicle and bicycle parking sufficiently caters for the development while **minimising visual impacts** from the street or public space*". And yet *Parking provision rates* are proposed to be reduced and *Visitor* spaces to be eliminated altogether (*Table 13*).

Q7: What *impacts* are the likely result, in established areas which may have relatively narrow streets and where parking is already at a premium?

The *Subdivision Policy* and *Specifications* are also proposed to change:

- minimum block area for unit titling reduced to 600m2;
- block subdivision to be permitted with minimum block size of 350m2 (RZ1);
- limits imposed on consolidation of blocks. The 'Comparison Table explains: "*Limits on consolidation outcomes for RZ1 blocks are provided to limit over-development and maintain the low-rise, lower density character of RZ1 areas compared to RZ2 outcomes*".

Comment: Larger, consolidated sites are more likely to yield satisfactory outcomes than focusing on single-block redevelopment. To be serious about maintaining "lower density character of RZ1 areas" the Government would not be proposing all the changes referred to above. Furthermore, the *Design Guide* contains contradictory statements on 'consolidation'.

CHANGES FOR RZ2-RZ5 ZONES

Comment: in general, these appear supportable. However new, single detached houses should be discouraged in these zones and the 'Site Coverage' and 'Impervious Area' controls should be at least as good as the Auckland Unitary Plan (AUP – see Attacchment to this submission, Table 1).

As proposed in the above 'Summary' – "A better approach to reform"., we recommend that there should be a 'Special Character Zone' "to protect particular high-quality residential areas, including Heritage housing precincts, similar to the Auckland '*Single House Zone'.* This could replace the current RZ1 zone. Either RZ4 or RZ5 zones may become redundant with the changes, so some renumbering may need to be considered.

POSITIVE AND POTENTIAL NEGATIVE IMPACTS FROM SUPPORTING REPORT

In general, both the "positives" and the "negatives" are exaggerated.

"Positive impacts":

"• *Increased housing choice*—Missing middle housing can cater more effectively to the needs of Canberra's population within existing residential areas by offering flexible and diverse living arrangements." (etc.)
Comment: There appears to be no specific Policy requirement for such diversity.

"• *Housing availability and affordability*—Missing middle housing provides more affordable living options compared to traditional single dwelling family homes."
Comment: no evidence is presented for this assertion. The most common complaint is the shortage of family sized detached housing in Canberra. There are units aplenty on the market already. The reforms proposed will further diminish the detached housing stock in Canberra [or simply substitute much larger single houses] and thus drive up prices. The price of new housing continues to rise, with developers blaming rising labour and material costs.

"• *Urban vitality*—Missing middle housing can reinvigorate older neighbourhoods with underutilised land or aging housing stock."
Comment: Sensitive redevelopment can certainly improve older neighbourhoods, but badly designed redevelopment can have the opposite effect, in particular by reducing canopy cover and recreational space, and by degrading heritage characteristics.

"• *Environmental sustainability*—compact housing types promote more efficient land use, and reduces the need and environmental impact of urban sprawl. Smaller homes require less energy to heat and cool, and denser development patterns make public transportation more viable, helping to reduce greenhouse gas emissions."
Comment: **While the factors mentioned can help to reduce greenhouse gas emissions, more intensive building, with the consequent reduction in green space and canopy cover, will increase the *heat island effect* of global warming. This will in turn increase the requirement for air conditioning, producing more carbon emissions.**

"• *Economic development*—removing barriers to missing middle housing will support development viability, providing opportunities for the building and construction sector and providing employment of design professionals, tradespeople and associated sectors."
Comment: with current levels of demand and the availability of large development sites around the city, together with new office and hotel development, there seem to be plenty of existing opportunities for the building and construction sector for the foreseeable future. The main constraint would seem to be the cost and availability of qualified personnel, and the high cost of building materials.

"• *Infrastructure and operational efficiencies*—A more compact urban environment will ensure more efficient public services can benefit the public through a reduction in per capita expenditure. Public funds are therefore able to be used to benefit the community in other ways, such as greater investment in public amenities, services and infrastructure."
Comment: **The Government will need to continue to service the existing urban area, so it is hard to see where funds will be available for redistribution. Planned development is more likely to lead to efficiencies than the haphazard approach proposed, which is likely to overload ageing infrastructure in unsustainable ways. Necessary infrastructure upgrades should be carried out before significant increases in housing density are allowed to occur.**

"Potential negative impacts":

"While the amendments are not anticipated to generate significant negative impacts, the proposed changes are likely to be discussed with regard to the following:"
Comment. **The Auckland experience is that there are significant negative impacts – see below.**

"*Increased infrastructure demand*—In the absence of appropriate planning and investment, significant increases in housing density in certain areas may place put a strain on existing infrastructure, such as roads, schools, parks and public services. This may cause impacts such as congestion, overcrowded schools, and overburdened public services. This is expected to be mitigated through appropriate planning and investment in infrastructure throughout the Territory."
Comment: A more targeted and gradual approach would help, rather than unplanned and haphazard increases in density.

"*Increased parking demand*—If not appropriately catered for by new development, higher density residential housing can lead to car parking shortages, especially in areas where public transportation options are limited. This can create conflicts between new and existing residents over available parking spaces, including greater load placed on residential streets with associated amenity impacts for nearby residents. This is expected to be effectively mitigated through the assessment process, where parking and traffic impacts are considered prior to approval being given."
Comment: **The proposed changes reduce on-site parking requirements, and there can be no confidence this will be "effectively mitigated" when approval is given. Haphazard development is particularly likely to cause traffic and parking problems in older suburbs with narrow streets, as can already be seen in Narrabundah. More illegal parking on nature strips can be expected.**

"*Potential for unintended gentrification*—It could be perceived that the changes may result in unimproved land values and rates increasing. However, while the proposed reforms will increase the "option value" of properties, these reforms in isolation are marginal in the context of the suite of considerations made in the planning system. Noting rates are calculated based on a five-year average of unimproved land value, any increase will flow over a considerable period of time, unless the value is reset by a lease variation pursued by the leaseholder."
Comment: **This suggests that the proposed changes are unlikely to address concerns about the "unaffordability" of Canberra's housing, reflecting national trends.**

"*Impacts on local character and amenity*—a key concern often raised with densification of established suburbs is the impact on existing local character and amenity. The design-led approach to the reforms has put local character and amenity at the heart of the design principles, guiding sensitive redevelopment outcomes which contribute positively to the neighbourhood character and limit impacts on neighbours and the surrounding suburb."
Comment: **"existing local character and amenity" seems to be given little priority in the proposed changes, including the draft Design Guide, which provides no guidance in assessing and responding to the design context including "existing local character and amenity".**

"Policy work, in partnership with the development application process where many Government agencies, such as Transport Canberra and City Services and Education Directorate are engaged, provides an opportunity to assess individual development applications and consider any potential impacts it may have. Therefore, these potential negative impacts are expected to be appropriately mitigated through the MMHDG and key protections in the Territory Plan and supporting documents."
Comment: **Our recent experiences of the planning bureaucracy, and the confusing nature of the planning documentation, do not give us any confidence that such a harmonious outcome will be achieved. It is also not apparent the bureaucracy has sufficient staff to cope with a significant uptick in demand for approvals.**

DRAFT MISSING MIDDLE HOUSING DESIGN GUIDE

Comment: The 'guide' consumes some 134 pages, including appendices. Much of it consists of unhelpful diagrams, glossy photos and vague language. It is hard to believe that proponents and designers will carefully read and respond to this "Guide" and that assessment officers will know what to do with it.

One of the appendices is a 5-page 'Missing Middle Housing Checklist'.
Q8: **Will the planning authority just insist on all the 57 boxes being ticked, as an appropriate "response" to the Guide? The Checklist does not identify the 369 points of "Design Guidance" sitting under the 57 subject headings. Do these points therefore not need to be responded to?**

Comment: **The focus of this Guide is on what can possibly fit on a single block. It is much more important to determine what is appropriate in the "development context". However, the Guide is very poor in "Development Context and Site Analysis", which is a very important prerequisite to appropriate redevelopment.**

Much of the Guide is about detailed suggestions for building design, which should all be known to competent designers anyway. Much more important are the sections on designing for the big challenges of climate change and urban heating (which are mostly relegated to the end of the document).

Much more emphasis should be placed on "communal open space" requirements for higher-density development, particularly to allow the greatest possible area to establish tree cover over and to provide play spaces for children close to home [see: '*Healthy Higher Density Living for Families with Children*' - Western Sydney Local Health District 2024, which has just won a national planning award].

DETAILED COMMENTS REFERRING TO PARTS OF THE DRAFT GUIDE:

'PART ONE: INTRODUCTION AND PURPOSE'

"*This vision continues the original plan for Canberra as a city within the landscape that celebrates its bushland setting. It protects and enhances the qualities that we value about Canberra while managing growth and change across the city*."
Comment: But uncontrolled "urban intensification" is proposed in established residential areas of very high landscape and streetscape quality, such as Forrest, Red Hill and Deakin, and in part in other suburbs in inner South Canberra. It is very unclear as to how such infill "*protects and enhances the qualities that we value about Canberra*".

.*"Maximising the use of already identified urban renewal areas is crucial for meeting the ACT's growth targets. Yet, these growth areas alone might not suffice to provide the housing choices in locations where people want to live. Consequently, there is a need to focus on renewing some suburban residential areas with higher density housing types and typologies."*

Comment: **How are these 'some' areas to be identified? There has been no comprehensive forward planning involving local communities to identify 'some' appropriate areas for 'urban renewal', as has been carried out by local government in other cities such as Melbourne.**

'*KEY FACTORS IN DEVELOPING MISSING MIDDLE*':

"The development of missing middle housing is a unique opportunity to balance feasibility with affordability. By ensuring appropriate density in more locations, we can provide more affordable housing options across the ACT."
Comment: What does: "balance feasibility with affordability" mean? And how does the Design Guide guarantee "affordability"? Experience suggests it is likely that the costly and sought-after residential areas will attract larger, more expensive and less affordable dwellings, regardless of the greatly increased Territory Plan densities proposed to apply to all RZ1 areas. And what is "appropriate density in more locations"? This is meaningless unless backed up with comprehensive and community-sensitive precinct planning.

"*Streamlining the planning application process can significantly enhance the feasibility of missing middle housing projects. By providing clear timelines, offering incentives for projects that meet specific criteria, and engaging with community stakeholders early on, we can reduce delays and foster a more supportive development environment. This proactive approach can encourage investment in missing middle housing*."
Comment: **The Guide and proposed Territory Plan changes offer nothing in terms of "clear timelines", "incentives" and community engagement.**

"*Investing in infrastructure capacity to support increased density is crucial for the successful implementation of missing middle housing. By addressing community concerns and ensuring that infrastructure keeps pace with development, governments can create a supportive environment for new housing This will help accommodate growth while maintaining quality of life for residents*."
Comment: "Investing in infrastructure capacity to support increased density" is not viable without the forward planning and identified appropriate locations for increased density.

'*WHY THE NEED FOR DESIGN GUIDES?*'

"*Design guides can provide greater clarity, flexibility and consistency for the community, authority officers and industry*."
Comment: This depends on the quality of the design guides and clarity about which elements are compulsory and which are discretionary. Greater certainty of outcomes is very important for all stakeholders, and will not be assisted by this design guide.

"An outcomes focused planning system puts the focus on achieving high quality design outcomes."
Comment: **There need to be clear, unambiguous statutory planning controls. 'Outcomes" statements replacing these are a recipe for reduced "clarity" and "consistency".**

"Our urban environments need to be responsive and adaptable to environmental challenges such as climate change, natural hazards and the build-up of urban heating, and societal challenges such as pandemics. Design guides can help public space and housing designs consider and be responsive to these challenges."
Comment: **This Guide does not "*help public space and housing designs consider and be responsive to these challenges*".**

'WHAT IS GOOD DESIGN?'

"*Achieving good design involves a thoughtful process that considers the specific context…."*
Comment: The Design Guide gives no guidance on how to do this.

'MISSING MIDDLE DESIGN PRINCIPLES':

Comment: Principle two should be amplified, e.g. with words such as "with tree shading to enhance amenity and reduce urban heating".

***'TERRITORY PLAN ASSESSMENT OUTCOMES'*:**

"*In demonstrating consistency with the assessment outcomes, proposed development must demonstrate consideration of the design guidance provided in the Missing Middle Housing Design Guide for each of the themes. This includes consistency with the assessment outcomes*."
Comment: **What kind of demonstration will be required?**

'PART TWO: CHARACTER AND SITE'

'PLACE-BASED DESIGN THINKING'

"*A place-based approach to design builds upon a place's character to create places that are responsive to their context and create a desirable sense of place. Designing for place requires a deep understanding of the physical, environmental, social and cultural attributes that make a place desirable…"*
Comment*:* this Guide gives no design guidance in this regard.

' Photo 1 'is of Throsby Court Narrabundah, which was an early low-density public housing development with a large central communal open space and big, exotic trees.
Comment: Will this Guide produce that? None of the other photographs or diagrams reflect this sort of quality.

'UNDERSTANDING YOUR SITE'

Comment: There is nothing about understanding development context. The *Australian Model Code for Residential Development* (AMCORD) - *2.4 Development Context and Site Analysis'* (pages 63,64), is one of the best works available on the subject but is ignored in this Guide. AMCORD says:

"*The development context involves four aspects:*
- planning and development intentions for the site;
- the relationship of the site to the local community; [the locality's identity and character, the streetscape, and the relationship to local movement and social networks]
- the relationship of the site to adjoining properties;
- physical characteristics of the site." **This Guide deals only with the site.**

'SITE CONDITIONS'

"*1.Block consolidation – Consolidation of multiple blocks enables greater development opportunities…"*
Comment: **Yes, but the Technical Specifications limit opportunities for consolidation.**

The *"Site scenario matrix"* [p.25] is a particularly strange document. Each of the Block size categories has a point '*i. Block consolidation*', but with no explanation.

'PART THREE: DESIGN GUIDELINES'

'SITE AND LAND USE'

"*The proposed use and scale of development needs to be appropriate to the character of an area, site and zone*." **Comment: No guidance is given about "*appropriate to the character*".**

' *3.1 BUILDING TYPOLOGIES*'

Comment: These seem to be mainly examples of what not to do! The 'Low-rise apartments '[p.44] look particularly horrendous—3 storeys and occupying most of the site.

'*3.2 UNDERSTANDING YOUR SITE'*

'*- 3.2D TREE RETENTION*'
Comment: **This is good, but buried away to almost guarantee it will be ignored.**

'3.3 LAND USES '
"Effective planning of residential land uses ensures that housing developments are well-integrated with essential amenities, infrastructure and green spaces, fostering vibrant and sustainable neighbourhoods." **Comment***:* **This sounds like an argument for getting the land use planning right in the first place, but this is not what's being proposed!**

'*- 3.3C BLOCK CONSOLIDATION AND SUB-DIVISION*'
"*Consolidation:* "*i. Consider developing in collaboration with neighbouring property owners to* achieve *more cohesive and efficient land uses through block consolidation."*
Comment: **But the Technical Specifications do not generally encourage block consolidation.**

'*3.4 BUILDING ENVELOPE'*
"Appropriate height and transition in building form maintains neighbourhood character and prevents abrupt changes in scale and streetscape."

'- 3.4A HEIGHT AND TRANSITIONS'
"i. Adhere to zoning height regulations to ensure the building fits within the planned character of the area." **Comment**: **So the right answer in RZ1 is 2 storeys, regardless of the existing character?**

'4.2 RESIDENT AND VISITOR CAR PARKING'

'*- 4.2A OFF-STREET AND SURFACE CAR PARKING'*
Comment: Suggestions for consolidating car parking, using "*medium or large canopy trees*" and "*permeable surface materials*" and landscaping good. But:
"*viii. Locate guest car parking on street where possible along low-use residential streets."***?**
The Technical Specifications do not require 'guest' or visitor parking at all!

'5.1 COMMUNAL OPEN SPACE '
"Communal open spaces in multi-dwelling development enhance quality of life and community cohesion. They provide essential green areas for physical activity, relaxation, recreation, and social interaction, fostering wellbeing and a sense of belonging."

Comment: **This is quite good, but useless with no quantification of requirements.**

‘*6.1 SCALE AND BUILDING FORM ’*

“The proposed use and scale of development should be **appropriate** to the local character and site context.”

‘*- 6.1A BUILDING HEIGHT AND SCALE’*

“i. Ensure scale responds to the existing context and desired character of the street and locality…”

Comment: These things may be contradictory – no Design Guidance is given.

‘*6.2 ORIENTATION AND STREET INTERFACE ’*

‘*- 6.2A SETBACKS AND SEPARATION’*

“i. Ensure that new building front and street setbacks respect the existing urban pattern, adjacent buildings, desired streetscape and neighbourhood character and make efficient use of the site”.

Comment: **No Design Guidance is given on how to resolve all these competing requirements.**

‘*Figure 71: Missing middle development integrating into and becoming part of the streetscape*’ – shows three buildings, one apparently a 3-storey apartment block and an attached single garage, one a conventional 2-storey with hipped roof and garage under, and one 2-storey saw-tooth roof terraced triplex.

Question 9: Is this the sort of new streetscape intended for RZ1 zone in Inner South Canberra?

‘*6.3 DIVERSE HOUSING CHOICE AND OCCUPANT AMENITY’*

‘*- 6.3A HOUSING MIX’*

“i. Provide a mix of housing types and sizes that support the future needs of the community and provide housing choice and affordability to households of all shapes and sizes.”

Question 10: How can one project, particularly if on a single block in a high-value area, possibly achieve that?

‘*7.1 TREES, LANDSCAPING AND NATURAL FEATURES’*

“*Reduce the impact of urban heat island effects, minimising stormwater runoff, maintaining ecosystem services, sufficient planting areas and providing large canopy trees.”*

“Deep soil planting zones and canopy cover support healthy tree growth, enhance urban greenery and provide essential shade, reducing urban heat island effects and improving comfort and energy usage. Selecting climate-specific plant species that thrive in Canberra conditions creates resilient and water-sensitive gardens. The integration of landscaping will foster healthier, more resilient urban communities, contribute to resident’s well-being, and create a more sustainable community.”

‘- 7.1A PLANTING AREAS’

“i. Provide deep soil planting zones to maximise tree canopy coverage of larger, long-lived shade trees as per Living Infrastructure Plan targets.**”**

Comment: **Unfortunately, the minimum tree canopy requirement in the Technical Specifications has only been marginally increased, to 20% of the block area, while the minimum planting area has been reduced.**

‘*7.4 CLIMATE CHANGE RESILIENCE’*

‘*- 7.4B. URBAN HEAT ISLAND’* – **Comment**: **The “hierarchy of urban heat mitigation measures” is very important and should be given much greater prominence.**

Submission by: [redacted]

[redacted] 23 June 2025

ATTACHMENT - "AUCKLAND UNITARY PLAN" (AUP)

The AUP, introduced in 2016, allowed urban "intensification" across "many established suburbs and some greenfields areas" ('Auckland Unitary Plan Operative in part 15 Nov. 2016 – Chapter H Zones - *H4. Residential - Mixed Housing Suburban Zone'*).

This appeared to lead to a substantial increase in "dwellings consented". However, according to the '*Auckland Future Development Strategy 2023-2053 Monitoring report December 2024* 'covering the five years 2019/20 to 2023/24, the'dwellings consented 'per year went from 14,776 at the beginning of the period, to a high of 21,609 in 2021/22, declining to 13,855 in 2023/24 (lower than the beginning).

Interestingly, that report noted re 2023/24 that: "*compared with the previous reporting year, there was a similar pattern with consenting activity continuing to concentrate in the outer suburbs …with less occurring in the city centre and inner suburbs*".

Note that the AUP retained an '*H3. Residential – Single House Zone'*. Its purpose "*is to maintain and enhance the amenity values of established residential neighbourhoods in a number of locations. The particular amenity values of a neighbourhood may be based on special character informed by the past, spacious sites with some large trees, a coastal setting or other factors such as established neighbourhood character…To support the purpose of the zone, multi-unit development is not anticipated, with additional housing limited to the conversion of an existing dwelling into two dwellings and minor dwelling units. The zone is generally characterised by one to two storey high buildings consistent with a suburban built character.*"

The AUP has six Residential zones – two below the 'Single House Zone '(the 'Large Lot Zone 'and the 'Rural and Coastal Settlement Zone') and three higher density – see table below {from "*The Impact of Upzoning on Housing Construction in Auckland – Economic Policy Centre May 2023*". Note the 'Site Coverage' and 'Impervious Area' controls, as well as the 'Max. dwellings', are all much more rigorous than is proposed in the ACT.

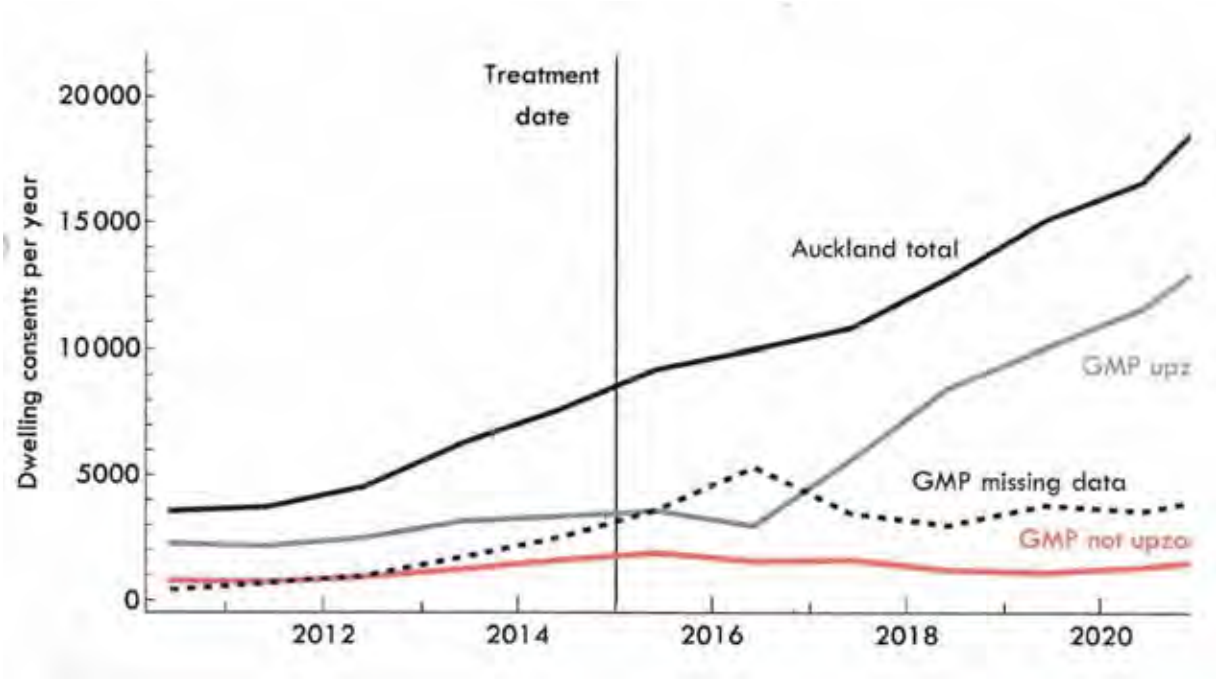
Table 1: Summary of Land Use Regulations by Residential Zone under the Auckland Unitary Plan

Regulation	Terrace Housing and Apartments Zone	Mixed Housing Urban Zone	Mixed Housing Suburban Zone	Single House Zone
Max. height	16m (five to seven storeys)	11 to 12m (three storeys)	8 to 9m (two storeys)	8 to 9m (two storeys)
Height in relation to boundary	3m vertical + 45° recession plane	3m vertical + 45° recession plane	2.5m vertical + 45° recession plane	2.5m vertical + 45° recession plane
Setback	0m	1m	1m	1m
Site Coverage	50%	45%	40%	35%
Impervious Area	70%	60%	60%	60%
Min. dwelling size (1 bedroom)	$45m^2$	$45m^2$	$45m^2$	n/a
Max. dwellings (on existing parcels)	does not apply	3	3	1
Min. Lot Size (subdivision)	$1200m^2$	$300m^2$	$400m^2$	$600m^2$

Has Auckland's 'upzoning 'of a large part of its residential areas been successful?

The paper by Greenaway-McGrevy & Phillips [GMP] for the 'Economic Policy Centre 'May 2023: *The Impact of Upzoning on Housing Construction in Auckland;*" found strong evidence that upzoning (by the 2016 *Auckland Unitary Plan*) stimulated construction". However, a later paper: *The Auckland myth: There is no evidence that upzoning increased housing construction* by Murray & Helm [M&H] in '*Fresh Economic Thinking '*4 June 2023 criticised GMP's paper. The graph below illustrates that there was actually no real change in the upward trend of total dwelling consents in Auckland (black line) from about 2012/13 to 2020/21.

What this table does not show is that total dwelling consents per year for Auckland actually went DOWN again, from 21,609 in 2021/22 to 13,855 in 2023/24 (*Auckland Future Development Strategy 2023-2053 Monitoring report December 2024*).



Further, the M&H paper noted that net additional dwellings completed and connected to electricity two years after approvals were only 69% of consents since 2020.

M&H say: "*We agree that more homes are better than fewer, but good planning matters too. Organising the location and types of dwellings can reduce total infrastructure costs and avoid social costs that cause a net loss of utility. The disorderly nature of where post-AUP development occurred is hated even by the most strident supporters of the policy now living through it.*"

"*Auckland's consent trend, like Wellington's, looks a lot like a growth cycle spurred by an uptick in migration around 2014, and a normal cyclical boom, one also seen in Australia's major cities following the post-GFC recovery period.*" (Murray & Helm)

Advocacy for Inclusion
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Environment, Planning and
Sustainable Development Directorate
GPO Box 158, Canberra ACT 2602

Via email: EPSDDComms@act.gov.au

Submission to the ACT Government: Missing Middle Housing Reforms

Thank you for the opportunity to provide feedback on the Missing Middle Housing Reforms.

Advocacy for Inclusion acknowledge and welcome the ACT Government's focus on improving the planning system to allow more diverse housing options in Canberra's established suburbs. However, while these reforms are designed to increase private medium-density housing supply, it is essential to recognise that without safeguards and clear standards, they risk entrenching barriers to safe, affordable, and accessible housing for people with disability and older Canberrans.

About us

Advocacy for Inclusion (AFI) is an independent organisation delivering reputable national systemic advocacy informed by our experience in individual advocacy and community and government consultation. We provide dedicated individual and self-advocacy services, training, information and resources in the ACT. As a Disabled People's Organisation, the majority of our organisation, including our Board of Management, staff and members, are people with disabilities. AFI speaks with lived experience and is committed to advancing opportunities for the insights of people with disability to be heard and acknowledged.

Housing and Disability in the ACT

People with disability face a double disadvantage in Canberra: a lack of affordable housing and a lack of housing designed to support disability and ageing in place. This is compounded by a high-cost private rental market, limited tenure security, and declining public housing investment.

Around one in five Canberrans has a disability, and one in two people over 65 experience some form of disability. With Canberra's population ageing rapidly – more than 114,000 residents will be over 65 by 2060 – designing inclusive housing is not just a niche concern but a central planning imperative.

More than half of ACT public housing households include a person with disability, and yet only 60 per cent of those dwellings meet an acceptable standard. A Disability Support Pension recipient could not afford any of the 1,978 rental properties in the ACT and surrounding areas

advertised in March 2025. Inaccessible and poor-quality housing increases the risks of homelessness, poor health, and social exclusion.

While planning reforms can expand housing supply, simply enabling more medium-density redevelopment will not on its own deliver the accessible and affordable homes that people with disability and older people urgently need.

Three Priorities for Reform

To ensure the Missing Middle reforms deliver meaningful improvements rather than replicating past inequalities, we recommend the following:

1. **Accessibility as a Baseline Requirement**
    - New housing enabled through the reforms should be required to meet Gold-level accessible design standards by default.
    - Accessibility must be treated as essential infrastructure within planning frameworks, not an optional feature in the private market.

Universal design enables safe and dignified participation in daily life regardless of age or ability. Embedding these principles now ensures Canberra's housing stock remains fit-for-purpose over time. It also avoids the much greater cost of retrofitting inaccessible homes later.

2. **Diversify Beyond Medium-Density by Default**
    - Medium-density housing should not become the default model for all redevelopment.
    - Planning rules should support a mix of housing types – detached dwellings, dual occupancies, terraces, small-scale infill – to better match the diverse needs of people with disability and older Canberrans.
    - Reforms must also avoid the risk of smaller, less accessible homes becoming the only affordable options.

Intentional social planning, driven by lived experience voices, is critical to ensuring this diversity. Canberra's changing demographics demand a housing system that supports ageing in place and lifelong inclusion.

3. **Incentivise Accessible Private Housing Supply**
    - The ACT Government should include measures within the planning reforms to incentivise the delivery of accessible housing in the private market.
    - Options could include planning bonuses, reduced fees, or other incentives to encourage developers and landlords to deliver accessible dwellings.

Too often, the cost of inclusion is over-scrutinised, while the significant costs of inaction – social exclusion, wasted public investment, preventable hospitalisation – go unexamined.

Additional considerations to support the success of Missing Middle reforms

While these planning reforms focus primarily on zoning and approval pathways, complementary policy action in adjacent domains will be critical to achieving equitable outcomes. We encourage the ACT Government to consider the following areas as part of broader implementation and future reform efforts:

- **Visibility and choice in the rental market**
  Ensure that accessible and adaptable dwellings are clearly identified and searchable in rental listings, enabling people to find appropriate housing when seeking to downsize or relocate.
- **Secure tenure and capacity to modify housing**
  Improve protections for renters with disability and older people to remain in their homes, including the ability to make reasonable accessibility modifications, so that newly built accessible dwellings retain their value and purpose over time.
- **Climate-ready and suitable housing**
  Embed minimum standards for thermal comfort, energy efficiency, and climate resilience in medium-density dwellings to protect residents with temperature regulation issues and other health vulnerabilities.

These considerations, while beyond the immediate scope of zoning reform, are vital to ensuring that medium-density housing delivers on the goals of inclusion, liveability, and long-term suitability for Canberra's diverse and ageing community.

Conclusion

The Missing Middle reforms are an important opportunity to modernise Canberra's planning system and improve housing supply. However, they must be designed and implemented in ways that do not leave people with disability and older Canberrans behind.

Medium-density infill alone will not solve the shortage of affordable, appropriate, and secure housing. The reforms should embed accessibility as standard, support a diversity of housing types, and include clear requirements and incentives to deliver homes that people with disability and older residents can actually live in.

Accessible, affordable housing is not a niche issue – it is a whole-of-community investment. By embedding universal design and inclusive planning now, the ACT Government can shape a future Canberra that is age-friendly, disability-inclusive, and socially just.

Thank you for your time and consideration. Please feel free to contact me at [redacted] to discuss this submission.

[redacted]
[redacted]
[redacted]
[redacted]
Advocacy for Inclusion

From: [redacted]
To: EPSDD Communications
Cc: BRADDOCK; CASTLEY; Milligan, James; ORR; PETTERSSON; STEEL
Subject: Submission on Missing Middle Housing Reform Proposal
Date: Wednesday, 16 July 2025 2:24:38 PM

Some people who received this message don't often get email from [redacted] Learn why this is important

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Village of Hall and District Progress Association Inc.
VHDPA Inc.
PO Box 43
Hall ACT 2618
www.hall.act.au

The City and Environment Directorate
ACT Government
Canberra ACT 2600

Submission on Missing Middle Housing Reforms from the Village of Hall and District Progress Association

The Village of Hall and District Progress Association offers the following comments on behalf of the Hall Village and District (postcode 2618) community.

The Village of Hall and surrounds is included in the ACT Heritage Register (as *Hall Village Heritage Precinct 23 August 2001*). Urban blocks in Hall Village include RZ1, CZ4 – local centre, Community Use and Urban open space zoning.

The Missing Middle Housing Reforms propose to introduce key opportunities for subdivision and consolidation of residential blocks, particularly for RZ1 zoned urban blocks. As Hall Village is predominantly RZ1 zoned, it is essential that it is made explicit to all parties that the Missing Middle Housing Reforms do not apply to RZ1 zoned urban blocks in Hall Village as subdivision and consolidation is not permitted for registered heritage places.

In this regard the ***Draft Major Plan Amendment to the Territory Plan 04. Missing Middle Housing Reform May 2025*** provides clear and early advice that subdivision and consolidation is not permitted for registered heritage places if such activity is specifically prohibited via registration requirements under the ***Heritage Act 2004***.

The current *Missing Middle Housing Reforms* explanatory and guidance materials need to provide similarly clear and early advice that the new policy opportunities do not apply to heritage registered places (like Hall Village) where subdivision and consolidation of RZ1 blocks is not permitted. This is particularly important as the guidance and less-technical discussion-type documents are more reader friendly and more likely to be consumed by ordinary residential landowners. Clear advice about applicability of the policy in heritage areas, or not, should be provided in plain English as early as possible.

Post reforms it would also be relevant to include similar advice in development

application guidance and factsheets e.g. *Factsheet: Navigating the planning process: Subdivision design application Preparing a development application 2023.*

The Progress Association is ready to provide further information if required.

Thank you for seeking community views on this matter.

Yours sincerely,

Robert

[redacted]
Village of Hall and District Progress Association
PO Box 43
Hall ACT 2618
Australia
www.hall.act.au

From: [redacted]
To: EPSDD Communications
Subject: Missing Middle consultation
Date: Thursday, 19 June 2025 5:24:49 PM

Caution: This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

My comments on the proposed changes to the Territory Plan are as follows:

1. In general, I support the proposed changes. There are many housing blocks, particularly around the older suburbs, with quite small houses but enormous gardens. Provided tree canopy can be maintained, it would make sense to accommodate 2 or 3 dwellings on the sites. And every dwelling needs to get good solar access and must accommodate solar panels and batteries.

2. It is important that a proportion of the new dwellings be single level, with no stairs. Many older people would be happy to downsize from large homes to smaller ones, provided that they can remain in the same local area and that the new dwelling is suitable for ageing in place.

3. Parking requirements for larger developments should be maintained, especially for visitor parking. Many older (or disabled) people live on their own and are very dependent on visits from carers, cleaners, health professionals etc. If visitor parking is not readily available, these people are likely to become more isolated and/or more likely to end up in care.

4. It is time to consider whether every single tract of scrub or bushland around Canberra's suburbs needs to remain as bushland. The city is so spread out that it makes the provision of every service more expensive than it otherwise could be, and many of the bushy open spaces contribute significantly to the city's bushfire vulnerabilities. Obviously, there are many bush areas that are vital parts of the city's natural environment, but there are others that could well be included in the city plan. Off the top of my head, I would suggest the block bounded by Kent St & Carruthers St in Deakin; the patch at the back of Curtin bounded by Heysen St, Tugg Parkway and Cotter Rd; some of the area referred to as Hannah Community Park south of Foxton Cres in Fadden. I'm sure there are others in Weston/Molonglo and North Canberra, but you get my drift.

[redacted]

[redacted]

I support increasing residential density in existing areas. However, the outcome of re-development needs to provide good outcomes for existing and future residents. My focus is guaranteeing solar access – particularly in winter.

It appears that the various proposed changes will not ensure solar access and need to be re-worked so that all people are guaranteed good solar access.

At present most people live in RZ1 zoning in free-standing houses. Most of these people have access to direct sunlight in winter somewhere in the house in which they live, the garden around the house, and the nearby streets, footpaths and parks. Under the various proposed changes these good outcomes all are potentially at risk of removal.

A key objective of the Missing Middle changes is to have more people living in existing areas. I support that objective. However, higher density means that if the minimum requirements are deficient then more people than currently are detrimentally affected.

I consider that the proposals need to be re-worked to guarantee solar access in winter in **all**: living spaces of all residences; private open spaces; communal open spaces; and public open areas including footpaths.

There are specific areas where the proposals need to be re-worked. For example, the proposal to increase the 'solar building envelope angle for Multiunit housing' (see p9 of the booklet 'Missing Middle Housing Reform - Snapshot) from 31 degrees to 45 degrees inherently increases the risk of overshadowing (unless you have arranged for the sun's elevation to increase!).

Another example is that the (current) requirements for the minimum solar access in winter to apartments in a multiple residence development (including that only 70% of apartments need to meet the minimum, and that up to 15% of apartments can receive no sunlight – see **ZS1 – Residential Zones Specifications section 15.2)** need to be re-worked to guarantee solar access to all apartments. Unless this occurs, the more needy in our community are more likely to live in a cold or expensive to heat apartment.

Not only do the proposals need to be re-worked, but the minimum requirements also need to be in legally binding form.

In summary, residential density should be increased. However, in allowing and facilitating that outcome there need to be legally binding guarantees for current and future residents.

Introduction

I strongly support the Missing Middle Housing Reforms and commend the ACT Government for taking important steps to increase housing choice and affordability in our city. These changes are a critical opportunity to deliver more inclusive, walkable, and sustainable neighbourhoods. As a young person living in Civic, I have personally experienced how much better life can be when you are close to shops, gyms, public transport, and friends. I walk almost everywhere, and it's made me healthier and more socially connected. I want others in Canberra to have that same opportunity — but for that to happen, the reforms need to go further in a few key areas.

---

1. Clarify and Strengthen RZ1 Objectives

I welcome the proposed amendments to enable more diverse housing in RZ1, but the objective that RZ1 remains "primarily low density and low rise" remains vague and potentially self-defeating.

Suggestion:
Please provide clearer, objective guidance on what "primarily low density" means — for example, that the majority of dwellings in the zone should remain detached houses, but that duplexes, triplexes and even small apartment buildings are acceptable and desirable where they meet the new built form rules. This will reduce uncertainty for proponents and the community, and help ensure the written rules — not subjective perceptions — guide decisions.

Further, I believe this language should be **more ambitious**. The reform should reflect that *more* housing in RZ1 is not just acceptable, but necessary to meet housing demand, affordability goals, and the Planning Strategy 2018 target of 70% infill. The design guides and new built form rules already manage scale — if a proposal complies, it should be approved.

---

2. Remove or Loosen the Maximum Consolidation Limits

The current rules retain a cap that generally prevents more than two blocks being consolidated in RZ1 unless strict conditions are met. This **needlessly restricts** our ability to build great medium-density housing. Consolidation is already hard — landowners need to coordinate sales and developers take significant risks. Putting arbitrary limits on it just blocks well-designed projects from going ahead.

Suggestion:
Allow more than two blocks to be consolidated where the resulting proposal delivers more housing, complies with built form and tree canopy rules, and improves overall site

layout. The focus should be on outcomes, not a fixed number. This would allow more flexibility and unlock better design outcomes.

---

3. Eliminate Parking Minimums

The proposed reduction in parking requirements is a good first step, but it does not go far enough. For two-bedroom dwellings, the new requirement (1.2 spaces per unit) is still too high — it's only a 20% reduction on current minimums.

As someone who lives car-free, I see how much space and cost is wasted on parking that many people, especially younger Canberrans, simply don't need. Reducing or removing parking requirements lowers construction costs, increases affordability, and allows more space for homes, trees, and open space.

Suggestion:
Follow the lead of cities like Auckland, Minneapolis and Portland and **eliminate minimum parking requirements entirely**. Let the market decide. Developers will still provide parking where there's demand, but people who don't need a car shouldn't be forced to pay for one.

---

4. Strong Support for the Overall Reform Direction

Despite these areas for improvement, I want to make clear that I **strongly support** the core of the reform. Removing dwelling caps, reducing minimum block sizes, allowing apartments in RZ1, and updating height and open space rules are all sensible, evidence-based changes. These are the kinds of reforms that will allow more Canberrans — especially renters, young people, downsizers, and essential workers — to live closer to jobs, transport and community.

Conclusion

We all want a Canberra that is affordable, inclusive, and sustainable. These reforms move us in that direction — but we can be bolder. Clarify and strengthen the RZ1 objectives. Remove barriers to consolidation. Eliminate parking minimums. Let's make sure this once-in-a-generation opportunity actually delivers the housing our city needs.

Thank you for the opportunity to comment.



From: [redacted]
To: EPSDD Communications
Cc: [redacted]
Subject: LVC will bury the missing middle - Missing middle response
Date: Tuesday, 22 July 2025 2:15:58 PM

You don't often get email from [redacted] Learn why this is important

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Increased Lease Variation Charges — Another Hit to the Missing Middle

Missing Middle reforms are welcomed, however the missing middle will be buried under new LVC increases quietly introduced on 1 July (Disallowable Instrument DI2025-178).

Real-World Impact
Let's take two missing middle scenarios:

Ainslie – Dual Occupancy
A family decide to build a second dwelling on their RZ2 block in Ainslie, after paying for the DA including consultant fees and government charges, and before entity charges and other contributions and increased build costs, they need to contend with LVC.

- In 2024 LVC: $82,500 per dwelling (already an eye-watering figure)
- 2025 LVC: $181,250 per dwelling
- That's a $100k increase in 12 months!!

Dickson – 7 Townhouses
A small developer purchases several blocks and opts to build 7 missing middle style townhouses in RZ3. The LVC hit has more than doubled since 1 July 2024.
- 2024 LVC: $330,000
- 2025 LVC: $770,000
- An increase of $440,000 in 12 months!!
- Meanwhile median sale values of this type of product over the last 12 months have seen negative growth (-15%)!! (realestate.com.au)

Put simply, any minimal margins are gone, and the feasibility for both scenarios above are now in the RED. It doesn't take much to see that neither of these missing middle style proposals will move beyond initial feasibility to the DA phase. Development usually requires a 15%-20% margin to gain finance approval, this has been fully absorbed and then some by LVC alone.

The ACT promotes that LVC is a tax paid by developers. This is disingenuous. This is a charge passed on directly to the purchaser. There is no room in any feasibility modelling to absorb any level of LVC and other charges by the developer. LVC is therefore a huge impediment on housing affordability and provision of the missing middle as it simply just pushes dwelling prices up, if they're built at all.

With these conditions the missing middle will remain missing. The proof is in the pudding, while not solely to blame, LVC has contributed to the dismal residential dwelling approvals in the ACT for Financial Year 24-25. All during a housing crisis and while the ACT is trying to Achieve 30,000 new homes by 2030.

So where's the incentive to add dwellings to existing blocks? Between LVC and other government charges, prolonged DA Assessments, and rising construction costs?

Possible solutions:

- A five year moratorium on LVC, measure what happens and if the results are good in terms of a boost in residential development and rates income, permanently retire LVC, or
- Introduce new missing middle remissions, removing LVC for the types of missing middle developments we want and need in the ACT. Once again monitoring the outcomes and adjusting based on the results.

Regards



From: [redacted]
To: EPSDD Communications
Cc: [redacted]
Subject: The Missing Middle housing plan
Date: Tuesday, 22 July 2025 2:58:57 PM

You don't often get email from [redacted]. Learn why this is important

Caution: This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Thank you for the opportunity to comment on the ACT Government's 'Missing Middle' housing plan. I'm delighted you've recognised and are addressing the lack of intermediate-sized houses in the ACT. Here are some compatible suggestions for housing and transporting a larger yet net-zero emissions population in ACT in the future:

- The rate at which houses can be built is currently limited by the out-dated technology we use and its reliance on an insufficient number of tradesmen and women. Both could be resolved in the long term by establishing an ACT-based prefabricated housing industry. Once demand in the ACT has been satisfied there'd still be a ready market in NSW and Victoria for prefabricated housing using innovative low energy materials.
- What is now the racetrack could be transformed by a mix of house-types, built on land interspersed by parks and playgrounds. It would readily accommodate dual and tri-occupancies, town-houses, terrace homes and low-rise apartments. The light rail and buses are already nearby, as are North Canberra Hospital, schools and Dickson shops.
- The Missing Middle plan seems to assume that the occupants of these new houses will be driving to work, school, shops and leisure activities. While I congratulate you on bringing our household greenhouse gas emissions to net zero, our over-reliance on private cars blocks our progress towards a net zero emissions transport system. The current frequency of buses in the suburbs is too patchy to get people where they need to be on time. While I support the southward extension of our light rail, it will need to be supported by a network of frequent electric buses before it can become a reliable transport system that will enable the ACT to become fully net-zero.

Best wishes,

[redacted]

To the ACT Government,

We, the affected homeowners of PBS Building, urge you to take immediate action to address the systemic failures that have left us vulnerable to unscrupulous builders. The current lack of effective legislation has enabled builders to exploit loopholes, enter liquidation, and start anew, leaving homeowners to bear the financial burden.

The attached statement outlines our concerns and demands:

For those affected by PBS Building, please note you are not alone 🙏

Some businesses avoid accountability for past mistakes by establishing new business entities and obtaining a new

ABN/ ABR 😡💯💸

As a #HomeOwner and #Victim I feel;

a) It is essential to review the legal fees paid, with the expectation that they are reflected in our pockets, especially in light of [redacted]'s involvement in a new project (please refer to the attached article written by Brittney Levinson).

b) It's expected that Chambers Russell Lawyers will both diligently pursue reimbursement from PBS Building and Maliganis Edwards Johnson for all legal fees we have incurred. Whilst I am unaware of Chambers Russell Lawyers practices, I sincerely hope the team provides a service that fits in line with their company's values and their client's (us homeowners) best interests in mind.

c) As a collective, we face a challenging situation within a flawed system that the ACT Government is responsible for. So wouldn't it be reasonable that the #ACTgovernment reimburse us for all legal fees we have incurred thus far?

d) If our situation with [redacted] does not materialize, it will eventually be necessary for homeowners to engage their own independent legal advice from a reputable local team that is not Sydney-based but also holds more expertise in handling cases involving building contractors located in the ACT.

[redacted]

The Canberra Times #PBSBUILDING Sky News #AndrewBarr LJ Hooker

Specifically, we request that the ACT Government:

- Implement robust legislation to hold builders accountable for their actions
- Prevent phoenixing and exploitation through new ABNs
- Protect homeowners' rights and interests
- Provide reimbursement for legal fees incurred due to builders' negligence

We demand a comprehensive review of the current system and the implementation of effective measures to prevent such situations in the future. As vulnerable residents, many of whom are on support pensions, we cannot afford to bear the financial burden of builders' misconduct.

We urge you to take responsibility for protecting homeowners' rights and implement the necessary changes to ensure a fair and transparent construction industry in the ACT.

Sincerely,
Affected Homeowners of PBS Building

Submission to Missing Middle Housing Reforms, 23 July 2025 – [redacted]

I live in a well-designed, north-facing, space- and energy-efficient, all-electric secondary residence in the Woden Valley.

I understand the need for 'missing middle' housing and have been living the experience for the past 3 years. However, I have a particular concern with this statement in the Snapshot:

Changes to the Territory Plan will remove barriers in the planning system and allow more housing options (including more townhouses, terraces, and duplexes) in residential areas. These changes will make it easier to build well-designed, sustainable homes in our existing suburbs.

- Current planning laws don't stop developers or homeowners from building houses that don't comply with the law. I know of numerous examples in the Woden Valley of people building 2- or 3-storey-height houses that overlook neighbours, encroach on the boundaries, block solar access and don't meet regulations, and yet these houses are built and the builder/developer/owner isn't made to rectify the non-compliance.
    - What protection do householders have against this happening with the 'barriers' are removed in the planning system?
- I am also concerned that tree cover and green space will be compromised when 'barriers' are removed.
    - I walk around my neighbourhood and see so many giant 2-storey duplexes on 'Mr Fluffy' blocks where mature gardens and trees are replaced with a box hedge or even worse, no garden at all. In a heating climate, we need to *increase* our tree cover.
- What protections are planned to ensure the missing middle style of housing will be properly sited on blocks to make them as energy-efficient as possible, to minimise the amount of energy needed to run them. This relates again to the heating climate, but also to make it more comfortable for neighbours who will have many more heaters/air conditioners close to them, which presents a noise pollution risk (something I already experience in my neighbourhood where a giant 2-storey house runs it's A/C almost 24 hours. It's 2 houses along from me on the street behind me, but because it is so poorly designed it uses heating/cooling constantly and creates noise pollution throughout the immediate neighbourhood.

Regulation should be a balance between the individual and collective good; it shouldn't favour the individual to the detriment of the community.

PIA Planning Institute Australia

11 July 2025

EPSDD (CED) Communications
City and Environment Directorate
EPSDDcomms@act.gov.au

Dear Sir/Madam

RE: PIA ACT Submission – Missing Middle Planning Reforms

Executive Summary

Summary

PIA ACT welcomes the opportunity to provide comments on the Missing Middle planning reforms. PIA agrees completely that urban consolidation is necessary in Canberra and has the potential to afford greater housing choice and make better use of existing urban land and infrastructure while protecting natural assets.

Statutory Planning / Strategic Planning connection

PIA ACT was a strong supporter of the planning reforms of 2023 that resulted in a performance-based planning system. We especially supported the introduction of District level strategic planning to establish a stronger 'line-of-sight' between strategic planning and statutory planning in the ACT, through District Strategies being reflected in policies in the Territory Plan.

PIA ACT considers that ongoing place-based planning together with infrastructure planning as outlined in the District Strategies to complement the 'compact city' opportunities that the current Missing Middle reform presents is critical to the success of these reforms.

Residential Zone Policies

PIA ACT considers that the change in Policy Outcomes, together with the limited connection to Assessment Outcomes, warrants all future applications being required to demonstrate compliance with this Policy Outcome, not just the Assessment Outcome. The Residential Development Outcome Report template should be amended to reflect this. This should necessitate an explicit character statement outlining the existing neighbourhood characteristics and a design statement that explains how the new development respects valued features (through a detailed explanation of what those specific features are for the neighbourhood in which the development is located) and avoids adverse impacts.

Development Standards

While PIA ACT generally supports the changes to Technical Specifications as they serve the overall aim of creating a more navigable and user-friendly development control framework which PIA also supports, we urge CED to reconsider the following standards: Density target; Solar fencing; Unit titling; Driveways; Visitor Parking

PIA ACT also encourages CED to consider a stronger legislative framework to confirm that the Technical Specifications sit outside the Territory Plan and are a guide only with no statutory weight. The primary requirement of a DA is to satisfy the Policy and Assessment Outcomes.

Design Guide

PIA ACT supports the scope and content of the proposed Design Guide but encourages CED to continue with place-based planning as outlined in the District Strategies to complement the provisions of the Design Guide and enhance 'compact city' opportunities that the current Missing Middle reforms present.

Levels of DA Documentation

PIA ACT encourages CED to be more consistent with acceptance of documentation for DAs. PIA ACT also encourages the Chief Planner to issue 'Industry Guidance Notes' that supplement the DOR templates to assist applicants to provide appropriate levels of documentation for various DA types.

Implementation Role for TPA

PIA ACT encourages CED to implement ongoing internal training to ensure all assessment staff are consistent in their approach to consideration of Assessment Outcomes.

PIA ACT also encourages the Chief Planner to issue 'Industry Guidance Notes' to assist applicants to understand the key elements that will be considered by the Planning Authority as part of evaluation of DA documentation against the Assessment Outcomes.

PIA ACT encourages the TPA to undertake a review of the current 6-stage DA assessment model, including seeking industry feedback to inform such a review.

Fiscal Policy

PIA ACT encourages CED to work cooperatively with the Treasury department and industry to review current fiscal policy and its influence on financial viability of missing middle housing, noting that it has the potential to 'make-or-break' the uptake of missing middle reforms.

PIA Planning Institute Australia

Introduction

The Planning Institute of Australia (PIA) is the national association representing professional town planners throughout Australia. The Institute has a total membership of about 5,500 people. The ACT Division of the Planning Institute of Australia (PIA ACT) is led by a committee of members who voluntarily help advance the planning profession in the ACT.

PIA ACT welcomes the opportunity to provide comments on the various documents comprising the Missing Middle planning reforms. We also appreciate the opportunity PIA members have had to participate in the Technical Advisory Group (TAG) and Pool of Practitioners (POP) as well as inputs to the preparation of background studies and research leading up to the current draft. It is stressed that members who have participated in background work for EPSDD (now CED) have not participated in the preparation of this submission.

PIA ACT committee members have reviewed each of the documents forming part of the public exhibition. This includes:

- Missing Middle Housing Design Guide – Engagement Copy
- Missing Middle – Snapshot
- Missing Middle – Comparison Table
- Draft Missing Middle Housing Reform – Supporting Report
- Draft Major Plan Amendment – DPA-04
- Draft Residential Zones Technical Specifications – Missing Middle Reform
- Draft Subdivision Technical Specifications – Missing Middle Reform

Our submission, outlined in the following pages, is structured in the following manner:

Statutory Planning / Strategic Planning connection ('line-of-sight')

Residential Zone Policies

Development Standards

Design Guide

Levels of DA Documentation

Implementation Role for TPA

Fiscal Policy

1. Statutory Planning / Strategic Planning Connection

PIA agrees completely that urban consolidation is necessary in Canberra and has the potential to afford greater housing choice and make better use of existing urban land and infrastructure while protecting natural assets.

PIA ACT was a strong supporter of the planning reforms of 2023 that resulted in a performance-based planning system. We especially supported the introduction of District level strategic planning to establish a stronger 'line-of-sight' between strategic planning and statutory planning in the ACT, through District Strategies being reflected in policies in the Territory Plan.

However, we are concerned that upon review of available documents, there seems to be missing links between the District Strategies and the proposed Missing Middle controls. We note that the *Supporting Report* states that the changes respond to the ACT Planning Context including the ACT Planning Strategy and District Strategies, but there is a lack of information about how the place-based considerations contained in the District Strategies have been considered in preparing the changes.

We note that in 2023, the *District Strategies Indicative Implementation Report* stated that *"In the future, more detailed investigations and planning will refine the extent of and likely yields from potential urban regeneration areas in each* district*."* It was accepted at the time that further detailed place-based planning in conjunction with infrastructure planning would be adopted as a 'whole-of-Government' approach to planning and delivery (refer page 5, District Strategies Implementation Report).

Specifically, one example, the Gungahlin District Strategy, states: *"Further planning will be needed to fully understand the potential capacity for future housing in change areas and in future, in potential urban regeneration areas and any required changes to planning controls." (p30).*

The District Strategies repeatedly state that more detailed future planning will be undertaken to scope where urban regeneration and urban consolidation should be prioritised to allow for infrastructure sequencing and to consider the desired future character of distinct places.

PIA supports this and agrees that urban consolidation is absolutely necessary to achieve sustainable urban growth. However, it is not clear whether the place-based work cited in the District Strategies has been completed and, if it has, how it has then informed the proposed Missing Middle changes.

PIA agrees that a more compact urban environment can allow infrastructure investment and operation to be more efficient, as stated on page 9 of the *Supporting Report*. The Report also acknowledges that increased infrastructure demand will result, and that this "*is expected to be mitigated through appropriate planning and investment in infrastructure throughout the Territory*." This infrastructure planning should be completed in sequence and committed to,

alongside the proposed Missing Middle changes to planning controls – giving effect to the detailed and place-based District Strategies which are supported by robust technical assessments.

Key Point:

1. **PIA ACT encourages CED to continue with place-based planning as outlined in the District Strategies to complement the 'compact city' opportunities that the current Missing Middle reforms present.**

2. Residential Zone Policies

With the removal of current Policy Outcomes that limit the extent of change and effectively entrench original subdivision patterns, it is critical that the new Policy Outcomes are given appropriate weight. In this regard there will be considerable pressure on the Planning Authority's application of the last policy outcome, being: "*Development respects valued features of the neighbourhood and landscape character of the area and does not have unreasonable negative impacts on neighbouring properties.*"

While it is acknowledged that the current template for the Residential Development Outcome Report does not require an applicant to address any Policy Outcomes, the Territory Plan states, "*Development proposals in residential zones will be assessed having regard to the policy outcomes....*" This places the onus on the Planning Authority to ensure their assessment includes an analysis of the relevant area's neighbourhood and landscape character. We note that currently the only connection to an applicant being required to consider neighbourhood character, albeit to a limited extent, is through Assessment Outcome #6, being: "*Adverse impacts of development on surrounding uses (both within a site and on adjoining sites) is minimised and residential amenity protected. This includes between residential uses and between non-residential and residential uses*".

PIA ACT considers that this change in Policy Outcomes, together with the limited connection to Assessment Outcomes, warrants all future applications being required to demonstrate compliance with this Policy Outcome, not just the Assessment Outcome. This should necessitate an explicit character statement outlining the existing neighbourhood characteristics and a design statement that explains how the new development respects valued features (through a detailed explanation of what those specific features are for the neighbourhood in which the development is located) and avoids adverse impacts.

Desired future character for precincts or neighbourhoods should be established in adopted statements to ensure that individual applicants do not need to establish a Policy Outcome from first principles. This will enable applicants to use the template to insert their understanding of valued neighbourhood and landscape character in context.

PIA ACT Committee representatives have reviewed the other proposed changes to the Residential Zones Policy and confirm our support for:

- apartments in RZ1.
- redefining the naming of residential zones.
- adjusting assessment requirements for heights.
- standardised site coverage assessment requirements.
- removal of block density assessment requirements.
- removal of 500m² block size for secondary residences.
- permitting co-housing.
- removal of block size limit for co-housing.

Key Point:

2. **PIA ACT encourages CED to amend the Residential Development Outcome Report template with explicit instructions for applicants to outline the valued neighbourhood and landscape character in which the new development is located and to demonstrate design attributes that respects those characteristics and avoid adverse impact to them.**

3. Development Standards

While the Planning Authority continue to stress that Technical Specifications are not part of the Territory Plan and do not need to be considered if an application demonstrates alternative approaches to meet the Assessment Outcomes, a recent ACAT decision (Khandelwal v Territory Planning Authority (Administrative Review) [2025] ACAT 48) suggests that this approach may not be followed by the ACAT. In that case, the tribunal confirmed that "*... there are two conditions, one is that the development complies with the specifications, the second is that the development comprehensively addresses the assessment outcome. Both need to be met.*" (Point 38(e), page 11).

Assuming the above ACAT decision sets a precedent for the influence (or importance) of Technical Specifications in the DA assessment process, PIA ACT considers that there needs to be a stronger legislative structure to confirm that there is only one "condition to be met": that is the Assessment Outcome. If compliance with the Technical Specification, as stated in the ACAT judgement, is the first condition to be met, this seriously compromises the over-arching success of a 'performance-based' planning system.

In addition, if the Technical Specifications take on a degree of influence in site planning, (beyond that intended under the Territory Plan), it is likely that the real estate industry will simply look at potential density and advertise sites for sale as, for example, "a four unit site" if it is a 600m^2 block (thereby solely factoring in the only development standard that they will be interested in, that being the Technical Specification 'allowing' 67 dwellings per hectare). PIA ACT is concerned that this initial marketing tool will then be the dominant factor in ongoing site planning and design with developers determined to achieve this density outcome notwithstanding site constraints or neighbourhood characteristics.

Notwithstanding, PIA ACT generally supports the changes to Technical Specifications as they serve the overall aim of creating a more navigable and user-friendly development control framework which PIA also supports.

However, we urge CED to reconsider the following standards:

- ***Density target*** – The proposed density targets of 54 dwellings per ha for attached housing and 67/ha for apartments (with allowance for more if basement parking is provided) are optimistic and have potential to have a significant impact to the neighbourhood character and landscape values within areas zoned RZ1. We note there are no similar targets for other residential zones. We consider that these targets should not be included in the Technical Specification. The first reason not to include the target is outlined above in that the marketplace will establish this density control as the determining factor in sale price and subsequent development outcome. The second reason is that based on the recent ACAT decisions quoted above, Technical Specifications should not include 'open-ended' development standards (i.e. the statement "more can be considered if parking is contained within a basement" is not appropriate). A Technical Specification should be a finite quantitative statement that a proposal either meets or fails to satisfy in 'black and white' terms. It should not be open to interpretation that under some undefined circumstance that "one more unit might be allowed" or "a few more", but under another circumstance "a lot more units might be allowed", without any reference to what is a few, or lots of, units.
- ***Solar fencing*** – PIA ACT is concerned about the appropriateness of the change in the solar fencing control from 31 to 45 degrees, given that sun altitude in Canberra is approximately 32 degrees at midday during Winter. There does not seem to be sufficient evidence that the "solar fence" or solar envelope provides sufficient flexibility to enable a good planning

outcome. We consider that it would be more appropriate to have controls around adequate internal solar access to the proposed development and maintenance of adequate solar to adjacent residential uses (living areas and private open space). The control is quite restrictive/prescriptive but doesn't appear to take into account the arrangement and design of an existing building on a neighbouring site. We note that 45 degrees is the prevailing sun angle on April 20 and August 22. This means that for a third of the year a dwelling to the south could be in shadow. We submit that there is no need to restrict the envelope of the building on a site to the degree required by the solar fence control if there is no impact on solar on the neighbouring property (or properties). We consider that a better outcome would be to require applications to demonstrate (for example) retention of 50% solar access in midwinter to adjoining POS and 3 hours of solar to any living areas (which would entirely relate to things like positioning of windows).

- ***Unit titling*** – We understand that (within RZ1) unit titling of units built on blocks over 600m^2 will be permitted. We also understand that land subdivision of existing leases will be permitted if each new block is over 350m^2 (i.e. existing lease is over 700m^2). It is not clear why there is a difference between the unit title development standard and the land subdivision standard. In addition, it seems that an owner of an existing house on a 700m^2 block could construct a secondary residence, which does not trigger any LVC. After construction the block could be subdivided and the secondary residence (which would now be defined as a 'dwelling') could be extended beyond the 90m^2 floor area limit. This seems to be an opportunity for applicants to subvert the intended development (and Government charges) process.
- ***Driveways*** – The potential for increased multi-unit housing on existing detached dwelling sites increases the likelihood that those blocks will be designed with additional driveways and verge crossings. We suggest that additional Assessment Requirements be included in the Draft Major Plan Amendment to prevent redevelopment proposals from unreasonably increasing the extent of driveways across the verge. We understand that the (former) TCCS had policies to discourage second or wide driveways across the verge, but we feel this should be strengthened via the planning reforms.

- **Visitor Parking** – PIA ACT supports the reduction in development standards for residential car parking. However, we consider this should be accompanied by development standards or policies that prevent visitor parking on the verge. This could be achieved by requiring developments to undertake physical works in the verge that prevent parking but enhance pedestrian movement. It is a common occurrence throughout suburban Canberra (particularly where layback kerbs are prevalent) that verges are covered in decomposed granite or similar material which encourages cars to park on the verge and force pedestrians to walk on the roadway.

Example of a recent dual occupancy where all street vegetation was removed and the verge covered in loose gravel, allowing cars to park over the existing pedestrian footpath PIA-ACT are concerned that this example has become commonplace in suburban areas.



Key Point:

3. **PIA ACT encourages CED to consider a stronger legislative framework to confirm that the Technical Specifications sit outside the Territory Plan and are a guide only with no statutory weight. The primary requirement of a DA is to satisfy the Policy and Assessment Outcomes.**

4. Design Guide

PIA appreciates the consideration of design principles and Canberra's unique combination of built and natural elements given in the Missing Middle Housing Design Guide. The use of typology illustrations and other drawings throughout the Guide is also supported.

Along with the appreciation of existing built form and character, there should be a stronger statement of intent for the character of Canberra's streets and neighbourhoods incorporating both natural and urban values.

The proposed Guide is supported as a means of raising the overall standard of development on individual sites – but cohesive urban design outcomes will not be achieved without a clear image of the desired built environment, supported by design objectives and guidance.

Key Point:

4. **PIA ACT encourages CED to continue with place-based planning as outlined in the District Strategies to complement the provisions of the Design Guide and enhance 'compact city' opportunities that the current Missing Middle reforms present.**

5. Levels of DA Documentation

PIA ACT notes that the templates provided to assist with preparation of the Development Outcome Report continually urge applicants to refer to the instructional page for directions on what to include in an outcomes response and that the instructions advise that "*The outcomes response must outline how the outcome has been met (just stating 'complies' with no further justification is not sufficient)*".

However, occasional anecdotal review by PIA ACT members of DAs lodged over the last year indicate this desired documentation outcome that is accepted by the Planning Authority is not always consistent. While we do not wish to highlight individual applications, our members note that there are occasions where the Planning Authority have accepted a simple "complies" (or equivalent) response to an Assessment Outcome with no further advice provided.

PIA ACT initial and ongoing support for the performance-based planning system was premised on the understanding that there would be increased onus on an applicant to demonstrate compliance with the Assessment Outcomes.

PIA ACT accepts that the extent and scope of documentation for any DA should reflect the significance of the development and its potential impact. However, we do not believe that a simple "complies" response is acceptable.

Key Points:

5. **PIA ACT encourages CED to be more consistent with acceptance of documentation for DAs especially with regard to demonstrating compliance with assessment outcomes.**

6. **PIA ACT also encourages the Chief Planner to issue 'Industry Guidance Notes' that supplement the DOR templates to assist applicants to provide appropriate levels of documentation for various DA types.**

6. Implementation Role for TPA

As outlined in the above points, PIA ACT notes that the success of the Missing Middle Housing Reforms and indeed the Territory Plan 2023, from an urban character outcomes focus, rests with the manner in which the development standards and performance measures are implemented by officers within the Planning Authority.

PIA ACT considers that the implementation of the Missing Middle Housing Reforms presents an ideal opportunity to review the current DA assessment process. We are concerned that the 6-stage assessment process is not achieving the consistency in decision-making that the 'performance-based' planning system demands to ensure its overall success.

PIA members would be happy to assist in a review of the current staged assessment process, particularly offering detailed feedback from an applicant's perspective. We feel that a greater continuum of assessment by specified assessment officers, particularly on major development proposals, may be a more efficient procedure leading to more consistent decision-making.

Key Points:

7. **PIA ACT encourages CED to implement ongoing internal training to ensure all assessment staff are consistent in their approach to consideration of Assessment Outcomes.**

8. **PIA ACT also encourages the Chief Planner to issue 'Industry Guidance Notes' to assist applicants to understand the key elements that will be considered by the Planning Authority as part of evaluation of DA documentation against the Assessment Outcomes.**

9. **PIA ACT encourages the TPA to undertake a review of the current 6-stage DA assessment model, including seeking industry feedback to inform such a review.**

7. Fiscal Policy

PIA ACT acknowledges that the Government's fiscal policy is not the responsibility of the Planning Authority, however, if the Missing Middle Housing Reforms are to achieve over-arching Government objectives, there needs to be a 'whole-of Government' approach, not just a change to development controls. In addition to changing the planning framework, the overall success is contingent upon the financial viability of the types of development proposed through these reforms.

The proposed Missing Middle Planning reforms appropriately focus on how the urban structure can be reformed to assist in achieving compact city objectives. However, other objectives to increase housing stock and typology will only be achieved if the development opportunities facilitate a level of 'development viability'. The action of redeveloping existing detached housing will only occur if the development industry (including "mum & dad" investors) can realise an appropriate

level of return on investment. In this regard, development viability has been significantly influenced in recent years by factors such as increased price of land, cost of construction, and increases in the ACT Government's lease variation charge.

PIA ACT broadly supports the ACT Government's measure to capture the value of windfall uplift gains achieved by landowners through a rezoning or lease variation process. However, the level of LVC should be considered as part of a broader consideration of overall housing costs to establish an incentive for redevelopment to achieve Missing Middle Housing typology.

Key Point:

10. **PIA ACT encourages the ACT Government to undertake a 'whole-of-Government' review of the approach to costs and charges for missing middle developments, undertaken concurrently with the implementation of the Missing Middle Reforms and in conjunction with industry representatives.**

Yours sincerely,



From: [redacted]
To: EPSDD Communications
Subject: Personal Submission on 'Missing Middle Housing Reform' proposals by ACT Government.
Date: Saturday, 26 July 2025 3:33:01 PM

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Caution: This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madam,

The proposals by the ACT Government on the 'Missing Middle Housing Reform', while aiming to both increase public housing stock and enable older residents to "age in place", are likely to achieve neither objective well and create other, undesirable consequences.

First, as an older resident who has downsized and moved into an apartment in inner south Canberra, I can verify that the move has cost me dearly. High rates and exorbitantly expensive corporate fees (the norm for apartments in Canberra, I understand) mean that I pay more in compulsory fees to live in an apartment than I ever did in a much larger house a mere two blocks away. In addition, there is a reduction in privacy, restricted decision making about my property and little in terms of a garden to enjoy in an apartment.

Consequently, I would not recommend apartment living for older residents. While town houses may be seen as an alternative, they are not suitable for the elderly unless on a single level because of steps and stairs and lack of wheel chair access. Falls are a major cause of disability and death for older people and so homes with steps and stairs are impractical at best and lethal at worst.

For those on limited incomes, current levels of compulsory rates and fees, in otherwise inexpensive apartments, are likely to be prohibitive. This is assuming that all those on limited incomes will not be eligible for public housing and therefore forced to rent or buy.

Secondly, for children, particularly young children, apartment buildings usually lack safe, open places for them to play. This cannot be healthy for children in the long term. Access to safe, green spaces, including enclosed back yards attached to single houses, enable children to exercise and socialise freely. Confinement in a small apartment with the only access to the outdoors being a public park, limits individual freedom and expression.

Thirdly, we know that there is limited water available in the Murray- Darling river system, including the Cotter and Murrumbidgee rivers. Adequate water flows are necessary to maintain a healthy estuarine environment. Increasing Canberra's population significantly can only increase pressure on that system, leading to negative effects for towns and farming communities down stream.

Fourthly, changing the rules for RZ1 and RZ2, as proposed, will likely change the character of many older suburbs in central Canberra for the worse. For example, Forrest, where I live, has a range of homes of heritage value. This value derives in part from who were previous residents (for example, Gough Whitlam, Charles Weston, Sir John Eccles, Alec Derwent Hope, Sir Arthur Tang and others lived for a time in Forrest). Heritage value may also derive from the architects who designed many of the homes (for example, Parkes and Oakley, Roy Grounds, Ken Oliphant, Enrico Targlietti and others).

Even less well-known architects have contributed styles and features in older buildings that represent ages and stages in the development of this city. Many of these older homes have been solidly constructed from local bricks, tiles and woods from the cork and pine plantations planted early last century for the specific purpose of constructing the new capital city.

I believe that Canberra has so little of historical and heritage value that we should seek to preserve, cherish and support what we do have. In this context, note could be taken of the construction restrictions applying in other capital cities, particularly in their central areas. Cities like Washington, Paris, London and Berlin restrict the population and/or the height of buildings allowed in their inner areas. This is done in a bid to preserve their

unique character and emphasise the special status of these areas.

This leads me to my last, and for me, my most important point - the probable impact of these policy changes on the local environment.

Old Canberra is known for its wide, tree lined streets and domestic gardens. These, particularly the latter, contribute significantly to temperature mediation across the city. With increasing extremes in temperature a likely consequence of climate change, stabilising the temperature in built up areas is becoming a priority in cities world wide. In addition, green spaces, including domestic gardens, provide vital spaces for local wildlife. This includes birds, reptiles, small animals and beneficial insects like butterflies, bees and dragon flies.

During my twenty two years in a house in Forrest I recorded visits by a range of animals and birds, including rarer birds such as gang-gangs, whip birds, bell birds, hawks, superb blue wrens (who nested in my camellias), lorikeets and honey eaters. Increased densification will threaten these as well as the more commonly observed species.

In conclusion, I wish to acknowledge and support the submission on these proposals by the Inner South Canberra Community Council.

Yours sincerely

[redacted]

[redacted]

Submission on Missing Middle Housing and Infill Development

To: ACT Government – Planning Directorate

Re: Considerations for Solar Access, Privacy, and Amenity in Missing Middle Housing Developments

I am writing to provide feedback on the ACT Government's approach to "missing middle" housing and infill development. While I appreciate the intent to increase housing diversity and supply, I urge the Government to ensure that any future developments protect the amenity, sustainability investments, and liveability of existing neighbourhoods.

1. Protecting Solar Access and Sustainability Investments

Residents across Canberra have made **substantial personal investments** in line with ACT Government sustainability goals, including:

- **Solar passive design**: Many homeowners have designed and renovated homes to optimise winter solar gains through window placement, orientation, and landscaping.
- **Rooftop solar panels**: A significant number of households have installed solar PV systems to reduce emissions, lower energy costs, and contribute to the Government's renewable energy targets.

Any new infill development that overshadows existing properties—especially multi-unit or multi-storey dwellings—will directly **erode these investments**. This is not only financially unfair to existing residents but also **undermines the Government's stated climate and sustainability priorities**.

We strongly recommend that **solar access protections be enshrined** in planning codes for all infill developments. This includes minimum sunlight access standards for neighbouring properties in midwinter and preservation of existing solar energy generation potential.

2. Privacy and Overlooking

Increased housing density, particularly through medium-density and multi-storey developments, **poses significant privacy concerns**. Overlooking of backyards, living spaces, and previously private areas would materially impact residents' amenity and enjoyment of their homes.
To address this, developments should include:

- **Mandatory privacy screening** (e.g., frosted or louvered windows, setbacks).
- **Height and design limits** that minimise direct overlooking into neighbouring properties.

3. Traffic, Parking, and Noise

The proposed infill developments will inevitably lead to:

- **Increased street traffic**, raising safety concerns for pedestrians, cyclists, and children.
- **On-street parking pressures**, particularly in older suburbs with limited road widths and no off-street parking provisions.
- **Higher ambient noise levels**, reducing residential amenity in currently quiet neighbourhoods.

Any planning reforms must include **robust requirements for off-street parking** and measures to manage increased vehicle flows.

4. Neighbourhood Character and Infrastructure

Residents value the established **character of their suburbs**, including tree canopy cover, open space, and low-rise profiles. Higher-density infill without careful design will **erode this character** and reduce green space. In addition, **local infrastructure (roads, drains, schools, health services)** must be upgraded before significant densification occurs.

Conclusion

The ACT Government's housing strategy must **balance the need for increased housing** with the protection of existing residents' investments in sustainable living, their privacy, and the liveability of their neighbourhoods.
I call for:

- **Stronger solar access protections** for existing properties.
- **Mandatory privacy and setback controls**.
- **Adequate parking and traffic management measures**.
- **Investment in infrastructure and green space** to support increased density.

Without these safeguards, infill development risks **diminishing the sustainability, amenity, and quality of life** in our communities.

Thank you for considering this submission.

Yours sincerely,

[redacted]

From: [redacted] on behalf of CMTEDD, Our Canberra
To: [redacted]
Subject: FW: Middle housing reforms
Date: Monday, 28 July 2025 12:45:28 PM

OFFICIAL

Hi [redacted]

We received this piece of Missing Middle feedback that I wanted to pass on to your team.

Kind regards, [redacted]

[redacted]
Communications & Engagement | Chief Minister Treasury and Economic Development Directorate | ACT Government
220 London Circuit, Canberra City | GPO Box 158 Canberra City ACT 2601 | www.act.gov.au

-----Original Message-----
From: [redacted]
Sent: Sunday, 27 July 2025 6:15 PM
To: CMTEDD, Our Canberra <ourcanberra@act.gov.au>
Subject: Middle housing reforms

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Caution: This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good evening,

I read today in the Our CBR newsletter that you are considering housing reforms. I would like to make some suggestions.

Most importantly better building standards and quality. I can't count the number of apartments I have considered purchasing and then you read the strata reports and discover there are serious failings in the build quality, the cost of which ends up being born by residents. This is unacceptable and easily avoidable. The ACT government should be doing more to enforce building standards and ensure buildings are of good quality. Bad buildings do nothing to improve the welfare of Canberrans and aren't helping to reduce the impacts of climate change.

I'm very supportive of town homes and apartments, but the ones built in Canberra are so small and pokey (in addition to being badly built), that they're unliveable. If people are going to live permanently in apartments, they need space, room to store their life's belongings. There also need to be more 3 and 4 bedroom apartments to accommodate families. You can't have a city entirely made up of single people and couples.

On building design, there needs to be more green space. I'm appalled going to the new developments at how much concrete there is and how little green space and trees. In the new Woden development, it's entirely possible to look around and not see a speck of green, either in the development or in the distance. What makes Canberra special as a city is the amount of greenery, not just nearby in parks and reserves, but throughout the urban landscape. It's incredibly disappointing that the new urban planning is erasing this.

Many thanks for your consideration.

Warm wishes,





[redacted]

MISSING MIDDLE HOUSING REFORM SUBMISSION

28.07.2025

INTRODUCTION

- My comments are limited to Suburban Zone (RZ1) and Suburban Density Zone (RZ2)
- The proposed reforms are largely supported, with the recommended tweaks listed below. Generally, they suggest less numerical controls and a simplification/standardisation of how the controls are applied and some ideas for facilitating the good design solutions to meet the Missing Middle objectives and housing targets.

GENERAL

- Recommend that all numerical controls in policy documents and tech specs are discretionary (non-mandatory), meaning that if numerical controls are exceeded then the development application would be subject to a DA assessment process (including 1N). If mandatory controls are considered necessary, then can this be clarified.
- Recommend that if multi-unit development proposals comply with Residential Zones Policy, Subdivision Policy and Technical Specifications then they are assessed as exempt (or complying) developments and therefore not subject to DA approvals.
- Recommend that larger developments (eg: consolidated sites over 3000 square metres) should still be subject to a DA assessment and design review panel process.
- Recommend the establishment of a Missing Middle Development Authority (potentially part of the Suburban Land Agency) to facilitate high standard multi-unit developments in existing suburbs, particularly consolidated block developments. They could work directly with neighbouring lessees, facilitating the potentially daunting process of design, approvals, financing, contracting and construction.

TARGETED DEVELOPMENT

- Recommend prioritising and incentivising Missing Middle development in suburban precincts that have the least appropriate housing options for their residents, possibly through a revamped District Strategies process. Suburbs like Kaleen would qualify – they have 20% of residents over 65 and only 9% medium density housing. Targeting of such areas may also lead to revitalisation of local shopping centres. It would also free up family homes for younger families.
- Recommend the construction of demonstration housing in such areas by a Missing Middle Development Authority (or the Suburban Land Agency).

ZONING

- Recommend merging of RZ1 and RZ2 zones into one Suburban Low-Mid Density Zone as the proposed reforms make them very similar with the main distinction being an extra storey being permitted in RZ2.
- This recommendation is further supported when block amalgamations in an RZ1 zone are taken into account. It would be counterproductive to limit the number of stories on larger amalgamated sites when the extra density might be required for project feasibility and to meet housing targets. The higher yield would also increase housing choice for older resident, and those with disabilities, to remain living in accessible low rise apartments within their existing neighbourhoods. Overall building height and envelope controls would ensure suburban character is maintained.
- If a separate RZ2 zoning is retained, then then I recommend that development proposals must provide an increase in occupancies (or demonstrate the potential for such an increase in the future). It's so disappointing to see large single residences rebuilt on these prime sites, failing to capitalise on the opportunities to create higher densities.

[redacted]

HERITAGE and CHARACTER PRECINCTS

- Recommend a separate policy (and design guide) be established for heritage sites drawing on the Bluefield Housing model developed by Damian Madigan (University of South Australia) which encourages densification while retaining existing building fabric and shared landscape.
- Recommend incentives be implemented (for example, an exemption from LVC) to encourage retention of existing building fabric outside of heritage precincts. Sadly, many great examples Canberra's mid-century homes, and their gardens, have been razed and replaced with much larger (and often characterless) homes.

BLOCK and SUBDIVISION CONTROLS

- Currently leased blocks configuration (Subdivision Specification 2.2): Recommend minimum area controls for RZ1 and RZ2 be consistent - 300sqm rather than 350sqm for RZ1 and 300sqm for RZ2 (excluding the battleaxe handles). This would be better correlate with the proposed minimum of 600sqm.subdivision and unit titling controls for blocks over
- Currently leased blocks - frontage of RZ1 blocks (Subdivision Specification 2.4): Recommend removal of conditions for street frontage or frontage to urban open space or community path (note that the Missing Middle Design Guide itself shows mid-section blocks with detached homes one behind the other).
- Subdivision Design Application (Subdivision Specification 3.2): Recommend removal of restrictive percentage controls on compact and mid-sized blocks. These should address the housing needs of the specific precinct.

BLOCK CONSOLIDATIONS

- Recommend incentives be implemented to encourage block amalgamations , particularly adjacent to urban amenities such as shops, parks, educational, health and public transport infrastructure.
- Scale and location of consolidated RZ1 blocks (Subdivision Specification 2.5): Recommend a more flexible approach than the specified area controls. There have been successful examples in the past on much larger sites that have yielded higher densities and generous landscape zones (such as the Kingston Towers development in the 1980's)
- Recommend a Missing Middle Development Authority (like the SLA) be stablished to facilitate block consolidations and redevelopment of compact, appropriate housing to provide for existing residents to age in place and affordable housing options for new residents.

HEIGHTS

- Recommend removal of control for number of stories (Residential Zones Policy) BUT retention of overall height control (Technical Specifications). Height plus building envelope controls will suffice and allow for more creative design solutions (eg: variable floor levels within overall height/envelope controls).
- Clarify that two storeys plus attic AND basement are allowed in RZ1 (also confirming that basements can be used for other than storage and vehicle accommodation).
- Recommend increasing the allowable height of attic roofs from 35 to 45 degrees to provide useable floor space.

SETBACKS

- Front Boundary Setbacks (Residential Zones Specification 14.3): Recommend a reduction of minimum front setbacks from 6 metres to 4 metres on all sites (both single and multi-unit). This would allow better utilization of sites, allowing for more generous private open space and landscape in the rear zone. It seems illogical to impose larger setbacks in older suburbs where verges tend to be a lot deeper, thereby creating a much greater perception of the combined landscape zone from the roadside kerb to the building line.
- Recommend standardisation of setback controls in Residential Zones Specification (Front setback Controls Tables 1-4) by removing the (no longer relevant) distinction between post and pre-1993 blocks and applying the 4m front setback to all blocks).
- Ditto with garage setbacks which are increased from 5.5m to 6m in older blocks. Pedantic and unnecessary.
- Ditto with setbacks to open spaces/paths regardless of their minimum dimensions. Pedantic and unnecessary.
- Recommend removal of new setback rule imposing a maximum front setback of 8 metres to allow optimal aggregation of private open space and landscape in the rear zone. Or, in cases where the front of the block is orientated to the north, then it makes sense to deepen the front setback to cater for the principal private open space and landscape zone at the front of the block (potentially behind a courtyard wall).

[redacted]

SOLAR BUILDING ENVELOPES

- Solar Building Envelope (Residential Zones Specification 15.1): Recommend consistency and equitability so that impacted neighbours are assured of solar access regardless of whether their northern neighbour is part of a single residence or multi-unit property. Therefore, recommend standardising the solar fence height to 3 metres (in both front and rear zones) but with retention of 31 degree angle (or slight increase to 35 degrees).

DEMONSTRATIONS

- Facilitate demonstration projects in various precincts showcasing good design practices.
- Provide more Information of the proposed Online Map identifying well designed examples of various missing middle typologies
- Provide information on the proposed Pattern Book to accompany the Missing Middle housing guide. Note that the pattern book needs to address the demand for accessible housing for our older residents to age-in-place within their established communities. Two storey townhouses or walk-up apartments are not likely to be suitable.

How antiquated that ACT is trying to create the missing middle but considers basement garages as a 2nd story of a house. Just not sure any other states in Australia have such a ridiculous bylaw.

Maybe the missing middle is describing what is between the ears of the ACT planning department

PLANIT

Strategic + Transport Town Planning

30th July 2025

Missing Middle Planning Amendment – Review & Discussion

Introduction

This document presents a brief overview of the proposed Missing Middle Housing Reform.

The overview is based on a review of the following documents:

- Draft Major Plan Amendment to the Territory Plan 04 (May 2025)
- Supporting Report - Missing Middle Housing Reforms Amendment 04
- ZS1 Residential Zones Specifications – Proposed Amendments
- SS1 Subdivision Specifications – Proposed Amendments
- ACT Missing Middle Housing Design Guide (Draft)
- Planning and Economic Feasibility, Integrating the Missing Middle in RZ1 and RZ2 (Purdon, October 2024)
- Missing Middle Housing Reform Comparison Table
- Missing Middle Housing Reform Snapshot

The Snapshot document is a very good summary of the proposed changes.

Key Messages

The documents contain the following key messages:

- The reforms target residential zoned land.
- There is an identified need for more housing. The ACT's population is currently around 470,000 people and by 2050, the population is expected to reach almost 700,000 people. To support this anticipated growth in population, the ACT will need to provide 30,000 new homes by 2030 and up to 100,000 new homes by 2050.
- The intention is to provide 70% of this housing as infill development. The supporting report acknowledges the policy intent to limit the need for new greenfield develop and urban sprawl.
- 'Missing Middle' is defined as multi-occupancy (dual and tri-occupancy), townhouses, terrace homes and low-rise apartments (up to three storeys).
- The reforms consist of changes to Territory Plan Policies and supporting documents such as Technical Specifications and the introduction of the new Missing Middle Housing Design Guide.
- The supporting report acknowledges that planning policy change is not the only requirement. "However, industry advises that high interest rates, high construction costs, Lease Variation Charges, existing lease conditions and other regulatory approvals required are significant barriers to development." P16.

Draft Amendment 04

Draft Amendment 04 proposes to introduce changes to the Territory Plan, including:

- Removal of maximum dwelling size for dual occupancy projects.
- RZ1 & RZ2 - No minimum block size for dual occupancy. More than 2 dwellings permitted.
- Allowing unit titling on RZ1 blocks greater than 600 m^2.
- Allow apartments in RZ1.
- RZ1 blocks can be consolidated (but can't further consolidate previously consolidated blocks, and consolidation must result in an increase in dwelling numbers).
- Allow secondary dwelling on any size block.
- Height controls in storeys rather than metres. RZ1 remains 2 storey.
- Allows taller building envelope for multi-unit versus single dwelling. Effective outcome is RZ2 at 3 storeys (increase of 1). RZ3 at 4 storeys (increase of 1), RZ4 at 6 storeys (increase of 2). RZ5 stays at 7. This will incentivise multi-unit development over large single dwellings.
- Removal of density controls (but retaining site coverage controls).

The anticipated outcome is that building envelope controls are generally retained (with modest additional height and other amendments), but there is no restriction on the number of dwellings within the envelope.

In many older areas of Canberra the existing housing stock is much smaller than the currently permitted building envelope. When these blocks are being redeveloped a single large house is typically being constructed. This is changing the character of some of these areas – a change that is already underway. The reforms will encourage multiple smaller dwellings within a similar building envelope increasing the housing supply while achieving a character change that is similar to what is already occurring.

The Amendment also Renames the Residential Zones and updates the Policy Outcomes statements.

The amendment is not proposed to have interim effect.

Technical Specifications

Numerous changes are proposed to the relevant Technical Specifications.

Changes include

- Reduced parking ratios.
- Density targets (RZ1 = 54 dwellings per hectare for attached houses, 67 for apartments) [these targets are high – 54 dwellings per hectare is one dwelling per 185 m^2.]
- Slightly reduced planting area, but increased canopy coverage.
- Minor changes to building envelope.

The controls in the Technical Specifications are not compulsory, and the specifications are notifiable instruments so can be updated without the need for a Territory Plan Amendment process.

Missing Middle Housing Design Guide

The Missing Middle Housing Desing Guide will apply to multi-unit housing of 3 storeys or less, and/or subdivision or consolidation of RZ1/RZ2 for missing middle housing.

The existing Housing Design Guide will continue to apply to multi-unit housing 4 storeys and above.

Multi-unit housing proposals are expected to respond to one or the other housing design guide, not both.

No change is proposed to the other design guides (BSUD, UDG, City).

Note that the Missing Middle Housing Desing Guide could be introduced without the Territory Plan Amendment. It would still help developments that are delivering smaller multi-unit projects under the current policies.

Observations on the guide

- It is long and detailed for a guide that is intending to simplify the planning process for smaller developments. The final version could focus on removing background information, duplication or non-critical information.
- It appears to assume that it will only be applicable in redevelopment scenarios but is likely to be used on many greenfield sites within new estates.
- It seems to assume (Page 2) that all missing middle housing will be delivered in areas that contribute to walkable neighbourhoods – but this is unlikely to be the case where larger RZ1 blocks that would facilitate redevelopment, are typically around the perimeter of older suburbs.
- Reference to using the design guide to inform courts and tribunals (Page 5) is potentially concerning. Depending on how this is used, it runs the risk of converting the design guidance into strict planning controls.
- Reference to 'greater diversity near activity centres, employment areas and active travel' on page 5 is not necessarily reflected in the proposal. The proposal allows for missing middle everywhere, not just in well located areas.
- The design guide identifies 4 principles. This adds to the multiple sets of principles, drivers and themes in the planning system that don't necessarily correlate to each other. For the planning system to be coherent from strategic planning through to project delivery, all documents should align with the 10 principles of good planning identified in the Planning Act 2023.
- The application of the guide needs to be clear if it is for multi-unit housing 'and/or' the subdivision clause in the applicability statement.
- The disclaimer on page 13 should also be present adjacent to the reference to courts and tribunals on page 5. "*The building examples and conceptual drawings presented in this design guide are not to be taken literally. They are aimed at demonstrating particular concept and not necessarily a holistic design outcome, and will not guarantee a development approval*."
- The approach seems to presume that missing middle housing will be delivered on RZ1 & RZ2 blocks only. It is conceivable that it would be delivered in other zones, including commercial zones. The guide should contemplate this scenario.
- Where there are numerical measures, there is a risk that these will be seen as default rules. For example, page 32 identifies Block sizes greater than 800sqm for triple occupancy. If this intended to be a planning control it should be in the policy.
- 3.3C iv suggests that all dwellings should meet the sizes in the specifications. This is misleading as the specifications are not supposed to be a default rule.
- 3.4A i Should reference height 'assessment requirements' rather than regulations.
- 4.1A vi encourages shared spaces whereas 4.1B i encourages separation of pedestrians, vehicles and cycles. This seems contradictory.
- 7.1C i encourages native species and the minimum of exotic species. 7.1C v encourages the use of deciduous trees for summer shade and winter sun. This seems contradictory.

An overall review of the guideline suggests that it provides a comprehensive checklist of matters to consider when preparing a proposal for missing middle housing.

General Observations

As noted in the supporting documents, missing middle housing is not new to Canberra.

The RZ2 zone was introduced prior to 2007 to bring medium density redevelopment to well-located areas close to the local shops. Based on data collected by PLANIT, there are about 14,500 RZ2 blocks in Canberra and about 12,000 of these blocks still contain just one dwelling. Of these single dwelling RZ2 blocks, about 5000 are larger than 800 m^2 in area. This suggests that there has been a material opportunity for missing middle housing, available for the past 20 years, that has not been taken up. This suggests that planning changes alone will not result in significant delivery of missing middle housing projects.

Within the current planning system, missing middle housing can be delivered in RZ2 and higher residential zones (and commercial zones). An alternate approach to the currently proposed changes would be to upzone land in targeted areas where missing middle housing would be highly desirable. For example, make some of the RZ1 areas into RZ2, and some RZ2 areas into RZ3 etc. This approach could preserve some areas of RZ1 in its current predominantly single dwelling form which could be appropriate. The current approach runs the risk of having missing middle housing delivered in easy locations (probably around the periphery of a suburb) rather than desirable ones (closest to the shops).

The supporting documents discuss the need for up to 100,000 new homes in Canberra by 2050 but do not provide any overall summary of where these homes are expected to be delivered. Based on the 70% infill target, 30,000 homes will be in greenfield estates. It is not clear what percentage of the 70,000 other new homes will be apartments at commercial centres, transport nodes and corridors, and what percentage is expected to be delivered within existing suburbs through the missing middle reforms. It would be useful to provide this information to allow the community to understand the anticipated rate and scale of change.

It is noted that there is no overall discussion about the transport impacts of these changes. The expectations about rate and scale of change should be used to inform a discussion about overall transport changes. It is acknowledged that parking and traffic issued will be addressed a DA stage for individual projects, but these will never account for the overall cumulative effects. Uncertainty about traffic and parking is often a significant issue expressed by opponents of development applications.

These reforms provide for additional density in residential zones, but typically the best place for additional density is within the commercial centres themselves. While it is not a compulsory control, the Commercial Zones Technical Specification (14.1) suggests a maximum building height of 2 storeys in Group Centres, Local Centres (CZ4) and the Leisure and Accommodation Zone (CZ6). This technical specification should be changed to avoid being contrary to the intention of the missing middle reforms.

Overall, planning reform is supported with the intention of delivering more housing in well located parts of Canberra. The philosophy of controlling built form rather than the number of dwellings is supported. The proposed reforms seem reasonable with the following caveats:

- There is no guarantee that changes to the planning controls alone will result in the delivery of missing middle housing. It is likely that an ongoing review of feasibility will be required, and most likely changes to rates, taxes or other government controlled cost elements.
- To help facilitate desirable development outcomes, there could be a broader range of exempt development opportunities based on specific design controls.
- Consideration of the potential for missing middle housing in zones other than RZ1 and RZ2 is required. If nothing else, this needs to clarify the applicability of the design guide.
- Height specifications in Group and Local Centres need to be adjusted.

- It would be reasonable to expect discussion in the supporting documents about the likely impact on future transport arrangements.
- The potential impact on greenfield estates needs to be understood. It is possible that recent estates will result in very different built outcomes compared to the underlying estate design.
- The introduction of developer licencing (which requires a licence for any developer doing 3 or more dwellings) might inadvertently prevent the delivery of small multi-unit projects. The impost of the licence might make it more attractive to develop 2 dwellings rather than 3 or 4. Alternatively it may lead to developments being subdivided into multiple 1 or 2 dwelling projects rather than delivering a single development of more than 2.
- Projects of 5 storeys and above are subject to review by the NCDRP. The increase in height limits in RZ4 means that development in this zone might need referral. This could increase the number of projects being reviewed by the NCDRP, or in some cases the additional height allowance may not be taken up to avoid the additional work associated with presenting to the NCDRP (and then subsequently submitting a significant development application).
- The definition of Missing Middle Housing is identified in the Design Guide rather than in the Territory Plan. It is suggested that the definition should be in the Territory Plan Dictionary.
- In addition to (or possibly instead of) these reforms, there are several areas within existing urban Canberra where upzoning should also be considered. For example, areas of RZ1 that are adjacent to town or group centres, or within a 5-minute walk of light rail stops etc. The image below highlights with warmer colours areas of RZ1 that would be better suitable for missing middle housing based on proximity to services, block sizes and available transport. This highlights areas that would logically be considered for upzoning and hence encourage well placed additional dwellings.



Figure 1 – Example of priority areas for missing middle development (PLANIT dataset)

Master Plumbers ACT

Submission

to the

ACT Missing Middle Housing Reforms

Master Plumbers Association ACT (MPA) was established in 1976 and is the region's peak organisation for the plumbing industry, aimed at supporting a strong and professional industry, a satisfied community, and a flourishing environment. We do this through our support of training excellence, industry leadership, an emphasis on environmental protection and sustainability, protection of public health and safety, and upholding highest ethical standards.

MPA's work importantly brings all groups together to underpin best outcomes for the ACT community & ACT Government through our collaborative endeavours.

Contact:

[redacted]

[redacted]

www.masterplumbersact.asn.au

1. Cover Letter

Master Plumbers Association - Canberra ACT (MPA), as the leading membership association for the plumbing sector, welcomes the opportunity to provide a submission to the ACT Government's Missing Middle Housing Reforms.

The plumbing industry remains a critical component of the ACT economy, contributing significantly to the regional GDP and employing a large workforce of licensed professionals and support staff. The plumbing and the trades sector play a crucial role in the development of housing because it is the trades that hold the hammers.

With that in mind the MPA Board thought it crucial to provide a submission to ensure our subcontracting industry is involved in this discussion as the housing reforms continue to progress.

MPA and the plumbing industry supports missing middle to increase Canberra's supply of homes, drive down housing prices, promote sustainable economic growth, enhance community wellbeing, and support environmental initiatives.

The proposed changes to the RZ1 component of the Territory Plan will allow for subdivision of blocks that are no longer based on a minimum block area presenting the greatest opportunity for growth. Additionally, allowing for design guides that speed up development applications to get construction moving quicker is supported by the MPA.

The subcontracting, trades and plumbing sector will play an important role in the implementation of these reforms particularly when it comes to the scaling up Canberra's construction capacity, the development plumbing plans that are required for homes and ensuring we have the right skills mix and pipeline to build these future homes.

MPA is overall supportive of the reforms, but we do believe there is an opportunity to improve them by involving the trade sector.

There are 2 policy recommendations we would like to highlight in our submission:

1. **Remove the requirement under regulation 16A of the Water and Sewerage Regulation 2001 for an unnecessary duplicated grey / blackwater system to speed up construction, planning, development and increase productivity.**
2. **As part of the housing reform agenda the Government needs to create a skills pipeline for our critical shortage areas in construction, particularly in plumbing, carpentry and electrical.**

More details of these recommendations are found on the following pages.

MPA would welcome the opportunity to discuss these and any other aspects of the housing reforms with you and look forward to taking part in the discussion.

[redacted]

[redacted]

[redacted]

2. About Master Plumbers Association – Canberra ACT

The Master Plumbers Association – Canberra ACT (MPA) stands as the leading membership association for the plumbing sector in the region, driven by our vision of cultivating a thriving and professional industry that significantly contributes to a safe, healthy community, and a sustainable environment.

MPA's membership is diverse and robust, encompassing a wide range of experts in the plumbing sector. This includes policy makers, contracting businesses of all sizes from large-scale operations with over 200 employees to individual sole operators, training organizations, apprentices at various stages of their 6-year journey towards full licensure, product suppliers, and allied organizations.

Our mission at MPA is to empower our members to maintain the highest ethical and professional standards. We achieve this through dedicated efforts in knowledge sharing, professional development, networking, and advocacy.

Our key objectives are:

1. **Promotion of a Professional and Ethical Plumbing Industry:** We advocate for the recognition and advancement of plumbing as an integral and professional industry within government, business, and community circles.
2. **Public Health, Safety, and Environmental Advocacy:** Our focus includes advocating for policies and practices that bolster public health and safety, as well as environmental protection.
3. **Improving Sector Outcomes for Vulnerable Groups:** We strive to enhance outcomes within the plumbing sector for various demographics and groups in the community, particularly those who are vulnerable.
4. **Leadership in Industry Collaboration:** We lead by example in promoting a collaborative environment that encompasses all stakeholders responsible for and working within the plumbing industry.
5. **Support for Training and Professional Development:** Advocacy for the highest standards in training and continuing professional development is one of our key pillars.

With direct engagement with over 480,000 members of the ACT community, MPA is uniquely positioned to positively influence both community health and safety and environmental sustainability. Our commitment to ethical practices and community wellbeing is unwavering. To continue making a substantial impact, we seek the ACT Government's support for our extensive range of programs, as detailed in Appendix 1 of our submission.

Through these efforts, MPA remains dedicated to ensuring the plumbing industry's growth and excellence, ultimately contributing to the betterment of the Canberra community and beyond.

3. Our policy recommendations

Remove the requirement under regulation 16A of the Water and Sewerage Regulation 2001 for an unnecessary duplicated grey / blackwater system to speed up construction, planning, development and increase productivity.

As discussed with ACT Government there is a requirement under ACT Regulations for every new build to have a greywater pipe installed. The ACT continues to be the only jurisdiction where it is mandated that every new building must be built with a duplicated grey/blackwater plumbing system 'just in case' a resident may wish to install a greywater recycling system at some point in the future.

We understand this system was implemented with the forethought that the majority of ACT homeowners would choose to install greywater recycling. However, the reality is that greywater recycling is rarely installed in new or existing properties and is rarely utilised even when available.

Additionally, should an individual wish to utilise greywater for their home at any point they are able to install a system via a whole host of other methods that are cheaper and quicker without the need for this extra pipe to exist. This is the common approach adopted by all other jurisdictions around Australia.

Since ACT brought in this requirement in January 2005 there have been only a handful of examples where members can recall that a homeowner has requested to have it activated.

This unnecessary pipe duplication wastes precious products and skilled labour, which are both in short supply, and causes costly mid-pipe 'sewer-strandings' & subsequent blockages due to a lack of adequate water to flush sewerage through the system.

Should the Government's proposed missing middle reforms progress it will mean that each subdivision, renovation and build will require this extra pipe to be added causing delays and creating extra cost.

Recommendation

The location for this requirement can be found under Part 2 Section 16A of the *Water and Sewerage Regulation 2001* (ACT). We are requesting for this regulation to be removed.

The current regulation adds further costs to the construction of a new home and cause delays in construction by adding in extra pipe planning processes. If the ACT Government were to remove this regulation the benefits would include:

- Alleviating pressure on the skilled plumbing & regulatory labour force;
- Releasing precious plumbing supplies which are currently being wasted;
- Minimising strandings & blockages in sewer lines;
- Minimising water usage to adequately flush drains;
- Reducing expense to homeowners as a result of less clearing of blocked drains;
- Reducing the overall cost for the construction of new homes;
- Reducing delays in the construction of homes;
- Improving waste transportation efficiency performance of the drainage network; and
- Ensuring the industry and community is supporting best sustainability outcomes for ACT's precious water resources

This change will be crucial to progress the Government's housing reform agenda.

As part of the housing reform agenda the Government needs to create a skills pipeline for our critical shortage areas in construction, particularly in plumbing, carpentry and electrical.

While MPA supports the missing middle housing reform agenda we are concerned that the subcontracting and trades industry being the ones that hold the hammer in construction will not have the capacity to meet increasing demands.

Our conversations with industry and ACT Skills have found that trade numbers and apprenticeship commencements are down year on year. This is due to a multitude of factors including a lack of encouragement for those in schooling to enter the trade sector despite the data showing the higher-than-average earning capacity and a lack of incentives for businesses to take on apprentices.

The MPA supports the Government's push to increase employer apprenticeship training subsidies to 90% but believes there is another opportunity to incentivise the uptake of apprentices.

Recommendation

The MPA recommends that the ACT Government provide a payroll tax exemption for apprenticeship wages.

Payroll tax is a tax on wages paid by employers. In the ACT, the payroll tax-free threshold is currently $2 million, with a 6.85% payable on wages above this point. From 1 July 2026, the threshold in the ACT will drop from $2.00 million to $1.75 million, while the initial tax rate will fall from 6.85% to 6.75%.

This tax places a burden on employers but is particularly painful to trade businesses wanting to bring on apprentices. It is well known in the trade industry that taking on an apprentice is a cost to the business as the employer rightly invests time to train them to be the industry of the future. Adding an extra burden of tax on the already extra cost needed to train an apprentice is putting too much strain on businesses and preventing them from bring on more.

If we are serious about having enough tradies to build the government's 30,000 homes, then payroll tax should not apply to apprentices.

At present wages paid to 'new starters' are exempt from payroll tax only if the employee is new to the industry or occupation and commences recognised training within 12 months of their first employment. The exemption applies once, and only for a single 12-month continuous training period. This policy however is not tailored to apprentices.

Our conversations with industry indicate that if payroll exemptions applied then larger Canberra construction businesses could bring on more apprentices thereby increasing our skills pipeline.

Other state jurisdictions have recognised the benefit of this and provided their own tailored exemptions to incentivise the uptake of apprentices. Below is a table of the different apprenticeship payroll tax exemptions.

Jurisdiction	Payroll Tax Concessions
NSW	Payroll tax rebate/offset on wages paid to apprentices and "new entrant" trainees (claimed against payroll tax in monthly or annual returns).
VIC	No broad exemption for apprentice wages, but wages of "out-of-trade" apprentices or trainees are exempt if rehired by a new employer.
QLD	Full exemption for wages paid to apprentices and trainees are exempt from payroll tax. On top of that there is also a 50% rebate on these wages.
WA	Wages paid to an apprentice under a registered training contract are exempt for the duration of the apprenticeship. Trainee wages are taxable.
SA	Temporary exemption for apprentices and trainees who commenced between Nov 2020 and June 2022. Outside this window, apprentices are taxable as normal.
TAS	Payroll tax rebate for wages paid to apprentices and trainees for up to 2 years, for those commencing between July 2023 and June 2025.
NT	From 1 July 2025, wages paid to apprentices and eligible trainees will be exempt from payroll tax.

MPA recommends that due to the dire skills situation that the ACT Government exempt apprentices from payroll tax in line with the Queensland Government's model.

Exempting apprentices from ACT payroll tax would likely cost the Territory roughly **$10–$12 million per year under current settings**, and on the order of **$11–$13 million per year under the 2026 settings**. This estimate is based on the latest data indicating about 5,000 apprentices in the ACT with an **average annual wage around $50k–$60k**, and considering the **payroll tax rate/ threshold** (6.85%/$2m now, moving to 6.75%/$1.75m) and the distribution of apprentices across small vs large employers (roughly 42% in small firms not paying payroll tax). These figures, drawn from publicly available government and industry sources, provide a data-driven foundation for estimating the revenue impact of an apprentice payroll tax exemption in the ACT.

With the cost to the budget being between $10-$13million per year this a small price to pay to increase the amount of apprentices that employers are able to bring on and subsequently increase the skills pipeline.

We would welcome the opportunity to discuss this further with the relevant ACT Government representatives.

4. Conclusion

The plumbing industry continues to play a vital role in the ACT's evolving economic landscape, especially in the context of delivering on housing supply. We therefore welcome the opportunity to provide a submission on the ACT Government's Missing Middle Housing Reform and look forward to continuing the discussion on how the trades sector can help the government reach the 30,000 homes target.

We welcome any queries or requests for additional information regarding this submission.

Appendix 1 – Our Programs

Master Plumbers Association – Canberra ACT (MPA) has implemented and sustained a range of programs aimed at ensuring consumer protection, environmental sustainability, and support for vulnerable groups in our community. Despite challenges such as the ongoing impacts of the COVID-19 pandemic, disruptions in global supply chains, and a worsening skills shortage, MPA has continued its commitment to these important initiatives.

1. **Rigorous MPA Membership Application Process:**
    - Our thorough vetting process for MPA members includes checks on licenses, insurances, industry standing, and adherence to our Code of Ethics and Consumer Guarantee.
    - This process ensures that only qualified and dedicated professionals join our ranks, maintaining high industry standards and fostering a professional community.
2. **Consumer Guarantee Program:**
    - The first of its kind in Australia, our $5,000 Consumer Guarantee provides assurance of professionalism and workmanship quality from our members.
    - This program is essential in protecting the community and environment from the impacts of unethical business practices, especially given the current skills shortage.
3. **Pro Bono Plumbing Program:**
    - Developed in collaboration with Care Inc., this program assists financially vulnerable community members with urgent plumbing needs.
    - Many MPA members have volunteered to provide services free of charge, ensuring that those in need receive necessary plumbing assistance.
4. **Consumer Education Programs:**
    - Through various channels, including partnerships with ACT Government, Icon Water, and Evoenergy, we educate the community on important issues like health, backflow prevention, safety, and environmental sustainability.
    - Our direct daily contact with over 480,000 ACT residents and our active social media and media promotional activities amplify the reach of these important messages.
5. **Commitment to the MPA Code of Ethics:**
    - All MPA Members commit to our Code of Ethics upon joining, supporting the highest standards of personal and business conduct.
6. **Support for ACT Government Legal and Consumer Protection Efforts:**
    - MPA's role as an industry complaints portal and our work with legal departments, fair trading, consumer legal services, and our dispute resolution service are crucial in maintaining industry standards and consumer protection.
    - We seek to expand these efforts in collaboration with the ACT Government to further eliminate unethical practices in the industry.
7. **Plumbing Industry Excellence Awards:**
    - Our annual awards recognize and celebrate industry champions and ambassadors, fostering an environment that rewards professionalism and excellence.

- The upcoming Gala Dinner and Awards event is a testament to the importance of these recognitions within the industry and community.

8. **Charity Events:**
    - Events like the Charity Bowls Day support important causes such as road safety, the Canberra Hospital Foundation and OzHelp.
    - With government support, these events can have an even greater impact on community causes and raise awareness on critical issues like road safety and support for hospitalized children and their families.

The MPA's suite of programs and initiatives represents our ongoing commitment to the plumbing industry's professionalism, consumer protection, and community wellbeing. Continued support from the ACT Government will enhance these efforts and ensure the positive impact of our work reaches even further into the Canberra community.

---------- Forwarded message ---------
From: [redacted]>
Date: Thu, 24 July 2025, 7:05 pm
Subject: Edit this so it refers to your project
To: <EPSDDComms@act.gov.au>

Submission to the ACT Government Territory Planning Authority on its 'Missing Middle Housing Reform' Proposals

[redacted]

First, I wish to support the 25 June 2025 Submission of the Inner South Canberra Community Council on the ACT's proposed 'Missing Middle Housing Reform'. This offers both a broad and detailed analysis of the ACT Government's Draft Major Plan Amendment to the Territory Plan '04.

While the goals of the Draft Amendment may be worthy ones - to increase the stock of both public and private housing in Canberra - the Amendment itself conflates two different issues: the critical need for increased public housing, frequently discussed by former ACT politicians and public servants in the local 'City News'; and the reported wish of older Canberrans to 'age in place'. Instead of treating the two goals separately, opening up new land and taking its responsibility for financing and administering public housing, while allowing the private sector to manage the private market, the ACT Government has allocated responsibility for both public and private housing to the private sector.

This has led the government to propose Canberra-wide densification via alterations to the rules in both RZ1and RZ2 zones in Canberra, amounting to some 70 percent of Territory land. By proposing a mix of different forms of middle housing to be establihed in such suburbs, it thereby imperils the uniqueness and integrity of individual Canberra suburbs, particularly the older inner Canberra of North and South, established on larger blocks than is the case elsewhere. This proposal thereby represents a direct threat to long-held values of urban heritage and the preservation of Canberra's development history, as well as to the green environment, leading to the loss of the beneficial cooling of the greenery in Canberra's suburbs.

Under this single-plan proposed solution, the sector most in need, public housing, will be relatively neglected: the suburbs most favoured by the private sector for development will be those of the Inner North and South, where the size of blocks will attract developers and the prohibitive values of land will automatically exclude the young, the less wealthy and the homeless from access even to the more modest housing envisaged in the proposed Draft Amendments.

In fact, it does not appear that this Draft Amendment is so much a 'plan' , in the sense of the establishment of an ordering principle to govern development, as an 'unplan', enabling a large array of different designs and heights of housing to be established throughout the ACT. No guidance appears to be offered to decide what is acceptable design, apart from different heights, and no opportunity appears to be allowed the community to challenge government decisions.

Positive middle housing development in the older RZ1 and RZ2 has been allowed by earlier ACT governments. Middle housing has not been missing in the older suburbs, particularly Kingston; townhouses were built in the early Sixties in Forrest. Red Hill was, until lately, home to a large public housing development. In fact, part of the loss of public housing has been caused by ACT government decisions. This submission is a plea to the ACT government to retain the integrity of RZ1, to allow some more minor densification in RZ2 zones, to build government-funded public housing on newly opened government land, and thereby not only extend fair access to housing, and preserve the environment, but also continue to preserve the heritage and built history of Canberra.

Yours sincerely,

[redacted]

[redacted]
[redacted]
[redacted]
[redacted]

31/07/2025

Attn: EPSDD Communications

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[redacted]

AUSTRALIAN INSTITUTE OF LANDSCAPE ARCHITECTS (AILA) SUBMISSION

Missing Middle Housing Reform, Canberra

PREFACE

The Australian Institute of Landscape Architects (AILA) is the peak national body for the Landscape Architecture. AILA champions quality design for public open spaces, stronger communities, and greater environmental stewardship. We provide our members with training, recognition, and a community of practice, to share knowledge, ideas and action. With our members, we anticipate and develop a leading position on issues of concern in landscape architecture. Alongside government and allied professions, we work to improve the design and planning of the natural and built environment.

In operation since 1966, AILA represents over 3,500 landscape architects and promotes excellence in planning, design and management for life outdoors. Committed to designing and creating better spaces in Australia, landscape architects have the skills and expertise to improve the nation's liveability through a unique approach to planning issues via innovative integrated solutions. In doing so, landscape architects contribute towards better environmental, social and economic outcomes for all Australians.

The work of landscape architects is recognised for creating liveable cities and sustainable design outcomes for everyone, our members help shape many projects across Australia, creating vibrant community spaces for all.

We believe that AILA, through its advocacy, will significantly contribute to a better-informed urban development decision-making process, the enhancement of our urban greenspaces, and long-term community wellbeing.

STATEMENT

The Australian Institute of Landscape Architects (AILA) ACT Chapter, supports the ACT Government's aims and objectives for the Missing Middle Housing Reforms to create greater social equity and a city that is more sustainable in its use of resources and energy emissions.

Change is inevitable and these reforms provide an opportunity to produce a more diverse and vibrant residential environment in Canberra. AILA considers that the reforms proposed would be exemplary in shaping the desired change:

- *with nuanced, targeted application where good outcomes and improvements are assured*
- *through monitoring and evaluating the effect of the policy, especially regarding biodiversity, soil permeability and canopy cover*
- *establishing correlations between increasing residential densities with investment in the living infrastructure provided in Canberra's public realm.*

The appointment of an ACT Government Landscape Architect and the preparation of a Strategic Landscape Plan and Policy will be instrumental to ensuring the objectives of the Missing Middle Reforms and, the targets in the Living Infrastructure Plan are achieved and Canberra's enviable landscape quality is managed for the future generations.

BACKGROUND

Missing Middle Housing Reforms

The case for introducing the reforms is well made and AILA acknowledges the importance of providing greater housing diversity, and as consequence, the opportunity and capability to make more sustainable lifestyle choices.

While individual proposals can be assessed as having minimal impact, collectively and over time these will create incremental, cumulative change that will alter the suburban character. Increased housing density does mean:

- Spatial change: there will be smaller backyards and diminished middle to long distance views past the houses toward open space.
- Shift in Biodiversity; private gardens significantly add to Canberra's biodiversity and provide habitat for many pollinating species.
- Less significant Canopy trees within the block and section: there will simply be less opportunity to incorporate significant canopy trees within the blocks,

- Increase in hard surfaces: the increased building footprint along with the incremental additions of hard surfaces (even if they are below 500m^2 per development) will add to the urban heat island effects, increase runoff and reduce soil permeability.1
- Exacerbating the issue of car parking on the street: until there is a corresponding shift in transport modes, increased density will lead to more cars parked on streets/verges, be they resident or visitor car parking.

These changes are manageable but requires investment in monitoring the effects of the reforms, preparedness to review the policy and co-ordination with other planning policy and strategic initiatives.

Draft Design Guide

The prescription in the Draft Design Guide of the preferred outcomes for different housing types and the multivariant block and site configurations are commendable (although the amount of information can be overwhelming). Of course, these do need to address the basis of how individual proposals will be assessed but the guides should also articulate for developers, the community and assessors 'contextual principles' that will guide decisions. For example:

- (Notwithstanding the District Strategies,) amplify what is an acceptable typical outcome for a range of Canberra streets regarding how development addressees the street.
- Identify what are non-negotiable standards (e.g., minimum garden depths, deep soil zone requirements, canopy tree planting, limitations on hard surfacing) and clarify what elements may be open to negotiation (e.g., driveway locations, setbacks).

These additions could well be valuable in setting out more objectively what high-quality design means and will delivers to the community in the future.

RECOMMENDATIONS

In the context of the above, AILA recommends:

- In conjunction with reforms, putting in place the means and processes to monitor the rate of change and evaluate the outcomes. This will provide the important feedback to inform any review.

- Ensure the findings of this monitoring contributes to the work of the ACT Government Landscape Architect, more specifically the formulation of a Strategic Landscape Plan and Policy.

- Considering targeting the application of the Missing Middle Housing Reforms, through entering partnerships or providing incentives to establish a range of exemplary developments.

- The Draft Design Guide:

[1] The issues raised here around the incremental loss of biodiversity, canopy trees and increased impermeable surface would not be addressed by the requirements in the Biodiversity Guideline as these are all below the thresholds identified in this Guide.

- Be more explicit in defining preferred outcomes in relation to the desired street/section. This definition should go beyond citing good examples and include what elements are non-negotiable
- Include a separate section on Site/Landscape Design. This section must address the desired site/landscape relationships between the development and the public realm (street, walkways and parks). In this section, guidance on other related site, external space, planting and water management should be included. This will ensure a comprehensive, cohesive approach will be applied to the design of the external environment.

CONCLUSION

The Australian Institute of Landscape Architects (AILA) ACT Chapter overwhelmingly support the need for change and reform in policies that will establish housing diversity, create greater social equity and allow people to make choices in how they live more sustainably. The Missing Middle reforms are important to this.

However, in achieving these outcomes it is vital Canberra retains the resilience it gains from the level biodiversity, the urban forest, extent of permeable surfaces and the ecological connectivity in the landscape. To address this the AILA encourages the ACT Government to undertake the appropriate monitoring, to invest in exemplary developments and ensure the corresponding investment in the public realm. The early appointment of an ACT Government Landscape Architect will be advantageous.

The AILA is always keen to contribute to ACT Planning policy and reform and support the ACT Government in managing the 'Bush Capital' legacies.

Sincerely yours,

[redacted]

Australian Institute of Architects

MISSING MIDDLE HOUSING REFORM



Response to ACT Government reform proposal

ACT CHAPTER

August 2025

ABOUT THE INSTITUTE

The Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation with around 15,000 members across Australia and overseas.

The Institute exists to advance architecture, architects' professional standards and contemporary practice, and expand and advocate the value of architects and architecture to the sustainable growth of 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.

PURPOSE

This submission is made by the Institute to further the development of 'missing middle' housing opportunities within the ACT planning framework.

At the time of this submission the ACT Chapter President is [redacted] The Chief Executive Officer is [redacted] and Executive Director ACT is [redacted].

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MISSING MIDDLE HOUSING REFORM

To address housing needs and ensure a balanced urban environment, we must deliver diverse housing options through sustainable and master-planned developments. This includes a mix of housing types – such as townhouses, apartments, and medium-density developments – that can accommodate various households. Architecture plays a critical role in fostering community connection, promoting environmental sustainability, and ensuring efficient land use through good design outcomes.

Architects are already working to create designs that prioritise energy efficiency, adaptability, and liveability, enhancing the long-term value and social outcomes of housing projects while supporting broader housing affordability goals.

With over 70% of blocks in the ACT zoned RZ1, a strong government focus on enabling a greater variety of housing typologies within suburban areas is strongly encouraged. Architects can design appropriately scaled dual-occupancies, townhouses, manor houses, small apartment buildings, and co-housing to meet the growing demand from ACT residents looking to buy their first home, move within their community — or simply age in place.

The Institute welcomes the consultation put forward by the ACT Government. The proposed changes to encourage missing middle development are generally welcomed. The Institute has appreciated the opportunity to be engaged in the drafting of the Missing Middle Housing Design Guide and looks forward to further consultation on this important document, a potential Pattern Book, and the reform program overall. Locally led engagement is vital to the success of the proposal both in design and build phase.

The potential to meet the goals of missing middle reform will be enhanced with some small technical changes. It is vital the new guidelines foster the take-up of a diversity of housing options, not just allowing larger dwellings.

Summary of Recommendations

- An immediate review of the ACT Heritage polices, and guidelines be conducted to support missing middle development in heritage areas where appropriate.
- Guidelines be developed for heritage sites, drawing on the Bluefield Housing model, to encourage densification while retaining existing building fabric and shared landscape.
- Review current subdivision policy requiring new RZ1 blocks to have either street frontage or public pathway frontage, to allow greater flexibility and considered design in support of retention of existing buildings.
- Establish a design review panel to assess complex (block greater than 2000m^2) missing middle developments.
- Multi-unit development proposals that comply with the Residential Zones Policy, Subdivision Policy, and Technical Specifications be considered as exempt (or complying) developments and therefore not be subject to a Development Application process.

- Mandate use of architects for developments over the dwelling/hectare ratios in the Technical Specifications and for all apartment buildings 3 storeys and above, to align with NSW regulations.
- Provide a clearer definition of co-housing (including reference to carparking specifications) within the Missing Middle Housing Design Guide.
- Provide a definition of Micro blocks and develop suitable guidelines to ensure high-quality outcomes for the use of this typology.
- Lease Variation Charges (LVCs) to be reviewed and updated to encourage development in line with missing middle reforms.

HERITAGE GUIDELINES AND RETENTION OF EXISITING DWELLINGS

The importance of heritage in our built environment is well established. A heritage item may be significant for aesthetic, historic, social, spiritual or technical reasons. Creativity allied with design skills and an appreciation of the original item are required for successful conservation and adaptive re-use. The proposed missing middle Design Guides and Technical Specifications do not currently address issues of heritage and sit separate to ACT Heritage policies and guidelines. This division has the potential to restrict missing middle development in heritage areas, or on blocks identified as having heritage value.

Bluefield Housing is a concept developed by Damian Madigan from the University of South Australia. Proposed as an extension to established definitions of Greenfield, Brownfield and Greyfield, Bluefield refers to both a land definition and an infill housing model. With an aim of increasing housing diversity and choice while retaining existing neighbourhood character Bluefield concepts look to retention and adaption as an alternative to knock-down-rebuild developments. Such an approach could support increased density and housing choice in heritage precincts. Undertaking a Bluefield Housing approach can also encourage greater consideration of future heritage value. Thoughtful design can make use of existing dwelling to ensure housing of potential heritage significance (such as mid-century homes) are not lost in densification processes.

Recommendations

- An immediate review of the ACT Heritage policies, and guidelines be conducted to support missing middle development in heritage areas where appropriate.
- Guidelines be developed for heritage sites, drawing on the Bluefield Housing model, to encourage densification while retaining existing building fabric and shared landscape.
- Review current subdivision policy requiring new RZ1 blocks to have either street frontage or public pathway frontage, to allow greater flexibility and considered design in support of retention of existing buildings.

DESIGN REVIEW OPPORTUNITIES AND APPROVALS PROCESS

The ACT Government has been successful in adopting a design review panel to assess complex developments within the urban context of our city. This has seen significant improvement in the quality of multi-residential buildings since its inception. Such a review process could support the successful rollout of missing middle reforms by ensuring developments of a certain scale (block greater than 2000m^2) are designed with appropriate amenity and streetscape character.

The NSW Government requires all apartment buildings of a certain scale to be designed, or signed off, by a registered architect. This has delivered a measurable uplift in design quality since inception and should be used as a benchmark for the ACT.

With the implementation of the Missing Middle Housing Design Guide, the ACT can strive for design excellence through the implementation of criteria on design delivery by

mandating the use of professional services on complex projects. ACT registered architects and building designers who demonstrate proficiency in housing design and undertake continuing professional development should be eligible to deliver these professional services.

Recommendations

- Establish a design review panel to assess complex (block greater than 2000m^2) missing middle developments.
- Multi-unit development proposals that comply with the Residential Zones Policy, Subdivision Policy, and Technical Specifications be considered as exempt (or complying) developments and therefore not be subject to a Development Application process.
- Mandate use of architects for developments over the dwelling/hectare ratios in the Technical Specifications and for all apartment buildings 3 storeys and above, to align with NSW regulations.

TECHNICIAL DEFINITIONS

The proposed missing middle reforms is an opportunity to broadly consider review of definitions to encourage greater shared understanding and ease of use of planning policies. **Further detail on the Institute's response to technical changes is outlined in comments in the comparison tables below**.

Co-housing: There is great opportunity for more co-housing to be developed. Due to a lack of understanding on the typology within the community, co-housing requires additional promotion and education. Clarity on parking requirements that may differ from the current specifications should be included in the definitions.

Micro blocks (under 150m^2): The ACT planning framework does not currently include Micro Blocks, with the smallest block typology being Compact Blocks (less than 250m^2). Micro blocks (under 150m^2) are a viable option to deliver housing density, particularly in the missing middle context. The proposed Design Guide and Technical Specifications can be updated to include the definition of Micro Blocks with suitable guidelines to be developed and tailored to ensure high-quality outcomes.

Recommendations

- Provide a clearer definition of co-housing (including reference to carparking specifications) within the Missing Middle Housing Design Guide.
- Provide a definition of Micro blocks and develop suitable guidelines to ensure high-quality outcomes for the use of this typology.

LEASE VARIATION CHARGE

The current implementation of Lease Variation Charges (LVCs) should be reviewed and updated to encourage development. Even with these missing middle reforms in place there is a need to incentivise the delivery of a greater yield of housing to meet increased population need. Under the current LVC there is a risk developers will reduce the number of

dwellings per hectare on a missing middle project to avoid charges – as the rate is applied per dwelling, regardless of dwelling size. To encourage an uptake of more compact and affordable housing, with increased dwelling yield, the LVCs could be reviewed to have reduced rates for more compact typologies.

Recommendations

- Lease Variation Charges (LVCs) to be reviewed and updated to encourage development in line with missing middle reforms.

Review of Change Tables

Comparison Table: RZ1 – Suburban Zone

Element	Current Provision	Proposed Change	Reason for Change	Institute Comments
Policy Outcomes: (Residential Zones Policy)	1. Achieve and/or maintain low density residential neighbourhoods in suburban areas.	1. Provide for a range of housing choices in a suburban setting which is primarily low density and low rise.	These changes reflect that the main residential zone needs to provide a range of housing choices, that are low-rise. This will require some change within the RZ1 zone to housing density, whilst retaining the lower density character and valuing neighbourhood and landscape character.	Supported.
	2. Provide for a range of housing choices that meet changing household and community needs.	2. Housing development meets changing household, and community needs and demonstrates good design outcomes.	As above	Supported.
	3. Limit the extent of change that can occur particularly with regard to the residential density and original pattern of subdivision.	3. Provide opportunities fore redevelopment by enabling some change to residential density and subdivision pattern.	As Above	Supported.

	4. Ensure development respects valued features of the neighbourhood and landscape character of the area and does not have unreasonable negative impacts on neighbouring properties.	4. Development respects valued features of the neighbourhood and landscape character of the area and does not have unreasonable negative impacts on neighbouring properties.	As above.	Supported.
Maximum height: (Residential Zones Policy)	2 storeys + attic	2 storeys + attic	No change	Not Supported. Recommend the number of storeys be removed. The Technical Specification sections 14.1 Building Height,14.2 Building Envelope, and 15.1 Solar Building Envelope ensure appropriate bulk and scale and the NCC mandates minimum internal ceiling heights. Having no limit on storeys will allow for more creativity and flexibility in design to deliver split level designs and have potential to enhance planting area / tree canopy cover with a reduce building footprint.
Maximum site coverage: (Residential Zones Policy)	45% for MUH	45% for MUH	No Change. This provision works closely with other important planning rules, such as setbacks, building envelopes and canopy cover requirements to	Supported.

			limit the size and scale of development.	
Minimum block area for 2 dwellings: (Residential Zones Policy)	800m^2 (or 600m^2 for supportive/community housing).	Minimum block area for 2 dwellings no longer specified.	The minimum block area has been removed to enable more missing middle housing in RZ1. These provisions previously sought to limit density, which is now being relaxed. Other requirements, such as those relating to site coverage and living infrastructure, will provide limitations on the size of developments.	Supported.
Maximum dwellings: (Residential Zones Policy)	2	Appropriate number of dwellings is guided by site context and dwelling density targets in the Residential Zones Technical Specifications	Dwelling densities have been developed and are located in the Residential Zones Technical Specification. These have been increased from the previous maximum to enable the delivery of missing middle housing. The dwelling density targets balance providing more housing with important amenity outcomes such as living infrastructure, private open space, on-site	Supported. We note the dwelling/hectare ratios should be flexible and allow for increased numbers where a design solution can prove high quality amenity for the site and surrounding neighbourhood.

			parking, and suburban character.	
Apartments: (Residential Zones Policy)	No apartments permitted in RZ1.	Apartments permitted in RZ1.	Apartment developments are proposed to be allowed in RZ1. Apartment developments are limited to 2 storeys. This will allow walk-up apartments and manor house style developments (i.e. separate dwellings on the ground floor and upper floor).	Supported - Inclusion of apartments. Recommend the restriction to 2 storeys should be reconsidered. Refer to comment above on Maximum Building Height.
Secondary Residences: (Residential Zones Policy)	- Associated with a single dwelling. - Maximum dwelling size of 90m^2. - Minimum block size – 500m^2 - 1 secondary residence per block.	- Associated with a single dwelling. - Maximum dwelling size of 90m^2. - 1 secondary residence per block.	Removed minimum block size to allow secondary residences on smaller blocks, where all other requirements are met. Overall size and scale of secondary residence is primarily controlled by site coverage and the other key outcomes such as Iplanting areas, canopy coverage and other living infrastructure considerations. This has been relaxed to allow for different living arrangements on the same block (such as granny flats for multi-	Supported.

			generational living). Other provisions allow for blocks to be subdivided to provide a separate dwelling.	
Co-housing: (Residential Zones Policy)	Limited to block of 1050m^2 or more.	Minimum block area removed.	To allow co-housing developments on all blocks, where all other requirements are met. Overall size and scale of co-housing is primarily controlled by site coverage and other key outcomes such as planting areas, canopy coverage and other living infrastructure considerations. This will contribute to the housing choice available to residents who may wish to live in this type of housing model.	Supported.
Car parking rates: (Technical Specification)	One parking space per single bedroom dwelling. 1.5 spaces per 2-bedroom dwelling.	One parking space per dwelling. Plus an additional 1 space per five 2-bedroom dwellings.	A reduction in minimum car parking rates intends to balance the desire to achieve on-site amenity and limit unreasonable impacts to the street and neighbourhood.	Supported.

	2 parking spaces for each dwelling with 3 or more bedrooms. 1 visitor space per 4 dwellings.	Plus an dadditional 1 space per three 3+ bedroom dwellings. No requirement for on-site visitor parking.	Car parking is considered through the development assessment process, with the acceptable rates of parking considered on a case-bycase basis, involving consideration of factors such as proximity to public transport and active travel corridors, and capacity of the existing street and parking network to support off-site car parking. It is also important to note that the provision of car parking is often driven by location, such as proximity to public transport routes, and market preferences.	
	Location of car parking spaces: One car space per dwelling is roofed.	No requirement.		Supported.
	Basement car parking: RZ1, where block is less that 30m wide, ramps accessing basement car parking are not located within 50% of minimum front setbacks.	No requirement.		Supported.

Planting area (MUH): (Technical Specification)	35%	30%	A reduction in planting area for MUH is intended to be offset by an increase in canopy cover, to support Government's 30% canopy cover target.	Supported.
Tree canopy coverage (MUH): (Technical Specification)	15%	20%	An increase in canopy cover is intended to be balanced by a decrease in planting area, to support Government's 30% canopy cover target.	Supported.
Dwelling density RZ1 (MUH): (Technical Specification)	None	Attached houses – 54 dwellings per hectare (more can be considered if parking is contained within a basement). Apartments - 67 dwellings per hectare (more can be considered if parking is contained within a basement).		Supported. Recommend densities over these figures be reviewed by a Missing Middle Housing Design Review Panel to ensure higher quality outcomes. Refer to comments associated with this schedule on the Missing Middle Housing Design Review Panel.
Other Residential Zones Technical Specification changes:	Site and Land Use – Distribution of non-residential developments in all residential zones – varied development types	Site and Land Use – Distribution of non-residential developments in all residential zones – varied development types with addition of: - Social enterprise		Supported.

		- Veterinary clinic		
	Site and Land Use – Distribution of non-residential developments in all residential zones – no more than 2 home businesses per section	Site and Land Use – Distribution of non-residential developments in all residential zones – no more than 2 home businesses per 20 dwellings		Supported.
	Private open space for MUH – 40% of site	Private open space for MUH – 30% of site	Private open space requirements have reduced in site percentage however the quality of space that contributes to the private open space area has increased. This is intended to see improvements in usable, high amenity spaces for residents.	Supported.
	Principle private open space (at lower level) for MUH $28m^2$ – $45m^2$ minimum area and 5m-6m minimum dimension.	Principle private open space (at lower level) for MUH $24m^2$ – $36m^2$ minimum area and 4m-6m minimum dimension.		Supported.
	Building height – RZ1 is 8.5m	Building height – RZ1 is 8.5m	No change.	Not Supported. Recommend this be changed to a height of 9.0m to enable greater flexibility in built form for complex sites such as those with large cross fall and reducing the

				likelihood of developments having ground floor levels below natural ground lines.
	Building envelope measurement taken from 3.5m above boundaries.	Building envelope measurement taken from 4m above boundaries.	Setbacks, building and solar envelopes have been modified to enable increased building area where impacts to neighbours is minimised. Solar access and privacy requirements for neighbours continue to apply.	Supported.
	Front setbacks for MUH – 6m	Front setbacks for MUH – 4m-6m		Remove reference to 'Primary front boundary setback for blocks in subdivisions approved before 18 October 1993' from the Technical Specifications. Recommend one front setback of 4m for all single dwelling and MUH. This provides more flexibility in design and allows better use of sites where it is more beneficial to have tree canopy cover in the rear of the site. Remove the proposed single dwelling front setback 'Maximum of 8m' requirement. This is inconsistent with maintaining streetscape character where some existing suburbs have larger setbacks.
	Front setbacks for MUH Corner blocks secondary street	Front setbacks for MUH Corner blocks secondary		Supported.

	frontage (mid-sized blocks) – 3m	street frontage (mid-sized blocks) – 2m		
	Side and rear setbacks for MUH primary building zone – 3m	Side and rear setbacks for MUH primary building zone – 0m		Supported.
	Side and rear setbacks for MUH rear setback – 3m	Side and rear setbacks for MUH rear setback – 6m		Supported.
	Side and rear setbacks for MUH unscreened elements – 3m	Side and rear setbacks for MUH unscreened elements – 1m, 3m, 6m		Supported.
	Solar building envelope angle for MUH – 31°	Solar building envelope angle for MUH – 45°		Recommend a review of the solar building envelope solar fence and envelope angle be considered. An increased solar fence height to 3.0m coupled with an angle of 35° allows more flexibility of design whilst ensuring good solar access to neighbouring blocks.
	Separation between walls in MUH – RZ1: Unscreened elements and an external wall on the same block or an adjoining block are separated by 3m or more. External walls at the lower floor level on the same or adjoining	Separation between walls and PPOS in MUH – RZ1: The minimum separation between walls and principle private open space to dwellings on the same block and adjoining block is:		Recommend the various setback be reviewed. Current setbacks to unscreened elements are too onerous and will lead to increased use of screened elements reducing the thermal performance and natural light into dwellings.

	block are separated by 1m or more.	3m, 6m, 9m, 12m (refer to Technical Specifications)		
	Privacy – MUH: various rules (refer Technical Specifications)	Added to above.		Supported.
	Minimum dwelling size – MUH: Minimum dwelling floor areas for: - Studio dwellings = 40m^2 - 1 Bed dwellings = 50m^2 - 2 Bed dwellings = 70m^2 - 3+ Bed Dwellings = 95m^2	Minimum dwelling size – MUH: Minimum dwelling floor areas for: - Studio dwellings = 35m^2 - 1 Bed dwellings = 50m^2 - 2 Bed dwellings = 70m^2 - 3+ Bed Dwellings = 90m^2		Supported.
	Minimum widths and area – MUH: Minimum widths are as follows: - Beds = 3.0m	Minimum widths and area – MUH: Minimum widths are as follows: - Master Beds = 3.0m - All other Beds = 2.7m		Supported.
	Minimum widths and area – MUH: Minimum widths are as follows:	Minimum widths and area – MUH: Minimum widths are as follows:		

	- Living Rooms – Studio + 1 Beds = 3.6m - Living Rooms – 2 Bed + 3 Bed = 4.0m	- Living Rooms – Studio + 1 Beds = 3.0m - Living Rooms – 2 Bed + 3 Bed = 3.6m		
	Internal Storage – MUH: - Studio = $2m^3$ - 1 Bed = $3m^3$ - 2 Bed = $4m^3$ - 3 Bed+ = $5m^3$ External Storage – MUH: various rules	Storage – MUH: - Studio = $4m^3$ - 1 Bed = $6m^3$ - 2 Bed = $8m^3$ - 3 Bed+ = $10m^3$		Supported.
	Balustrades – MUH: various rules	No requirement		Supported.
Subdivision: (Subdivision Policy)	Unit titling above $800m^2$, max $120m^2$ for size of second dwelling. Block subdivision not permitted,	Unit titling above $600m^2$, no maximum size limit for second or subsequent dwellings. Block subdivision permitted where a dwelling has been lawfully constructed.	This is to allow subdivision of RZ1 blocks, but only where the blocks already contain a dwelling. This has been included to: - Avoid land banking, - Disincentivise the creation of ad hoc mid-sized and compact single dwelling in favour of the	Supported.

			creation of larber blocks for appropriate missing middle housing. Site cover, setbacks, planting area and solar access requirements will control the overall size of additional dwellings.	
Consolidation: (Subdivision Policy)	2 blocks for supportive housing only.	Permissible for all development that will result in more dwellings – the Subdivision Technical Specifications guide suitable consolidation outcomes. General limit of 2000m^2, 2500m^2 for consolidations adjoining urban open space/community path network, and 3000m^2 for end of section consolidation.	Block consolidation will support efficient land use for missing middle developments and will support higher quality development outcomes. It will also enable the delivery of more housing and will also contribute to a range of missing middle outcomes. Limits on consolidation ouctomes for RZ1 blocks are provided to limit over-development and to maintain the low-rise, lower density character of RZ1 areas compared to RZ2 outcomes.	Supported in principle. The indicated limits are supported. For consolidations over 3000m^2 it is recommended proposals be reviewed by a Missing Middle Housing Design Review Panel to ensure higher quality outcomes. Refer to comments associated with this schedule on the Missing Middle Housing Design Review Panel. Recommend all developments over 2000m^2 be subject to RZ2 Policies and Technical Specifications.

Comparison Table: RZ2 – Suburban Density Zone

Element	Current Provision	Proposed Change	Reason for Change	Institute Comments
Policy Outcomes: (Residential Zones Policy)	1. Facilitate development or redevelopment of sites within reasonable proximity to local services to achieve a mix of low to medium density housing.	1. Facilitate development or redevelopment of sites that are generally in reasonable proximity to local services and amenities.	Name change and policy outcome changes are proposed to reflect the aim for more development and redevelopment opportunity and a greater mix of housing to be provided. It is noted that these will still be low rise (up to 3 storeys) and more compact single dwellings.	Supported.
	2. Provide for a range of housing choices where the housing is low rise and contains a mix of single dwelling and multi-unit housing.	2. Achieve a mix of low and medium density housing in a manner that demonstrates good design outcomes.		Supported.
	3. Provide opportunities for redevelopment by enabling a limited extent of change in density.	3. Provide for a range of housing choice that is primarily low-rise lumti-unit housing or more compact single dwelling housing.		Supported.
		4. Provide opportunities for redevelopment by enabling change,		Supported.

		including to residential density and subdivision pattern.		
Maximum height: (Residential Zones Policy)	2 storeys + attic	Single dwellings / secondary residences: 2 storey + attic MUH: 3 storey + attic	Building heights for muti-unit housing in RZ2 have been increased to better reflect the transition in scale between RZ1 and RZ2 zones. This change provides a relaxation of height restrictions for RZ2 development to allow more homes to be provided, however there are important requirements around setbacks, building envelopes and over-shadowing that must be met to limit impacts on neighbours.	Not Supported. Recommend the number of storeys be removed. The Technical Specification sections 14.1 Building Height,14.2 Building Envelope, and 15.1 Solar Building Envelope ensure appropriate bulk and scale and the NCC mandates minimum internal ceiling heights.
Maximum site coverage: (Residential Zones Policy)	45% for MUH	45% for MUH	No change. This provision works closely with other important planning rules, such as setbacks, building envelopes and canopy cover requirements to limit the size and scale of development.	Supported.

Minimum block area for 2 dwellings: (Residential Zones Policy)	700m^2 (or 600m^2 for supportive/community housing).	Minimum block area for 2 dwellings no longer specified.	The minimum block area has been removed to enable the uptake of missing middle housing in RZ2. Other requirements, such as those relating to site coverage and living infrastructure, will provide limitations on the size of developments.	Supported.
Maximum dwellings: (Residential Zones Policy)	1 additional for every 250m^2 over the minimum.	No maximum.	To incentivize missing middle housing development in RZ2 where they can be proposed and constructed to meet the other relevant Assessment Outcomes and guidance.	Supported.
Car parking rates: (Technical Specification)	One parking space per single bedroom dwelling. 1.5 spaces per 2-bedroom dwelling. 2 parking spaces for each dwelling with 3 or more bedrooms. 1 visitor space per 4 dwellings.	One parking space per dwelling. Plus an additional 1 space per five 2-bedroom dwellings. Plus an additional 1 space per three 3+ bedroom dwellings. No requirement for on-site visitor parking.		Supported.

Planting area (MUH): (Technical Specification)	35%	30%		Supported.
Tree canopy coverage (MUH): (Technical Specification)	15%	20%		Supported.
Other Residential Zones Technical Specification changes:	Site and Land Use – Distribution of non-residential developments in all residential zones – varied development types	Site and Land Use – Distribution of non-residential developments in all residential zones – varied development types with addition of: - Social enterprise - Veterinary clinic		Supported.
	Site and Land Use – Distribution of non-residential developments in all residential zones – no more than 2 home businesses per section	Site and Land Use – Distribution of non-residential developments in all residential zones – no more than 2 home businesses per 20 dwellings		Supported.
	Private open space for MUH – 40% of site	Private open space for MUH – 30% of site	Private open space requirements have reduced in site percentage however the	Supported.

			quality of space that contributes to the private open space area has increased. This is intended to see improvements in usable, high amenity spaces for residents.	
	Building height – RZ2 is 8.5m	Building height – RZ2: - Single Dwelling – 8.5m - Multi-unit housing – 10.5m		Single dwelling - Not Supported. Recommend this be changed to a height of 9.0m to enable greater flexibility in built form for complex sites such as those with large cross fall and reducing the likelihood of developments having ground floor levels below natural ground lines Multi-unit housing – Supported.
	Building envelope – 3.5m and 45°	Building envelope – 4.0m and 45°		Supported.
	Front setbacks for MUH – 6m	Front setbacks for MUH – 4m-6m		Remove reference to 'Primary front boundary setback for blocks in subdivisions approved before 18 October 1993' from the Technical Specifications. Recommend one front setback of 4m for all single dwelling and MUH. This provides more flexibility in design and allows better use of sites where it is more beneficial to have tree canopy cover in the rear of the site.

	Front setbacks for MUH Corner blocks secondary street frontage (mid-sized blocks) – 3m	Front setbacks for MUH Corner blocks secondary street frontage (mid-sized blocks) – 2m		Supported.
	Side and rear setbacks for MUH primary building zone – 3m	Side and rear setbacks for MUH primary building zone – 0m		Supported.
	Side and rear setbacks for MUH rear setback – 3m	Side and rear setbacks for MUH rear setback – 6m		Supported.
	Side and rear setbacks for MUH unscreened elements – 3m	Side and rear setbacks for MUH unscreened elements – 1m, 3m, 6m		Supported.
	Solar building envelope angle for MUH – 31°	Solar building envelope angle for MUH – 45°		Recommend a review of the solar building envelope solar fence and envelope angle be considered. An increased solar fence height to 3.0m coupled with an angle of 35° allows more flexibility of design whilst ensuring good solar access to neighbouring blocks.
	Separation between walls in MUH – RZ2: Unscreened elements and an external wall on the same block or an adjoining block are separated by 3m or more. External walls at the lower floor level on the same or adjoining block are separated by 1m or more.	Separation between walls and PPOS in MUH – RZ2: The minimum separation between walls and principle private open space to dwellings on the same block and adjoining block is:		Recommend the various setbacks be reviewed. Current setbacks to unscreened elements are too onerous and will lead to increased use of screened elements that reduce the thermal performance and natural light into dwellings.

		3m, 6m, 9m, 12m (refer to Technical Specifications)		
	Privacy – MUH: various rules (refer Technical Specifications)	Added to above.		Supported.
	Minimum dwelling size – MUH: Minimum dwelling floor areas for: - Studio dwellings = 40m^2 - 1 Bed dwellings = 50m^2 - 2 Bed dwellings = 70m^2 - 3+ Bed Dwellings = 95m^2	Minimum dwelling size – MUH: Minimum dwelling floor areas for: - Studio dwellings = 35m^2 - 1 Bed dwellings = 50m^2 - 2 Bed dwellings = 70m^2 - 3+ Bed Dwellings = 90m^2		Supported.
	Minimum widths and area – MUH: Minimum widths are as follows: - Beds = 3.0m	Minimum widths and area – MUH: Minimum widths are as follows: - Master Beds = 3.0m - All other Beds = 2.7m		Supported.
	Minimum widths and area – MUH: Minimum widths are as follows: - Living Rooms – Studio + 1 Beds = 3.6m	Minimum widths and area – MUH: Minimum widths are as follows: - Living Rooms – Studio + 1 Beds = 3.0m		

	- Living Rooms – 2 Bed + 3 Bed = 4.0m	- Living Rooms – 2 Bed + 3 Bed = 3.6m		
	Internal Storage – MUH: - Studio = $2m^3$ - 1 Bed = $3m^3$ - 2 Bed = $4m^3$ - 3 Bed+ = $5m^3$ External Storage – MUH: various rules	Storage – MUH: - Studio = $4m^3$ - 1 Bed = $6m^3$ - 2 Bed = $8m^3$ - 3 Bed+ = $10m^3$		Supported.
	Balustrades – MUH: various rules	No requirement		Supported.

Comparison Table: RZ3 – Residential Transition Zone

Element	Current Provision	Proposed Change	Reason for Change	Institute Comments
Policy Outcomes: (Residential Zones Policy)	1. Facilitate development or redevelopment of sites to achieve medium density housing.	Facilitate urban development or redevelopment to achieve primarily medium density, low-rise housing within close proximity to local services and amenities in a manner that demonstrates good design outcomes.	Name change and policy outcome changes are proposed to align RZ3 to be the 'transition' residential zone between the suburban zones and the urban zones. This acknowledges that RZ3 may play a role in predominately	Supported.

			accommodating more compact single dwellings (such as the case through Gungahlin), or as more of a medium density and mid-rise zone (as in the case in more of the established suburbs).	
	2. Provide a range of housing choices where the housing contains a mix of single dwelling and multi-unit housing.	2. Provide a range of housing choices, which are predominately multi-unit housing of various dwelling types or more compact single dwelling housing.		Supported.
	3. Provide opportunities for redevelopment by enabling change to the residential density and original pattern of subdivision.	3. Provide opportunities for redevelopment by enabling change, including to the residential density and the original pattern of subdivision.		Supported.
	Provide opportunities for redevelopment by enabling change.			Supported.
Maximum height: (Residential Zones Policy)	10.5m	Secondary residence: 2 storeys Single dwelling housing: 3 storeys MUH: 4 storeys	The gradation of heights across the different housing typologies is designed to incentivize multi-unit housing redevelopment to provide more housing in an	Not Supported. Recommend the number of storeys be removed and the Technical Specifications Building Heights be used.

			efficient manner in this zone.	
Other Residential Zones Technical Specification changes:	Site and Land Use – Distribution of non-residential developments in all residential zones – varied development types	Site and Land Use – Distribution of non-residential developments in all residential zones – varied development types with addition of: - Social enterprise - Veterinary clinic		Supported.
	Site and Land Use – Distribution of non-residential developments in all residential zones – no more than 2 home businesses per section	Site and Land Use – Distribution of non-residential developments in all residential zones – no more than 2 home businesses per 20 dwellings		Supported.
	Private open space for MUH – 40% of site	Private open space for MUH – 30% of site	Private open space requirements have reduced in site percentage however the quality of space that contributes to the private open space area has increased. This is intended to see improvements in usable, high amenity spaces for residents.	Supported.

	Building height – RZ3 is 2 storeys.	Building height – RZ3: - Single Dwelling – 10.5m - Multi-unit housing – 14m		Supported.
	Building envelope – 3.5m and 45°	Building envelope – 4.0m and 45°		Supported.
	Front setbacks for MUH – 6m	Front setbacks for MUH – 4m-6m		Remove reference to 'Primary front boundary setback for blocks in subdivisions approved before 18 October 1993' from the Technical Specifications. Recommend one front setback of 4m for all single dwelling and MUH. This provides more flexibility in design and allows better use of sites where it is more beneficial to have tree canopy cover in the rear of the site.
	Front setbacks for MUH Corner blocks secondary street frontage (mid-sized blocks) – 3m	Front setbacks for MUH Corner blocks secondary street frontage (mid-sized blocks) – 2m		Supported.
	Side and rear setbacks for MUH Second Upper Level – 0-6m	Side and rear setbacks for MUH Second Upper Level– removed and aligned with Upper Floor Level rules.		Supported.
	Solar building envelope angle for MUH – 31°	Solar building envelope angle for MUH – 45°		Recommend a review of the solar building envelope solar fence and envelope angle be considered.

				An increased solar fence height to 3.0m coupled with an angle of 35° allows more flexibility of design whilst ensuring good solar access to neighbouring blocks.
	Separation between walls in MUH – RZ3: Unscreened elements and an external wall on the same block or an adjoining block are separated by 3m or more. External walls at the lower floor level on the same or adjoining block are separated by 1m or more.	Separation between walls and PPOS in MUH – RZ3: Addition of unscreened elements to primary window and centre of any other dwelling's PPOS: 12m		Supported.
	Privacy – MUH: various rules (refer Technical Specifications)	Added to above.		Supported.
	Minimum dwelling size – MUH: Minimum dwelling floor areas for: - Studio dwellings = 40m^2 - 1 Bed dwellings = 50m^2 - 2 Bed dwellings = 70m^2 - 3+ Bed Dwellings = 95m^2	Minimum dwelling size – MUH: Minimum dwelling floor areas for: - Studio dwellings = 35m^2 - 1 Bed dwellings = 50m^2 - 2 Bed dwellings = 70m^2 - 3+ Bed Dwellings = 90m^2		Supported.

	Minimum widths and area – MUH: Minimum widths are as follows: - Beds = 3.0m	Minimum widths and area – MUH: Minimum widths are as follows: - Master Beds = 3.0m - All other Beds = 2.7m		Supported.
	Minimum widths and area – MUH: Minimum widths are as follows: - Living Rooms – Studio + 1 Beds = 3.6m - Living Rooms – 2 Bed + 3 Bed = 4.0m	Minimum widths and area – MUH: Minimum widths are as follows: - Living Rooms – Studio + 1 Beds = 3.0m - Living Rooms – 2 Bed + 3 Bed = 3.6m		
	Internal Storage – MUH: - Studio = $2m^3$ - 1 Bed = $3m^3$ - 2 Bed = $4m^3$ - 3 Bed+ = $5m^3$ External Storage – MUH: various rules	Storage – MUH: - Studio = $4m^3$ - 1 Bed = $6m^3$ - 2 Bed = $8m^3$ - 3 Bed+ = $10m^3$		Supported.
	Balustrades – MUH: various rules	No requirement		Supported.

Comparison Table: RZ4 – Urban Residential Zone

Element	Current Provision	Proposed Change	Reason for Change	Institute Comments
Policy Outcomes: (Residential Zones Policy)	1. Facilitate development or redevelopment of sites to achieve a distinctly medium density housing character in a manner that demonstrates design excellence.	Facilitate urban development or redevelopment of sites to achieve medium to high density, mid-rise housing in a manner that demonstrates good design outcomes.	Name change and policy outcome changes are proposed to reflect that RZ4 does not often contain housing that is of a density and height that would be considered 'medium density'. While these reforms will step RZ4 closer to medium density, this name change reflects that RZ4 is practically the start of the more 'urban' residential zones.	Supported.
	2. Provide for a range of housing choices where the housing contains a mix of single dwelling and multi-unit housing.	2. Provide for a range of housing choices, which are predominately medium to high density multi-unit housing of various dwelling types.		Supported.
	3. Provide opportunities for redevelopment by enabling changes to residential density and the original pattern of subdivision.	3. Provide opportunities for redevelopment by enabling change, including to residential density and the original pattern of subdivision.		Supported.

	4. Provide opportunities for redevelopment by enabling change.			Supported.
Maximum height: (Residential Zones Policy)	12.5m	Secondary residence: 2 storeys Single dwelling housing: 3 storeys MUH: 6 storeys	The gradation of heights across the different housing typologies is designed to incentivize multi-unit housing redevelopment to provide more housing in an efficient manner in this zone.	Not Supported. Recommend the number of storeys be removed and the Technical Specifications Building Heights be used.
Other Residential Zones Technical Specification changes:	Site and Land Use – Distribution of non-residential developments in all residential zones – varied development types	Site and Land Use – Distribution of non-residential developments in all residential zones – varied development types with addition of: - Social enterprise - Veterinary clinic		Supported.
	Site and Land Use – Distribution of non-residential developments in all residential zones – no more than 2 home businesses per section	Site and Land Use – Distribution of non-residential developments in all residential zones – no more than 2 home businesses per 20 dwellings		Supported.
	Private open space for MUH – 40% of site	Private open space for MUH – 30% of site	Private open space requirements have reduced in site	Supported.

			percentage however the quality of space that contributes to the private open space area has increased. This is intended to see improvements in usable, high amenity spaces for residents.	
	Building height – RZ4 is 3 storeys.	Building height – RZ4: - Single Dwelling – 10.5m - Multi-unit housing – 21m		Supported.
	Building envelope – 3.5m and 45°	Building envelope – 4.0m and 45°		Supported.
	Front setbacks for MUH – 6m	Front setbacks for MUH – 4m-6m		Remove reference to 'Primary front boundary setback for blocks in subdivisions approved before 18 October 1993' from the Technical Specifications. Recommend one front setback of 4m for all single dwelling and MUH. This provides more flexibility in design and allows better use of sites where it is more beneficial to have tree canopy cover in the rear of the site.
	Front setbacks for MUH Corner blocks secondary street frontage (mid-sized blocks) – 3m	Front setbacks for MUH Corner blocks secondary street frontage (mid-sized blocks) – 2m		Supported.

	Side and rear setbacks for MUH Second Upper Level – 0-6m	Side and rear setbacks for MUH Second Upper Level– removed and aligned with Upper Floor Level rules.		Supported.
	Solar building envelope angle for MUH – 31°	Solar building envelope angle for MUH – 45°		Recommend a review of the solar building envelope solar fence and envelope angle be considered. An increased solar fence height to 3.0m coupled with an angle of 35° allows more flexibility of design whilst ensuring good solar access to neighbouring blocks.
	Separation between walls in MUH – RZ4: Unscreened elements and an external wall on the same block or an adjoining block are separated by 3m or more. External walls at the lower floor level on the same or adjoining block are separated by 1m or more.	Separation between walls and PPOS in MUH – RZ4: Addition of unscreened elements to primary window and centre of any other dwelling's PPOS: 12m		Supported.
	Privacy – MUH: various rules (refer Technical Specifications)	Added to above.		Supported.
	Minimum dwelling size – MUH: Minimum dwelling floor areas for: - Studio dwellings = 40m^2	Minimum dwelling size – MUH: Minimum dwelling floor areas for: - Studio dwellings = 35m^2		Supported.

	- 1 Bed dwellings = 50m^2 - 2 Bed dwellings = 70m^2 - 3+ Bed Dwellings = 95m^2	- 1 Bed dwellings = 50m^2 - 2 Bed dwellings = 70m^2 - 3+ Bed Dwellings = 90m^2		
	Minimum widths and area – MUH: Minimum widths are as follows: - Beds = 3.0m	Minimum widths and area – MUH: Minimum widths are as follows: - Master Beds = 3.0m - All other Beds = 2.7m		Supported.
	Minimum widths and area – MUH: Minimum widths are as follows: - Living Rooms – Studio + 1 Beds = 3.6m - Living Rooms – 2 Bed + 3 Bed = 4.0m	Minimum widths and area – MUH: Minimum widths are as follows: - Living Rooms – Studio + 1 Beds = 3.0m - Living Rooms – 2 Bed + 3 Bed = 3.6m		
	Internal Storage – MUH: - Studio = 2m^3 - 1 Bed = 3m^3 - 2 Bed = 4m^3 - 3 Bed+ = 5m^3	Storage – MUH: - Studio = 4m^3 - 1 Bed = 6m^3 - 2 Bed = 8m^3 - 3 Bed+ = 10m^3		Supported.

	External Storage – MUH: various rules			
	Balustrades – MUH: various rules	No requirement		Supported.

Comparison Table: RZ5 – Urban Density Zone

Element	Current Provision	Proposed Change	Reason for Change	Institute Comments
Policy Outcomes: (Residential Zones Policy)	1. Facilitate development or redevelopment of sites to achieve high density housing in a manner that demonstrates design excellence.	1. Facilitate urban development or redevelopment of sites to achieve high density, medium rise housing in a manner that demonstrates good design outcomes.	Name change and policy outcome changes are proposed to reflect that RZ5 does not often contain housing that is of a density and height that would be considered 'high density' which are typically contained in the commercial zones, such as town centres, in the ACT. While these reforms will step RZ5 closer to high density, this name change reflects that RZ5 is just the densest of the residential zones, rather than always delivering high-density apartment tower style developments.	Supported.

	2. Provide for the establishment and maintenance of residential areas where the housing is generally high density in character, particularly in areas with very good access to facilities and services and/or frequent public transport services.	2. Provide opportunities for the establishment and maintenance of residential housing that is generally high density.		Supported.
	3. Provide for a range of housing choices where multi-unit housing, typically of a larger scale, are provided for a range of dwelling types.	3. Provide housing in areas with very good access to facilities and services and/or frequent public transport services.		Supported.
	4. Provide opportunities for redevelopment by enabling changes to the original pattern of subdivision.	4. Provide for a range of high density and larger scale housing choices of various dwelling types.		Supported.
	5. Provide opportunities for redevelopment by enabling change.	5. Provide opportunities for redevelopment by enabling changes, including to the original pattern of subdivision.		Supported.
Maximum height: (Residential Zones Policy)	21.5m	Secondary residence: 2 storeys Single dwelling housing: 3 storeys	The gradation of heights across the different housing typologies is designed to incentivize multi-unit housing redevelopment to provide	Not Supported. Recommend the number of storeys be removed and the Technical Specifications Building Heights be used.

		MUH: 7 storeys	more housing in an efficient manner in this zone.	
Other Residential Zones Technical Specification changes:	Site and Land Use – Distribution of non-residential developments in all residential zones – varied development types	Site and Land Use – Distribution of non-residential developments in all residential zones – varied development types with addition of: - Social enterprise - Veterinary clinic		Supported.
	Site and Land Use – Distribution of non-residential developments in all residential zones – no more than 2 home businesses per section	Site and Land Use – Distribution of non-residential developments in all residential zones – no more than 2 home businesses per 20 dwellings		Supported.
	Private open space for MUH – 40% of site	Private open space for MUH – 30% of site	Private open space requirements have reduced in site percentage however the quality of space that contributes to the private open space area has increased. This is intended to see improvements in usable, high amenity spaces for residents.	Supported.

	Building height – RZ5: Within 50m of RZ1,2,3 – 3 storeys Within 40m of blocks in CFZ, RZ2, or RZ3 – 3 storeys Within 30m of blocks – 4 storeys In all other cases – 6 storeys	Building height – RZ5: For single dwelling housing – 10.5m Within 50m of RZ1,2,3 – 14m Within 40m of blocks in CFZ, RZ2, or RZ3 – 14m Within 30m of blocks – 17.5m In all other cases – 24.5m		Supported.
	Building envelope – 3.5m and 45°	Building envelope – 4.0m and 45°		Supported.
	Front setbacks for MUH – 6m	Front setbacks for MUH – 4m-6m		Remove reference to 'Primary front boundary setback for blocks in subdivisions approved before 18 October 1993' from the Technical Specifications. Recommend one front setback of 4m for all single dwelling and MUH. This provides more flexibility in design and allows better use of sites where it is more beneficial to have tree canopy cover in the rear of the site.
	Front setbacks for MUH Corner blocks secondary street frontage (mid-sized blocks) – 3m	Front setbacks for MUH Corner blocks secondary street frontage (mid-sized blocks) – 2m		Supported.

	Side and rear setbacks for MUH Second Upper Level – 0-6m	Side and rear setbacks for MUH Second Upper Level– removed and aligned with Upper Floor Level rules.		Supported.
	Solar building envelope angle for MUH – 31°	Solar building envelope angle for MUH – 45°		Recommend a review of the solar building envelope solar fence and envelope angle be considered. An increased solar fence height to 3.0m coupled with an angle of 35° allows more flexibility of design whilst ensuring good solar access to neighbouring blocks.
	Separation between walls in MUH – RZ4: Unscreened elements and an external wall on the same block or an adjoining block are separated by 3m or more. External walls at the lower floor level on the same or adjoining block are separated by 1m or more.	Separation between walls and PPOS in MUH – RZ4: Addition of unscreened elements to primary window and centre of any other dwelling's PPOS: 12m		Supported.
	Privacy – MUH: various rules (refer Technical Specifications)	Added to above.		Supported.
	Minimum dwelling size – MUH: Minimum dwelling floor areas for:	Minimum dwelling size – MUH: Minimum dwelling floor areas for:		Supported.

	- Studio dwellings = 40m^2 - 1 Bed dwellings = 50m^2 - 2 Bed dwellings = 70m^2 - 3+ Bed Dwellings = 95m^2	- Studio dwellings = 35m^2 - 1 Bed dwellings = 50m^2 - 2 Bed dwellings = 70m^2 - 3+ Bed Dwellings = 90m^2		
	Minimum widths and area – MUH: Minimum widths are as follows: - Beds = 3.0m	Minimum widths and area – MUH: Minimum widths are as follows: - Master Beds = 3.0m - All other Beds = 2.7m		Supported.
	Minimum widths and area – MUH: Minimum widths are as follows: - Living Rooms – Studio + 1 Beds = 3.6m - Living Rooms – 2 Bed + 3 Bed = 4.0m	Minimum widths and area – MUH: Minimum widths are as follows: - Living Rooms – Studio + 1 Beds = 3.0m - Living Rooms – 2 Bed + 3 Bed = 3.6m		
	Internal Storage – MUH: - Studio = 2m^3 - 1 Bed = 3m^3 - 2 Bed = 4m^3	Storage – MUH: - Studio = 4m^3 - 1 Bed = 6m^3 - 2 Bed = 8m^3		Supported.

	- 3 Bed+ = 5m^3 External Storage – MUH: various rules	- 3 Bed+ = 10m^3		
	Balustrades – MUH: various rules	No requirement		Supported.

Comparison Table: Subdivision Policy

Element	Current Provision	Proposed Change	Reason for Change	Institute Comments
Assessment Outcome 2:	New blocks are of a size and configuration that can accommodate the intended use for the site (for example an appropriately sized and configured site for single dwelling use).	New blocks are **appropriately located and are** of a size and configuration that can accommodate the intended use for the site (for example an appropriately sized and configured site for single dwelling use).		Supported.
Currently Leased block – Residential block configuration:	RZ1 400m^2 RZ2 350m^2 RZ3 325m^2 RZ4 300m^2 RZ5 250m^2	RZ1 350m^2 RZ2 300m^2 RZ3 275m^2 RZ4 250m^2 RZ5 250m^2		Not Supported. The variance in blocks size limits based on residential zoning is not required. A standardized limit of 250m^2 for all blocks is an equitable approach that provides greater opportunity for appropriate density in RZ1 and RZ2.

Currently leased blocks – frontage of RZ1 block:		RZ1 blocks created through the subdivision of consolidation of a currently leased block have one of the following: a) A street frontage b) A frontage on to an urban open space of the community path system.		Not Supported. This rule discourages the retention of existing dwellings and contradicts the design guide's typical layouts shown for mid-section blocks. There should be no design limitation on how blocks are subdivided on an existing site providing suitable amenity and accessibility to blocks is delivered.
Currently leased blocks – scale and location of consolidation RZ1 blocks:		Consolidation of currently leased RZ1 blocks that: a) Create an end of section block is limited to a consolidation are of 3,000m^2. b) Are adjacent to an urban open space or the community path systems is limited to a consolidation area of 2,500m^2. c) Consolidation of other RZ1 blocks (which includes mid-section blocks) is limited to a consolidation block area of 2,000m^2.		Supported in principle. The indicated limits are supported. For consolidations over 3000m^2 it is recommended that proposals be reviewed by a Missing Middle Housing Design Review Panel to ensure higher quality outcomes. Refer to comments associated with this schedule on the Missing Middle Housing Design Review Panel. Recommend all developments over 2000m^2 be subject to RZ2 Policies and Technical Specifications.

Subdivision Design Application – Land use zoning:	New land use zones comply with all of the following: Etc.	New land use zones **proposed in a subdivision design application** comply with all of the following: Etc.		Supported.
Subdivision Design Application – Residential zoned blocks:	Residential zoned blocks comply with the following: a) RZ1 contains: i) No more than 10% compact blocks ii) No more than 30% mid-sized blocks b) RZ2 contains: i) No more than 15% compact blocks ii) No more than 40% mid-sized blocks c) RZ3+4 contains: i) At least 25% compact blocks ii) At least 50% mid-sized blocks	Residential zoned blocks comply with the following: a) RZ1 contains: i) No more than 15% compact blocks ii) No more than 40% mid-sized blocks b) RZ2 contains: i) No more than 20% compact blocks ii) No more than 50% mid-sized blocks c) RZ3 contains: i) At least 30% compact blocks ii) At least 60% mid-sized blocks		Not supported. This rule, even with increased percentages, is significantly restricting densification. In RZ1 it is mandating 45% of subdivision designs remain as large blocks, which is not consistent with the need for densification. There should be no limit to the number of compact and mid-sized blocks. The regulations should be encouraging subdivision design appropriate to the housing needs of a particular precinct.

	d) RZ5 contains: i) At least 30% compact blocks ii) At least 60% mid-sized blocks	d) RZ4+5 contains: i) At least 40% compact blocks ii) At least 70% mid-sized blocks		

Woden Valley
Community Council Inc.
wodenvalleycommunitycouncil@gmail.com

The Secretary
Environment, Planning and Sustainable Development Directorate
By email: EPSDDComms@act.gov.au

1 August 2025

Dear Secretary

Submission on Missing Middle Planning Changes

The Woden Valley Community Council (WVCC) thanks the Directorate for the opportunity to comment on the Missing Middle Planning Changes.

Overall, the WVCC has strong concerns about whether the proposed planning changes will achieve its desired policy outcomes of more affordable housing in the suburbs and build sufficient housing in a short period.

Moreover, the WVCC is concerned that the proposed changes fail to recognise the need for more community infrastructure in the context of an increased population.

The Woden Valley Community will be affected by the proposed changes

The WVCC represents residents and organisations located in the Woden Valley. This includes suburbs stretching from Isaacs and Mawson in the south to Hughes and Curtin in the north. A large swathe of the Woden Valley and its suburbs is currently zoned as RZ1, which is the subject of proposed Missing Middle changes.

The Woden Valley Community expressed strong interest in the proposed Missing Middle changes, and the WVCC's consultation has noted the proposed changes will directly affect a large part of the community.

The WVCC acknowledges the **need for Zoning Changes.**

The WVCC believes the proposed changes to RZ1 zoning are needed. RZ1 covers around 80% of the urban area of the ACT so RZ1 usage has a major impact on the design of the community and on the ACT's natural environment. The WVCC is concerned however, about what the actual impact of the changes will be.

Likely effect of the changes in practice

Woden Valley suburbs were built from the late 1960s into the 1980s, so 50 years later many homes are at a stage where homeowners are considering options to rebuild, renovate or extend their house.

A relevant example of how the missing middle changes could end up working in practice is Hurley Street, Mawson. Hurley St was originally built with single residences and a reasonable proportion of government housing. Hurley St and other streets adjacent to it were rezoned to RZ2, I think around 2000 – as part of the TPV200, the Garden City Variation changes.

As a result of the changes, properties were rebuilt, and very few remained as the original modest single residences. Most blocks were rebuilt with 2 or 3 four-bedroom 'luxury-style' townhouses. In a few instances, blocks were consolidated and up to 6 townhouses were built on what was originally 2 blocks with 2 three-bedroom houses. The new dwellings are considerably larger than the houses they replaced. The new townhouses are not affordable, and each townhouse cost more than the older modest house they replaced. Other blocks have had the original modest three-bedroom house demolished and replaced by very large 'McMansions'.

In Hurley St and the rest of Woden, there has not been an increase in affordable housing, tree canopy or open space as a result of redevelopment of existing RZ1 blocks. There has been an increase in parking in the street and hard surfaces. The new units have higher EER ratings but as they are a lot larger, the decrease in energy use has not been as high. There has been a whole house worth of demolished building materials which largely have gone to land fill. There has been an even larger quantity of building materials imported from outside the ACT to build the new building. These imported materials are not counted in the ACT's greenhouse gas inventory.

Consultation

The Directorate formerly known as EPSDD has clearly put a lot of resources into consultation both online and in person – thank you.

However, EPSDD has not been prepared to run any town hall style meetings. In particular, they have refused to engage with the community councils to assist or facilitate this style of community consultation beyond an initial briefing session to the councils. Town hall meetings where people can see and hear what their fellow Canberrans are saying are very useful for helping people get a better understanding of how the potential changes could affect them.

The ACT government established and funded community councils to assist in consultation with the community and it is sad to see the government ignore the councils in this regard. The WVCC is concerned that a more one-on-one and restrictive style of engagement was selected in lieu of any town hall style community consultation to reduce the diversity of thought and information sharing opportunities, and to stifle discussion within our communities. Given the possible widespread nature of the changes this is particularly disappointing.

Draft Major Plan Amendment to the Territory Plan

The WVCC supports most of these amendments which aim to give more flexibility in the use of RZ1 land. A potentially important change is to allow subdivision and block consolidation. In some instances this will be very beneficial as the original block layout was designed for different land uses.

The WVCC also supports the:

- Reduced minimum block area for 2 dwellings or secondary residences
- Increased maximum dwelling numbers on a block.

We support these **only** in conjunction with rules to preserve the natural environment and residential amenities, and provide infrastructure, including transport, schools and community facilities that cater for the additional population growth.

We **do not support** the reduction in setbacks and building envelope protection in the draft legislation and design guides. If these protections are reduced, then the case to reduce controls on dwelling numbers is a lot less.

We **are unsure about** what 'Block subdivision permitted where a dwelling has been lawfully constructed' means in the context of unit titling. We **do support** allowing unit titling or subdivision where it can be made to work with existing dwellings even if they were originally built without permission, as long as the dwellings can be upgraded to meet building and planning requirements.

Design guides

To make these changes to the Territory Plan work, the buildings must be well designed. The government has produced additional documents to give guidance about what it wants to be built. They are the Technical Specifications and the relevant Design Guides. These documents are guidance, not law, and are therefore non-binding to those developers that may choose to ignore them.

The text in these documents is very positive. Page 7 of the ACT Missing Middle Housing Design Guide has the missing middle design principles:

1. Respond to neighbourhood context and character to create a sense of identity and reflect local styles.
2. Contribute to healthy and safe communities through well designed streets and communal spaces.
3. Encourage sustainable design practices that optimise resource and energy efficiencies and minimise impact on the natural environment.
4. Support housing diversity and community needs by providing a mix of different housing typologies.

If these 4 principles are all achieved then the missing middle changes will be a success. However, the WVCC doubts that the reality will live up to the promotional words.

We **do not have** the capacity to comment on all the technical and design guide contents. This submission only covers some of the most obvious issues.

Changes we support

- We **support** allowing apartments in RZ1. This will enable more single level residences and help aging in place. These apartments may need a lift system to enable older or less mobile people to live there.

- We **support** removing the minimum block size for secondary dwellings **subject to** the strict adherence to site coverage requirements etc such as tree canopy, planting area, solar access and overlook.

- We **support** allowing cohousing in all RZ1 blocks, **subject to** the strict adherence to site coverage requirements such as those controls identified above.

- We **support** not specifying a maximum number of dwellings per block, instead allowing this to be governed by the strict adherence to the general site controls such as those identified above.

- We **support** increasing the tree canopy requirements from 15% to 20%. However it appears that this increase is being used to divert attention from the actual reduction in planting area; see our comments on that below. Trees need planting space to grow in. Tree canopy areas can be put in the plans by the landscape architect but it will be 10–20 years or longer before the trees grow to full size. At that point it will be too late to fix any lack in tree canopy.

Changes we are unsure about

The changes in car parking requirements are complicated. Ideally there would be adequate public and active transport so that residents could genuinely live without owning a car, and visitors would not need to come by car. Most of Canberra's suburbs are not like that however and it is important that residents and visitors to these areas have adequate parking. Possibly the rules could incentivize car parks that later can be used for other purposes when public transport improves?

Making this a harder problem is that if there is inadequate parking provided, all the neighbourhood may be affected as existing parking spaces are used by the new development. So the existing residents get the pain without any gain to them.

Changes we do not support

WVCC **does NOT support** some changes. These are the changes that will contribute to creating an environment which lacks open green space, reduces the space for the natural environment, reduces solar access for adjacent buildings and reduces privacy to neighbouring properties.

- We **do NOT support** reducing the planting area from 35% to 30%. This will increase the urban heat island effect and reduce the space for environmental uses as well as human enjoyment.

- We do not object to reduced private open space as long as there is good, usable communal open space. However there does not seem to be any assurance of this.

- The change in the building envelope so it is measured at 4m above the boundary, not 3.5m as well as the reduction in front and side setbacks will enable larger dwellings.

- The change in solar building envelope angle from 31 degrees to 45 degrees will increase overshadowing and reduce residential amenity. It will also make it harder to have usable open space as more will be in shade most of the time.

- Moving of the building heights (heights in metres) from the Territory Plan (legally binding) into the Planning Technical Specifications (non legally binding), but leaving the building heights in storeys in the Territory Plan. This enables greater building heights to be achieved in metres (not legally binding), for the same number of storeys (the legally binding component). This may be detrimental to the surrounding properties by creating privacy and overlooking concerns. However there will be no way to object to or change the design, in our now outcomes-based design provisions.

RZ2, RZ3 changes

As far as the changes for RZ2 and RZ3, we have no comments except in the RZ2 areas where RZ1 changes will be allowed there. Our comments for RZ1 would then be relevant to RZ2.

Finances, cost, affordability and timeliness

The proposed Missing Middle changes will be most viable in inner established areas where land values are high, blocks are bigger and houses older and smaller. The WVCC thinks that in most cases Missing Middle redevelopment will only be viable if either the existing house needs very major renovation and thus will be demolished anyway, or the home owner has a non-financial motivation.

These would likely be family support such as accommodating an aged parent or disabled family member. For many of these developments existing granny flat/secondary dwelling rules would be adequate if there was the option to unit title the block into 2 units.

It is interesting to see the step-by-step guide for property owners in the Missing Middle Housing Design Guide. We assume that this reflects the government's expectation of the likely uptake of the Missing Middle Housing reforms in practice.

If that analysis is correct, it will take decades for the missing middle reforms to change the building through the suburbs. They are unlikely to be a major source of new affordable housing.

The consultation document does not consider the financial aspects of redevelopment. Given the siloed nature of the ACT government this is not surprising. However, it is the finances that will largely determine whether or not any of these planning changes are acted on. The WVCC hopes that even if the government is not prepared to share its financial modelling with the public, it has done some. The WVCC suggests that the government should share its modelling about the likely uptake of the plans and the barriers to adopting the new regulations.

The WVCC suggests that the rate of land variation charges (LVC) should be considered as a part of ways to increase affordable medium density housing stock. In particular LVC could be adjusted to promote social and affordable housing.

It is our expectation that as in Woden under current RZ2 rules and ACT-wide with the 'Mr Fluffy' blocks, most of the dwellings constructed under these rules will be large and unaffordable to the low and average income Canberrans. This of course is due to many factors such as cost of construction and the taxation arrangements for property ownership and rental. However it is disappointing that the ACT government has produced a new scheme which is unlikely to significantly increase housing supply or affordability in Canberra.

Possible other changes to increase affordable housing

The missing middle rules are all about putting more and bigger buildings in our suburban areas.

However the WVCC would like to see an emphasis on affordable housing, urban amenity and preservation/enhancement of the natural environment. We would like to see an emphasis on good use of the resources embodied in our existing housing stock. This policy does not do that. It will encourage knock down/rebuild of houses that are still usable. We would like to see an environmental analysis of the program including the impact of the demolition and supply of new building materials.

For a more timely source of additional affordable housing, the WVCC suggests the ACT government should look at ways to make better use of our existing housing stock. Older areas of Canberra have an abundance of larger houses where the children have left home and the spouse has died, leaving a widow/er who does not want to leave the family home.

In some cases, these homes could be shared which would benefit the existing resident with more support for household maintenance and possibly financial and social support. It could provide affordable housing to the other person.

The most significant barrier to this is lack of understanding of the option and support for the home owner. Providing a service to support older homeowners to share large homes was part of the 2016 Parliamentary agreement between the Greens and the ALP. It was never implemented in the ACT but has been in other states.

Taxation arrangements are a substantial deterrent to house sharing. In the ACT the owner could be charged land tax on part of the building. They would lose part of the capital gains tax exemption and any rental income could reduce Centrelink income if

applicable. The ACT government could clarify the land tax issues with shared houses.

A targeted loan program, to be paid back when the house was sold, could be available for minor renovations such as an upgraded bathroom or kitchen or additional door.

Another quicker and cheaper source of new housing is tiny homes. These can be prefabricated and moved into place comparatively cheaply. They have become a normal part of housing in some parts of Australia. They could be put on RZ1 blocks now instead of waiting for a new $500,000 plus Missing Middle development to be feasible.

The WVCC does not suggest that these ideas will solve all the issues of affordable housing, community development and preservation – even enhancement – of the natural environment. We do see them as part of the solution.

Yours faithfully

Woden Valley Community Council
wodenvalleycommunitycouncil@gmail.com

From: [redacted]
To: EPSDD Communications
Subject: Missing middle housing reform feedback submission
Date: Saturday, 2 August 2025 9:33:53 AM

You don't often get email from [redacted]. Learn why this is important

Caution: This email originated from outside of the ACT Government. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hello,

I live in the inner north, and agree with the aims of creating more housing options for a liveable Canberra. My main concern is that the current strata system often leaves apartment owners and renters in challenging positions.

Liveability of housing is decreased by slow decision-making processes
Apartment owners and renters can spend months or years trying to get repairs to common property that affects their unit. Even if the strata committee is not trying to be obstructive, all the members are volunteering their time, fitting it around their other commitments, information gets lost via the strata manager and trying to get a decision can take a really long time.

Strata committees lack support and take on a disproportionate workload
Being on a strata committee is a frustrating and thankless position where a small number of people shoulder all of the work to maintain the complex. "Unit titles management in the ACT: What you need to know" was a helpful starting point, but I didn't feel like I properly understood what I should be doing, and our strata manager was not helpful in this regard. This meant that I was often relying on the knowledge of existing committee members, and sometimes it turned out they weren't aware of our obligations.

Strata companies provide poor service
Working with a strata company has been a continuous disappointment. Rather than being an informative source of support, we're constantly having to check and follow up on basic requests and they don't even seem to understand the legislative requirements. However most people in the complex don't have to engage with them frequently, and changing providers represents its own challenges and workload increases.

Possible solutions
- Could it be allowed that strata committee members receive a reduction in their strata fees? Maybe this would increase people's desire to be on the committee, and more competition might make it more responsive?
- Are there ways to encourage good service from strata management companies? Like a reputable ratings service?
- Could the Territory invest in a research project about how to create communities within apartment complexes?
- Could the Territory provide or inform about existing training opportunities for committee members? (Acknowledging that this also increases the time commitment for them)

If we're aiming to greatly increase the proportion of residences that use a strata scheme, Canberra needs to find ways to make this a better experience for the people living in them.

Thank you for being open to consultation!

Kind regards,

[redacted]

Environment, Planning and Sustainable
Development Directorate
EPSDDcomms@act.gov.au

Mr Chris Steel MLA
Minister for Planning
GPO Box 1020
Canberra ACT 2601
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Dear Planners

GNCA SUBMISSION ON THE PROPOSED MISSING MIDDLE CHANGES

1. The Griffith Narrabundah Community Association (GNCA) was founded in 2000 and represents the interests of residents and other interested parties such as businesses within Griffith south of Canberra Avenue and Narrabundah west of Sturt Avenue. The GNCA thanks the Directorate for the opportunity to comment on this issue.

2. The Government announced on 20 May 2025 that it would amend the Territory Plan to allow "more low-rise 'missing middle' homes in Canberra's existing suburbs" to help achieve its target of 30,000 new homes by 2030. The changes will permit more low-rise multi-occupancy homes (2-3+ homes on a block), townhouses, terrace homes and low-rise apartments in existing RZ1 and RZ2 zones.

3. While the GNCA generally supports the points made in the Inner South Canberra Community Council's (ISCCC's) submission on this matter, the GNCA feels it is worthwhile making the following additional comments.

RECOMMENDATIONS

4. The GNCA **Recommends** that the Government:
    1. **Withdraw the proposed changes pending further consideration and wider consultation, particularly with those bearing the burden of the changes;**
    2. **Initiate a full review of the RZ2 zoning to determine how effective it has been since its inception in 2002; how uptake has varied over the years; if appropriate how the rules applicable to RZ2 might be amended to improve operation of the zoning system; and if deemed appropriate how the area zoned RZ2 might be incrementally expanded either now or in future years;**
    3. **Also initiate an inquiry into RZ3 to consider how useful this zoning classification has been and whether its rules should be modified to make it a more useful planning device;**

4. **Establish arrangements for wide and genuine pre-DA consultation to ensure that future changes to existing RZ1 areas are acceptable to the residents as well as the proponents and the TPA; and**
5. **Ensure that third party appeals continue to have a significant potential role in the system to maintain public confidence in the integrity of the planning system.**

DISCUSSION

Is there a Missing Middle and how should Canberra Respond?

5. Wikipedia advises that the term Missing Middle was introduced by American architect Daniel Parolek in 2010 when advocating for "small-scale, multi-unit or clustered housing in liveable, walkable, urban communities. Wikipedia defines the term as medium density housing "characterized by a range of multi-family or clustered housing types that are still compatible in scale and heights with single-family or transitional neighbourhoods." Arguably "Multi-family housing facilitates walkable neighbourhoods and affordable housing, and provides a response to changing demographics."

6. The Government has defined missing middle[1] as "multi-occupancy (dual and tri-occupancy), townhouses, terrace homes and low-rise apartments (up to three storeys)", qualifying what is meant by low rise. We note that this excludes the requirement for compatibility in "scale and heights with single-family or transitional neighbourhoods" included in the original Parolek definition.

7. The inclusion of 3 storeys high apartment buildings raises the possibility that much of RZ1 closer to Group Centres (or even theoretically anywhere within RZ1) could end up looking much like Kingston, where there is a height limit of 3 storeys except with 4 storeys permitted "only where it is not the dominant feature of a street frontage". As apartments are not currently permitted in either RZ1 or RZ2 this will remove a major discriminator between the two lower density zonings and the higher density RA3, RZ4 and RZ5 zonings when they will be permitted all over Canberra. We presume the acceptance of apartment buildings in RZ1 will mean that four dwellings in a multistorey building, the so called "Manor House" configuration, will be permitted.

8. To what extent is there a missing middle in Canberra? ABS statistics for 2021 indicates that there were 106,433 separate houses (63.2%), 28,921 semi-detached, row or terrace houses, townhouses etc (17.2%), and 32,669 flats or apartments (19.4%) in Canberra. So middle density housing is not missing, it is just the least numerous category of housing. Does this require a major Government intervention to increase the Missing Middle's proportion so that it is the second most common, or even the most common form of housing? The disparity between middle density housing and flats and apartments does not suggest that there is any crisis nor that instant, drastic action is called for. If the Government believed that it was desirable that Missing Middle housing be more common than apartments some modest, well considered tweaks to the current planning rules would seem to be a more reasonable response.

[1] Draft Major Plan Amendment to the Territory Plan 04, p.4

9. Construction of Missing Middle dwellings is to be encouraged by significant changes to the Residential Zones through redefining the naming and policy outcomes for all residential zones. In particular, RZ2, the Suburban Core Zone, is to become the Suburban Density Zone, and the practically moribund RZ3, currently called the Urban Residential Zone, will become the Residential Transition Zone.

10. The Missing Middle changes are aimed at removing and reducing planning constraints on the potential subdivision of blocks in the older suburbs of Canberra to increase dwelling density. The casual reader might think that all these changes would not deliver too much change – possibly a doubling of the present housing density. This is not the case. The changes are intended to result in a dramatic and significant alteration to the way that redevelopment takes place in Canberra's suburbs, especially in RZ1. The proposed residential density[2] for apartments is to be 67 dwellings per hectare, while for attached house (terrace houses) the density will be 54 dwellings per hectare, with more permissible in both cases if there is basement parking. For comparison, the Supporting Report[3] indicates (p.5) that RZ1 housing occupies 11,933.00 ha[4]. The Report does not give the number of dwellings so we must use the ABS's 2021 figures as a proxy. This suggests that the average block size in Canberra is 11,933/106,433 = 0.11 ha, giving a dwelling density of 8.9 dwellings per ha So the proposed densities are 6.1 to 7.5 times as dense as at present. Surely this is a significant overreaction to an issue which despite some media hype cannot be categorised as catastrophic. With the proposed increases in residential density the entire population of Canberra could be consolidated into less than one fifth of the existing area. This is more than just an uplift of RZ1 to RZ2 rules.

11. The GNCA has doubts that the proposed changes, if introduced, would have much effect in encouraging the construction of the 30,000 new dwellings that the TPA believes will be required by 2030, that is in the next four and a half years. The evidence is that it takes a considerable period for leaseholders to respond to changes in the territory plan such as the establishment of the RZ2 planning zone. See our comments on this in paragraph 29 below and paragraph A2 in the Attachment.

12. The GNCA believes that the proposed changes are an over-reaction to the current position of Missing Middle housing in the ACT. The GNCA recommends that the Government w**ithdraw the proposed changes pending further consideration and wider consultation, particularly with those bearing the burden of the changes.**

13. Rather than a sudden very significant change to the planning rules the GNCA believes that the TPA should give some thought to which of the current planning zones are not fulfilling their stated

[2] See ZS1 – Residential Zones Specifications p.8 Assessment Outcome 5 Dwelling density – multi-unit housing – RZ1

[3] Missing Middle Housing Reforms Draft Plan Amendment 04 Supporting Report

[4] There is no date for the Supporting Report's figures but presumably they are relatively current, somewhere between 2023 and early 2025.

objectives, whether changing some of the applicable rules might be effective, or whether the zoning system requires significant change.

14. As a start to this process **the GNCA recommends that the Government initiate a full review of the RZ2 zoning to determine how effective it has been since its inception in 2002; how uptake has varied over the years; if appropriate how the rules applicable to RZ2 might be amended to improve operation of the zoning system; and if deemed appropriate how the area zoned RZ2 might be incrementally expanded either now or in future years;**

15. In addition, the **GNCA recommends that the Government also initiate an inquiry into RZ3 to consider how useful this zoning classification has been and whether its rules should be modified to make it a more useful planning device.**

16. The pros and cons of the proposed changes as listed in the Supporting Report (p.8) are discussed in **ATTACHMENT A**. Readers will no doubt attribute differing values to each of these anticipated (positive and negative) impacts. Without being overly negative one could reasonably argue that the Government is somewhat overegging the benefits of the proposed changes. The GNCA is of the view that, while there might be some benefits flowing from the changes, these are generally outweighed by the losses and disadvantages.

17. Many of the supposed advantages reveal an optimistic if not Panglossian attitude that things will work out for the best. For example, the assessment posits that housing will be cheaper, while the evidence for this is equivocal (See the discussion in paragraphs A3 and A4 in the Attachment).

18. In a similar vein likely disadvantages are minimised or completely ignored. For instance, the risk of the need for (very) expensive retrofitting or upgrading of existing infrastructure, especially sewerage and storm water management is just waved away. A common argument for densification is based on the assumption that much of Canberra's infrastructure is underutilised (or putting it another way, overbuilt) and that consequently many more users can be added without the need for any further investment by the Government. This is unlikely to be the case (see our comments at paragraph A9 in the Attachment).

19. Perhaps the Government could initiate a study of Canberra's urban infrastructure (water, sewerage, storm water, electricity, gas, digital, road capacity and educational infrastructure from preschools upward) capacity and identify any spare capacity, and make public the results. We would expect these from area to area as Canberra's infrastructure has been expanded as required over the past century or so. Such a study should also identify the resilience in the various systems, particularly in light of increased rainfall events with global warming, and the reduced water absorption capacity consequent on the decrease in permeable areas as a consequence of greater site occupancy. Until this has been done the GNCA would regard it as unwise to presume that Canberra had in previous years so grossly overbuilt its infrastructure to the extent that parts of it could cope with a long term six-fold increase in use.

20. The problem of increased parking demand, which the Supporting Report notes will likely lead to conflict between existing and new residents, is just waived away. Claiming that it will be resolved in the assessment process is absurd. The Government needs to articulate a plan to either increase parking space availability or arrange for frequent and reliable public transport so that residents will not need cars.

21. No suggestions are made as to how gentrification could be prevented or mitigated. The discussion seems to focus on the delay to be expected in the Government receiving any increased rates from the rise in house prices.

22. In assessing the likely impact on local character and amenity, the report asserts that "the design-led approach to the reforms has put local character and amenity at the heart of the design principles" which will somehow magically lead to "outcomes which contribute positively to the neighbourhood character". Furthermore "potential negative impacts are expected to be appropriately mitigated through the MMHDG". This is just hand waving. The MMHDG is the document which has created the problem, so how is it expected to mitigate itself? Frankly it is hard to see how it is possible to believe that the intrusion of RZ2 type multiple dwelling redevelopments, let alone 3 storey structures, will positively contribute to the existing neighbourhood character. Or are we talking about "desired" character, which to date has been at the whim of the TPA? Any assessment of whether a proposal fits with the existing character must be left to the local residents, not the TPA.

23. A significant downside also not discussed is the decrease in deep soil planting areas with a consequent loss of at least the existing tree cover that makes the inner suburbs such pleasant places to live. Not only will there be a loss of visual amenity and associated loss of value to residents' properties (people really do like looking at trees (and the birds which live in them), but power bills will go up as there will be less trees to shade houses and transpire water reducing the air temperature.

24. The discussion of Environmental Sustainability appears to ignore the heat island effect. As both increased numbers of bulkier and taller building at higher dwelling densities, and an associated decrease in the number of mature large umbrageous trees to provide shade and transpiration, are likely results of implementing the changes, the island heat effect can only be expected to get worse with the rising temperatures and greater rainfall (or at least more intense rain events) which we can look forward to with global warming.

25. A 2017 CSIRO study[5] revealed that there is a heat island effect in Canberra and that "Land surface temperatures varied … by up to 10°C in suburban areas" and that "Residential areas with above-average surface temperatures were characterised by little tree cover and higher dwelling densities". Assuming that both a typical inner and outer suburb are somewhat closer to the mean than the extremes separated by 10°C suggests that the typical difference is likely to be around 5^0C. Consequently it is not unreasonable to postulate that an increase in building density and a decrease in large tree cover could typically raise temperatures by a similar 5^0C or so.

[5] Mapping surface urban heat in Canberra CSIRO Jacqui Meyers, Drew Devereux, Tom Van Niel and Guy Barnett 6 December 2017 p.6

26. Failing to even mention these likely outcomes suggests that there may be other downsides that have not been taken into account by the TPA. The Government has a duty to govern for us all, and to give due weight and consideration to all potential outcomes, even if they may be 10, 20 50, or 100 years ahead.

General Acceptance of the Need for Some Change

27. Despite these doubts as to the efficacy of the changes, the GNCA is not opposed to redevelopment in the older suburbs, nor to appropriate well considered amendments to the Territory Plan. Overlooking for the moment the very small proportion of housing built before the Second World War, most of Canberra's older suburbs consist of dwellings built between 1945 and the 1970s. So the oldest are now 80 years old and the youngest a youthful 50 or so. Not surprisingly some are less suitable for modern living and cannot be brought up to modern standards at a reasonable cost. Thus some redevelopment is essential, but our preference is that this should maintain a neighbourhood's Garden City attributes. The existing RZ1 Suburban Zone was explicitly created in 2002 to preserve Canberra's low rise separate housing areas, with the other zones designed to concentrate higher density development in more suitable areas located near to employment, retail outlets, and transport routes. Thus RZ2, the Suburban Core Zone, is restricted to areas within easy walking distance (not 15 minutes walk) of local or Group Centres and along bus routes. The intention was to protect and maintain the treasured streetscapes of Canberra's inner suburbs.

28. That said, it is hard to generally argue that a serious loss of amenity would occur if a block of over 1,200m^2 is redeveloped as a dual occupancy, although occasional cases might have problems. Some blocks of 2,000m^2 or more could probably permit triple occupancies. Although not common, blocks of this size exist in Belconnen, Woden, Weston Creek, and Tuggeranong, but not obviously so in Gungahlin or Molonglo (using ACTmapi to identify examples). The GNCA believes that with appropriate safeguards on what was built, subdivision and redevelopment of such large sites could be permitted in RZ1.

29. The GNCA has had concerns for some time that the RZ2 zoning was not achieving its objectives[6]. Redevelopment of blocks zoned RZ2 has been slow for reasons which are not immediately apparent. We recognise the possibility that some of the RZ2 rules may have been appropriate in 2002, when the zoning was first introduced as A10 Residential Core, but may now be inappropriate or unclear in their purpose. For instance, why does the allowable plot ratio drop to 35% for a dual occupancy with only one street frontage but remain at 50% if there are two frontages, while it remains at 50% for triple occupancies with only one street frontage? Why are two dwellings side by side permitted, but two dwellings each with a separate entrance but one above the other not permitted? If the concern is the maintenance of streetscape the latter configuration would arguably

[6] This perception is shared by other residents' associations. See paragraphs 2.2 and2.3 and associated recommendations in the Inner South Canberra Community Council's (ISCCC's) letter to Minister Steel of 19 February 2025.

be less damaging to the streetscape if the site sloped steeply away from the street, as on Lindsay and Landsborough Streets.

30. The GNCA believes that there is a need to examine all the rules which apply to RZ2 to decide whether they are still fit for purpose in 2025. While the GNCA believes that the results above from Grifith Narrabundah are typical of other RZ2 areas, any such review of RZ2 would provide an opportunity to understand how rapidly the densification opportunities it offers have been taken up in other parts of Canberra. The GNCA's preferred approach would be to identify and resolve difficulties with the Plan as they arise rather than developing wholesale transformations of the Territory Plan. In a complex system such as the intersection of planning rules with building and development, small changes made sequentially gives all players a better chance to understand what is happening, and allows for graduated responses.

Loss of Amenity and Garden City Character with Adoption of Proposed Changes

31. While time and space preclude this submission from analysing everything in the proposed Missing Middle proposals, a prominent theme involves significant reductions in size. Reductions are proposed in the size of blocks which may be subdivided, minimum block size, required setbacks, dwelling size, private open space, principal private open space, balcony size and bedroom size. Plot ratio requirements are to be abolished, the height of the solar envelope will be increased (with reduced solar access for neighbours), minimum planting areas reduced, car parking requirements reduced. Perhaps the biggest change is that apartments (defined as where a number of dwellings share a common entrance from the outside as distinct from semidetached or terrace housing) are to be permitted in RZ1 (and presumably RZ2). At present apartments (i.e. dwellings sharing a common entrance) are not permitted in either RZ1 or RZ2.

32. In consequence, if these changes are enacted it will be easy in future years to identify developments constructed after their introduction by the markedly reduced amenity, possibly matched by a lower price. While this latter outcome might be welcomed by the Government, and by some aspirant house buyers, it is not certain that developers would wish to construct cheaper dwellings if this places pressure on their profit margins.

33. The changes would effectively abolish RZ1 as a low rise separate dwelling zone, making it hard to distinguish from areas currently zoned RZ2. However, similar changes are to be applied to RZ2 and higher residential zonings, meaning that RZ1 will remain the lowest density residential zone, just (in the longer term) considerably more dense than it was prior to the changes.

34. The seemingly unconsidered wholesale extension of existing RZ2 and higher zoning provisions to RZ1, without any thorough consideration of the likely pros and cons and their potential costs, and no real analysis of whether the changes are likely to be effective, appears to be a bold initiative. Some might think that the Government wished to appear to be dealing with the pressure for more housing but lacks any structured approach as to how to achieve this end. Any assessment of the effectiveness and timeliness of the changes must always be subjective in the absence of desired outcomes articulated before the changes were introduced.

35. While an increase in housing and cheaper housing seem to be at least some of the Government's objectives with this policy change, there does not seem to be any explicit statement of what the Government hopes to achieve. This absence of defined outcomes will make it difficult for any assessment in the future to determine whether this change was good policy. It is recognised that this shortcoming may not a be flaw but a feature.

36. The cost of the proposed changes would be quite steep, even if not borne by the Government. The apparent abandonment of any commitment to Walter Burley Griffin's Garden City, a touchstone for Canberra planning for over half a century, surely calls for some public debate before embarking on such a significant and irreversible change. Once inner Canberra's Garden City character and its constituent streetscapes have been destroyed these would be very difficult to reconstitute.

37. Some elements of the proposed changes are self defeating. For instance, the changes will allow for aggregation of RZ1 blocks for redevelopment, as is currently permitted for RZ2 blocks, but places relatively small limits on this: 3,000m^2 appear to be the largest aggregation permitted. If the new policy is to do more than introduce large, looming ugly buildings which encroach on their neighbours and the street then terrace houses (as seen in Melbourne and to a lesser extent in Sydney) and courtyard housing (as seen in Europe, with four or five 3 of 4 storey apartment buildings surround a central courtyard which opens off the street via a passage) will need to make up a significant proportion of redevelopments. Both these desirable forms of densification require significant areas, and if the Government is serious, it should be developing policies which allow block aggregations of an entire Section or more to encourage these types.

38. Life for both the TPA and the Planning Minister would be easier if these changes were to be accompanied by requirements for proper and genuine pre-development consultations to ensure that it is not only the developer who believes that the proposed development is consistent with the existing character of the neighbourhood. However, enhanced pre-DA consultation cannot and should not be used as an excuse to reduce third party appeal rights. **The GNCA recommends that the Government establish arrangements for wide and genuine pre-DA consultation to ensure that future changes to existing RZ1 areas are acceptable to the residents as well as the proponents and the TPA.**

39. Planning Approvals are a form of regulation (and not all regulation is bad). However, humans are human, and while some humans are honest all of the time, and all (or at least most) humans are honest some of the time, any system which assumes that all humans will be honest all of the time is naïve or deeply misguided. Are people in the ACT really that different to those in NSW, which fortunately has an ICAC to remind us of human frailty?

40. There needs to be a system to make sure that egregious breaches of the rules are spotted and stopped unless one's preference is to live in a jurisdiction where corruption flourishes. The Government could institute a complex compliance enforcement system, or it can outsource this to its citizens by making it easy for them to detect non-compliant developments and prevent them proceeding.

41. While developers will no doubt complain to the Minister that third party appeals waste time and money and make developments more expensive, the Minister should be aware that they are actually the cheapest way of keeping developers (and architects, certifiers and planners) honest. He doesn't need to mention this to a complaining developer, but he should always bear it in mind. It is essential for the planning processes to retain public confidence, and third-party appeals are an essential part of this. **The GNCA recommends that the Government ensure that third party appeals continue to have a significant potential role in the system to maintain public confidence in the integrity of the planning system**

The GNCA is grateful for the opportunity to comment.



ASSESSMENT OF THE PROS AND CONS OF THE PROPOSED CHANGES

A1 Minister Steel's media release announcing the changes indicated that "We want to provide more homes for Canberrans where they want to live and "This reform is about providing more low-rise homes for first home buyers". More explicitly the Supporting Report (p.8) analyses the anticipated advantages and disadvantages of the changes. These are listed below, with our explanations of what these titles mean in brackets. Readers will no doubt attribute differing values to each of these anticipated (positive and negative) impacts. Without being overly negative one could argue that the Government is somewhat overegging the benefits of the proposed changes.

Advantages:

A2 Increased housing choice

(*i.e. smaller dwellings, more apartments, less open space, lower amenity, possibly lower costs*);
Making it easier to subdivide existing blocks could be expected, other things being equal, to eventually lead to a larger number of dwellings in any given area. The time frame over which this might take place is not clear. One could note for instance, that the street block bounded by Stuart St, Favenc Circle, Lindsay St and Strzelecki St (Section 75 Griffith, Section 55 Narrabundah) had 34 dwellings in 2002. The block was zoned RZ2 (actually RZ2's precursor zoning, A10 Residential Core, but much the same rules applied) in 2002. By 2025, 23 years later, some 18 blocks had been redeveloped and now house 63 RZ2 dwellings. Consequently, there are still 16 RZ1 style single stand-alone houses on this block. Change does happen, but it is not immediate. At this rate of change, one could expect the remaining RZ1 houses to have been redeveloped into RZ2 dwellings by 2050, five decades after the policy changes were introduced. Clearly leaseholders' response to changed zonings is quite long, in the order of decades

A3 Housing availability and affordability

(*i.e. provides more affordable living options compared to single family dwellings, increase overall supply of housing*);
Whether housing will be either more plentiful or cheaper after the changes is not axiomatic. One might expect that the value of a smaller dwelling on a smaller block would be lower reflecting its lesser amenity. On the other hand, a new dwelling resulting from a redevelopment can expect to have a higher value than the value of the significantly older original dwelling. Bear in mind also that any developer would have to buy an existing block at market price, demolish it, and then construct at least two new dwellings built to a standard consistent with the local character. Clearly such dwellings are unlikely to be "cheap". It is unrealistic to expect developers to accept a lower rate of return just to lower house prices. Consequently, whether any newly redeveloped dwelling would be significantly more affordable than the original dwelling is not clear.

A4 Two academics, Limb and Murray[7], in their 2021 paper titled "*We zoned for density and got higher house prices: Supply and price effects of upzoning over 20 years*" examined the impact of repeated relaxations of planning rules to permit denser redevelopment in Brisbane over a 20 year period. The paper concluded that the "evidence suggests that private housing markets will not rapidly supply new housing and cause significant price reductions, even if the planning system allows it." This suggests that if it is the Government's hope that the Missing Middle changes will either dramatically increase housing availability in inner Canberra, or significantly reduce house prices, it is likely to be disappointed on both counts.

A5 Urban vitality

(*i.e. reinvigoration of older neighbourhoods, increased patronage for businesses, more crowded open spaces*);

Most residents in the GNCA area are unlikely to feel that their area needs revitalisation, except perhaps in relation to the Group Centre at Manuka, which is outside any residential zone. Revitalisation might be welcomed in some of Canberra's more outer suburbs where local centres do not seem to be doing as well as in the inner suburbs.

A6 Environmental sustainability

(*i.e. reduces urban sprawl, improves transport efficiency*);

Improved environmental sustainability is plausible but not a certainty. Newer dwellings would presumably be better insulated and designed, and equipped for lower energy consumption and more use of renewable power, but on the other hand smaller blocks means reduced opportunity to orient the dwelling appropriately to maximise solar passive effects, and to also cool the house with suitable large and deep-rooted deciduous trees. Lack or reduced area of planting space will make it very hard to combat the heat island effect which we can expect to only get worse with climate change.

A7 Economic development

(*i.e. provides opportunities and employment for the building and construction sector*);

While it might be that the proposed changes lead to increased building activity this is not necessarily an advantage of the proposals. Unless there is surplus capacity in the sector at present (which does not obviously seem to be the case) then the increased demand for workers in the sector may merely lead to an increase in the shortage of housing, inflation in building and development costs, and an unwanted lengthening of construction times. In light of this the GNCA believes that the possibility of stimulating the building and construction sector should be moved into the cons column.

A8 Infrastructure and operational efficiencies

(*i.e. more efficient provision of utilities (and any other services where cost is an inverse function of density*)).

It seems plausible that there would be some savings (presumably this is what is meant by efficiencies) with delivery of utilities and public transport, but any improvements are likely to be at the margin given Canberra's absurdly gigantic layout. With a central lake and surrounding

[7] Mark Limb, Cameron K. Murray, Urban Policy and Research, Vol 41, 2023 - Issue 2 pp.129-147

parks leaving a 2km gap (between King Edward Terrace and Parkes Way) in the middle of the city, the other parks, reserves, and the ridges and mountains separating Canberra's various districts, and other apparently unnecessary design features such as 7m wide road verges[8], the city will always be low density compared with most others no matter how high the density is raised in selected residential pockets. Too much emphasis on raising the density of scattered pockets of residences risks an outcome of windy Manhattan style intense development surrounded by empty parklands, at best risks looking simply ridiculous and possibly giving rise to the suspicion that our planner put too much faith in one dimensional solutions. Canberra's form is now pretty well set, and it would be better to plan with an acceptance of this than to look for cheap ways to undo it.

The identified downsides of the change are all very real. Potential disadvantages are:

A9 Increased infrastructure demand

(*i.e. strains on existing infrastructure, congestion, overcrowded schools*);
Canberra's infrastructure was built for a much smaller, low density, city and incidents like the need to completely replace the storm water system under Wentworth Avenue after the redevelopment of Kingston to a three or four storey apartment precinct should discourage the easy assumption that Canberra's infrastructure is significantly underutilised. Previous generations of engineers were not ill-educated, and did not gratuitously overbuild their infrastructure. Whether any of Canberra infrastructure could withstand long term usage rates 6 to 7.5 times their designed usage is very doubtful. And even in a world of declining birthrates some increase in the number of school places would be needed if densities doubled or tripled, let alone a seven-fold increase. And, as a final consideration, much of the long-term costs of providing utilities in Canberra reflect the extra kilometres necessary to connect all of Canberra's users, compared with other cities of the same size. The overall size of the city can be expected to overcome any savings from local increases in density.

A10 Increased parking demand

(*i.e. car parking shortages, exacerbated by inadequate public transport, increased street parking*);
Shortage of parking would become a real issue, and it seems likely that the Government has no ability to offset this with more buses. The tram will offer no relief to those inner south suburbs east of Barton, and no relief at all to those districts that it does not serve. Autonomous (driverless) taxis might offer part of a solution, but these have been about to arrive in the next five years since 1995, so placing any faith in their timely advent would be foolish. Perhaps, in keeping with the disregard for the Garden City idea, we could cut 1.5m to 2m off each 7m verge and allow diagonal parking on either side of the street.

A11 Potential for unintended gentrification

(*i.e. increased unimproved land values and rates*);
Gentrification will almost certainly happen (only a Canute would deny this) and the Government appears to have no strategy except to look forward to an eventual increase in rates.

[8] Would we be worse off and have lower utility if the verges were only 5m wide, or even 4m?

This would certainly torpedo any hope that the changes would lower house prices, so half the justification for the changes has gone.

A12 Impacts on local character and amenity

(*i.e. densification leads to damage to existing streetscape and building character resulting in a loss of amenity*).

Local character and residential amenity would be destroyed, together with the Garden City, which the Government's Supporting Report manages to avoid mentioning. This could be expected to have real consequences. While some might dream of living in inner western Sydney, most don't.

A13 If Canberra goes out of its way to imitate the crowded grunge of other cities which do it much better, we should expect many of those coming to Canberra to work will simply opt to live in suburban spaciousness across the border in NSW. Those who doubt this should consider Fairfax County Virginia just outside Washington DC.

Submission on draft major plan amendment to the Territory Plan 04 – Missing Middle Housing Reform, May 2025

[redacted] **Weston Creek**

Draft major plan amendment, section, pg	Comments
S3.0, page 4	*Introduced in 2023, the District Strategies consider the broad policy aims of the Planning Strategy along with each district's unique character and values, and outlines where and how change is expected to occur in the next 15 years. Relevant to these amendments, the District Strategies note the importance of delivering missing middle housing.....* this statement is quite misleading. the term missing middle only appears in the Weston Creek district strategy twice. To say the community understands the missing middle concept or its potential impact or application to our district is simply not truthful. The next step prior to enacting missing middle is a more comprehensive conversation on missing middle application to each district, particularly allowing apartments in RZ1, which was never discussed with the Weston Creek Community.
S3.0, page 4	*The draft MMHDG provides best practice design guidance for targeted 'missing middle' residential typologies.* How was the draft guidance baselined to confirm best practice? Is this a self-assessed claim or independently assessed?
4.0 Consultation, pg5	*Consultation activities have been undertaken during the preparation of the draft Missing Middle Housing Design Guide with key design and industry professionals* Community consultation with Weston Creek to date has been fragmented and piecemeal. Decoupling missing middle from district strategies means most in the community will not understand what the degree of change is. Apartments are not flagged as likely in RZ1 in the Weston Creek Strategy It is suggested that additional consultation that alerts residents to apartments in the RZ1 zone should occur prior to progressing apartments RZ1

Draft major plan amendment, section, pg	Comments
5.0 Draft Major Plan Amendment, pg 7	*permit suitably designed apartments in RZ1 to increase housing choice* Its unclear if Apartments are proposed for RZ1 in Weston Creek – Apartments are not suggested in the district strategy
s5.5 Amendments to the Residential Zones Policy – Policy Outcomes, RZ1 Suburban Zone, pg11	*Development respects valued features of the neighbourhood and landscape character of the area and does not have unreasonable negative impacts on neighbouring properties.* How is unreasonable negative impact defined, enforced or disputed?
S5.6 Amendments to the Residential Zones Policy	*Delete* 1. *No new apartments are permitted in RZ1.* Allowing apartments in RZ1 should not be permitted as it was never discussed as part of consultation for the district strategies.

Submission on ZS1 – Residential Zones Specifications, Consultations

ZS1 RZ specifications, section, pg	Comments
Urban Structure and Natural Systems	Assessment outcomes 1, 2. 3 By not including any specification or planning rules these outcomes are meaningless, cannot be measured, enforced or disputed.
Assessment outcome 5, Dwelling Density – multi-unit housing	*The target number of dwellings permitted on an RZ1 block is:* *Attached houses – 54 dwellings per hectare (more can be considered if parking is contained within a basement).* *Apartments – 67 dwellings per hectare (more can be considered if parking is contained within a basement).*

ZS1 RZ specifications, section, pg	Comments
	Allowing apartments in RZ1 was never communicated as part of the Weston district strategy consultation. While there may be merit in progressing apartments it is disingenuous to suggest the community was adequately consulted For this reason apartments must be explicitly prohibited in RZ1 in Weston Creek until the community is adequately consulted.
Assessment outcome 11, Principal private open space	*Note: Overshadowing from vegetation is not considered when assessing solar access.* This approach by ACT Planning is disappointing and not acceptable for a City that is striving for sustainability. It is also ambiguous as the missing middle design guide relies on these same trees and an expanded canopy cover to attempt to reduce Urban Heat Island. It is suggested that ACT Planning completely rethink solar access and Urban Heat Island effect guidance and acknowledge the Urban Forest and tall shade trees as a vital component of residential areas If shade trees are to be ignored when it suits then the design guides will have to be revisited with an emphasis on building finish, material and colour choice that mitigates Urban Heat Island rather than shade. Building finish and materials to mitigate urban heat are inadequately addressed in the draft missing middle design guide. Rather than ACT planning allowing proponent to ignore existing vegetation for calculating solar access – a better approach would be to allow a proponent to choose to ignore overshadowing by existing trees for solar access if they want but then they have to demonstrate additional measures to demonstrate their proposal has zero impact on Urban Heat Island, without the shade provided by the same trees they have ignored for solar access considerations.
Sustainability and Environment	General comment - how does a new dwelling or the construction of that dwelling contribute to net zero
Assessment outcome 19	Proposed developments, including planting of future canopy trees should consider impacts to adjacent properties. Suggest the following is added Buildings and tree plantings should be:

ZS1 RZ specifications, section, pg	Comments
	"Sited and designed to ensure that the energy efficiency of existing dwellings on adjoining lots is not unreasonably reduced. "Sited and designed to ensure that the performance of existing rooftop solar energy systems on dwellings on adjoining lots are not unreasonably reduced. The existing rooftop solar energy system must exist at the date the application is lodged."
Assessment outcome 20 Urban Heat Island effects are reduced	***No applicable specification for this assessment outcome. Application must respond to the assessment outcome.*** This is a very disappointing approach to planning. It demonstrates you have no real interest in addressing climate change and ensuring we have a resilient urban form. The missing middle concept should not progress until you have meaning policy, standards and assessment criteria to assess and mitigate Urban Heat Island effect Given catastrophic consequences of urban heat island effect, it is suggested that requirements to reduce urban heat should be quantified, measurable and enforceable. WSROC has developed the urban heat planning toolkit, which should be considered and adapted in the ACT in order the reduce the UHI of roofs, walls, and outdoor spaces. HYPERLINK "https://wsroc.com.au/downloads/summary/3-reports/306-wsroc-urban-heat-planning-toolkit"WSROC Urban Heat Planning Toolkit - Download Summary - WSROC WSROC Local governments have also included urban heat in their local environment plans, as an example s6.12 of Cumberland Local Environmental Plan: "*6.12 Urban heat* *(1) The objective of this clause is to ensure new development incorporates effective design and ongoing operation to—* *(a) reduce and remove urban heating from the environment, and* *(b) protect community health and wellbeing.* *(2) In deciding whether to grant development consent for the purposes of commercial premises, industries or residential accommodation, the consent authority must consider whether—* *(a) the facade and roof of the proposed building and paved surfaces are designed to reduce adverse effects of solar heat on the surrounding land, including private open space and the public domain, and*

ZS1 RZ specifications, section, pg	Comments
	(b) the awnings and eaves of the building are designed to provide shelter from the sun and improve public comfort at street level, and *(c) the heating, ventilation and air conditioning systems of the building are designed to minimise the release of heat in the direction of private open space and the public domain, and* *(d) the development maximises the use of green infrastructure that is strategically designed and managed to support a good quality of life in an urban environment, and* *(e) the development accommodates sufficient tree canopy, open space and deep soil zones to achieve urban cooling benefits, and* *(f) the building is designed to achieve high passive thermal performance.* *(3) In this clause—* ***deep soil zone**—* *(a) means the soft landscaped part of a site area used for growing trees, plants and grasses that—* *(i) is unimpeded by buildings or structures above and below ground, and* *(ii) provides opportunities for groundwater infiltration and canopy trees, and* *(b) does not include basement car parks, services, swimming pools, tennis courts and impervious surfaces including car parks, driveways and roof areas.* ***green infrastructure** means the network of green spaces, natural systems and semi-natural systems that support sustainable communities and includes waterways, bushland, tree canopy and green ground cover, parks and open spaces.* ***solar heat** means radiant heat contained in the full spectrum of sunlight."* The City of Parramatta has also included substantial consideration, planning objectives and assessment criteria to address Urban Heat/Urban Cooling, refer: HYPERLINK "https://www.cityofparramatta.nsw.gov.au/development/planning/development-control-plans"Development control plans | City of Parramatta Current missing middle design guide does not adequately address Urban Heat. While some materials and darker colours have some benefits in passive heating of dwellings during cooler months, these benefits should be carefully weighed against catastrophic consequences that urban heat effect has on mortality/liveability and 100% increase in peak energy demand for cooling during heat waves. Use of darker colours / materials

ZS1 RZ specifications, section, pg	Comments
	should trigger urban heat island effect impact assessment and modelling to demonstrate no impact at the site/neighbourhood level. The current temptation to allow darker materials for roof and external brick walls for mostly aesthetics with a secondary benefit of increased thermal performance in winter should be carefully modelled and discouraged wherever there is a risk of increasing urban heat island effect that cannot be measurably mitigated. Choosing to ignore shade trees for solar access reasons or use of darker colours / materials should trigger additional urban heat island effect impact assessment and modelling to demonstrate no impact at the site/neighbourhood level. Similarly missing middle proposals in areas already mapped as Urban Heat Island should also trigger urban heat island effect impact assessment and modelling to demonstrate no impact at the site/neighbourhood level.

Submission on the ACT Government's Draft Missing Middle Housing Design Guide and Draft Major Plan Amendment

Thank you for the opportunity to comment on the proposed reforms. This process has sparked some wonderful conversations with family and friends around Canberra, which I have tried to capture here.

This submission warmly welcomes the reforms outlined in the DPA-04 document and Missing Middle Design Guide. It focuses on the potential benefits of these reforms in supporting diverse housing options that can evolve with our community, helping to build resilience to the pressure on housing affordability, cost of living, social cohesion and intergenerational equity.

The Missing Middle Design Guide rightly identifies the need to incentivize pro-social small-scale development, including (literally!) Mum and Dad developers, and multigenerational cohousing options.

This submission presents a proposal to incentivise a natural evolution in community-led, non-commercial housing development. The objective is to create the conditions for Canberra's current residential landscape to steadily, and voluntarily, transform itself into intergenerational 'missing middle' housing clusters—driven not by developers but by landowners, neighbours, family and friends. It is a vision of local YIMBYs: those who say literally, "yes in my backyard" -building the future of our community together.

This transformation requires government leadership in three areas:

1. A planning scheme that enables and positively incentivises small-scale, collaborative redevelopment (the current reforms pave the way for this).

2. A publicly promoted program of technical assistance and guidance (based on but moving beyond, the Missing Middle Design Guide).

3. A deferred-repayment loan scheme, limited to non-profit-seeking developments, to cover early-stage costs.

The net cost to government would be confined to program administration and the opportunity cost of low-interest or deferred repayment loans. However, the return on investment would be multifaceted, yielding long-term benefits in housing equity, sustainability, social cohesion, and intergenerational fairness.

Context and Need

The current housing sector in Canberra is overly dependent on private developers, whose business models are driven by rising land costs and shrinking profit margins. This often leads to:

- Overbuilt homes that use every allowable square metre of a block,

- Unsightly tower blocks,

- Reduced build quality and durability,

- Underinvestment in sustainability features due to high upfront costs,

- Missed opportunities for social and ecological design

- Significant impacts on living infrastructure.

At the same time, substantial land is tied up in single-dwelling homes owned by older residents, close to services but poorly suited to ageing in place. Many would gladly reconfigure their properties to support family or co-living arrangements but lack the know-how, confidence or capital to proceed.

A transformative missing middle policy would unlock the social potential of this land through voluntary, community-led intensification. This must be carefully differentiated from profit-seeking development, focusing instead on primary residences, not investment properties.

Cohorts Who Could Benefit

The proposal responds to the needs of multiple motivated citizen groups:

- **Younger people** locked out of the housing market and **older relatives** who want to help them but whose only wealth is tied up in the family home
- **Older people**, e**mpty nesters and solos** who want to take charge of their own destiny, wishing to age in place with dignity and reduce the risk of entering aged care facilities.
- **Siblings or co-heirs** of inherited homes who want to retain and repurpose land cooperatively but lack upfront capital.
- **Neighbours** interested in co-developing consolidated blocks while preserving green space and minimising construction disruption.
- **Philanthropic homeowners** who want to share their land and provide secure housing to others, driven by values of fairness and social good.
- **Friendship groups** keen to co-invest in ageing-friendly co-housing, but unsure how to begin.

Learning from Canberra's Own History

This proposal builds on the cooperative housing principles supported by the National Capital Development Commission (NCDC) in the 1960s and 70s. Developments such as Swinger Hill, Urambi Village and Wybalena Grove remain sought after but these models were not extended in the decades that followed. It is time to modernise and relaunch such community-led models, enabling landowners to create medium-density, sustainable homes that prioritise liveability and relationships over profit.

Improving Equity and Housing Affordability

Housing, like all major asset classes, has experienced rapid growth in value in recent decades, far outstripping the growth in average wages. This structural inequality has created enormous barriers to asset ownership and long-term security for working- and lower-income people, particularly the young. Logically, and mathematically, this concentration of assets, and the associated affordability problems for ordinary citizens, is only going to intensify.

Many Gen Xers and baby boomers feel increasingly uncomfortable with the privileges that benefitted our generation—free university, affordable housing, negative gearing—while younger generations face overwhelming barriers. Yet solutions often feel out of reach, especially in a system designed around individual private ownership. With wealth often locked up in the family home, many parents and grandparents cannot give the helping hand their children need to get into the property market.

By enabling landowners to convert underutilised land into multi-unit developments that serve as primary residences for themselves and others, (not as investment stock) we create a rare opportunity to improve housing equality. In this way, landowners can act as stewards of intergenerational equity, whether within families or by supporting unrelated households through co-housing or land-sharing.

A well-designed deferred loan scheme could play a catalytic role here. To preserve the non-profit character of these developments, eligibility must be clearly tied to primary-residence use and exclude speculative motives. This will ensure that the equity and affordability benefits flow to those who need them most.

Three Elements of the Proposal

1. **Planning Reform**: The current proposed amendments to the Territory Plan and the Missing Middle Design Guide are an excellent start, however these should be reviewed through the lens of enabling community-led, non-commercial missing middle housing. For example, the stepwise process on page 9 could include a new step 2 for landowners to contemplate their design needs before approaching an architect. This could link to specific guidance to aid the ‘Mum and Dad’, or neighbourhood developer to articulate their development objectives.

2. **Advisory and Capacity Building Program**: A publicly funded program to develop and disseminate model constitutions, governance templates, co-housing designs, and legal structures. Provision of a responsive expert advisory service. This would make the process of forming citizen-led housing projects more accessible and legally secure.

3. **Deferred-Repayment Loan Scheme**: A government-backed bridging financing initiative, available only to projects that:

    - Are non-profit-seeking in nature,

- Result in additional dwellings used as primary residences,
- Follow inclusive, sustainable design principles,
- Involve shared equity or cooperative models.

This kind of support would allow community members to initiate projects that would otherwise be out of reach due to capital constraints, especially when land is already owned.

Final Comments

This is an opportunity for the ACT Government to demonstrate leadership by enabling new models of housing ownership that directly address the twin challenges of affordability and sustainability. The planning system must move beyond regulating commercial developers and toward empowering citizens to shape the future of their own neighbourhoods. This submission invites government to not only permit, but to actively foster, a 21st-century model of collaborative urban renewal.

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SUBMISSION REGARDING THE MISSING MIDDLE

[redacted]

Article 25 of the Universal Declaration of Human Rights, Article 25, first sentence states "Everyone has the right to a standard of living adequate for the health and wellbeing of himself and of his family, including food, clothing, housing and medical care and necessary social services .... "

Sir William Deane stated the "ultimate test of our worth as a nation is how we treat the most vulnerable and disadvantaged of our people."

Any consideration of "The Missing Middle" must include thorough consideration of, and encouragement for, Affordable and Social housing.

Questions

In developing the concept of missing middle the following questions arise. They require clarification prior to reasonable analysis, and implementation:

What is the projected take up of the opportunities and over what time frame ?

What incentives are being considered to expedite involvement in the project ?

Will the tree canopy policy remain in tact ?

What changes will be required to manage increased demand for infrastructure such as; health, education, water, storm water and sewerage facilities ?

Noting the volume of installation of rooftop solar panels and the increased demand for home charging of electric vehicles, will there be a need for enhancement to electricity infrastructure.

Where is the tipping point in the provision of high quality public transport where residents will forgo cars and when will public transport arrive at that point ?

What financial and other incentives will be given to the building industry to change the present rate of construction to meet the planned objectives not only in the first 5 years (30,000) but in the following years ?

What financial incentives will be offered to homeowners to engage in this scheme ?

Will the present prohibition on parking on verges be relaxed to facilitate reasonable use of public roads. Large vehicles such as garbage or delivery trucks may be impeded when vehicles that are unable to be parked on the premises due to reduced on site parking requirements?

Will present heritage regulations be modified to address the wishes of communities concerned about how missing middle developments will change the character of their living environment ?

Will the “housing missing middle” take precedence in land allocation over the “missing cultural, social, sporting and arts” in the Woden Valley.

Will the planning, approval and inspection processes ensure that buildings meet quality standards of design, construction, environmental requirements and sustainability

How will developments be measured against a concept of “value added” to communities ?

Will all present parks, playgrounds, ovals and sporting and community facilities be retained?

Noting present planning emphasis on transport from Wodent Town Centre to Civic, has the increased demand for public transport arising from missing middle development throughout the Woden Valley been included in the design for the Woden Town Centre transport interchange ?

Flash flooding events have occurred previously, indicating that weather events overwhelm stormwater facilities occasionally. This will be exacerbated with climate change. Densification that increases non porous ground will further exacerbate this problem. What amelioration facilities are needed in readiness for these events ?

Comments

Integral to the suburban communities are the local shops, community and sporting facilities. Planning and development of the missing middle should respect the essential place that these facilities play in the coherence of the community and should reinforce their utility.

District facilities and services should be such that members of the district community have access to all needs within the district.

Planning

Planning processes are being reviewed currently. The problems of timeliness and cost should be resolved.

Enforceable legislation guaranteeing quality of construction is an essential element of the scheme. Confidence in the robustness and sustainability of buildings is important.

Where consultations with community and other parties affected should be swift but thorough with adequate responses to submissions.

[redacted]

[redacted]

I have heard that there is a fee related to changing leasehold arrangements from a single residence to two separate titles. Whilst I was unable to find any information on this myself, I understand this is approximately $158,000.

Firstly, I think the price is exorbitant, and well beyond the capacity for a normal ratepayer like me to pay upfront. I suggest that if the payment is absolutely required upfront before any title change or subsequent sale, many people like me will be deterred from proceeding with any title change and will instead remain on large blocks of unsubdivided land (I am currently living on a block of over 800 m^2).

I suggest the following:

- Either make the payment something more affordable that a ratepayer like me can afford (say, $10,000), or
- Allow the exorbitant payment of over $158,000 to be paid after the title change and the land has been sold.

4 August 2025

EPSDD Communications
City and Environment Directorate
ACT Government
By email EPSDDcomms@act.gov.au

To whom it may concern,

Re Missing Middle Housing Reforms public consultation

The Village Building Co. Limited (VBC) is pleased to make this submission regarding the ACT Government's Missing Middle Housing Reforms. VBC is a local developer, established in Canberra in 1988. Throughout our 37-year history we have delivered more than 12,500 dwelling sites in the ACT including the subdivisions in Bonython, Bruce, Dunlop, Gordon, Macgregor and Ngunnawal. Our current ACT project is the former AFP headquarters at 2 Unwin Street, Weston.

VBC is encouraged by the overall intent of the reforms. They are a meaningful step forward in assisting with the delivery of dwellings required to achieve the national housing targets. VBC seeks to make purposeful contributions to these targets. However, the following submission identifies some concerns with the integration of the existing statutory planning framework.

Lack of integration with District Planning Policies

VBC owns 2 Unwin Street, Weston (Block 2 Section 82 Weston). This site is zoned RZ4 Urban Residential Zone. We welcome the changes to the RZ4 zone Policy Outcomes that recognise it should prioritise medium to high density multi-unit housing. Similarly, we welcome changes to the Residential Zones Policy to increase the height limit to 6 storeys in the RZ4 zone. However, these changes need to be reflected in the Weston District Policy if they are to take effect for 2 Unwin Street.

The Weston Creek District Policy includes two assessment requirements that affect heights of buildings in Weston:

> *35. Medium density housing between Unwin Place and Heysen Street is to be a maximum of 3 storeys and be provided adjacent to open space.*
>
> *36. Residential development adjacent to Heysen Street and Orana School is to be a maximum height of buildings of 2 storeys.*

No maps, figures or references to blocks and sections are provided to assist the interpretation of these Assessment Requirements. The Assessment Requirements have no corresponding rules and criterion in the former Weston Precinct Map and Code from the Territory Plan 2008. On this basis, VBC believe the following is the correct interpretation:

- Assessment Requirement 35 is not relevant to 2 Unwin Street as the site is not located at Unwin Place and is not 'adjacent to open space'. It applies to the residential zoned land east of the Islamic School of Canberra and bounded by the Tuggeranong Parkway (Sections 110-119 Weston).
- Assessment Requirement 36 is relevant to 2 Unwin Street. The site is adjacent to Heysen Street as it provides direct frontage. The site is also adjacent to Orana School because both sites have front boundaries facing Heysen Street[1].

Under the proposed Missing Middle Housing Reforms, development at 2 Unwin Street should be up to 6 storeys. However, it will remain limited to 2 storeys fronting Heysen Street and Unwin Street because of the Weston Creek District Policy. This is an unreasonable limitation in and is contradictory to the generic height limit for other RZ4 zoned land under the current Residential Zones Development Code. Further, The Orana School Unwin Street frontage includes a substantial road reserve resulting in a physical separation between front boundaries that exceeds 50m. No buildings within the Orana School grounds face onto Unwin Street or are within 40m of that frontage.

It is recommended that Assessment Requirements 35 and 36 are removed from the Weston Creek District Policy as part of the Missing Middle Reforms. These controls are difficult to interpret, lacking figures to assist in their application, and their intent is unclear. In the spirit of the outcomes-based approach that informed the Territory Plan 2023 and associated planning reforms, statutory planning controls should not unreasonably impose a predetermined built form outcome. Limiting development of a large RZ4-zoned block to 2 storeys is inconsistent with the proposed changes to the Residential Zones Policy Outcomes, including the reclassification of RZ4 as 'Urban Residential', and will not achieve the intended Missing Middle outcomes.

[1] As per the Territory Plan 2023 definition of 'adjacent'.

Furthermore, any other site that is subject to lower height controls under its respective District Planning Policy (e.g. Section 76 Watson) will not be able to deliver the intent of the Missing Middle Reforms. Therefore, it is recommended that the Territory Planning Authority undertakes a comprehensive review of all District Planning Policies to ensure the Missing Middle Housing Reforms are as effective as possible to deliver low and medium density housing on areas intended for those outcomes.

Technical specifications for subdivision

The Planning Act 2023 (the Act) does not distinguish between 'subdivision', a 'subdivision development proposal' and a 'subdivision design application' for the purpose of development applications. As per s 43 of the Act, a subdivision development proposal *is* a subdivision design application and includes creating or consolidating blocks.

The overlapping definitions have been an ongoing issue since the commencement of the Act. Previously, under the Planning and Development Act 2007 and the Territory Plan 2008, subdivision and consolidation were clearly distinct from an 'estate development plan'. The important nuance has been lost since the commencement of the Act.

The current Subdivision Technical Specifications attempt to make a distinction between 'current leased blocks' (an undefined term which appears to refer to subdivision in established urban areas) and new residential blocks (an undefined term which appears to refer to the creation of new blocks in a future urban area) which are created under a subdivision design application. This attempted distinction is further inferred by the proposed amendments to TS 2.1, TS 2.2, TS 2.4 and TS 2.5 under the Missing Middle Reforms. However, the lack of distinction between subdivision and subdivision design application means any potential distinction does not exist in practice as:

- all blocks created by subdivision are 'new blocks' by virtue of being created under a new Crown Lease and registered under a new block and section number; and
- all development applications for subdivision are subdivision design applications/subdivision development proposals under s 43 of the Act.

If the Planning Authority intends to create distinct controls that distinguish between existing urban areas and future areas, it would be practical and helpful to review the Act, as well as any subordinate legislation (i.e. the Territory Plan) or supplementary policy documents (i.e. Technical Specifications). Technical Specifications are not mandatory or statutory and amendments to these documents are insufficient to address a statutory planning issue.

General errors

Pages 13-14 of Draft Major Plan Amendment 04 states: "Delete assessment requirements 16, 17, 18, 19, 20 and 21, shown below, of the assessment requirements in the Residential Zones Policy for the following". However, no replacements are provided. It appears that "for the following" is used in error and no replacement Assessment Requirements are proposed. However, this cannot be assumed. This error requires clarification to confirm whether replacement Assessment Requirements are proposed and, if so, further public consultation is required to understand the implications of any such changes.

Conclusion

VBC look forward to continuing its nearly 40-year tradition of making meaningful contributions to housing in the ACT. I encourage the Territory Planning Authority to consider the unintended consequences in the ACT planning systems that will prevent sites like 2 Unwin Street reaching their intended potential under the Missing Middle Reforms.

I welcome any opportunity to discuss this submission with representatives of the Territory Planning Authority. You can contact me at wpearson@villagebuilding.com.au.

Sincerely,

[redacted]

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Submission to 'Missing Middle' Housing Reforms

I have strong concerns about many of the proposed 'Missing Middle' reforms. I don't believe these changes find an acceptable balance between increasing housing density and the loss of quality of life for existing residents, or the damage to the unique streetscapes of established suburbs. Here is a breakdown of my objections to changes proposed to the Technical Specifications.

Proposed change	**Comment**
Allowing ***apartments in RZ1***	I oppose any new apartments in RZ1 – see separate comment.
Increasing the height of the ***building envelope*** from 3.5m to 4m	I oppose this change as it will result in noticeably taller building near block boundaries.
Reducing the ***secondary street frontage setback*** for multi-unit houses on corner blocks from 3m to 2m	I oppose this change as this will result in town houses, units and apartments on corner blocks being built extremely close to one of the boundaries – there will be almost no landscaping between footpath or public land and these buildings.
Eliminating the requirement for ***side setbacks in the primary building*** for multi-unit houses	I oppose this change as it will allow new town houses, units and apartments to be built right up to the neighbour's boundary – this combined with the change to the building envelope will result in 4m walls along the block boundaries. It's also outrageous that rules won't be consistently applied to single dwelling development. A home owner can't build a single dwelling to the boundary but a developer of multi-unit housing can.
Increasing the angle of the ***solar building envelope*** for multi-unit houses	I oppose this as it will allow new town houses, units and apartments to significantly overshadow neighbouring blocks.
Reducing the ***planting area*** for multi-unit houses	Again, more buildings and less green space. Not a great outcome.
Reducing the number of required ***carparking spaces*** per dwelling from 2 to only 1	I oppose this as it will result in less off-street parking and much more parking on the street – the impact of this will be amplified when there is an increase in the number of dwellings per block.

Additional comments

No apartments in RZ1

Under no circumstance should apartments be allowed in RZ1. This zone must remain limited to low-rise and low to medium density housing (single dwellings, town houses and similar). Including

apartments up to 3 stories (two stories plus basement parking) will destroy the character of existing suburbs. When combined with other changes such as increasing building heights and reduced seatbacks, apartments would overshadow and overlook existing single dwelling blocks in RZ1.

RZ2 and above remain the appropriate zones for apartments. Limiting apartments to these higher zones ensure they are placed close to infrastructure that can support the associated high-density.

In addition, including apartments in the definition of 'missing middle' is misleading. The ACT has a good supply of apartments and plenty of land available for this type of high-density housing. Canberrans are NOT crying out for apartments; they want more affordable housing for small families.

No reduction in parking spaces

Under no circumstance should the number of required parking spaces per dwelling in RZ1 be reduced from two to one space. This proposed change will result in existing streets being turned into a giant free for all parking lot. A fundamental character of Canberra is open leafy streets not an endless suburban parking lot.

Stricter enforcement of the rules is needed

Adding to all these concerns, the ACT Planning department frequently doesn't properly enforce the current planning rules. We often see bad developments approved in RZ1 zones (like large front fences, carports blocking views, and homes overshadowing neighbours) even when residents object. If this 'anything goes' approach continues with the new 'missing middle' changes, we could see even worse outcomes, like apartments that are too tall and severely overshadow private outdoor spaces. Moving forward, planning rules must be applied much more strictly during the development application process. Exceptions should only be allowed if they fit the spirit of the rules.

Proper review

Because these changes are so significant, they must be reviewed by the **Legislative Assembly** with a more detailed public process. It would be wrong for the planning department and the Minister to simply approve them without extra public scrutiny.

Regards

[redacted]

SUBMISSION TO DRAFT PLAN AMENDMENT 04
MISSING MIDDLE HOUSING REFORM

PUBLIC TRANSPORT ASSOCIATION OF CANBERRA

The Public Transport Association of Canberra (PTCBR) welcomes the opportunity to comment on *Draft Plan Amendment 04 – Missing Middle Housing Reform* (DPA-04). We believe this is a long-overdue reform that aligns with our association's core ideas and principles by allowing more Canberrans to live closer to existing public transport services.

PTCBR believes the success of this reform will depend on a whole-of-government response to the increase in housing density that will result from DPA-04. To simply "set and forget" without delivering corresponding improvements to services and infrastructure is to consign Canberra to all the downsides of a "compact city" with none of the benefits articulated in documents such as the 2018 *ACT Planning Strategy*. Key areas that will need to be addressed are outlined below.

Better local bus frequencies

In the long term, DPA-04 has the potential to significantly improve the patronage catchments of existing bus services. By allowing duplexes, townhouses and low-rise apartments in RZ1 and RZ2 zones, it is possible to achieve the population densities required to support frequent, all-day bus services beyond a few core trunk routes. However, this benefit can only be realised if increases in housing density are matched with improved bus services. DPA-04 provides the "demand" side of the equation – the ACT Government must also commit to the "supply" side by delivering real service improvements across the full seven-day network.

Improved active travel infrastructure

The *Supporting Report* for DPA-04 rightly acknowledges that densification could strain local infrastructure if not properly managed. This cannot be an afterthought – the ACT Government's approach to missing middle housing must ensure that housing density approvals are tied to budget commitments not just for more frequent bus services, but also for improved active travel infrastructure, including lighting, footpaths, bike lanes and bus stops. DPA-04 will not retain community support if it merely replicates the traditional mistakes of "greenfield" development by allowing new residents to arrive well before the services they need.

Reduced parking minimums

We commend DPA-04's proposal to adjust parking rates for new multi-unit housing. This is a sensible demand management lever that will be critical to discouraging car ownership and ensuring that new developments are oriented towards public and active transport from day one. Any efforts to water down these reduced requirements will undermine the success of DPA-04 and must be resisted by the Territory Planning Authority.

In summary, PTCBR supports DPA-04. This reform creates the opportunity for a more sustainable Canberra by allowing our city to grow in a way that supports public and active transport. Subject to the above matters being addressed, we believe DPA-04 is an essential step towards the integrated, accessible and well-serviced city that Canberrans deserve.

Kind regards,

[redacted]
Public Transport Association of Canberra
[redacted]

Submission to the consultation on the ‘missing middle’ housing reforms

Summary

- Australia produces very large amounts of housing, and the ACT has historically produced much more housing than the alleged shining lights of pro-upzoning economists
- The economic rationale is based on a flawed and biased view of housing economics, with use unsuitable models and a deliberate ignorance of other factors, often with cherry-picking and misrepresentation of examples
- House prices are mainly a monetary phenomenon, connected to the willingness of banks to lend, interest rates, perceptions of future growth and sentiment
- ‘Missing middle’ will not produce the kind of housing that people actually want – detached housing
    - Instead supply will be degraded by construction of low-quality units that are unfriendly for families
    - Reduced quality will be the main, if not sole cause of price reductions
    - Detached houses will continue to command a larger premium over unit-titled as relative supply falls
- There will be numerous negative impacts, all uncompensated:
    - Privacy will be degraded, if not eliminated in some cases
    - Noise and air pollution will increase, as will congestion and infrastructure wear
    - Canberra’s natural environment will be degraded with less vegetation

Recommendations:

- Solar access rules should not be relaxed as proposed, instead they should be returned to the rules that existed in their initial implementation in 2004
- Vegetation area rules should not be relaxed due to the negative impact it will have on Canberra’s environment
- Block occupancy should be reduced to 40% maximum for all development types
- Ideally, new ‘missing middle’ dwellings should be restricted to one storey unless at least one adjoining house is two stories
- Parking rules should not be relaxed as this will reduce transport flexibility
- Block consolidations should be limited to single storey town housing if done at all
    - The limit should not be expanded beyond the one proposed, contrary to some suggestions
- Block splitting for detached housing should be encouraged
- The government should reinvigorate the Suburban Lands Development Agency to make it like the National Capital Development Commission
    - The SLDA should carry out new developments itself
    - The legislation preventing the SLDA from selling below market value should be repealed
    - New housing should be sold by lottery at cost price to undercut the market

- Much better governance for property lobbyists and NGOs is needed
- The design guide should be completely revised, and be based on Canberra's historic housing styles up to 1990
- The government should speed up land releases and abandon plans for an urban growth boundary

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Introduction:

The proposed 'missing middle' reforms are attempting to propose a physical solution to what is primarily a monetary problem. They will have a very negative impact on people's privacy and amenity, and on Canberra's environment. Furthermore, they will not deliver the kind of housing that people actually want.

The Bad Economics of Housing

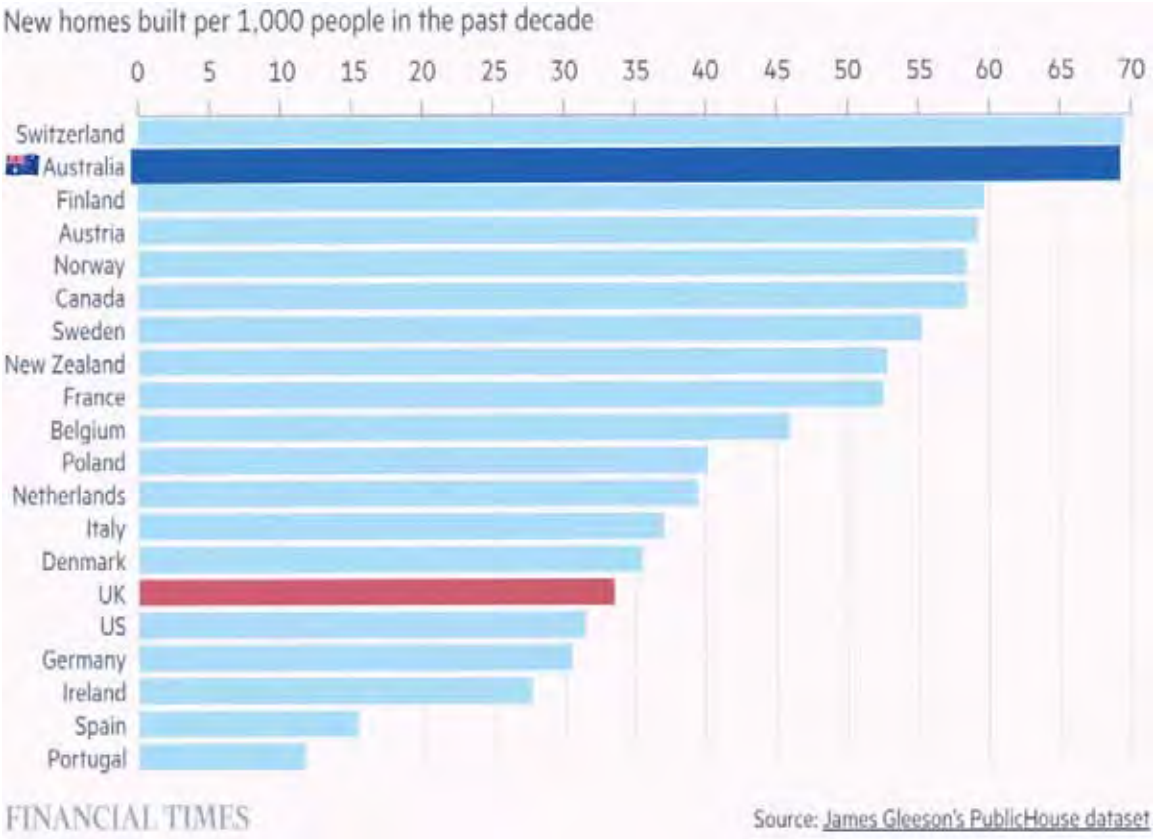
Australia and Canberra actually build a lot of houses

A common refrain from pro-density advocates is that Australia does not build enough houses. Almost every media article on Australia's housing crisis says that the problem is due to 'lack of supply'. Every other factor, from excessive demand to monetary effects is ignored. The problem is this isn't true.

Australia in fact has a very high rate of housing supply, comparable to countries that are known for having one, such as Finland and Japan, and higher than the United Kingdom or United States. The rate of housing completions has been so high that there are widespread instances of defects and concerns about the longevity of recently constructed apartments in particular.



Source: https://x.com/AvidCommentator/status/1826556739766137264



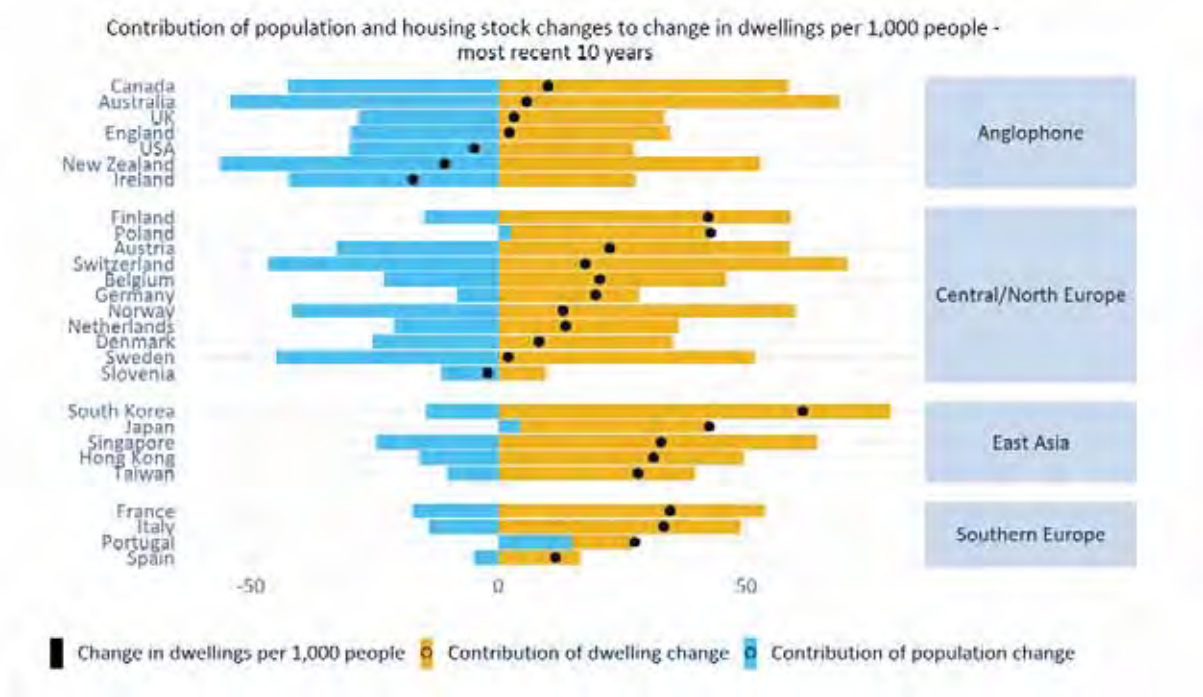
Source: https://www.ft.com/content/24117a03-37c2-424a-97ed-6a5292f9e92e

The number of completions is now so high that the trough being experienced in 2025 is equivalent to the former ceiling:



Source: https://www.macrobusiness.com.au/2025/07/demographic-change-drives-aussie-housing-shortage/

The number of dwellings per capita has actually grown over the past ten years, despite an extremely high rate of population growth:



Source: https://x.com/AzizSunderji/status/1833943739481686240

It can be seen that any lag in changes of dwellings per capita is almost entirely due to Australia's exceptionally high immigration rate giving it greater population growth than other countries. And as can be seen by the chart on page 41, Canberra has generally out-supplied the rest of the country. It is also worth noting that Australia's experienced population density is actually quite high by global standards[1].

Bad models

Prior to the late 1990s economists followed the foundations laid down by the likes of Adam Smith and David Ricardo. As land cannot be usually created, it is an inherently uncompetitive market. If someone wants to use a piece of land for a certain purpose, they exclude all other competing uses from that location. Thus, the cause of rising house prices was simple – greater demand (in the sense of money offered) for a fixed supply of land. It explained why land was so vulnerable to credit-driven bubbles, as occurred in the 1880-90s in Australia and in 1980s Japan. For if lending increased, it was capitalized into higher prices.

However, in the early 2000s, Edward Glaeser and Joseph Gyourko (henceforth G&G) made a different theory. They surmised the major, if not sole cause was zoning. They then set out to construct a model 'proving' this. They proposed, following the Marshallian supply-demand 'cross', that the average value by area (e.g. per square metre) should be equal to the marginal (i.e. difference between two blocks of similar use but different area) value by area. They measured the marginal land price by looking at the difference of prices between lots of the same type (e.g. detached homes) but different areas. They then produced a model using

[1] https://hub.worldpop.org/geodata/summary?id=50574

estimated average land values and estimated average construction costs from the *latest available year* in their sample of cities, to determine the difference between the calculated average and marginal land value by subtracting the construction cost. They *assumed* that any deviation (or 'wedge') above the construction cost was solely due to zoning.

They did not consider any other factors that could explain some of the features of their model. For example, in some US cities the cost of housing was below the construction price. G&G proclaimed this as showing that a truly competitive market could (and perhaps should) lower housing values below the construction cost. Of course, this would mean that anyone building in such as city would make a loss. The cities where this was the case were mainly ones such as Cleveland where the housing had been built well before and the population and incomes were declining due to industrial closures and/or the city becoming less desirable due to crime and interracial conflict. But G&G ignored – and continue to ignore – this, and worked as if values should be related to new builds, rather than accounting for factors that could cause depreciation.

The most serious flaw in G&G's model is that it is built off assumptions and is then used to prove those assumptions, i.e. it is circular. Rather than looking for causes of non-linearity of house prices, or examining alternative theories, they assume *from the start* than any such deviation is due to zoning. This is a common occurrence in pro-upzoning literature, where prior beliefs drive the interpretation of the data and alternatives are ignored.

A letter published that same year pointed out that their assumptions lead to a clearly incorrect conclusion – that people are indifferent to land parcel sizes. If G&G's founding assumptions are true, then absent zoning, a block of one square metre should have the same value *per square metre* as a block of 1,000 square metres. This is despite the fact that the one square metre block of land is useless, so should be worth less.

G&G's model implies that a landowner should not be able to increase the value of a parcel of land per square metre by subdividing it. This might instinctually seem fine, but it has an important upshot – in such a world, there would be no economic incentive to subdivide. Subdividing land has costs and inconveniences even before the cost of infrastructure to facilitate development is considered. A landowner could always realize greater profit from selling the land intact. This is the problem with many pro-upzoning economists. They have theories of why housing isn't built and spend considerable time trying to support them, but have no theories as to why housing *is* built.

By claiming that the price of housing should be equal to the construction price, G&G inadvertently claimed that land should have *no* value. This is observably not the case – empty blocks can have considerable value. Later they added an arbitrary 20% onto their construction price as cost of land. This was based off limited and outdated data, with little proof that a fixed figure should be used (in many modern developments, such as South Jerrabomberra, land is over half the price).

Lastly, the G&G model fails to recognize the spatial aspect of land competition – some locations are more desirable than others. While it is possible to adjust the kind of

development at a given location, this is something that can only happen over time, as it requires purchasing, demolishing and rebuilding the structures on those parcels of land.

Ed Glaeser: Yes in their backyard, not in my backyard

Despite propagating a model claiming that zoning is the most important factor in house prices, and regularly advocating the benefits of denser development for both affordability and environmental reasons, Ed Glaeser:

- Lives on a 2600 square metre block on the outer edge of Boston because it:
    - Offers more living space
    - Better schools
    - A fast commute
- Has vigorously opposed efforts to increase density in his area, saying extra housing should be built elsewhere

Notably, Glaeser's reasons for preferring low density are some of the very many reasons that 70% of the population also prefers low density. When it comes to his own neighbourhood, he's as much of a NIMBY as anyone else.

What Ed Glaeser says people should live in:



Weston, Massachusetts, where Ed Glaeser lives:

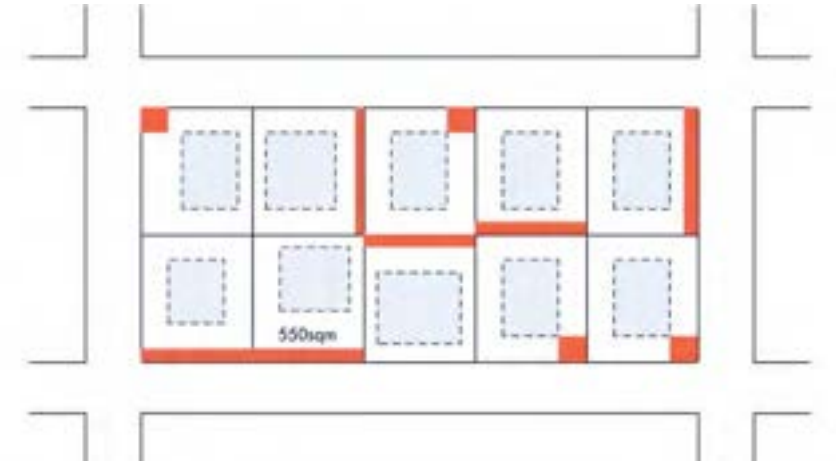


Source: https://www.fresheconomicthinking.com/p/is-ed-glaeser-a-nimby?s=w

This flawed model has been propagated widely ever since because it is relatively easy to use, and has seen heavy advocacy by Australian upzoning advocates, such as the Centre of Independent Studies, a centre-right think tank. The CIS in particular focuses on an alleged zoning cost on apartments, and ignores that detached houses have an even larger gap between construction and sales price, implying there is a greater shortage of them.

There are no circumstances *in real life* that the assumption that marginal and average land values should be equal, because different sized parcels *do* vary in usability. Very small

parcels aren't useful for anything, so should have lower values. For example, a 710 square metre block allows little difference in use to a 700 square metre block. Therefore, there is no reason for that marginal 10 square metres to have the same value per square metre as either block in totality, and no reason for the difference in price between the blocks to be equal to either block's price per square meter. The only way that G&G's 'perfect market' could be realized is if all the blocks in a given area were constantly reorganized into their optimal configurations. For example, to utilize the 'marginal land' shown in red, all the structures would have to be rebuilt in the 'ideal' configuration:



Source: https://www.fresheconomicthinking.com/p/the-zoning-tax-is-an-illusion

In reality, this is impossible, with or without zoning – it would require everything to be built and re-built constantly to reflect the ever-evolving market. In the real world, only a small number of parcels are transacted at any one time. While based of seemingly sound theory, G&G's model inadvertently shows the limits of applying economic assumptions ('axioms') to the physical world. Some economists like to claim that this is only a 'directional' quibble and that a 'pure test' will still show a 'zoning tax'. But there are no circumstances where this is true, as it completely ignores physical reality. Put simply, the world where G&G's model is useful does not exist, and cannot exist.

Another commonly used model that is also overly simplified and relies on bad assumptions is the 'Alonso-Mills-Muth' (AMM) model, which models a monocentric city with prices decreasing from the centre to rural areas. The weakness in the model is not its geometric nature, which can be overcome, but its consideration of time and value. Like many economic models of housing, it is a static model, where any given iteration is a snapshot in time and all the factors in that model are referenced to that time. As a critique from 1987 put it[2]:

> The static approach in the Alonso-Mills-Muth model is useless in explaining many stylized facts regarding the urban structure and its evolution through time. In the static analysis... land is continuously utilized within the city boundaries and the city boundaries are continuously extended with income and population size.
> ...

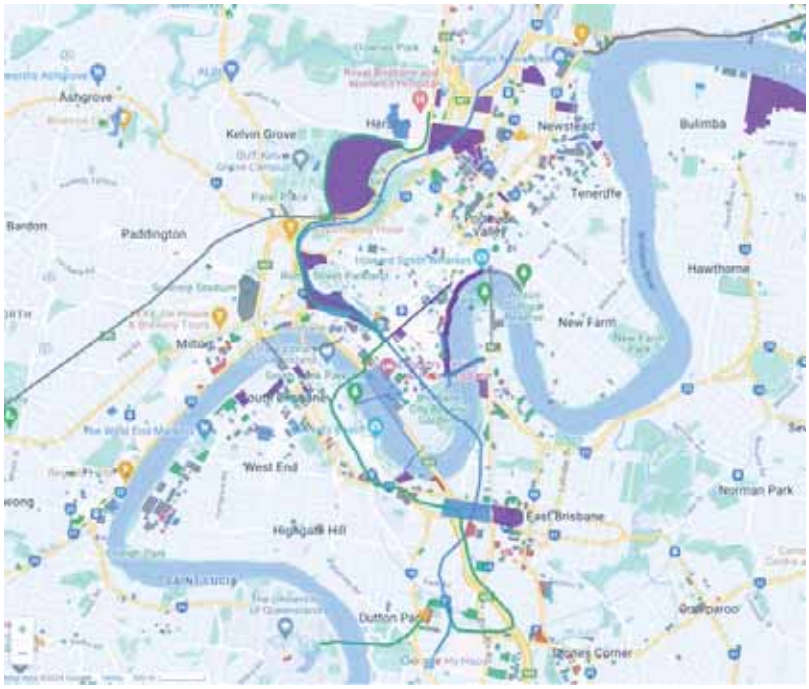
[2] https://www.sciencedirect.com/science/article/abs/pii/0166046289900252

> The reason for the failure of the static model in explaining these 'irregularities' is that the housing stock is assumed to be perfectly malleable, which, of course, is highly unrealistic.

The AMM model effectively assumes that at any given time, sites are all built to their best and highest use. There would be no economic reason for sites to remain vacant or underbuilt, despite the fact the such sites can be observed all the time in real cities. Furthermore, the 'malleabilty' assumption is equivalent to assuming that the city is rebuilt in the optimum configuration each time the market changes, a clear absurdity.

The AMM model is widely used in economics literature because it is straightforward and perhaps more importantly, it produces results that align with existing ideology. It does not describe the real world. Alternative treatments with land as an asset with the option to develop better reflect observed behaviour[3]. In some cases, they even show that constraints such as zoning can actually cause owners to bring forward development, as there is little to be gained from waiting[4].

A real-world examination will show the limitations of these assumptions. In Brisbane, a series of sites were upzoned, sometime repeatedly, over a twenty-year period[5]. In no site was anything but a tiny fraction of the upzoned capacity was actually used. Furthermore, development of upzoned sites was strongly associated with higher house prices. Even today there are numerous sites in Brisbane that have planning approval, but construction has not yet commenced:



Source: https://x.com/DrCameronMurray/status/1778392385766248808

[3] https://www.fresheconomicthinking.com/p/its-time-to-throw-out-the-standard
[4] https://www.jstor.org/stable/1814815
[5] https://www.tandfonline.com/doi/abs/10.1080/08111146.2022.2124966

Furthermore, more recently approved upzoned sites in Brisbane have been built to well below their approved capacity, or even in some cases even developed for commercial use rather than residential use:



Source:https://x.com/BrendanNatoli/status/1803916414790832142

Even in areas without loose or no density limits, land may sit vacant, as can be seen in Surfers Paradise:



Source: https://x.com/DrCameronMurray/status/1745374695598563571

This situation is not possible in the world of G&G's model and YIMBY economics. This leads many YIMBYs to assume that there must be some kind of restriction somewhere, because the models that they rely on are not capable of accommodating observed reality. Unfortunately, rather than getting better models, the approach has been to consistently double down.

Land is an asset, not a good – this means time is important

Glaeser and Gyourko ignore the physical reality of land – i.e. that it cannot be created[6] and occupies a fixed space – and treated it as if it was a producible good, like pencils or cars. They cannot, in any of their published work, seem to conceive of land as an asset, like the stock market, or a factory. It appears to them that a house's construction is the only thing that gives it value. When land is often the single most important cost building a house[7], this is a very problematic approach.

That land is an asset should go without saying. It is the one thing that enables activity, productive or unproductive. One cannot do anything from sleep to build a factory without land. And the houses on that land are also assets[8]. This has several implications:

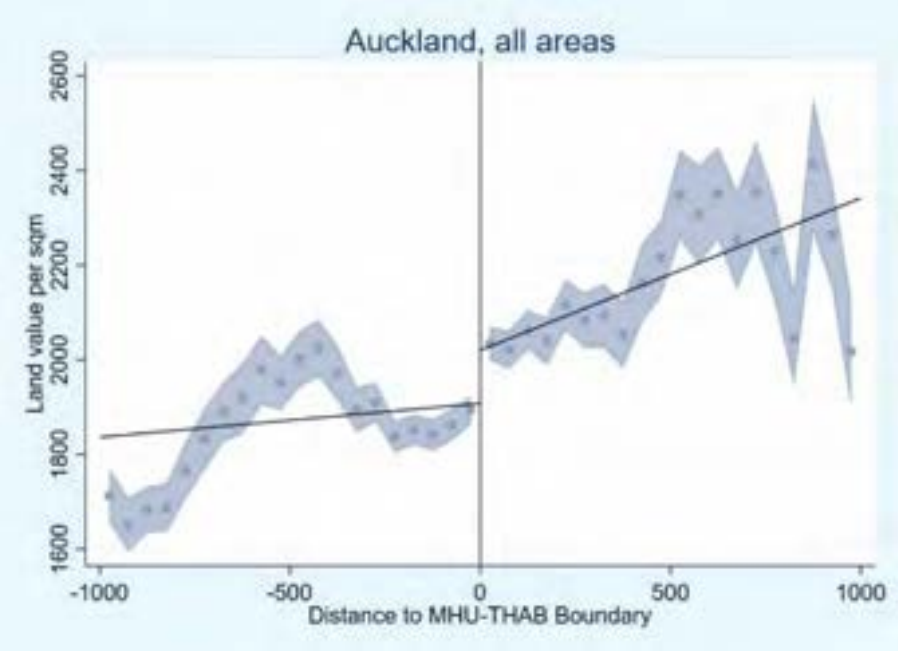
- Land and houses can be expected to produce a return across time to an investor
    - Hence time is an important factor
- Sentiment is important and speculation can occur
- Construction cost is not the sole determining factor of price
    - As an analogy, stocks cost a company almost nothing to create, but carry a value
    - The 'construction cost' of land itself is zero, though there may be large costs to acquiring and using it
- Allowing denser development can make land values go up – land value is determined by that land's highest and best use

One indicator of the asset nature of land is the difference in value between adjacent parcels of land that are similar in characteristics but are differently zoned. The starkest example of this is urban growth boundaries, where land values greatly increase on the urban side of the boundary. Subtler examples occur across zoning changes with suburbs. In Auckland, there are two main zones that allow three (MHU) and eight (THAB) storey construction respectively. The two zones have a highly irregular boundary that cuts through suburbs of similar original character. Across the boundary, block values jump up dramatically in the denser area:

[6] Technically it can be through land reclamation, which is very expensive. But even then, you cannot create more land in a *given location*. You can only create more locations. Thus the effective monopoly of an owner on a given location remains.

[7] https://escoe-website.s3.amazonaws.com/wp-content/uploads/2021/09/25132411/Robert-Hill-Slides.pdf

[8] https://bankunderground.co.uk/2019/09/06/houses-are-assets-not-goods-taking-the-theory-to-the-uk-data/



Source: https://drive.google.com/file/d/185n-YVLWnnct_8p5wS9H3svMrnBSw3M8/view

The extra value is significant (up to $200,000 per block), with the author (who is otherwise pro-upzoning in their social media posts) warning[9]:

> While YIMBY advocates for upzoning typically make lofty predictions about reducing house prices via the scarcity effect, they should be aware that many properties targeted for upzoning will immediately rise in value as the land capitalizes the value of increased profit potential. This explains the findings of studies such as Freemark (2020), which found that upzoning around Chicago's transit stations increased rather than decreased property prices.

The reason for this discontinuity is simple – the denser area offers the option of higher-value development[10]. Owning a parcel of land can be thought of like holding a stock option – one can realise the value of the option by developing (or redeveloping) the parcel, with the barriers being the price of construction. The greater the value of development allowed, the greater the potential future profit, and the higher the land value.

Thus upzoning raising the value of allowed development on the land will likely not reduce the price of housing on its own and may in fact increase the price of detached homes. This was shown in Minneapolis, where upzoning increased detached home prices, especially in inexpensive suburbs[11]. This is because buyers of existing detached homes will now be competing against developers who want to realise the extra value of the newly allowed development. When detached homes already sell at a large premium and are in short supply, this means an overall degradation of the quality of Canberra's housing stock.

[9] https://drive.google.com/file/d/185n-YVLWnnct_8p5wS9H3svMrnBSw3M8/view
[10] https://medium.com/fresheconomicthinking/delay-or-develop-what-really-determines-the-rate-of-new-housing-supply-e1dbdb3dfeee
[11] https://www.tandfonline.com/doi/full/10.1080/01944363.2020.1852101?src=recsys

It is especially salient in Canberra due to the planned introduction of an urban growth boundary, as exists in Auckland. This puts an absolute limit the amount of developable land and thus prevents competition from greenfield sites. This is akin to a company refusing to issue new shares.

Land being an asset has another important factor, perhaps the most important when it comes to explaining development cycles. People make investments to increase their wealth. This means they do not want the value of their investments to go down. If prices are falling, it will deter further investment into that asset (unless a future market turnaround is anticipated i.e. 'buying the dip'). This is especially important in property development, which unlike buying stocks has high extra costs (i.e. construction) associated with realising the value of the asset. Most developers need to finance development or rely on pre-sales. This especially applies to denser development, and apartment blocks in particular as they must be completed to realise the best sales price, whereas detached houses can be sold singly. If developers built so that prices meant the value of their dwelling fell below their debt's value, they would rapidly become insolvent. On the other hand, if prices are rising this can encourage extra investment.

This is why there are practically no examples of the 'free market' producing large reduction in house prices simply though building (without major reductions in quality). Almost all major house price falls are associated with, at minimum, economic difficulties, and the largest with major financial crises. In all these construction falls, often markedly, even when prices are still well above construction cost. The reluctance of financiers to lend in such situations creates a further brake.

This means that the housing market has an inbuilt speed limit – an absorption rate[12]. If prices, for whatever reason, begin to fall, then developers will slow down the rate at which they build dwellings, especially if paying for construction would mean selling at a loss (this would eventually imperil the company). In some cases even completed developments will not be sold in order to maximise asset value[13]. This makes no sense in a world of static models, but by treating land and housing as an asset, it does. This is because by not exercising the option to build or sell in a falling market, a landowner can realise greater value at a later date. In Australia, land tax equivalents (e.g. rates) are relatively low and often based partly on developed value. Thus, the costs to holding land without developing are relatively low.

This also means holding onto land without developing it can be a very good strategy. This is known as land banking[14]. A stock of several years' worth of developable land is held, with only a proportion under development, and new land acquired to maintain the 'bank'. It is an especially important strategy in countries such as Australia, where getting greenfield land approved for development can be a difficult process. YIMBYs and some economists claim that land banking cannot exist because developers will always build if it is profitable. This is due to a static understanding of the market. In fact, investigation of property developer

[12] https://link.springer.com/article/10.1007/s11146-020-09815-z
[13] https://www.abc.net.au/news/2023-09-27/jewel-development-surfers-paradise-apartments-housing-crisis/102412680
[14] https://www.sciencedirect.com/science/article/abs/pii/S1051137720300449

strategies will easily yield examples of land banking, even if not expressed under that moniker[15] [16]. It is a key development strategy. Developers will even delay developing land to lobby for denser zoning, even if a project is already profitable. Land banking would apply even in the absence of land use regulation at all, for a simple reason – for a developer to acquire land, there has to be a willing seller, and only a small proportion of landowners are willing sellers at any given time. Vacant land is a perpetual real option to invest, and that option may be more valuable if exercised at a future date rather than immediately.

[It worth mentioning that the ACT Government's policy of limited, slow and often delayed land releases is a particular incentive for developers to land bank, as can be seen by the slow pace of releases in Molonglo. Introducing urban growth boundaries will worsen this even more]

As an aside, it is worth mentioning a common misconception in YIMBY literature, which even pervades peer reviewed studies. This is confusing *supply* and *density*. Supply is how many dwellings exist (new supply being dwellings being built). Density is simply the configuration of that supply. They are not equivalent. The greatest relative growth in dwelling supply in Australian history up to that point occurred post WWII and was associated with a major decrease in density as people moved out of city centres into suburbs. Home ownership soared. Yet a G&G type model would show major 'zoning restrictions' in these planned 'garden city' suburbs. It cannot be assumed that building extra density means greater supply[17]. The number of dwelling supplied may not change, instead they are simply built across fewer sites.

There is a simple truth that these oversimplified models fail to consider and incorporate. Land is not produced in the sense that industrial goods are, it already exists. In many cases (in essentially any society that has moved beyond foraging) it is already owned in some sense, and it is the owner who has the power to decide what to do with it. Landowners, not builders choose when and where dwellings are built[18]. Sometimes these are the same people, often they are not.

By treating housing as an asset, clear parallels can be drawn with other assets such as stocks and gold. Stock markets even have similar responses to financial bubbles and shocks, something clearly demonstrated in Japan since 1980, or in many countries with the Global Financial Crisis.

An alternative model based on reality

An alternative model[19] proposed in 2020 seeks to more accurately explain the observed pattern of land prices, where for a given level of development, marginal land is less valuable

[15]https://espace.curtin.edu.au/bitstream/handle/20.500.11937/97102/Roche%20J%202025%20Public.pdf?sequence=1&isAllowed=y

[16] https://medium.com/fresheconomicthinking/delay-or-develop-what-really-determines-the-rate-of-new-housing-supply-e1dbdb3dfeee

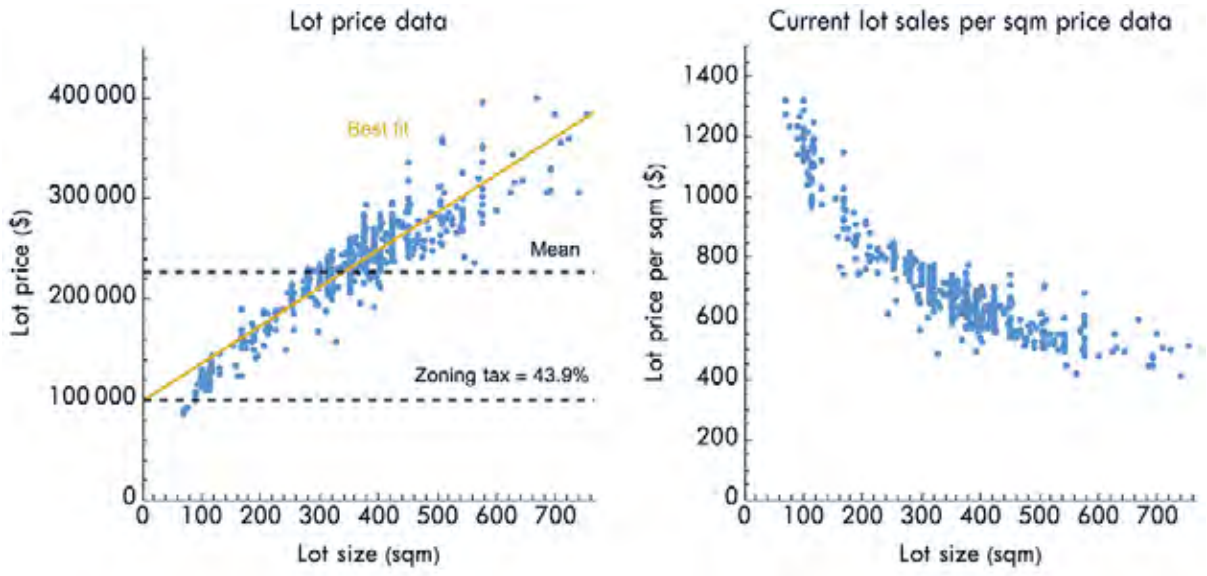
[17] https://www.fresheconomicthinking.com/p/please-stop-confusing-supply-and

[18] https://www.fresheconomicthinking.com/p/housing-confusions-builders-versus

[19] https://journals.sagepub.com/doi/abs/10.1177/0308518X20942874

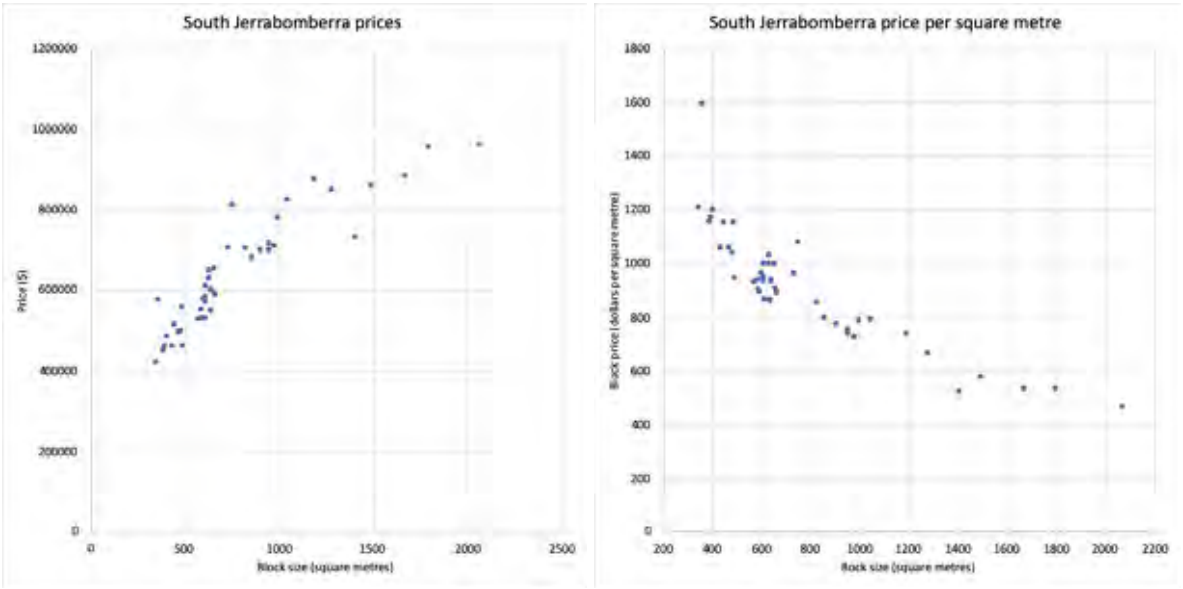
per square metre (i.e. the marginal cost is below the average cost), without having to resort to circular reasoning. Most importantly, it reflects that observable fact that *land* values in denser areas are often higher than those in less dense areas, whereas 'zoning tax' theory indicates that land values should be flat.

It can be seen in examples of undeveloped, unsold land that land value per square metre drops as land area rises (total land value per block of course increases, but at an increasingly slow rate). For example, from the 'Aura' development on the Sunshine Coast (the 'zoning tax' line was put in by the creator to show what the G&G model would say, while rejecting that model):



Source: https://www.fresheconomicthinking.com/p/the-zoning-tax-is-an-illusion

And in South Jerrabomberra:



Source: own work, data from Village and Allhomes

The new model bases this on a curve of marginal *utility*. In a nutshell:

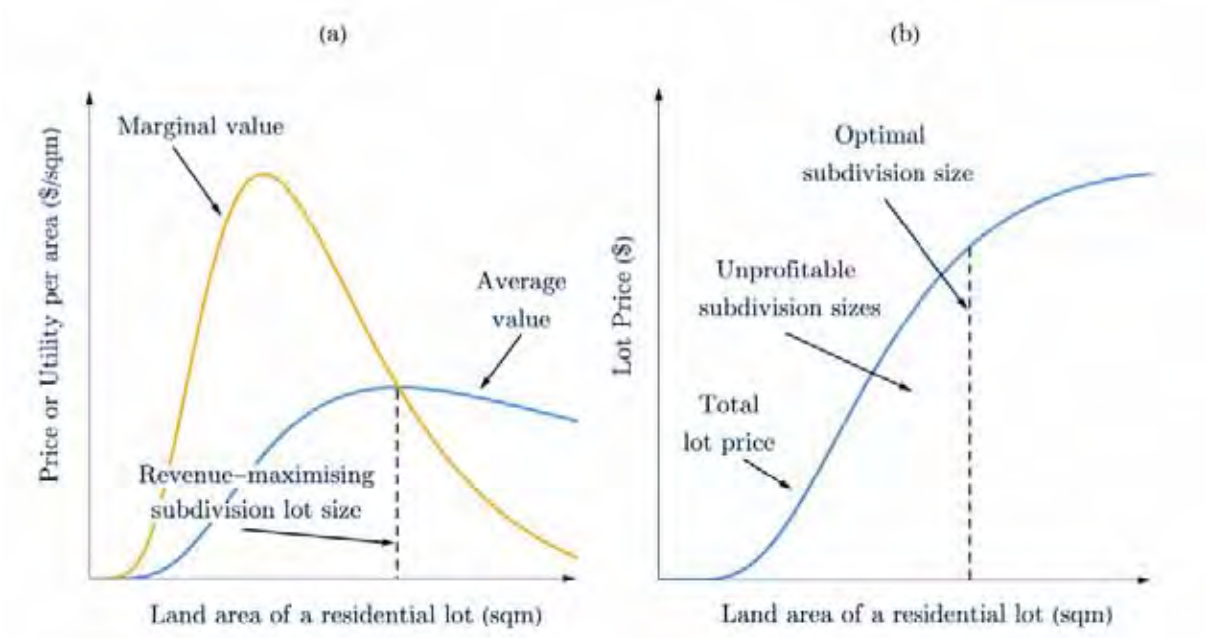
- Extremely small blocks have few uses. Their marginal utility is low, so their marginal value is low
- As blocks grow larger they may allow higher-value uses
    - E.g. a block may have enough room for a studio apartment, a bigger one for a three-bedroom house, a bigger one four bedrooms etc
- Maximum marginal utility is reached as the most economic use for a given location becomes possible:
    - This may be a detached house, closer to business centres this may be apartments etc.
- Beyond this point marginal utility falls
    - E.g. an increased block size may simply mean a bigger backyard, which while desirable, is not the same as enabling a house to be built in the first place
- There is an ideal block size with the best combination of marginal utility and price per area – G&G's model has no optimum block size

This model does not require any more assumptions than the G&G model, and importantly it does not assume that prices have to conform to a particular pattern – as the author points out, this assumption isn't applied to other goods[20].

The model does not completely exclude zoning effects – if land use restrictions (including, but not limited to zoning) result in an absolute restriction in the number dwellings (rather than them displaced to different locations or different types of dwelling), then prices will be higher than otherwise. But because it does not assume that land prices have to be linear it accounts for empirical observations of land prices and correctly characterizes the zoning effect as being much smaller than the G&G model.

This is why even a very 'pure' test, such as a new suburb built at a distance from existing ones (South Jerrabomberra being a good example) will still show a smooth curve of non-linear value per square metre. The blocks graphed are for detached houses, the most desired and most economical form of construction. They start at the peak of the marginal utility curve. Successively larger blocks may accommodate bigger houses, and/or bigger yards, but this is lower marginal utility than the block being large enough to accommodate a house *at all*. Hence the increase in value falls as the blocks increase in size, and the value per square metre falls:

[20] https://www.fresheconomicthinking.com/p/the-zoning-tax-is-an-illusion



Source: https://journals.sagepub.com/doi/abs/10.1177/0308518X20942874

Furthermore, it correctly allows for location effects. Sites in desirable locations will always attract a premium over those in less desirable locations so long as at least one prospective buyer is able to pay that premium, outbidding other buyers in the process. Much of the G&G 'zoning tax' is in fact explained by this.

Unlike G&G's model, this model does provide economic incentive for owners to subdivide blocks. If the increase in block value from subdivision is large enough, then it can overcome the price of developing infrastructure to enable that development. Hence the owner can make a profit from subdividing rather than selling a land parcel intact, something impossible in G&G's ideal unzoned market.

It also does not exclude sales of land for seemingly non-optimal uses[21]. For example, some blocks are much larger than optimum assuming the market it homogenous, but it is not. Large blocks will still attract a higher total price than smaller ones. Developers can actually use this to their advantage. Relatively less construction (e.g. services) is required for a larger block. Such a block can attract wealthier buyers willing to pay a premium for room. Even if the services cost was slightly higher overall (and it's usually under $70,000 for greenfields), the block can still command a price that more than covers any extra costs. It can thus be sold quicker and generate cashflow more rapidly for the developer, and a greater overall profit even if the realized value per square metre is slightly less.

Unlike G&G zoning theory, it can explain historic development patterns. This includes the fact that block sizes were still often unequal prior to modern zoning and that
Importantly, it finds that 'zoning taxes' still arise where there is no zoning, showing that the G&G model produces a 'zoning tax' both in nineteenth century Brisbane and in ancient Mesopotamia. The new model does not require legal restrictions to explain this, instead

[21] https://www.fresheconomicthinking.com/p/the-zoning-tax-is-an-illusion

showing it as a natural outcome of a free market with changing market conditions. It does not need a perfect world, and can instead exist in the real one.

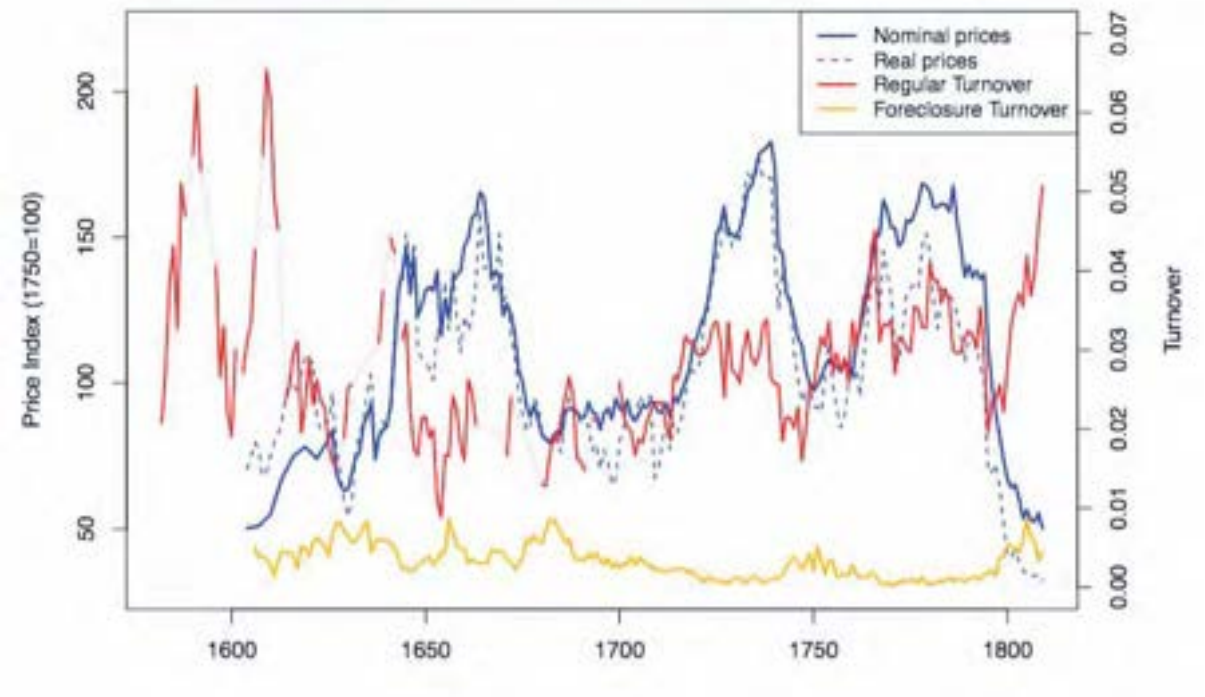
What else lies behind house prices?

House prices as a monetary phenomenon

The housing debate is beset by a high-school level understanding of economics, including from professional economists who should know better. While house prices are set by supply and demand, this ignores that demand as determined by the *amount that people are willing and able to pay* is only loosely connected to the number of houses desired. In the Post-WWII era, housing is largely funded through mortgages. Therefore, house prices are a monetary phenomenon, influenced by credit creation.

An instructive example is the house price bubbles that occurred repeatedly in Amsterdam during the early modern period. These large, long-term property cycles saw prices rise despite the fact bank lending was a smaller factor in real estate purchases at the time (banks being relatively limited in credit expansion compared to modern ones). These cycles were not caused by sudden surges in demand for houses – in fact Amsterdam's population grew relatively steadily over the time period. The most likely factor was *changes in investment strategy* by the wealthier citizens. The Dutch government funded wars through issuing bonds. The stability and lack of corruption in Netherlands at the time meant these bonds held good value, while their yields exceeded those of real estate. When the Dutch government reduced bond issuance, investors were no longer able to obtain low-risk returns, and moved their money into real estate, inflating prices.

Figure 2: House prices and turnover, 1625-1810



Notably, these bubbles had a clear evidence of sentiment effects – the rising prices signaled the possibility of greater future returns from short-term appreciation, so more people were encouraged to buy. This is a classic bubble dynamic, in which rising prices are accompanied by rising demand, when conventional theory predicts that demand should fall until equilibrium[22]. Demand in terms of *the amount of money people are willing and able to put towards housing* becomes detached from demand in terms of the number of houses people actually need – hence a monetary phenomenon.

Real estate has traditionally been a low yielding investment – rental yields are rarely more than 2-3%, meaning large gains in price are needed to produce performance comparable to stocks. But they are a *safe* investment due to being a secure physical asset whilst land has a limited supply. Real estate can even produce rental income while experiencing large downwards price excursions, so long as the owner remains solvent, whereas companies experiencing large falls in stock price are rarely in a position to pay dividends.

This becomes extremely important in the low interest rate environment, as the possible yield from housing will begin to exceed the possible yield from other safe investments – holding cash in term deposits, and holding government bonds. Since 2010, in order to stimulate the economy central banks held interest rates at low, zero or even negative levels. Banks could not offer good interest rates to their customers. Furthermore, large scale central bank purchases of government bonds have been used to depress bond yields to ease government finances. This makes holding government bonds less attractive, as the produce a smaller return. Hence investors were strongly incentivized to move into another form of

[22] https://www.forbes.com/sites/johnwake/2019/04/11/oldest-documented-housing-bubble-amsterdam-recent-u-s-housing-bubble-share-one-very-human-trait/

safe investment – real estate. Here, low interest rates had the effect of allowing large mortgage loan sizes.

The econometric models used in predicting house prices and the effects of policy interventions do not and cannot incorporate sentiment. This is part of the reason that proponents of zoning being a major factor in house prices will spuriously attribute price rises to zoning rather than other reasons. As sentiment cannot be quantified (even though it can often be observed qualitatively) it is left out. As a result, models always fall back on 'real' reasons for price rises, unable to portray the sentiment attraction of paying for potentially bigger returns, or the fear of missing out. One result of this is that bubbles are rarely foreseen. In fact, under some theories, bubbles cannot even exist – even though history shows they do.

Opponents of removing tax concessions on investment housing, and economists modelling the effects of removing them also miss sentiment. To stop rises in house prices, housing needs to be a less attractive investment. Removing these concessions will increase the hurdle rate (the rate of return from alternative investments) and reduce demand. They also miss the effect that every house sold by investors (and not bought by them) is bought by an owner-occupier, and that if there is genuine demand for housing prices will rise until supplying it is profitable.

The effect of interest rates

No phenomenon has been more ignored in discussing the recent house price rises than interest rates, despite their central role in determining how much banks lend. Banks

Once again this is partly due to mistakes of 'perfect market' theories. Some YIMBY economists claim that in a market without zoning, falling interest rates could never raise prices as the market would instantly accommodate demand. This is naïve for several reasons:

- People will try to borrow as much as they think they can to get a home
- Falling rates *instantly* increases borrowing capacity, thus instantly increasing the amount a potential buyer can bid
- Regardless of zoning or permitting, building – whether greenfields or denser infill – takes time and resources, and has its own economic barriers
    - This means the financial system can raise borrowing capacity – and hence prices – much faster than extra construction can counteract the price rises
- Locations are finite, which means it is not possible for everyone to obtain their desired type of dwelling in their desired location
    - Hence there will always be competition
    - This is especially true where the population is increasing

A 2019 RBA paper[23] modeling the Australian housing market stated:

[23] https://www.rba.gov.au/publications/rdp/2019/2019-01/full.html

> The model suggests that much of the strength in housing prices and construction over the past few years can be explained by the fall in interest rates

An analysis by Corelogic suggested that house prices can rise by up to 19% per percentage point fall in interest rates[24]. The reverse effect is not true though. Prices are resistant to falls due to 'debt lock in' – people will try not to sell a house for less than the value of the mortgage unless they are forced to.

This strongly reflects findings made by Bank of England staff and published informally[25]:

> We find that the rise in real house prices since 2000 can be explained almost entirely by lower interest rates. Increasing scarcity of housing, evidenced by real rental prices and their expected growth, has played a negligible role at the national level.

A study by the Reserve bank of New Zealand on the housing market in the Waikato region[26] also strongly demonstrates this effect. They found that mortgage repayment affordability is pretty much inverse of interest rates (higher number is more affordable):

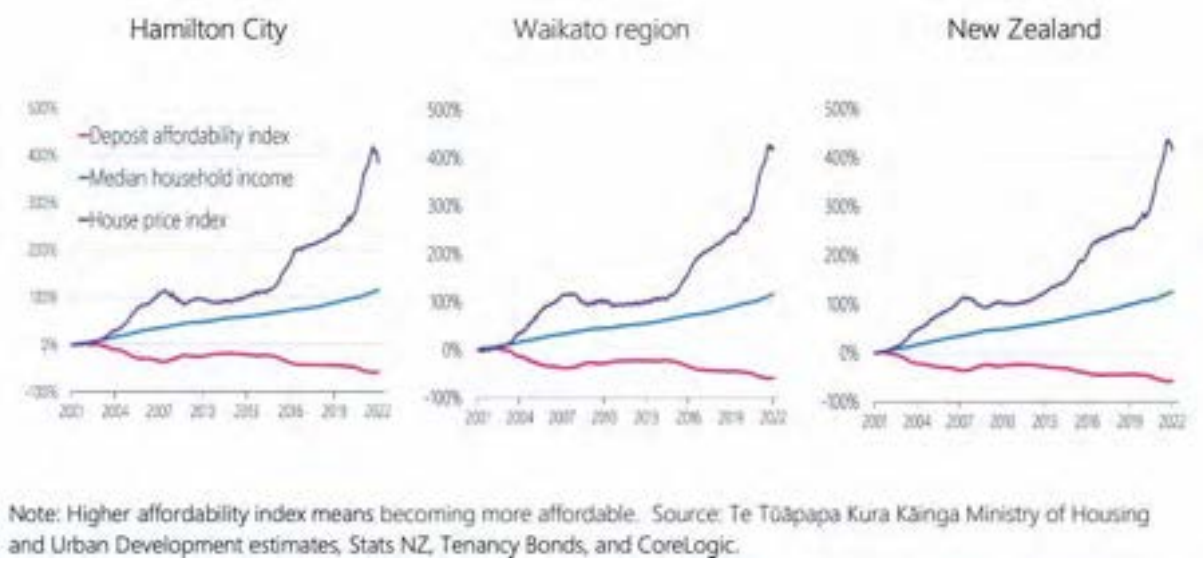


This means that people can more easily borrow more when interest rates are low, which will have the effect of raising prices. One side effect this has is raising the size of the deposit needed to obtain a mortgage. This is probably the main financial barrier to obtaining housing:

[24] https://www.mintequity.com.au/news/house-prices-soared-19-after-a-1-interest-rate-cut-will-it-happen-again

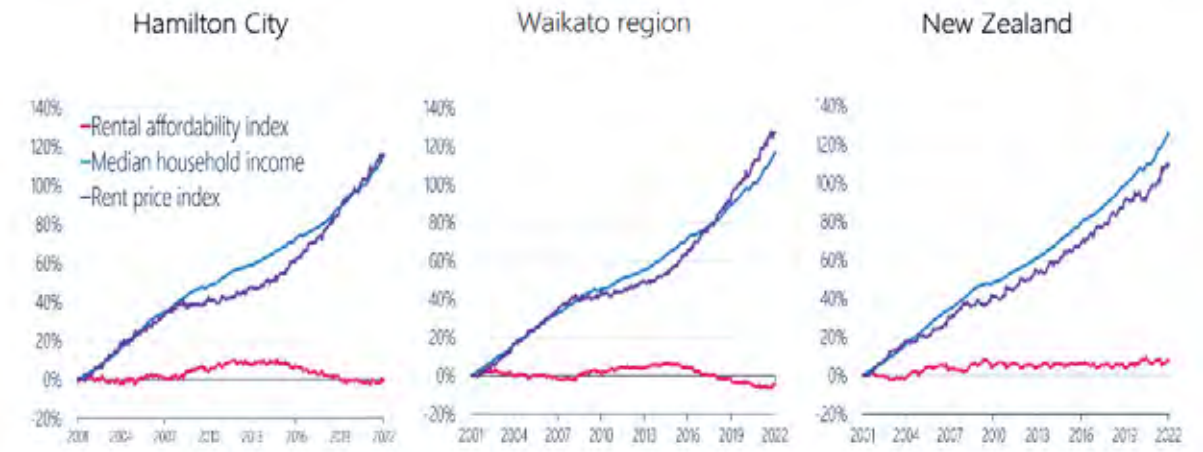
[25] https://bankunderground.co.uk/2019/09/06/houses-are-assets-not-goods-taking-the-theory-to-the-uk-data/

[26] https://www.treasury.govt.nz/sites/default/files/2022-08/htwg-assessment-housing-system-hamilton-waikato-aug22.pdf



Note: Higher affordability index means becoming more affordable. Source: Te Tūāpapa Kura Kāinga Ministry of Housing and Urban Development estimates, Stats NZ, Tenancy Bonds, and CoreLogic.

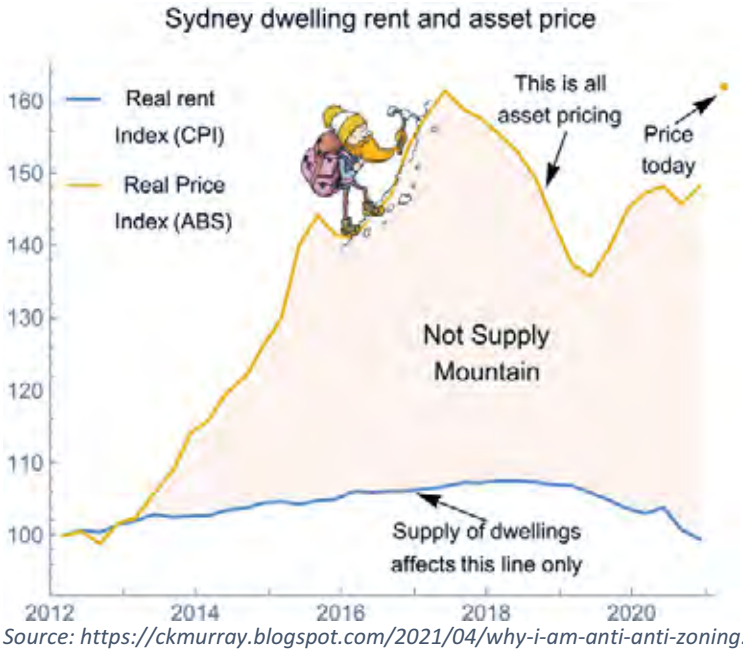
In comparison, rental affordability has varied much less, especially at a New Zealand-wide level. This was the case even before planning reforms:



Note: Higher affordability index means becoming more affordable. Source: Te Tūāpapa Kura Kāinga Ministry of Housing and Urban Development estimates, Stats NZ, Tenancy Bonds, and CoreLogic.

All this is fully consistent with interest rates being a major driver of house price changes. The study itself notes that housing supply has not been the major driver of house prices over the past 20 years.

Finally, interest rate effects can clearly be seen by comparing prices and rents in Sydney. Over the 2010s, real rents actually fell even though prices decreased dramatically:



Source: https://ckmurray.blogspot.com/2021/04/why-i-am-anti-anti-zoning.html

Overall, there is clear evidence that interest rates are one of the major drivers of house price changes by changing the borrowing capacity of buyers.

Macroprudential effects

Since the early 1990s a number of changes have been made in macroprudential policy that provide considerable fuel for rising house prices.

These include:

- Much higher lending limits relative to income
    - The normal cap from the fifties to the eighties was 2.5x one full time income (even if a couple were both working full time)
    - Banks now routinely lend over 6x and as much as 9x income
- Lower buffer between assessed and actual interest rates
    - Allows a borrower to borrow more
- No limits on the proportion of income taken by payments
    - In the US payments are often limited to 30% of income
- Interest only loans
    - By reducing the size of initial payments these greatly advantage investors looking to ‘flip’ houses, selling during the interest-only period
- Lending against equity
    - In the fifties and sixties investors would usually have needed a 30% cash deposit
    - Equity lending allows investments to be leveraged off each other with very little liquidity
- Basel risk-weighted liquidity rules
    - Banks do not need to hold as much liquidity for ‘low risk’ loans such as real estate

    - This encourages banks to lend to real estate and to not lend for business investment, reducing growth and increasing house prices
    - Almost all financial crises have been due to failure of 'safe' investments, primarily land
- Allowing mortgage securitization
    - This encourages banks to lend more by allowing them to spread their risk
    - Central banks may contribute directly to rising house prices by buying mortgage backed securities to encourage further lending
    - Derivatives such as mortgage backed securities pose a significant risk, and were primarily responsible for the failure of Lehman Brothers

All these changes have the effect of increasing what a bank is permitted to lend. This will then flow through to higher house prices. This is consistent with findings that credit liberalization increases house prices[27].

The effect of macroprudential policy can be seen in Australia around 2018, at the time of the banking royal commission. This spurred ASIC to try enforcing stricter standards on lending, that remained until they were overturned in a court case. This resulted in an approximate 10% drop in housing prices averaged Australia-wide despite no moves having been made to increase supply.

Changes in inflation calculations

Prior to 1998, the Australian Consumer Price Index included mortgage payments. This meant that when credit expanded, and house prices rose, interest rates rose to compensate. It also meant that the CPI had a direct proxy of credit creation, so monetary policy transmission was directly reflected.

In 1998 the ABS removed mortgage payments at the behest of RBA. The reasoning for this is twofold. Firstly, it was argued they reflect 'investment' and not 'consumption'. This is a false dichotomy as purchasing a house represents both, and few economists prior to 1980 would have maintained this position. Secondly, they argued that due to the large weighting of housing and the volatility of house prices, it made the CPI too volatile. However, this can be reduced through weighted smoothing.

Since 1998 there has been no reflection of housing credit creation in the CPI, even though *this is the main transmission channel of monetary policy*. Furthermore, since mortgage payments are the largest expenditure item of many households, the CPI no longer accurately reflects household expenses, and it is likely not a credible measure of its original intent, the cost of living[28].

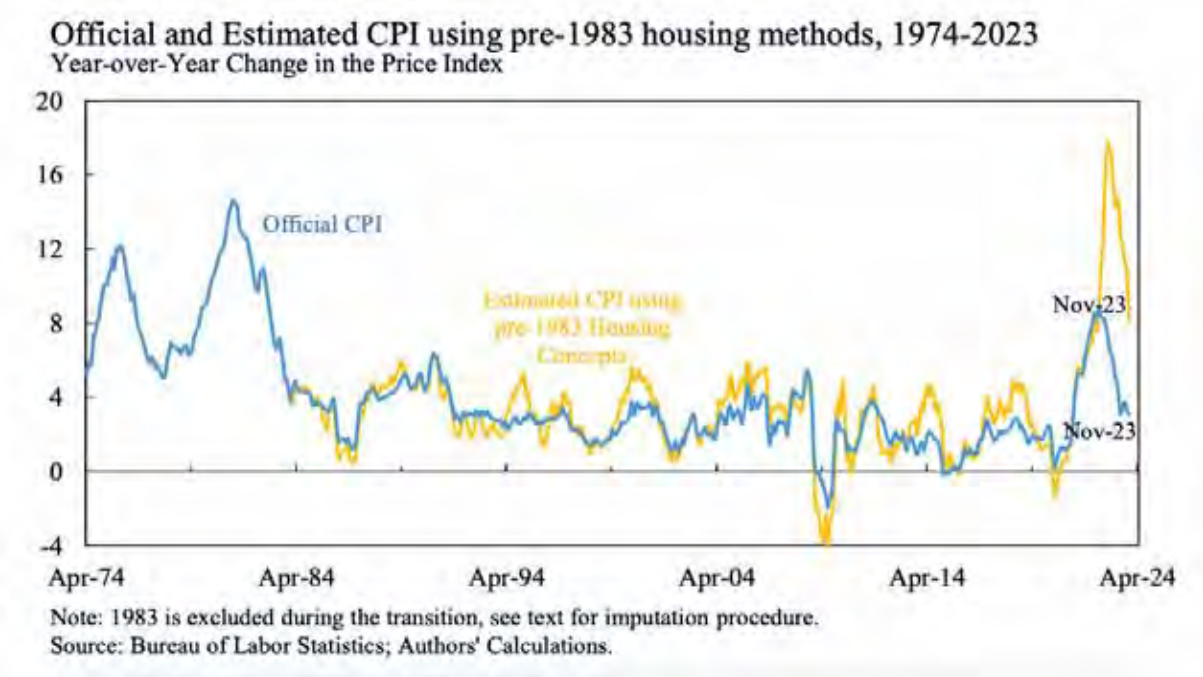
[27] https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4682572
[28] https://www.housing-critical.com/data/USR_057_DEFAULT/02_The_Role_of_Housing_Costs_in_Central_Banks_Inflation_Targeting_Regimes.pdf

It is therefore unsurprising that house prices begin to diverge rapidly from underlying inflation and wage growth from 1998. In particular, the interest rate cuts in 2012 greatly reduced borrowing costs, and spurred the 2013-2017 housing boom.

Had house prices been reflected in the CPI, this could have substantially raised it and had a dramatic effect on monetary policy and subsequent credit creation. Without the interest rate cuts around 2012 borrowing costs would be significantly higher and housing investment consequently less attractive. Despite this, the RBA is still targeting inflation based on a CPI of 2% per year, even though the current CPI no longer represents the same measurement as when the 2% target was first theorized in the 1990s.

Unfortunately, no Australia-wide CPI series is available that calculates what the modern CPI would have been with either old methods or methods incorporating house prices. However, there are some examples that demonstrate the potential effect.

The graph below was calculated for the United States' CPI using the US Bureau of Labor Statics' pre-1983 method. Note that the general level is higher, and that the COVID-era inflation was much higher by this measure.



Source: https://www.nber.org/papers/w32163

In an examination of different methods of treating owner-occupied housing in the CPI, Hill, Steurer and Waltl (2023) examined the Sydney micro-level CPI produced by the ABS. Unfortunately, this study only uses data going up to the 2013-14 financial year, and misses most of the housing boom. They show that different treatments of the CPI can produce very different results, and note that it could mean very different monetary policy responses[29,30].

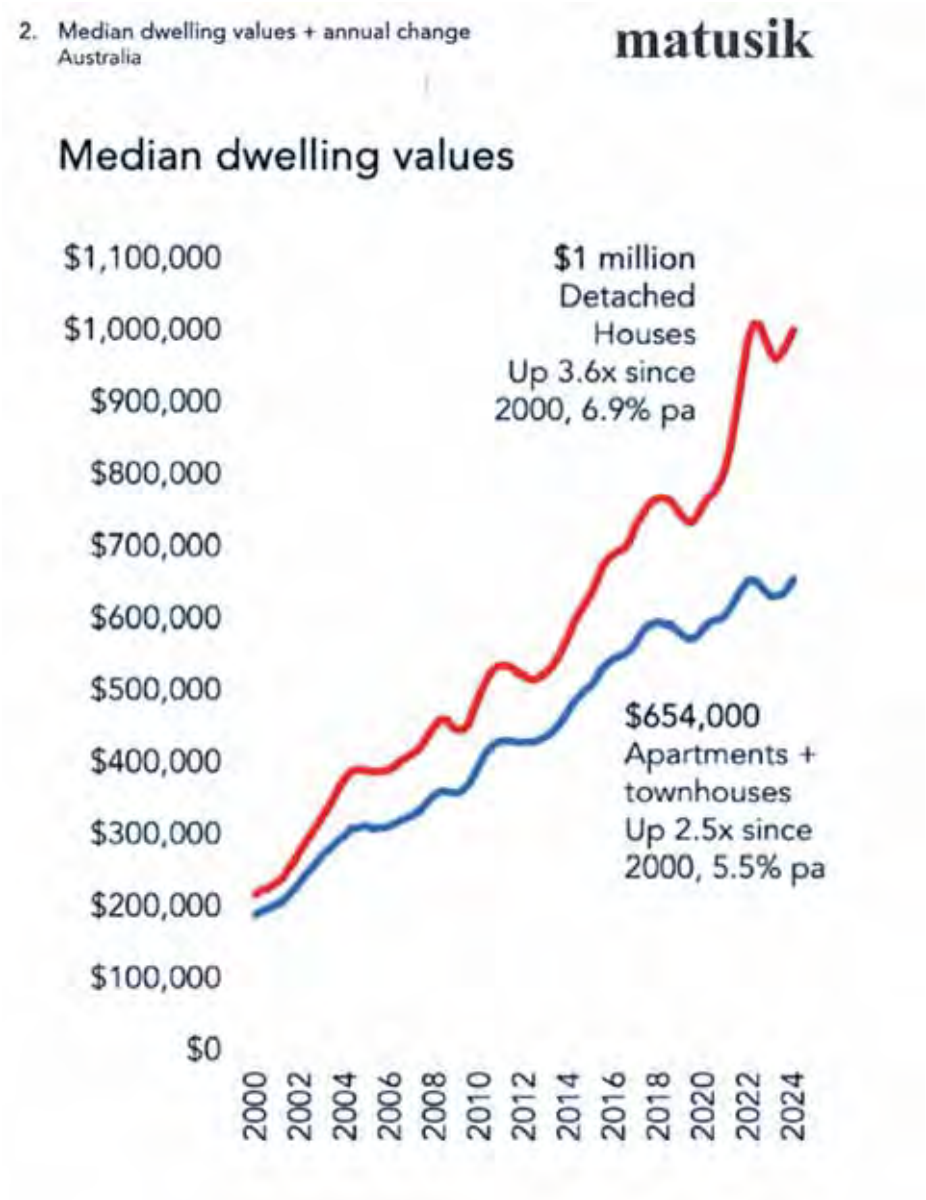
[29] https://onlinelibrary.wiley.com/doi/pdf/10.1111/jmcb.13059
[30] https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3118152

Unfortunately, without major revision Australia will continue to have monetary policy that is completely unresponsive to house prices. When monetary policy cannot direct where credit goes (that coming under macroprudential), it will continue to have a high potential to drive bubbles.

The housing market is heterogeneous

One thing that regularly is missed by advocates of upzoning as a solution to housing affordability is the fact that the housing market is not homogeneous. This means that supply of one type of housing can be increased with modest at best effects on the price of other types.

In Australia, this can most clearly be seen by the difference in price trajectories between separate titled housing (mostly detached houses with a very small number of terraces) and unit-titled housing (apartments and townhouses). Over the past fifteen years the supply of new dwellings has not met the preferences of prospective buyers (who want detached, separately titled houses). This has resulted in a large premium opening up for detached properties:



Source: https://www.investmentrise.com.au/the-truth-about-apartment-prices-rising/

These premiums can arise for multiple, sometimes interacting reasons:

- Demand for detached houses is not being balanced by new construction, which is increasingly skewing towards apartments, but people still prefer detached houses
- Detached houses have a yard, or otherwise extra land, which people will pay extra for
- The land in unit titled dwellings is effectively owned collectively through the body corporate. This means there is no individual owner who can chose what to do with the land. Hence it has fewer potential future use options.
- That unit titled dwellings require a body corporate introduces another set of fees and administration complexities[31]

[31] https://region.com.au/strata-upkeep-creates-complex-insurance-shortfalls/874271/

- Strata management issues are a significant source of conflict and stress, as is being raised in a current inquiry[32]
- Many body corporates are controlled by the builder

The issue arises when advocates of densification claim that housing affordability can be addressed by building more units. Aside from the fact that high-rise apartments are the most expensive kind of housing to build per dwelling unit, they simply do not meet people's needs. While townhouse style construction is somewhat less expensive (though still often moreso than single dwellings) and is somewhat more flexible, it still suffers from these problems.

Income

An almost completely ignored factor in housing debates is income. This is especially salient in discussions about the US, where people compare cities such as Houston and San Francisco without considering the difference in incomes, and in the case of San Francisco, the tech industry's presence meaning a much heftier upper tail of incomes.

A recent paper published by the NBER has found that the primary factor in United States housing prices is income[33]. Using a series of simple, robust tests against different measures – including alleged measure of zoning strictness – income was consistently the most important explaining variable. One interesting finding was that new supply and price increases were positively correlation, providing circumstantial evidence for housing behaving as an asset, and also demonstrating the difficulty of untangling alleged supply restrictions from other factors driving house prices and construction. In particular, although there was some correlation observed between alleged zoning strictness and *price growth*, there was no correlation between zoning strictness and *supply growth*. This indicates that zoning strictness measures are not independent and are probably capturing other factors. It should also be noted that unlike pro-upzoning papers such as those used to proclaim the success of Auckland's upzoning, the paper adequately accounts for certain confounding factors[34]. It is very unlikely that anyone will advocate for reducing incomes as a method to make housing more affordable, but income is a factor that must be kept in mind.

Immigration

No factor has been more controversial than the effect of immigration on house prices. This is both due to the difficulty of disentangling it from other factors in a robust manner, and due to the wide dominance of pro-migration advocates in shaping the conversation. Ironically, it often seems as if the simple law of supply and demand goes straight out the window when it comes to discussing it, with many YIMBY advocates claiming there is no effect at all! This is despite the absolute constraints on land.

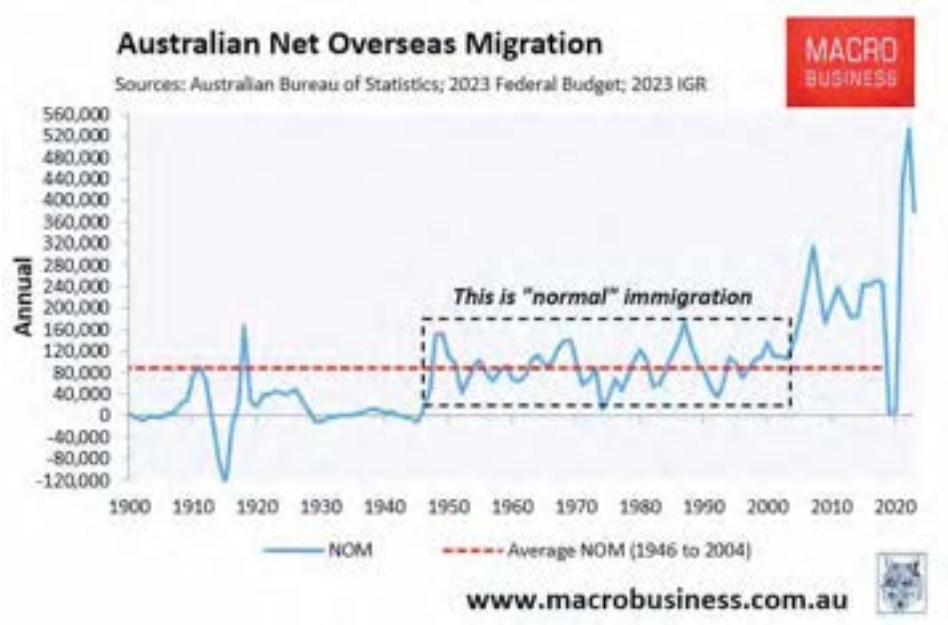
[32] https://region.com.au/please-look-after-my-wife-mental-toll-of-strata-sector-issues-laid-bare-at-public-inquiry/882160/
[33] https://www.nber.org/system/files/working_papers/w33576/w33576.pdf
[34] https://www.fresheconomicthinking.com/p/explainer-supply-constraints-do-not

The three countries most known for their housing bubbles over the past fifteen years have been Australia, Canada and New Zealand. One unifying factor of all three countries has been deliberate pursuit of exceptionally high levels of net immigration compared to other countries such as those in Europe, which as all three have below-replacement birth rates, is the sole contributor to their exceptional population growth:



Source: https://www.macrobusiness.com.au/2024/08/australia-is-actually-very-good-at-building-homes/

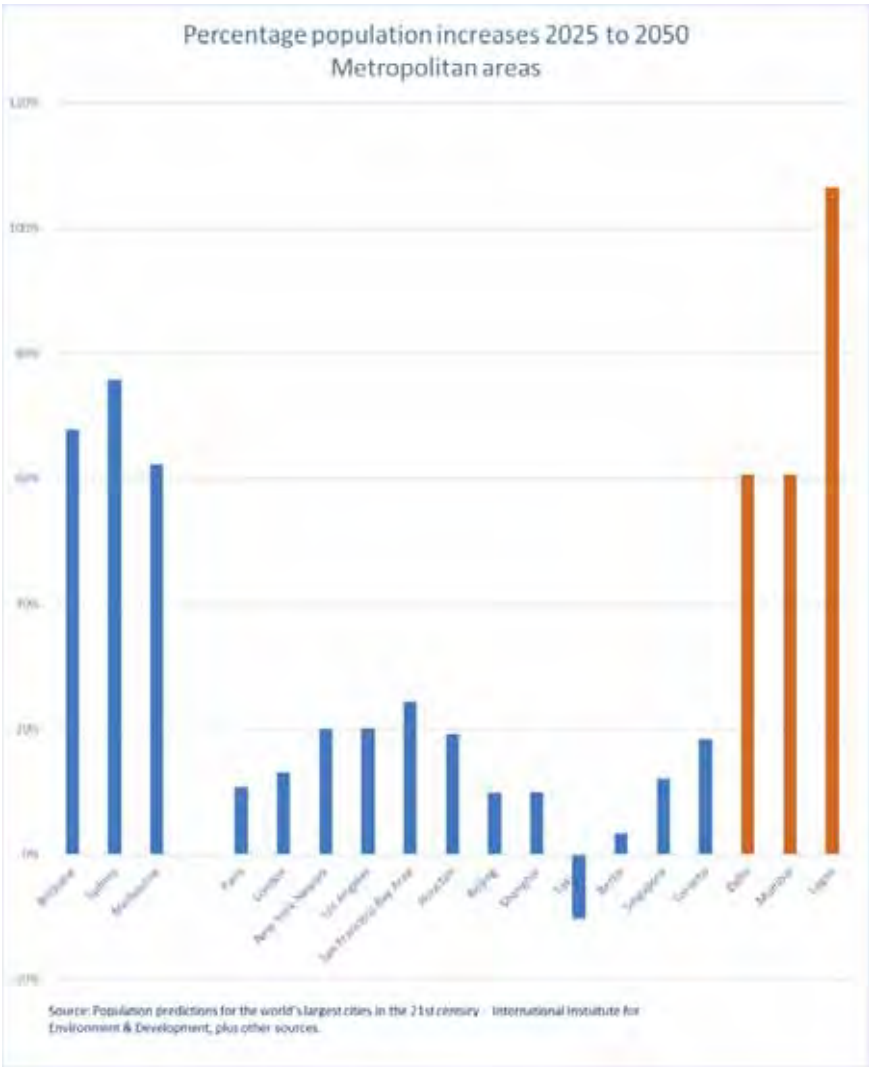
Since the reopening of borders after COVID, all three countries pursued a policy of extremely loose borders. In Australia, net immigration levels reaching record levels, several times more than the historic norm of 80-100,000 per year:



Source: https://www.macrobusiness.com.au/2025/04/how-the-australia-institute-transformed-into-immigration-propagandists/

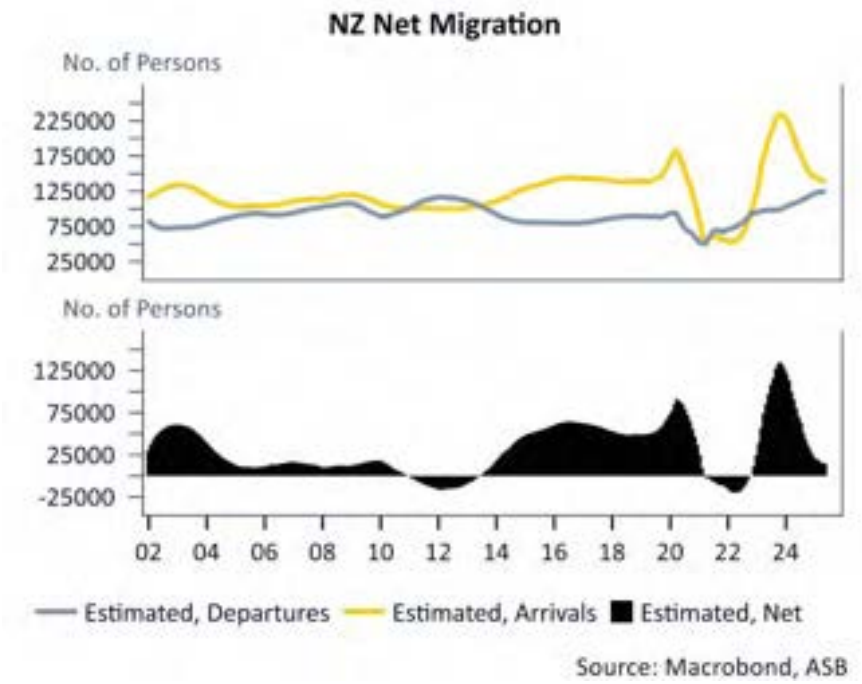
The growth rate of Australian cities between 2025 and 2050 is predicted to be equaled or exceeded only by cities in developing countries such as India and sub-Saharan Africa, which

have a much larger proportion of rural population so more intrinsic potential for urban growth:



Source: https://thefingeronthepulse.blogspot.com/2023/08/population-growth-context-in-few.html

While Canada and New Zealand experienced major peaks in net migration, New Zealand's briefly exceeding Australia's per capita, they have not continued at these levels. New Zealand's rate fell back dramatically with their declining economy (which increased emigration) and reduced visa approvals. In Canada, the Trudeau government cut back migration dramatically due to its deep unpopularity and Canada's dire housing situation. The result is that net immigration to both Canada and New Zealand has fallen back to historically normal levels, below even those sustained during the elevated immigration period of the 2010s:



Source:https://www.macrobusiness.com.au/2025/07/new-zealand-government-strives-to-reflate-house-prices/



Source: https://www150.statcan.gc.ca/n1/pub/71-607-x/71-607-x2019036-eng.htm

Associated with these falls in immigration have been falls in house prices of a remarkably similar magnitude, despite significant differences in planning strategy between NZ and Canada. The fall in housing demand is a likely explaining factor. One thing missed in static modelling is that high levels of migration will encourage speculative investment due to anticipated high future demand. Remove this factor and it also removes incentive to speculate.

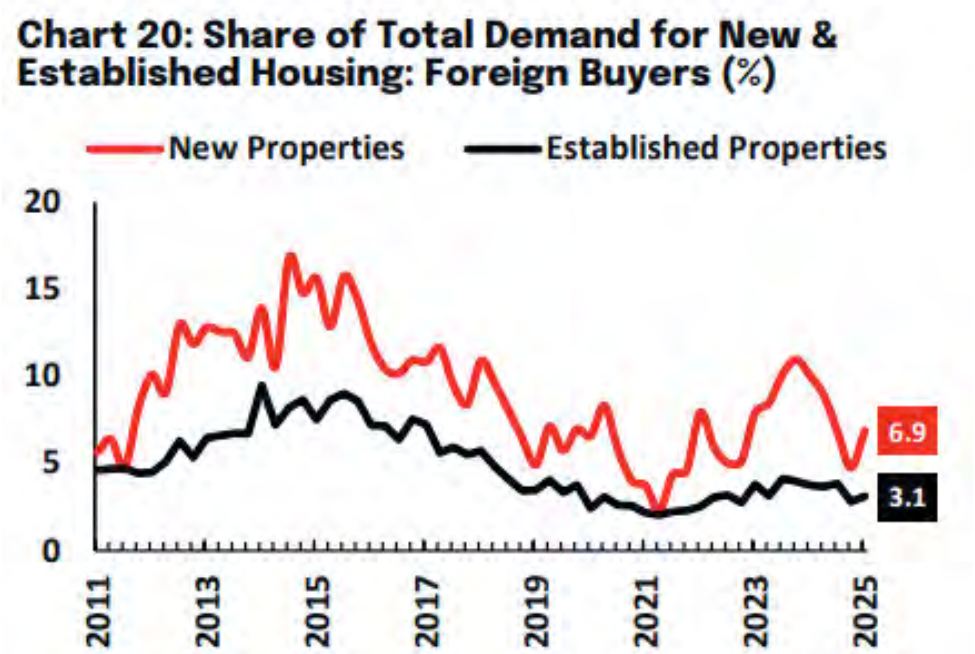
Foreign owners

Foreign ownership is a consistent cause of controversy about housing prices, however the most expansive data indicates that it is likely a significant factor.

Opponents of the idea that foreign investment contributes to high housing prices will usually cite the Foreign Investment Review Board data showing that only a small number of houses pass through consideration. However, this data is probably incomplete. FIRB reporting is self-assessed and the FIRB itself does not have the resources to investigate real estate transactions. This means there is little enforcement and the required penalties to deter such purchases are lacking.

There are various methods that foreign investors use to get around restrictions on purchases. For example, blind trusts are commonly used to reduce the traceability of money. Investors may use resident family members to act as proxies. Loopholes around 'new builds' allow foreign investors to purchase existing properties so long as they *eventually* demolish the residence to build new ones.

The result is that the amount of foreign buying is likely far higher than the official data. Data kept by National Australia Bank indicate that foreign purchases are around 3-5% of existing dwellings and 5-15% of new dwellings. The existing property purchases are most problematic as they act to tighten the market, especially when the purchaser has the means to outbid other potential buyers.



Source: https://x.com/AvidCommentator/status/1937383755137843293

Government subsidies

In Australia there are numerous direct and indirect policies that, with the stated intent of improving accessibility or economic stimulus, are subsidies that stop prices from falling naturally. At least twice they have been implemented upon economic downturns, thus preventing prices from becoming more affordable by natural economic factors.

The first type of subsidy is 'first homebuyers grants'. These have been implemented at times both federally and buy states, with several state schemes currently in existence today. These, being direct grants, act as direct price subsidies. The intent is to increase the purchasing ability of prospective new homebuyers by providing a direct grant. The end result of this is a large expansion of borrowing power. For example, if an FHB grant of $40,000 is going towards a 20% deposit for a house, it expands borrowing power by $160,000. This can be quickly capitalized into higher prices.

The second type of subsidy was the 'economy boosting' type subsidies for housing construction, typified by the 'homebuilder' program launched during the COVID crisis. This was a direct cash grant to construction activities and served to subsidize house prices. In some cases, developers actually raised prices by the grant amount immediately after it was announced.

Tokyo

Tokyo is commonly cited by infill advocates as an example of success, however this fails to stand up to basic scrutiny.

In the 1980s Japan underwent the largest real estate bubble the world had ever seen up to that point. This was caused by very loose regulation of real estate lending and a strong speculative sentiment – the kind of sentiment that can't be incorporated into econometric models. An examination of Japan's fundamentals would have showed the folly of believing that there was future growth in real estate, as Japan's population had already stabilized and begun to fall, meaning there was no future demand. Yet despite this, loose monetary policy encouraged credit expansion[35], closely paralleling Australia's monetary policy since 2012. Notably, the rising prices encouraged investors to bid up prices due to the likely gain, another parallel with Australia.

This period of credit creation was not accompanied by widespread inflation as measured by the CPI, as can be seen in the graph below, with there even being CPI deflation in 1987. This is because the new money went almost entirely into assets, not consumer goods. This is another strong parallel with Australia since 2012, and demonstrates the issue of relying on an indicator that does not properly incorporate house prices.

[35] Edgardo Demaestri, Pietro Masci (2003): Financial Crises in Japan and Latin America, Inter-American Development Bank



Source: https://fred.stlouisfed.org/graph/?g=WyxZ

In 1989 the government belatedly tightened monetary policy, which saw an initial stock market collapse (it took until the 2020s for the Nikkei 225 to regain its peak) and gradually banks became reluctant to lend such large amounts and investors pulled out, leading Tokyo house prices to gradually subside by about half by 1999.

In order to encourage investment, in 2002 the Japanese government enacted a series of planning reforms known in English as the 'urban renaissance reforms'. These loosened planning requirements to encourage denser, more valuable development, and are widely praised by YIMBYs as an example of the right thing to improve housing affordability. This is not the case.

Commonly cited is a Financial Times analysis claiming that Tokyo's prices only rise 4.2% between 1995 and 2016, and attributing it to these planning reforms. It is deeply dishonest as the reforms were enacted in 2002 and prices had not yet bottomed out in 1995[36]. When the reforms were enacted, prices turned around and have risen ever since, rising 86.3% between 2002 and 2022. While not the same magnitude as Australia's price rises, it is actually a counterexample to the idea of pro-density planning reforms improving affordability. Allowing higher value development in fact raised prices:

[36] https://www.conradbastable.com/essays/japans-housing-crisis-what-the-yimbys-dont-understand



Source: https://www.conradbastable.com/essays/japans-housing-crisis-what-the-yimbys-dont-understand

Tokyo is currently affordable only due to the low quality of its housing. By 2020 prices per square metre for second hand apartments in Tokyo had risen to 800,000 yen per square metre[37], equivalent to over 10,000 Australian dollars per square metre. For a new house in Australia, of about 200 sqm living space, this would mean a price $2 million, for a two-bedroom apartment of 80 sqm, about $800,000. These prices are quite similar to those at current in Sydney, despite the pro-density reforms. The average Tokyo apartment has a living space of 41 sqm[38]. These living conditions would not be acceptable to many Australians, and are a major contributor to Tokyo's exceptionally low birth rate. Although reliable figures are hard to get, Australia appears to have triple the living space per person that Tokyo has[39].

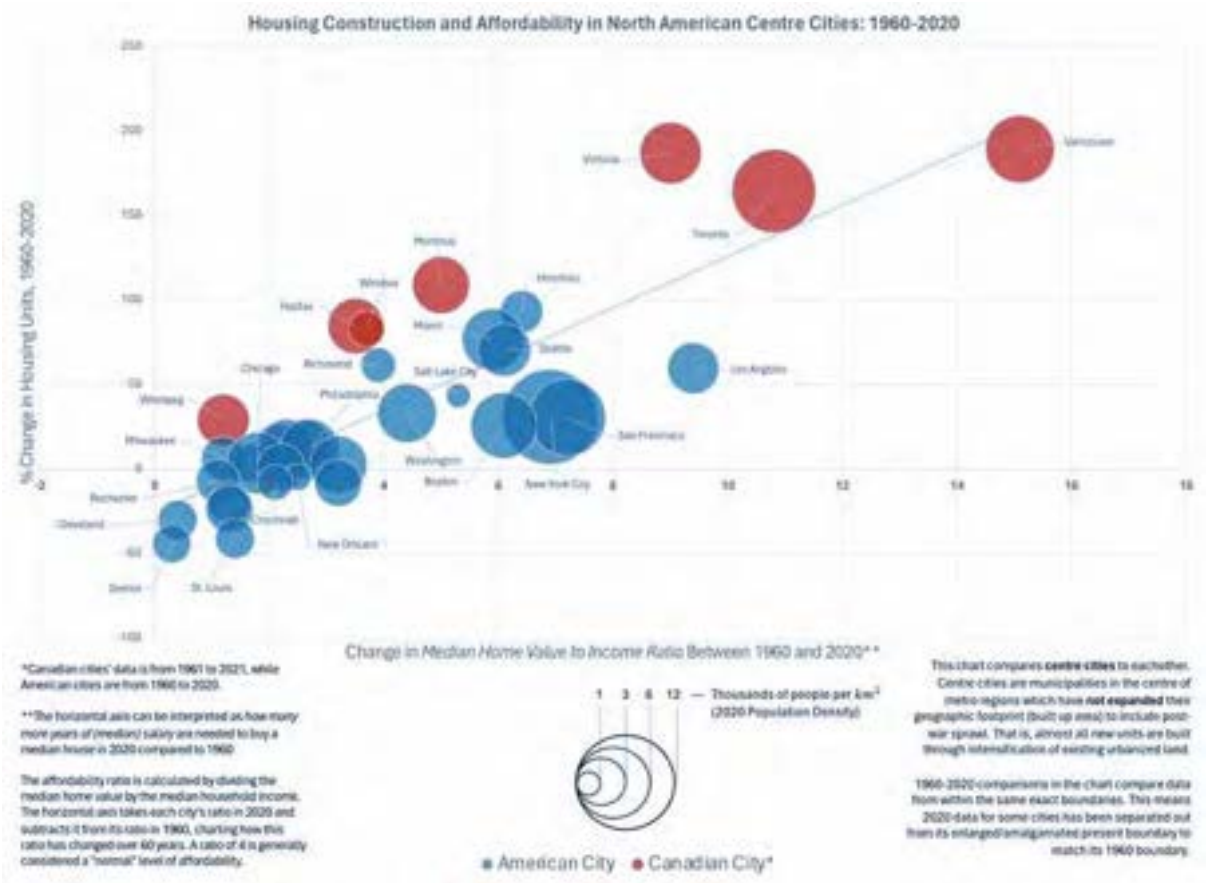
Vancouver

The progression of Vancouver's housing market strongly shows the limits of densification in facilitating affordability. Vancouver's physical geography is highly constrained due to the presence of protected areas and steep mountains a short distance from the city. This means that a large amount of new swelling supply in the city is through infill rather than greenfield development. Nonetheless, over the past fifty years Vancouver has added more dwellings *per capita* than any other major city in North America. In terms of new housing supply it is objectively a success story.

But this does not stop Vancouver from being the most expensive city relative to income in North America. The main driver of this is the restricted supply of land, which makes it an

[37] https://japanpropertycentral.com/2021/08/tokyo-apartment-prices-between-1992-and-2020/
[38] https://interacnetwork.com/japan-apartment-sizes-how-small-are-japans-living-spaces/
[39] https://www.fresheconomicthinking.com/p/did-germany-and-tokyo-really-get

attractive target for speculators. It also has a very high amount of foreign property ownership, not least due to extremely weak enforcement of anti-money laundering laws.



Source:https://www.linkedin.com/posts/thomaskroeker613_some-interesting-data-visualization-from-activity-7219976832765284352-QSD7

Vancouver, and west coast US cities such as Portland Oregon, presage the forthcoming disaster of another ACT government policy, that of urban growth boundaries. Urban containment has from its inception been an aesthetic preference that prioritizes everything else over humans and their needs. By restricting the supply of land it

It also raises a strong example against the idea that the only thing needed to improve housing affordability is relaxing planning rules and then 'the market' will sort it out. This is because for investment in housing to be profitable, dwellings of a given quality cannot be sold for less than the current market price. There are in fact no examples of 'market-based solutions' improving housing affordability except through quality reduction or greenfield expansion. Otherwise major falls in house prices occur exclusively with economic contractions and financial crises.

New York and Minneapolis

Parts of New York City tried upzoning in a similar manner to that used in Auckland or Canberra[40]. The result was that even though there was an increase in construction, dwelling prices in the upzoned areas were actually slightly higher, as were land values. Furthermore, the most intensely upzoned areas saw the greatest appreciation and the construction of high-end rental properties. This contradicts the idea promoted by zoning theory that relaxing zoning should cause large falls in price. As previously noted, this also applied in Minneapolis, with upzoned areas experiencing an uplift in prices for detached houses (i.e. constant quality).

Auckland, New Zealand, and limits of research

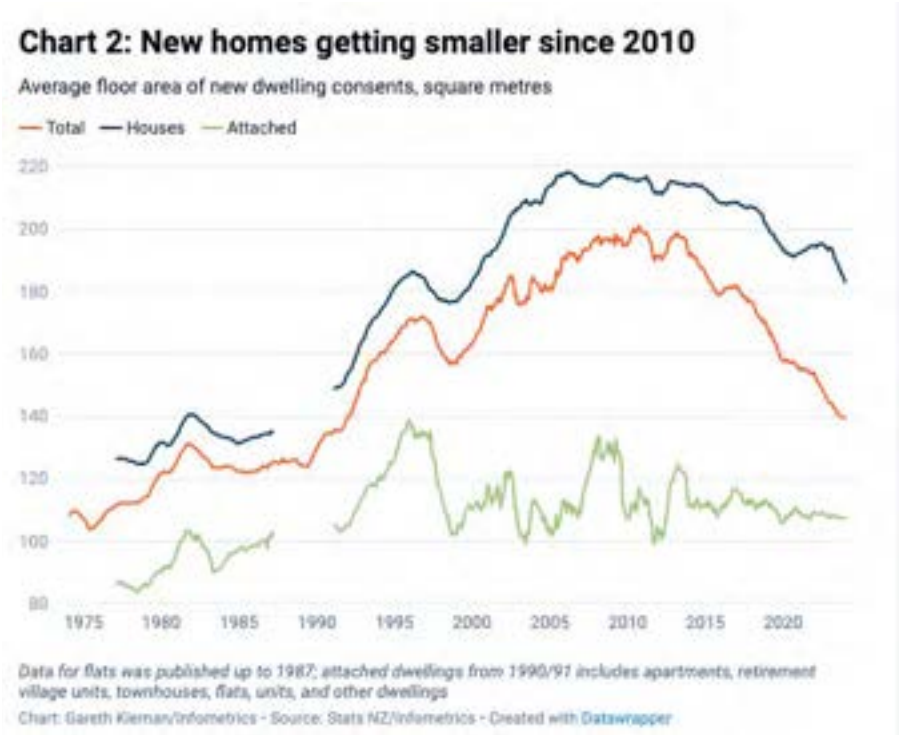
Planning reforms in Auckland and New Zealand are commonly cited as successful examples of housing affordability created by upzoning for 'missing middle'. However, this claim relies on downplaying a large number of factors:

- In New Zealand, prices rose a greater extent than they did in Australia after already being higher, meaning that the peak of the bubble was less sustainable
- Interest rates in New Zealand rose much earlier and higher than they did in Australia, peaking at over 5% in 2023. This reduced the borrowing capacity of New Zealanders to a much greater extent than in Australia.
- Under the Ardern government, New Zealand instated 'bright lines' rules that meant investors could not claim capital gains tax discounts unless they owned the property for more than a decade. This reduced the incentive for speculative 'flipping'
- Under the Ardern government New Zealand abolished negative gearing for future housing investors, making housing a less attractive investment. It has only been reinstated this year.
- New Zealand has experienced much higher unemployment than Australia, with a current rate of about 7%
    - This is due to the low spending policies of the current government. In comparison Australia has experienced a boom in non-market jobs, especially due to the NDIS.
    - Canada similarly has a higher unemployment rate than Australia
- Although briefly peaking higher, New Zealand's net migration relative to population has generally been lower than Australia's and has fallen well below Australia's level since early 2024
- New Zealand is currently experiencing extensive emigration of young (c. 30 age group), high income professionals – many of them to Australia. This is the demographic that would otherwise be expected to buy newly built homes
- New Zealand experienced a recession in 2024 and is likely to do so again this year
- There has been a dramatic decrease in the quality of new housing stock on offer, consisting mainly of two-bedroom townhouses that are not particularly desirable.
- Most of these factors will also act as deterrents to investors, reducing the potential for speculation and investor-driven price increases

[40] https://journals.sagepub.com/doi/full/10.1177/00420980241298199

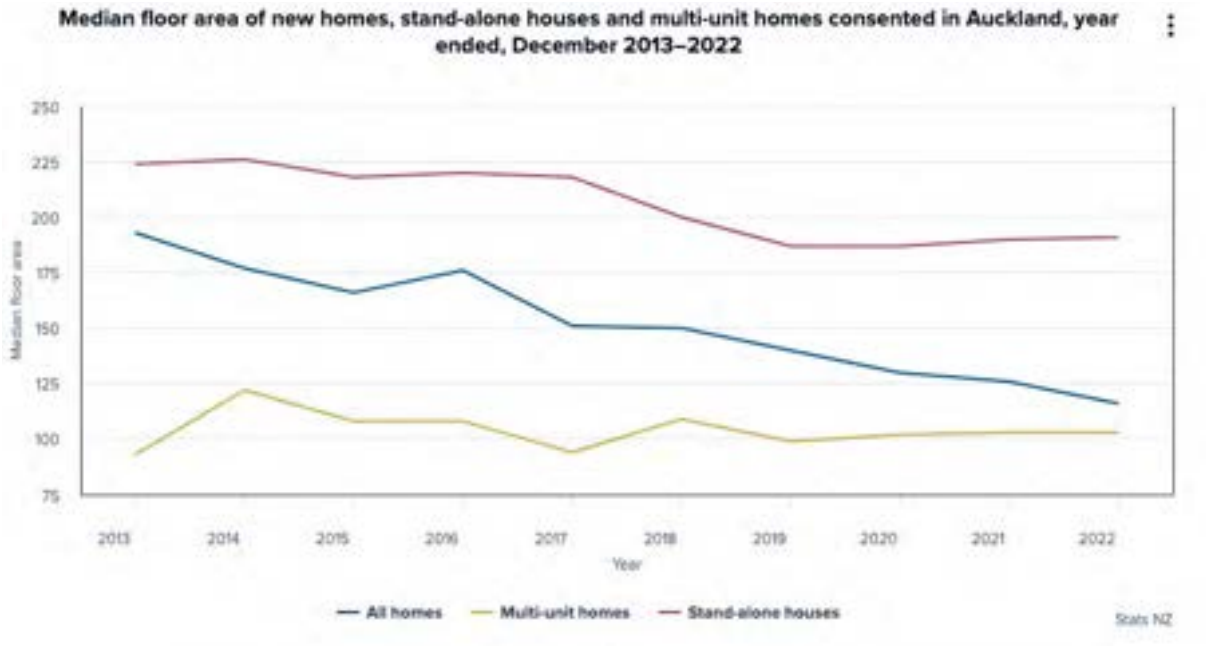
Pro-density New Zealand housing researchers recently produced several well-publicized studies that seem to consider these factors poorly. Supporters prefer to justify disregarding these factors and other weaknesses, such as claiming that picking from a series of linear trendlines is acceptable even though the housing market is markedly non-linear[41].

One primary poorly considered factor is the remarkable reduction in the quality of new housing stock in New Zealand, and particularly Auckland, produced by the changes in planning rules. Family-friendly three or four-bedroom detached houses are being replaced by townhouses that usually have only two bedrooms. This has manifested in a dramatic drop in the average size of new dwellings approved:



Source: https://es.infometrics.co.nz/article/2024-04-thirty-six-thousand-new-homes-isnt-what-it-used-to-be

[41] https://www.fresheconomicthinking.com/p/the-auckland-upzoning-myth-response



Source: https://www.stats.govt.nz/news/median-floor-area-of-new-homes-consented-decreases-10-percent/

This on its own would reduce the price simply through compositional effects. A greater supply of a cheap, low quality product, will lower the average price of that product's class. Furthermore, producing a less desirable product (townhouses and units) instead of that preferred (detached houses) will produce a further fall in prices as potential buyers choose to hang on to buy the product they want, meaning that to clear the market the less desirable product (townhouses) will have to be sold at a discount. In fact, New Zealand's floor area additions are well below what would have been expected by the pre-reform housing composition:



Source: https://es.infometrics.co.nz/article/2024-04-thirty-six-thousand-new-homes-isnt-what-it-used-to-be

This is consistent with findings that the 2015 reforms in Auckland lead to floor area being divided into a larger number of smaller dwellings, with the result that there is no break in the trend of floor area increase, which is not what would be expected if dwelling quality had not fallen[42]. Thus reduced quality is a big part of the alleged price benefits.

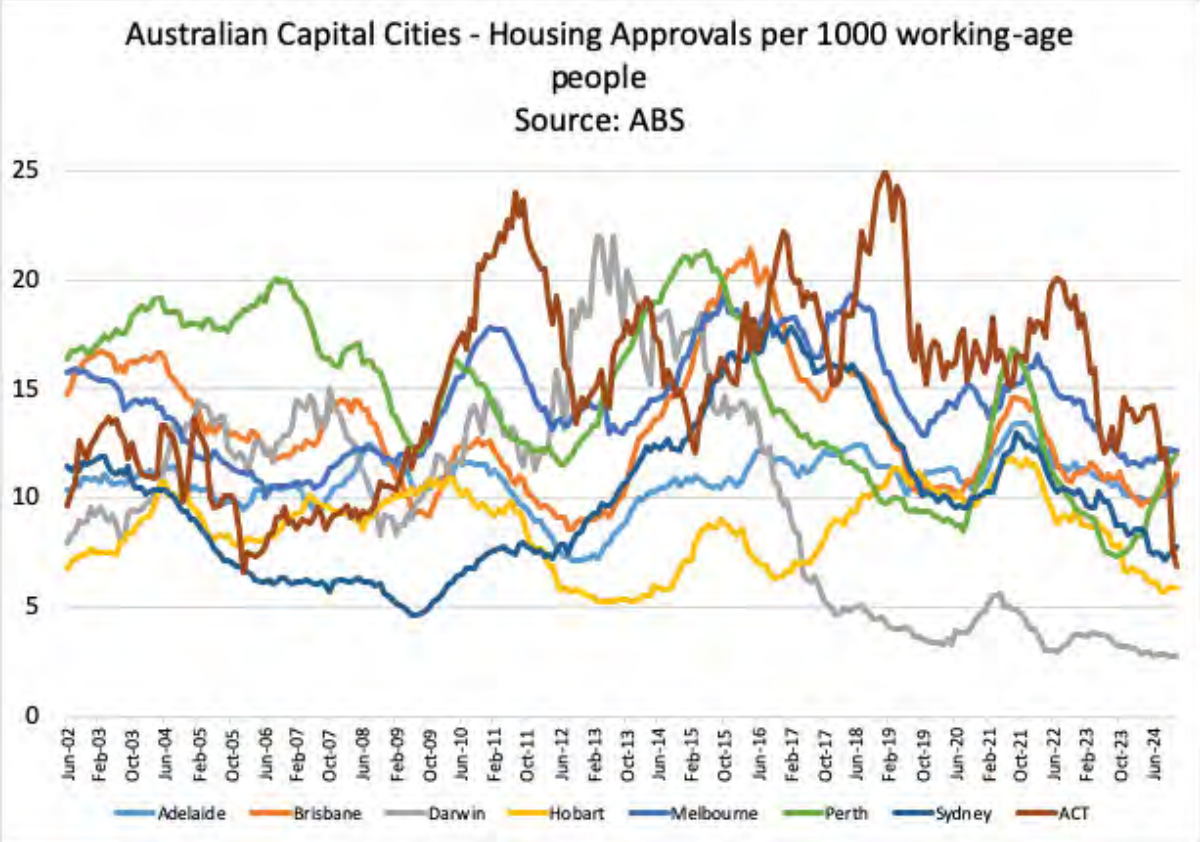
In their September 2024 Financial Stability Report, the Reserve Bank of New Zealand produced an analysis of the NZ housing market. It showed that in terms of new dwelling approved in comparison to working age population, the Canterbury Region had consistently outperformed all others, despite Christchurch not undergoing the same upzoning process as Auckland until much later:



Source: https://www.rbnz.govt.nz/-/media/project/sites/rbnz/files/publications/financial-stability-reports/2024/november-2024-special-topic-1/fsr-special-topic-update-on-housing-market.pdf

Furthermore, a comparison with Australian capital cities shows that New Zealand's blanket upzoning policy is overall delivering less housing supply than Australian cities have for a much longer period:

[42] https://www.fresheconomicthinking.com/p/more-eyes-on-aucklands-upzoning-experiment



It is clearly visible that the ACT is an outperformer in terms of housing supply, with a higher average supply than all other capital cities. The only recent underperformance has been since 2023, a period associated with high interest rates, high building costs and a dearth of land releases by the ACT government. It is laughable to use New Zealand as a measure of 'what to do' in housing policy when Australia trumps them in pretty much every measure, delivering a much larger, more sustained supply of larger houses.

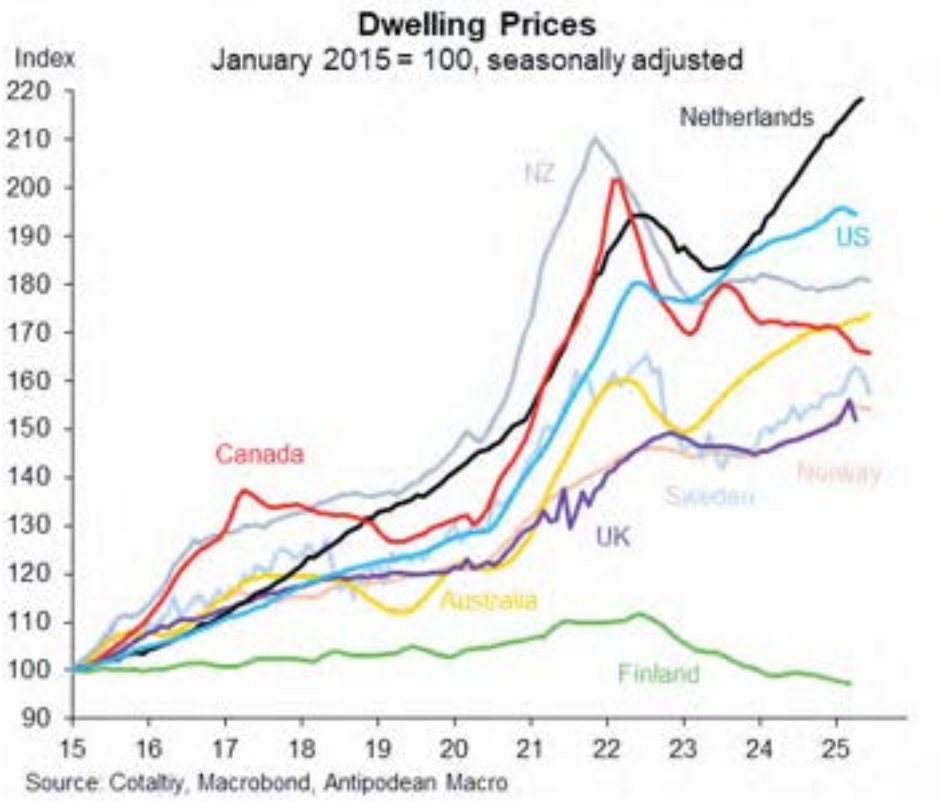
One final thing worth mentioning is that New Zealand's house prices are still extremely high, and appear to be stabilizing at levels well above those zoning theory advocates think should be the case. The rapid fall in new dwelling construction shows the asset nature of housing and that developers won't build so much as to crash prices. New Zealand is a good demonstration not only of the limits of zoning reform, but also of the ideological nature of researching it, with advocates ignoring confounding factors.

Canada

Unlike New Zealand, which has little in the way of intermediate government, Canada is a true federation like Australia, and planning rules are set at either state or local level, usually the latter. Canada's housing policies strongly resemble those used in Australia. There has been little or no blanket upzoning as has been done in New Zealand, with capacity increases instead coming from a similar combination of greenfields development, redevelopment in city centres and 'spot rezoning' where limited areas are upzoned.

Canada and New Zealand have had nearly identical house price trajectories despite these differences. They do however, share other factors that a more significant in explaining their similarity:

- A higher COVID spike in prices
- A dramatic fall in net immigration
- Interest rates that rose higher than those in Australia
- Higher unemployment
- Lower economic growth



Source: https://x.com/AntipodeanMacro/status/1945276114789642522

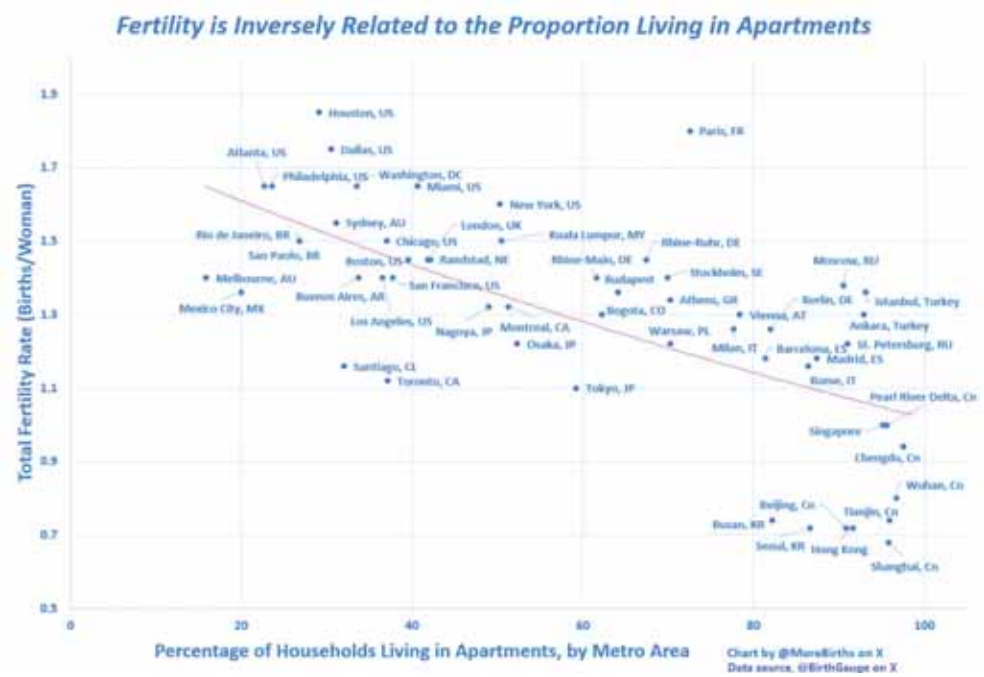
Any theory that claims New Zealand's house price fall was due to rezoning needs to account for Canada's where far less rezoning has taken place but there are many other shared economic factors.

A disaster for families

The two-bedroom unit that will likely be the most common dwelling built under the 'missing middle' reforms will have a long-term negative effect on Canberrans' family aspirations. It is worth noting that with its already higher than normal proportion of units, Canberra has a low birth rate compared to other Australian cities.

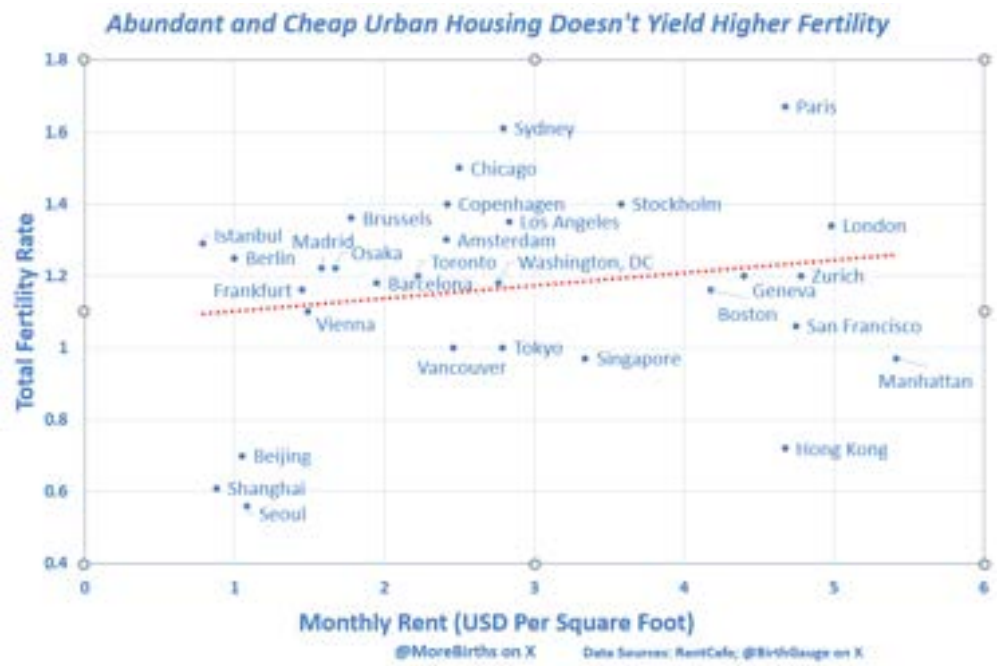
Apartments are devastating for fertility because people do not want to have children without sufficient room, and having a very high proportion of apartments and low

proportion of detached houses locks people into having no children or one child. People who want families, want detached houses[43].



Source: https://x.com/MoreBirths/status/1911863872493142471

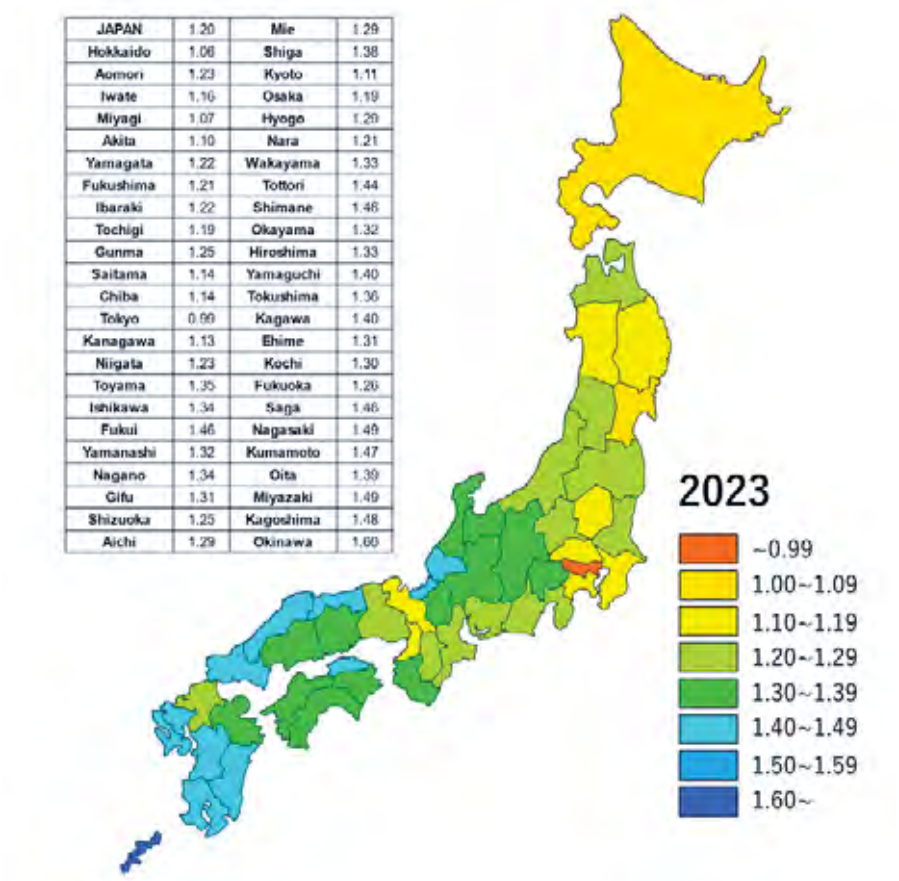
In comparison, housing affordability has only a very modest effect on fertility, not statistically different from zero:



Source: https://x.com/MoreBirths/status/1911863872493142471

[43] https://x.com/lymanstoneky/status/1901686035530080335

This effect can be most markedly seen in South Korea. Korea has strict urban growth containment strategies that favour density. This means that a very large number of Koreans wanting to work in major cities such as Seoul (the major cities being where most of employment opportunities are) are forced to live in one- or two-bedroom units. This delays family formation and means that people who do have children, have fewer of them. The result is that Korea's population is now rapidly declining. It can also be seen in ex-Soviet countries, which pursued a similar apartment-based housing strategy and in Japan, where density-favouring urban development policies and the concentration of job opportunities in Tokyo is rapidly eroding the country's population[44]:



Source: https://x.com/MoreBirths/status/1902008503859863884

In comparison, the 'baby boom' begun in the US and Australia during the 1930s and after the interruption of WWII, accelerated during the 1940s. A key trigger to the baby boom was suburbanization. The populations in city cores actually dropped as people moved outwards into larger detached houses with yards that provided an ideal protected environment to raise children. In comparison, Europe, with it denser pre-existing population and severe restrictions on urban expansion (both due to government policy and pre-existing landownership) did not have nearly as big a baby boom as the US and Australia.

Advocates of denser housing – such as ACT planning minister Christopher Steel – regularly talk about it as being more 'human scale', but this is in fact the opposite of the truth. People, especially people who want families, prefer to live in less dense housing. By

[44] https://x.com/MoreBirths/status/1902008503859863884

encouraging denser development people will be locking themselves into a type of housing they do not prefer, as detached options grow fewer and fewer.

The 'YIMBY' movement and refusal to see other's point of view

The so-called YIMBY (yes in 'my' backyard) relies on bellicose rhetoric and deliberately avoiding other potential solutions in order to fit their preferred lifestyle. This starts off with the use of 'NIMBY' ('not in my backyard'), a term originally applied to people who might otherwise have supported controversial developments, so long as they weren't near them. This was most saliently applied to nuclear powerplants, especially after Three Mile Island accident. However, the YIMBY usage is as an insult, deliberately denigrating people who don't want the negative externalities of denser development imposed on them. This has been very successfully weaponised. There are attempts at countering this, for example 'YIYBY' (yes in your backyard) and 'YITBY' (yes in their backyard) exist as attempts at more accurately characterizing the 'YIMBY' attitude where development is imposed on communities regardless of their desires. But these have not caught on.

Groups like Greater Canberra do not seem to understand that many people actually value privacy, space, peace and quiet. It is not 'greed' that drives people to oppose denser development – indeed it would arguably be a financial gain to the property owners, as allowing greater density raises land value. However, it comes at a loss to the intangible things that the majority of people value, like privacy and quiet. Greater Canberra founder Howard MacLean's op-ed in the *Canberra Times* demonstrates this in calling people trying to have government's own housing standards enforced[45] 'cranks'[46].

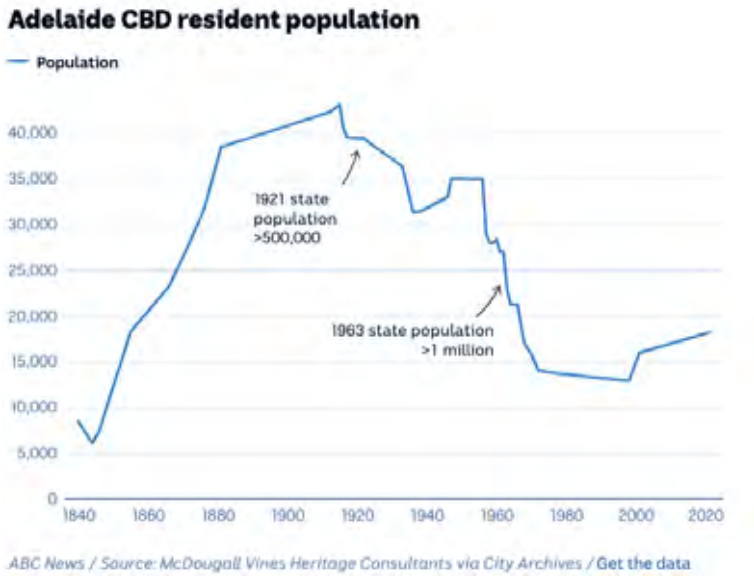
It is only a relatively small circle of people, predominantly young, single and university educated – especially in the arts or social sciences (including town planning and 'urbanism') rather than hard sciences – who desire apartment living. It is notable that many Australian 'YIMBYs', such as the founders of Greater Canberra, Sydney YIMBY and Melbourne YIMBY fit some or all of these traits. YIMBYism could be described as a perpetual university student mindset, where the advocates can play SimCity with real people. This is also often seen in the shallowness of commonly expressed benefits of greater density, such as greater access to cafes and restaurants, while deeper issues, such as privacy and noise pollution, are ignored.

This dominance over the majority's preference can be paralleled with another, that of open plan offices. Certain people strongly advocate them due to 'opportunities for collaboration', however most people dislike them due to them being disruptive and noisy, while studies consistently show they are very detrimental to productivity. In a similar vein, most people prefer the privacy of a detached house without overlooking neighbours, and interpersonal relationships actually suffer when interaction is forced.

[45] https://www.canberratimes.com.au/story/8942787/letters-to-the-editor-170425/
[46] https://www.canberratimes.com.au/story/8935320/opinion-act-housing-crisis-prolonged-by-handful-of-cranks/

Studies often show that people living in densely populated areas are more, not less socially isolated[47] and have worse mental health than those in less dense areas, despite inner city dwellers generally being higher socioeconomic status and physically healthier. Unwanted interactions are likely a driver. And YIMBY attitudes are not even the majority amongst Gen Z, at least in America, with recent surveys showing that despite the potential disadvantages the majority of younger people still prefer detached homes[48]. Furthermore, those who do have stronger community relationships than those who prefer apartments, contrary to the urbanist discourse.

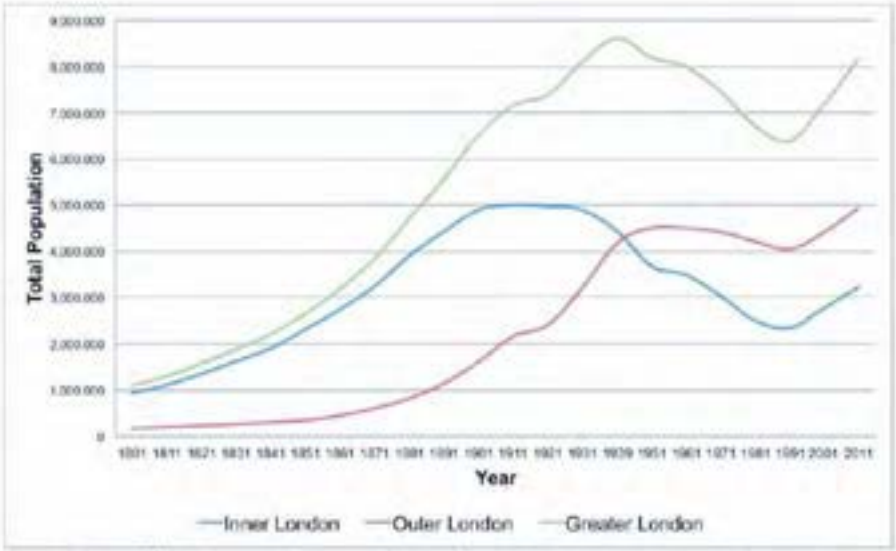
Most people do not choose to live in dense 'walkable mixed use' if they have less dense alternatives available. This has been shown time and time again across multiple continents. When mass suburbanization became possible in the inter-war period, population growth in the city centres halted. As the suburbs expanded and employment moved to more spacious locations more suitable for industry, this trend only accelerated, resulting in large reductions in CBD populations. For example, Adelaide:



Source: https://www.abc.net.au/news/2025-08-02/adelaide-cbd-population-target-50-000/105458028

And inner London:

[47] E.g. https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(21)02603-9/fulltext
[48] https://ifstudies.org/report-brief/homes-for-young-families-a-pro-family-housing-agenda



Source: https://www.researchgate.net/figure/nner-and-Outer-Londons-total-population-1801-2011-Greater-London-Authority-2012_fig1_277952346

Only the recent rise of service and IT oriented jobs has reversed this trend.

Paris is often cited by urbanists as the ideal city (an attitude seemingly based on temporary residency during university):



Yet the population of the city of Paris has been falling almost continuously since about 1930, with the population moving to the less dense areas in the broader metropole and Ile-de-France region. This is despite Paris' lack of suitable infrastructure for suburbanization, with transport investment focusing on rail rather than roads. Similarly, Barcelona is often pointed to as an example ideal dense development by YIMBYs, based on its tourist-oriented historic core. Not only is Barcelona one of the most congested and polluted major cities in Western Europe, but a survey of its residents showed they would prefer population growth to be accommodated by expansion, not density[49]. In Europe the more compact city style in general is a legacy the pre- or early-industrial development patterns, prior to modern

[49] https://policyexchange.org.uk/wp-content/uploads/2005/06/unaffordable-housing-jun-05.pdf

motorized transport, and the high rural population density and more entrenched land ownership constraining suburban growth.

Perhaps the starkest example of this was Halle Neustadt in East Germany. This was a compact, apartment focused development in the city of Halle. It was based on the best urbanist principles of the day, and which are still a bedrock of urbanist and town planning discourse, creating a dense, walkable neighborhood with collocated services and parks for open space. Upon the fall of the communist government, more than half the population left, many of them relocating to low density detached houses on large blocks on the outskirts of the city. Ultimately, compact cities result from deliberate constraints on expansion that go against people's desires. And even in 'successful' examples, housing costs are very high. For example, in Amsterdam, another poster child for urbanists, the average house price is more than €700,000[50] while the average dwelling size is under 75 square metres[51]. This means a far higher cost per square metre than low density cities such as those in Australia and America.

Ultimately, it seems YIMBYism is an expression of the entitlement that its adherents should have the right to live an apartment lifestyle anywhere and that the externalities of that lifestyle can be imposed onto anyone, even if they don't want them. It imposes very real costs on people who have different preferences. It takes away the democratic consensus of zoning, which reflects what people want in their suburbs. Ironically, there are plenty of locations available for this kind of living, with apartments and townhouses being the major type of new construction in Canberra. It is people who are trying to maintain the amenity of their suburbs who are really on the back foot, as they do not have a well-drilled, academic backed campaign to spread their message.

Furthermore, these attitudes are well embedded in academia, which has long been at war with the general population's preference for low density detached housing. Academic 'urbanists' and town planners have constantly sought to impose greater density, despite constant counterexamples where people voluntarily move to less dense areas. Not surprisingly they are often childless and/or do not practice what they preach. The fact that such an unrepresentative demographic has come to dominate most of planning discourse has had a very corrosive effect. Ordinary people cannot get their voices heard and are at best dismissed. It seems that academic planners cannot understand that the majority do not like apartments and want detached houses with peace and privacy.

Unfortunately, unlike in the United States, it is hard to find out the pattern of donations to NGOs in Australia. In the US, a significant number of YIMBY NGOs have been found to be founded directly by developers. However, it is not necessary for this to be the case in Australia, as the dominance of density favouring attitudes in planning discourse and the activist nature of the university student class will ensure similar outcomes.

Issues with this proposal:

[50] https://www.makelaaramsterdam.nl/en/amsterdam-housing-market/
[51] https://www.dutchnews.nl/2018/06/amsterdam-homes-are-smaller-than-the-national-average/

Canberra has a shortage of detached houses, not 'missing middle'

According the ABS' 2023 statistics, only 63.2% of the housing in the ACT is detached, significantly below the national average of 72.3%. Future planning concentrated on infill (even prior to this proposal) will lead the problem to becoming even more acute. In comparison, the proportion of townhouses is 17.2% and apartments is 19.4%, both significantly above the national averages of 12.6 and 14.2% respectively.

In Australia, urban planning over the past decade or so has concentrated highly on infill, and major barriers are put in the way of greenfields development. As a result, the premium which detached houses command over unit-titled dwellings (including 'missing middle' type dwellings') is large and continues to grow.

This planning policy cannot be divorced from the mooted introduction of urban growth boundaries that, until repealed, with constrain supply of land. This will force demand for detached homes into outlying areas, such as Googong, Bungendore and Murrumbateman. This pattern of development is already well established thanks to the ACT government's slow and usually delayed land releases.

'Missing middle' does not produce the kind of housing that people want

Surveys such as the Victoria Infrastructure Surveys consistently show that detached homes are by far the most desired type of housing, being the preference of about 70% of the population. This is despite the increasing inconvenience of detached housing due to the increasing distance of new suburbs and the refusal of governments to spend money on enabling infrastructure (for example, the Victorian government continues to refuse to spend a modest amount of money to upgrade train services in the Caroline Springs-Melton area, but is spending tens of billions on the 'suburban rail loop' expressly to facilitate greater density).

Unfortunately, as planning has become increasingly academicized, being put in the hands of people who, as described previously, have dwelling tastes well out of step with the general population. This demographic has come to dominate the planning conversations, completely and utterly crowding out the large majority who do not like their ideas and would prefer to live in detached homes. As previously explained, missing middle is not suitable for families. It lacks the desired open space and privacy that people prefer to raise children. Therefore the 'missing middle' reforms will likely decrease the supply of detached houses in the ACT, to the detriment of those wanting a family.

Furthermore, not only is missing middle housing not suitable for families, it is also unsuitable for another demographic commonly cited as a target market, which is elderly people with no immediate family who may be looking to downside. The Auckland style two-bedroom townhouses are unsuitable. This is because they are two storey, which makes them unsuitable for older people who may have physical infirmities. They also pose a safety risk with accidental falls in the home being one of the leading causes of death in Australia. These units almost always completely lack any kind of garden (if there is, it is usually a small paved courtyard) and thus lack physical spaces for people to spend time.

In comparison, the townhouses that were built prior to self-government were often genuinely ‘gentle’, being either single storey, or built both in a location (in dedicated streets, often backing a footpath or park) and in a manner (relatively small block occupancy) to make two-storey construction practically non-intrusive.





Single storey, non-intrusive townhouses of the type that will not be built under the missing middle reforms.

If the government did want to produce housing that is family friendly, and also produce housing that is good for downsizers, it would allow block splitting for single storey detached homes (which would preserve privacy and open space) and only allow construction of single-storey townhouses, on consolidated blocks, which would be better for downsizers. The single storey requirement should be relaxed only either where some existing dwelling are already two storeys, or the extra storeys can be backed on a path or open space.

Privacy, intrusion and solar access

There is nothing gentle about so-called ‘gentle density’ for the people exposed to it. The drawings that are on the ACT Government’s consultation website are misleading, with actual examples of ‘missing middle’ housing in Canberra being consistently more intrusive than shown. The weakening of solar access rules, vegetated areas and the extremely weak

setbacks (none of which are laws, merely guidelines, so can be breached) will further worsen this. The changes specifically enable extra intrusion.

Both existing developments in Canberra and those made in New Zealand show that redeveloped sites are likely to be rebuilt to their densest possible configuration, as this extracts the maximum possible profit per site (this does not mean that supply will increase, because as previously explained density and supply are not the same). This will make the sites maximally intrusive for people adjacent to them. This loss of privacy and sunlight will have a serious impact on the mental health of the existing residents that will be uncompensated.

The examples shown in the 'missing middle design guide' are misleading, as only the most impactful and intrusive examples will be built. This is consistent even with literature which has a spin in favour of upzoning, for example in Auckland showing that each redeveloped site was developed to more or less its greatest allowed density[52] (land values also generally increased, while lower house prices are easily explained through lower quality). The idea voiced by Greater Canberra that three stories should be allowed everywhere would have an even more disastrous effect.

As mentioned in the previous section, the developments are likely to be built will be a stark contrast with the genuinely gentle single-storey ones built in the seventies and eighties. There is no reason these could not be built again, as in many cases they are larger than a three-bedroom apartment. It would not be necessary to weaken any of the rules governing setbacks or solar access. The only reason to make these changes is to allow more valuable development, hence why property investors strongly advocate for these changes, as it will put more money in their pockets.

It is also worth mentioning that the example designs completely ignore Canberra's legacy architecture and produce a series of box-like designs with little aesthetic value. Even older apartments in Canberra were at least designed with traditional Australian styles in mind.

'Missing middle' housing will likely cost more than the housing it replaces

One irony of the 'missing middle' reforms is that in Canberra, they are likely to produce housing that is paradoxically high-cost but also lower in long term value. As mentioned previously, unit titled dwellings do not appreciate in the same manner as detached dwellings, for multiple possible reasons.

In some suburbs in Canberra, there are a large number of government-built houses that formerly served as social housing before many were sold off in the 1990s and 2000s. These are generally small and were built after simple patterns to keep costs down. Nonetheless, as detached three-bedroom house they offer the ideal 'starter home' for aspiring and new families

[52] https://journals.sagepub.com/doi/pdf/10.1177/00420980231190281

"Missing middle" housing suffers from an economics problem, in that it is less desirable than detached houses but does not have the economies of scale that apartments can have[53]. In Canberra this is likely to lead to one of two outcomes:

- Auckland style small, family unfriendly units, effectively building the densest possible to create the most units in a given area
- Building luxury units that will likely command a significant premium over the houses they replaced.

This especially applies to the likely two-storey townhouses, which will be somewhat more expensive to construct. Following either of the above prescriptions will let a developer squeeze maximum value from a site.

A good example of this is Houston. This is a commonly cited example of the alleged power of loose zoning restrictions. Houston has effectively no zoning laws other than minimum block size requirements, so should be ideal for compact 'missing middle' developments. Yet 66% of the metro area houses are detached[54], a greater proportion than Canberra. Of unit dwelling, most are apartment blocks and not 'missing middle' style housing. It is also worth noting that with similar incomes and ethnic composition, Houston's house prices are little lower than Chicago's, despite the latter's residential area being 75% zoned for detached houses. This despite Chicago being much more geographically constrained. It is worth noting that effective land taxes in Houston are about 2% (compared to about 0.6% in the ACT), which acts as a deterrent to land banking, and there are no urban growth boundaries.

In Canberra, it is the small, affordable ex-government homes that will be most targeted by investors, as they will offer greatest chance of profit. In many cases the units built will either cost more than the houses they replaced, be less suitable for families, or both. Canberra's most affordable housing will be knocked down to replace is with housing which will almost certainly be worse in some aspect. That there is potential for this to happen is already shown by the Minneapolis example[55], where the new option to redevelop resulted in the largest price rises in inexpensive suburbs.

Vegetation Cover, Heat Islands and Biodiversity

Canberra's 'Bush Capital' character is not merely a description of the city's surrounding, but of the city itself. Bill Bryson's (derogatory) description of Canberra as 'a large park with a city hidden in it' aptly describes the vegetation rather than building dominant nature of city, albeit seen through the eyes of someone who does not appreciate it. Unfortunately, it seems this government and many planning academics do not appreciate it either, even though the majority of the population seems to.

When Peter Harrison was planning the expansion of Canberra in post-WWII, he deliberately intended for the landscape, rather than buildings to be the dominating feature of the city, a pattern of development that was maintained up until self-government. In most pre-1990 suburbs in Canberra, the blocks are fairly large (though only occasionally as large as the true

[53] https://www.fresheconomicthinking.com/p/missing-middle-housing-blame-economics.html
[54] https://www.houstontx.gov/planning/Demographics/docs_pdfs/updates/Types-of-Housing-Units_June2017.pdf
[55] https://www.tandfonline.com/doi/full/10.1080/01944363.2020.1852101?src=recsys

quarter-acre blocks that were developed in, say, Melbourne post-WWII) and the houses are fairly small. This means that the built proportion of the block is usually quite small, almost always under 25% and often under 20%. Conversely, the area of vegetation cover is exceptionally high due to the large back and front yards, and the area of canopy cover is greater (often over 30% in older suburbs) compared to other Australian suburbs, let alone those in the 'compact cities' in Europe, which usually have very low vegetation cover outside of parks.

This, especially in the suburbs where the canopy is well developed, significantly mitigates the urban heat island effect and means that the suburbs are only a little warmer than the forested nature reserves. In comparison, areas of high-density development are much warmer. The expansion of rooftops (especially due to the modern fashion for very dark colours) and paved areas and reduction in vegetated areas will greatly increase Canberra's urban heat island.

The loss of vegetation will also have a very negative effect on Canberra's wildlife. Canberra is unique in its high vegetation coverage in residential areas and interlacing of nature reserves and vegetated buffers. This makes it one of the world's best urban habitats, if not the best, and wildlife is consequently rich. On blocks with their original dwellings, the large vegetated areas, a mix of grass, garden beds, bushes and trees, makes for complex microhabitats that accommodate a wide variety of wildlife. Canberra is particularly notable for its population of small songbirds such as pardalotes and scrubwrens. These usually occur in forested areas, often quite dense ones. In comparison densely built areas lack the habitat complexity and are dominated by introduced species such as mynas and feral pigeons.

Missing middle development in Griffith. Note the lack of vegetation and high impermeable areas. All dwellings are two-bedroom units:



Detached houses in adjacent area. Note high proportion of vegetated area. All dwellings are family friendly with three or more bedrooms:



Redeveloped duplex in Torrens. Note how little open space and vegetation is left under a 45% site coverage, and compare to house on adjacent block:



Overall, the missing middle reforms are likely to have a devastating effect on Canberra's 'bush capital' character. The permitted 45% site coverage will in many cases more than double the existing site coverage, leaving nothing more than a thin strip of possible vegetation around the outside of a block. Furthermore, the weakening of required vegetated area requirements will guarantee this extremely bad outcome. It is hypocritical of the ACT government to talk so 'green' and pass laws making it very difficult to remove nuisance trees, yet allow developers to create blocks that will have a fraction of the vegetation they originally did. The amount of vegetated area in heavily redeveloped suburbs could easily decrease by more than half.

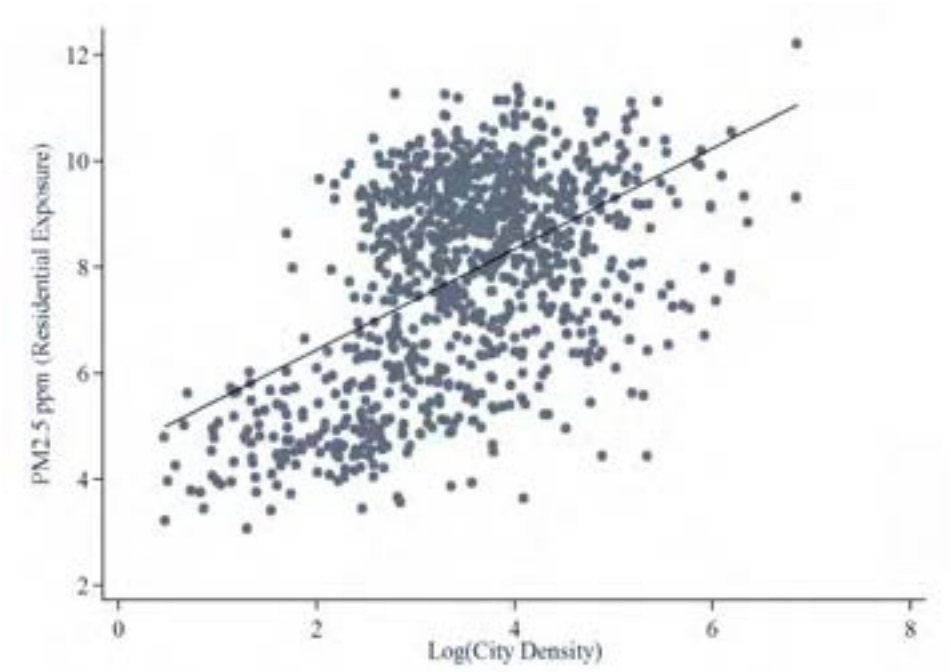
Pollution

Urban infill is likely to significantly worsen Canberra's air pollution. Population density is one of the most important determinants of air pollution[56], and especially particulate pollution, across major cities. This appears to be even somewhat independent of transport mode share and usage.

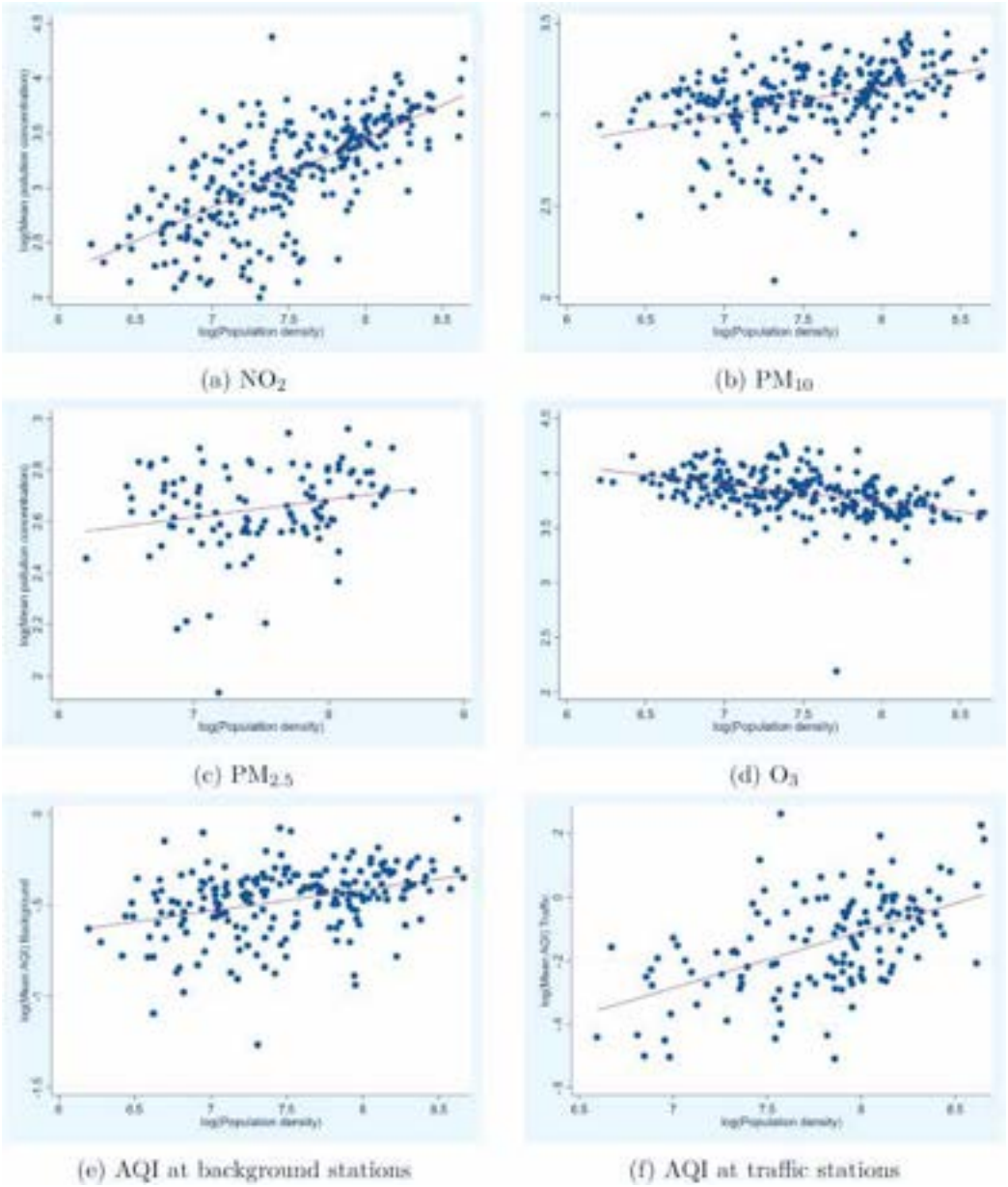
Australian cities, including Canberra, consistently rank much better than major western European cities in IqAir's air quality indices, based mainly around PM2.5 pollution. Paris, Barcelona and Amsterdam are commonly cited by urbanists and planning academics as ideal compact cities with transport policies strongly favouring active and public transport. They are consistently far more polluted than Australian cities. This is despite not only a much lower mode share of transport being cars, but Europeans generally having newer (on average) vehicles with stricter emissions standards than Australians, and many cities having low emissions zones that ban older cars. The lack of vegetation cover in higher density cities may be a crucial factor. Indeed, despite having less strict emissions standards and older cars on average, even American cities, which are spread out, do little worse than European ones.

[56] https://www.sciencedirect.com/science/article/abs/pii/S0166046220302817

Therefore, the new planning regulations are likely to increase the deaths caused by air pollution, offsetting the gradual effects of vehicle electrification (and electric vehicles still emit significant particulates due to tyre and brake wear).



Source: https://blogs.lse.ac.uk/usappblog/2019/08/15/when-it-comes-to-harmful-air-pollution-denser-cities-arent-greener-cities/



Source: https://www.sciencedirect.com/science/article/abs/pii/S0166046220302817

Similarly, Canberrans will be exposed to greater noise pollution by denser development. Greater density not only increases the potential number of polluters, but it ensures that more people will be exposed to each polluting event. Noise pollution is a serious issue associated with long-term health consequences.

Worsened Congestion and infrastructure wear

Densification is likely to worsen congestion even at a local level, and as a result affect more people than greenfield development. This is quite visible in densified suburbs of Melbourne, where often both sides of the street are almost completely parked out.

The least congested cities in the world are car-friendly, low-density American cities, outside of a few exceptions (like New York City). Despite their compactness, European cities are

more congested and have longer commute times practically regardless of transport mode. This is despite Europeans using public and active transport in a much greater proportion than Americans. The longest commutes in the world are in ultra-high density east Asian cities, again with a high dependence on public transport. This has further lessons for Canberra, as it is delusional to think that, with the anticipated population growth, public transport use will be able to significantly relieve congestion issues.

Furthermore, the reduced parking provisions in the 'missing middle' reforms will be exclusionary to people who have requirements for certain types of vehicle. Workers may be unable to park their work vehicles due to inadequate size and availability of parking spots. This will result in a reduction of either mobility options and the could seriously impact employment opportunities, for example for tradesmen. As only a proportion of overall employment is actually in town centres, reducing parking requirements will be very negative for people who do not work in them. Even if they have alternative options, these will almost certainly be slower, taking up valuable time.

The common argument that infill housing is preferable to greenfields is often based on the argument that developing greenfields housing has a much higher infrastructure cost. This is misleading because the cost (usually under $70,000 per dwelling) can be safely incorporated in the sales price. This is based on the premise that existing infrastructure has 'spare capacity' that can be used for denser development. Unfortunately, this is often without foundation, and there is no extra capacity. Even if there are reasons to pursue higher density, there is no dividend from infill[57]. The cost savings are simply from utilizing existing infrastructure more heavily, which will ensure that it degrades faster. Replacing degraded infrastructure and retrofitting it for a greater population will ultimately be more expensive, complex and disruptive than building new infrastructure in greenfield sites. The alternative is for the infrastructure to be inadequate or to fail.

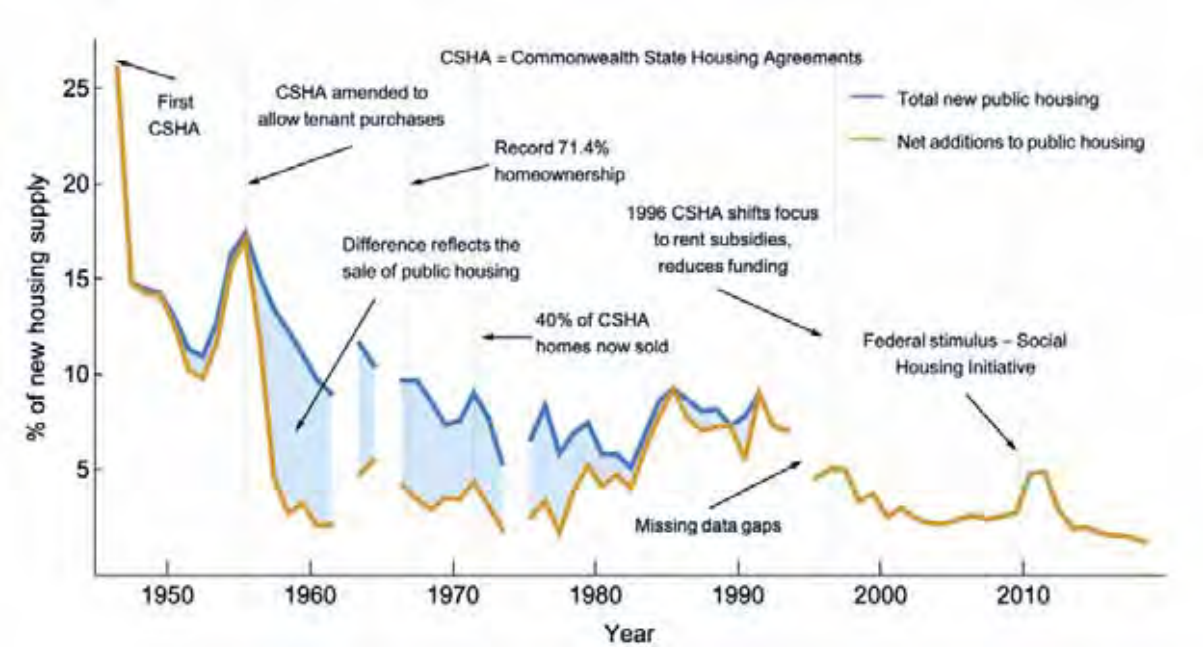
This also feeds into a further example of poor policy making by the ACT government. The original concept of betterment charges (like the ACT's lease variation charge) was to fund infrastructure to accommodate the increased usage by denser sites. However, in the ACT they are used only as a source of general revenue. The only way they will function properly is if the charge paid is allocated to the specific block and the funds used to upgrade the infrastructure serving that block.

How Australia actually solved the home ownership problem

Post-World War II Australia attained one of the highest homeownership rates in the world. This was part of a deliberate, bipartisan policy to facilitate owning rather than renting, and was facilitated by transport changes. In 1933, about 40% of the Australian dwelling stock was owned by landlords. By 1961, this has fallen to about 19% and remained so until investor-friendly tax and macroprudential changes facilitated investment. The number today currently stands at about 27%[58]. There were three policy pillars that created this situation:

[57] https://thefingeronthepulse.blogspot.com/2024/04/the-density-dividend-smaller-worse.html
[58] https://www.burnouteconomics.com/p/australias-property-investor-apocalypse

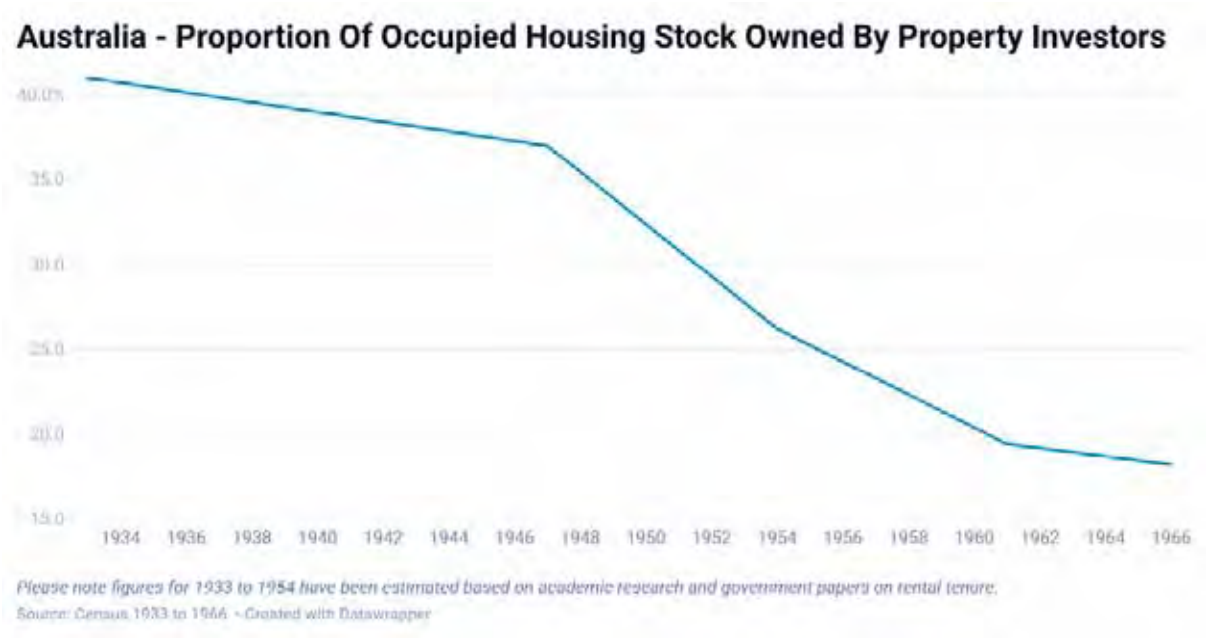
- Government housing construction: under the initial Commonwealth Social Housing Accords, the Chifley government provided funding for states to build social housing, and encouraged sales 'on favourable terms' to low income households. The Menzies government extended the sales provision to middle income households. Housing built by the CSHA accounted for a10% of new supply between 1948 and 1972[59].
    - In the UK this was even more marked, with government-built housing making up one-third of new supply, including during the decade of Conservative Party rule from Churchill to Douglas-Home



Source: https://gameofmates.com/wp-content/uploads/2021/07/antizoning.pdf

- Further houses were built by the Federal government for returning soldiers under the War Services Act.
- Rent controls were implemented as an emergency measure by Menzies in 1939. Although the High Court ruled that the Commonwealth Government could not implement rent controls in 1948, the states maintained them until 1955 or even later. This deterred investors from entering the market.
- Under Menzies, macroprudential policy heavily favoured owner-occupiers, who needed relatively low deposits and were charged preferential interest rates. Investors usually needed 30% deposits, were charged higher rates and needed better proof of ability to pay.

[59] https://gameofmates.com/wp-content/uploads/2021/07/antizoning.pdf



https://www.burnouteconomics.com/p/australias-property-investor-apocalypse

The net result of these policies was that landlords owned over 120,000 fewer houses by 1961 than in 1933. This was not accompanied by any supply shortage- the total housing stock rose by 680,000 just by 1954. This shows that government intervention can help facilitate homeownership and that investors are not in fact necessary to grow housing supply. Housing being affordable and being a good investment are in fact contradictory.

This was even more marked in the Australian Capital Territory at the time planning was carried out under the National Capital Development Commission. One-third of housing built in the ACT was built directly by the NCDC. This is a stark contrast to the current situation where no private residential housing is built by the government and the delivery rate of social housing is extremely low. Many of the NCDC built houses were modest in size. If this was pursued today it would likely reduce their construction cost to the same as or less than townhouses, which are only about 10% cheaper[60] despite being much smaller on average.

The other major factor in Australia's rise in homeownership was suburbanization. As car ownership became popular, the areas available for residential settlement began to reach much further than the restricted access provided by railroads. This meant that much more land could be developed at any one time. This had several effects:

- Working class people could buy their own land, greatly diluting the pricing power of the landlord class
- Detached houses greatly predominated over apartments, and the floor area available for families increased
- Backyards became larger and many more people had them, increasing access to nature, reducing exposure to pollution and facilitating outdoor exercise
- Many more people built their own homes, with owner-builders peaking at about a third of new sales in the 1950s.

[60] https://www.macrobusiness.com.au/2025/05/apartments-are-too-expensive-and-take-too-long-to-build/

Overall, the car opened up the avenue to more and better housing to a greater variety of people than ever before. This effect is most visible by comparing between Australia and the US, which adopted cars freely, and Asia and Europe, which built less car friendly infrastructure and favoured rail, despite its being loss making. Australians and Americans are more likely to own their home, own larger homes and have backyards than in Asia and Europe. Restricting land access strongly favours landlords who can leverage their existing land holdings, and results in worse housing outcomes. Suburbanization not only expanded Australian homeownership, but it made Australia a more equal country.

Land ownership, consolidations and a cozy relationship with the Property Council

One highly concerning aspect of these reforms is the block consolidation provisions and the seeming close involvement of the Property Council. The Property Council is the representative group for property investors. Investors' interests are most satisfied by their investments going up in value. As previously explained, the market acts to ensure that house prices will not fall except through lower quality outside of significant financial disturbances. The involvement of the Property Council has all the hallmarks of political capture of the planning process by property investor interests[61]. This is a perversion of representative democracy. The government is supposed to represent the people, not just the small number of property investors.

Furthermore, Greater Canberra leader Howard MacLean's advocacy for allowing much larger block consolidations would even further place landownership in investor's hands. By acquiring more land, investors would have the ability to leverage further to outbid prospective owner-occupiers. This would further decrease the supply of detached homes and reduce home ownership. Greater block consolidations should not be allowed, except possibly to build single storey townhouses. Similarly, there is no reason to allow a greater (45%) block occupancy than for detached houses (40%). This biases incentives away from the housing people actually want.

A much better result for land ownership and obtaining the kind of housing people want would be biasing the reforms towards easy splitting of blocks. If it was possible for an 800 square metre block to be split into two 400 square metre ones, with a 35-40% coverage limit, then many more modest but family friendly detached houses could be built. Meanwhile lease variation charges should be maintained as they currently are to ensure that there is some payback to the community. The commonly stated position they should be abolished would simply put more money in investors' pockets, when the entire point is to capture some of the uplift in value for the wider community.

Conclusion

The missing middle reforms ignore what worked to produce plentiful, affordable family friendly housing in Canberra in the past. They ignore Canberra's heritage and character. They will result in intrusive redevelopment that will do little make housing genuinely

[61] https://www.sciencedirect.com/science/article/abs/pii/S009411901630002X

affordable – not least because affordability is determined by the financial system. Without active intervention to undercut prices sustained price falls are unlikely. And most importantly, housing choice will worsen, not improve, as people will be unable to get the houses they want.

I am generally supportive of proposed level of density and carparking but have the following concerns:

Focus and staging of densification.

- Densification could be staged over time, so it doesn't create boom and bust in the building industry. What is being proposed appears to be a lot all at once, especially when taken together with the latest land releases just announced. I wonder if it might be a good idea if the changes to RZ1 could be released progressively over time moving outwards from the edge of RZ2.

- Densification could be better focused close to local centres to encourage people to use cars less. Encouraging a relatively low level of densification across the whole of RZ1 could slow down densification of RZ2 and thus slow down the move towards public transport and have the perverse outcome of more cars on the roads.

- Encouraging relatively low-density dual occupancies in RZ1 just outside the current RZ2 zone could limit the ability and/or usefulness of rezoning these areas to RZ2 in the future.

Unintended consequences due to massive release of buildable volume.

- Releasing more volume to build within won't necessarily lead to a rush of modest sized, missing middle dwellings with good outdoor spaces. The ability to fit more floor space on the block happened in 2023 when mandatory plot ratio was changed to site coverage. Now the proposal is to remove the 120m2 size limit on 2nd and 3rd dwellings, increase the number of storeys, increase building heights, make building heights non-mandatory, and make the solar envelope and setbacks less restrictive. These changes will greatly add to the amount of volume that can be built within. This could make land relatively cheap in the short term but won't necessarily create a larger number of more affordable, missing middle housing. It could have the unintended effect of people building bigger dwellings.

Proposal unlikely to encourage a lot of block consolidation.

- The proposal effectively upzones every zone in the ACT by one zone. This could result in low amounts of block consolidation. My experience living in Inner North RZ3 is that people are relatively happy living in their current house whilst they are only surrounded by 2storey townhouses. The rise in land values isn't so dramatic that skyrocketing rates force people out in the short term.

- Existing utilities such as sewer, water, and electricity further complicate block consolidation

- Due to these factors there is a very strong possibility that a lot of redevelopments will only happen on one block.

- As block consolidation generally creates better missing middle outcomes, it might be better to rezone selected areas gradually over time. If the rezoned area's density increased dramatically and the volume to build within was less abundant in the ACT, people would get forced out by high rates and a dramatically changing neighbourhood allowing block consolidation to happen. People would be compensated somewhat for the loss of their neighbourhood by the high rise in their land value.

Proposal encourages more of the same, instead of missing middle dwellings.

- In RZ1, the removal of the 120m2 maximum size for second or third dwelling could lead to very little missing middle type developments being built. It is likely that the preferred option would be to build two large mansions for economic or personal reasons. It would be good to have some sort of mechanism that prevented people putting two 360m2 or three 240m2 mansions on an 800m2 block. The 120m2 max rule is too restrictive so needs to be tweaked, but it shouldn't just be gotten rid of without some other mechanism to prevent big houses on small blocks. Maybe the maximum could be increased or maybe some sort of formula could be worked out.

Design Guide struggles to demonstrate good, affordable, missing middle developments for single blocks that will compete with large dual occupancies

- Refer to attached drawings to see my comments regarding this

Proposal to tweak Residential Zones Specifications to enable better developments on typical single blocks with long northern boundaries.

- Refer to attached drawing.

Outcomes based planning system:

- It remains to be seen whether the new "outcomes based" planning system will result in more "good" outcomes or more "bad" outcomes. Will site coverage become the new plot ratio where it is assumed that maxing it out is an entitlement and all the other good things like trees, sun, privacy, building envelopes and good outdoor spaces are given secondary importance and made to work as best as they can?

- I think densifying RZ1 and RZ2 would be easier to sell to the community if they were reassured that developments would be required to stick within a quantified solar envelope if concerns were raised by neighbours. Subjective planning where a particular planner may randomly allow something to stick 2m through the solar envelope makes neighbours nervous and creates uncertainty.

Parking

- Allowing people to park on formalised parking spots on the verge and in front of the building line will allow a lot more smaller missing middle type dwellings without needing basement carparks or trashing the site by the duplication of the road network behind the building line.
- Refer to attached drawing for offsite parking suggestion.

Allowing 3 storey or more in RZ2 and RZ3 not supported.

- Three storey developments are inappropriate for RZ2, and maximum building height should be kept to 8.5m. In terms of preventing overshadowing, it would be better to keep the building height a mandatory rule at 8.5m and get rid of the concept of the northern boundary and solar fence for multiunit housing. The solar fence typically only comes into play for an hour or so around noon, and for the rest of the day the highest point of the roof is what blocks the winter sun. Getting rid of the solar fence and keeping the maximum building height at 8.5m would result in better solar access for neighbours to the south and better built outcomes by discouraging more expensive and problematic "wedding cakes". If the solar fence is made more generous, I think it is then only fair if it is more rigorously enforced when ACT Planning is making subjective planning assessments.

- I think there is a strong chance that once three storey is allowed it will become the predominant building type, and everything will begin to look like current RZ4. Canberra already has plenty of apartments with poor outdoor space and therefore, by my definition, this isn't missing middle, but just more of the same.

- A 3 storey height limit in RZ2 is likely to create a predominance of large apartments in lieu of more affordable townhouses or apartments. Whether it is 2 or 3 storey, a development will typically only be able to fit the same number of cars on the site. The number of carparks limits the number of dwellings so the only difference is that the 3 storey development's apartments will be 50% bigger. This isn't affordable missing middle to me.

- There may be a case where big sites made from a large number of consolidated blocks may be appropriate for 3 storey development. If this is the case, then it would be a good idea to have a different technical specification dedicated to this type of dwelling type. The interface between 2 storey and 3 storey consolidated blocks would need to be such that the three storey didn't impact the 2 storey development any more than an adjacent 2 storey development would. An extra height limit and 3 storey rule would need to be added to the Major Plan Amendment to allow 3 storeys only for very large sites and in particular circumstances.

Rezoning of RZ3 and RZ4.

- **RZ3.** If Inner North RZ3 is producing exemplar missing middle type projects that have featured heavily in the Missing Middle Design Guide, then why break it by effectively rezoning it to RZ4.5, Apartment Land, with increased storey and height limits. There are enough apartments in the Inner North. Creating more is in fact anti-missing middle. On the other hand, rezoning RZ3 in the newer outer suburbs that have all those single storey houses almost covering the whole block is probably a good idea. All those houses are quite new so there needs to be careful consideration of when it should be done. Maybe it could be rezoned to give people the heads up, but the rezoning doesn't take effect for 10(?) years.

- **RZ4.** Don't have any major concerns with RZ4 being rezoned to allow 6 storeys, however I am not sure what happens to single blocks that have already been trapped between RZ4 three storey developments. Anything above 2 storeys tends to be apartments anyway and has overshadowing problems so storey limit may as well go to 6.

- Regardless of whether RZ4 is rezoned to six storey or not, it needs its own set of technical specifications that encourage massing towards the streets, having dwellings that address the street and a large central green space that is shared between blocks. For 3 storeys and above, orienting buildings to the north is a lost cause. Building envelopes and setbacks should be different to that of RZ1, 2 and 3. Blocks should be heavily consolidated.

Winter heating issues, summer cooling issues.

- Solar passive design is more important than ever. The proposed changes have too much emphasis on designing for future warming and the ability to achieve good passive solar design for winter heating is being eroded. Even with 3 degrees global warming, electricity for heating is going to be the limiting factor as all of SE Australia moves towards a 100% renewable grid.

Happy to discuss all this further and provide greater detail.

Yours sincerely,

[redacted]

[redacted]

[redacted]

My notes in blue

Typical layouts for townhouses

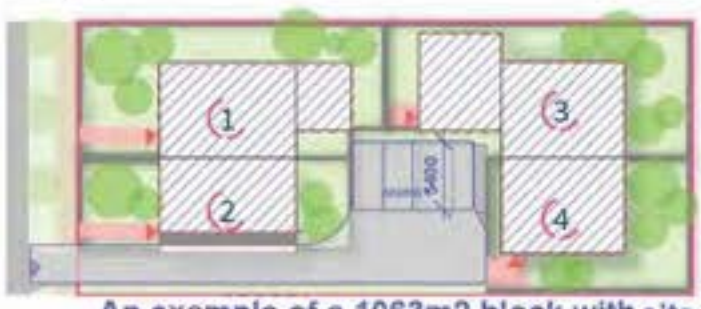
There are a range of alternative siting layouts for townhouses that may be used depending on specific conditions such as planning controls, solar orientation, site slope, adjoining buildings, block dimensions and shape.

Some typical layout examples for townhouses are outlined below and on the following pages. While they illustrate a range of potential site configurations, further refinement would be required in relation to access, car parking and site coverage requirements. They are aimed at demonstrating various concepts and not necessarily a holistic design outcome, and will not guarantee a development approval.

MID-BLOCK

Parking in the centre of site

misleading



An example of a 1063m2 block with site coverage 0.35

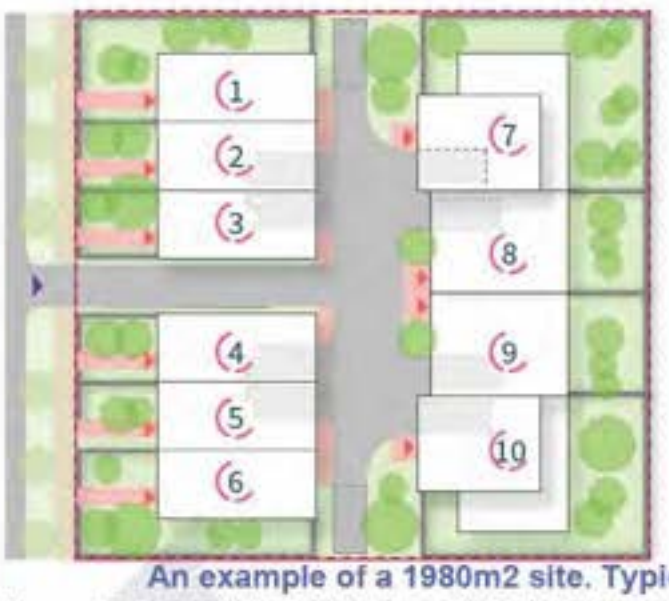
Figure 16: ~~Small~~ block with shared parking in the centre of the site maximises private open spaces .



An example of a 1280m2 block

Note: 16,17,and 19 are quite low density and expensive to build. I doubt they will become very common.

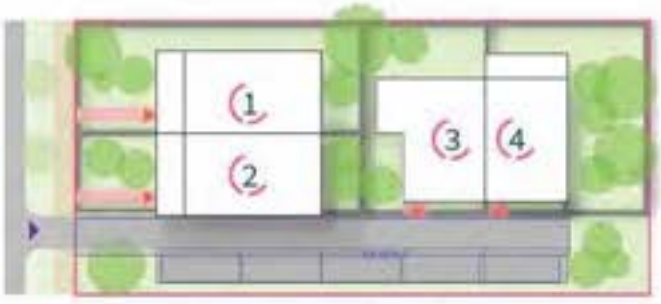
Figure 17: ~~Large~~ block with shared parking in the centre of the site maximises private open spaces.



An example of a 1980m2 site. Typically consolidated

Figure 18 Con lidated blocks with individual parking in the cen of the site. This means that buildings mphasise the streetscape while allowing for garaging.

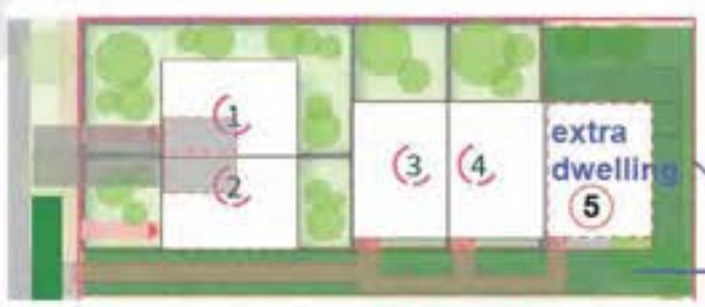
Shared parking to the side



An example of a 1000m2

Figure 19: Site with shared parking along side bour Buildings emphasise the streetscape an open space is maximised.

Sh parking ~~to the rear~~ offsite



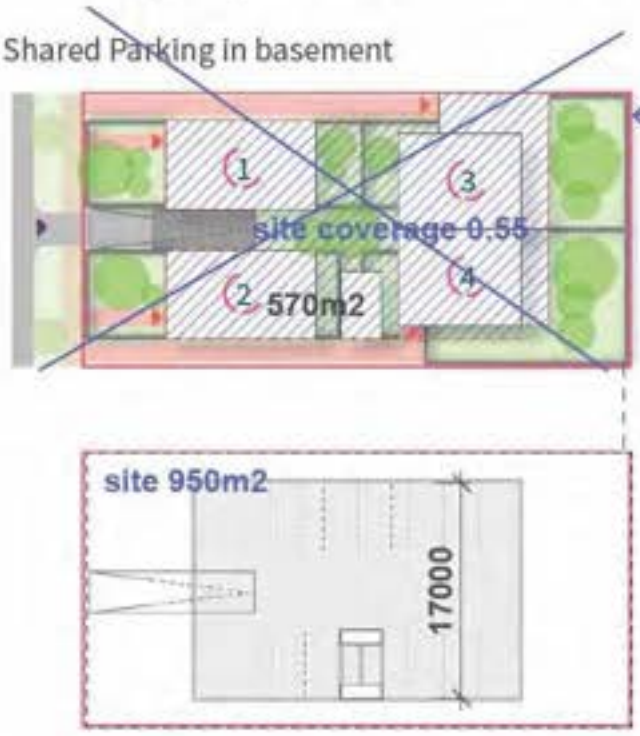
Dwellings 3,4 and 5 each have dedicated parking space(s) in offsite parking house.

lot more planting

Figure 20: Site with shared parking to the rear of the site. This means that parking does not dominate the streetscape.

We should reassess this concept. It is very restrictive.

Shared Parking in basement



Delete or rework these examples as they are over the allowable site coverage. Site coverage includes basements which is sensible as plants in planter boxes will most likely die.

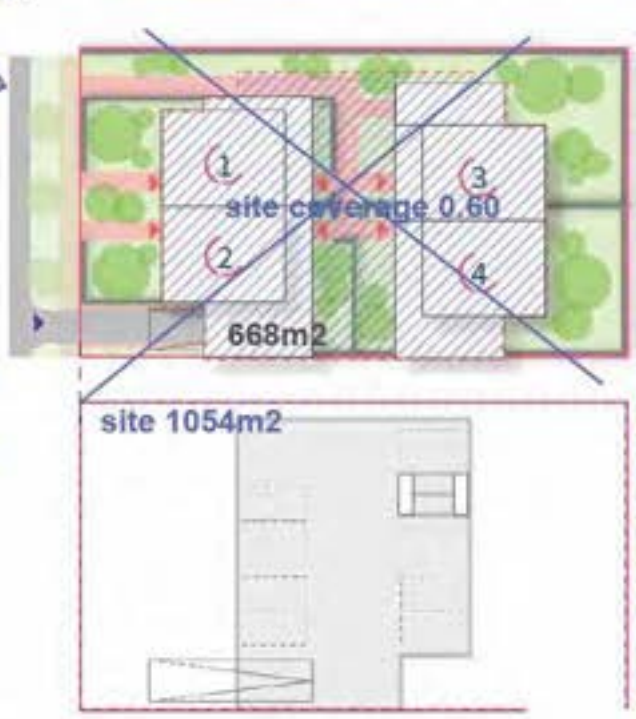


Figure 21: Small block with shared parking in basement. This minimises any negative effects associated with surface-level car parking and access.

Figure 22: Large block with shared par This minimises negative eff surface-level car parking an

Reason why it is so hard to make missing middle work in Canberra is because of the very Canberran concept of parking behind the building line. There are many good examples of missing middle around the world where people park in front of the building line, or in offsite parking stations. How about the ACT government or private developer buys up a block and turns it into an offsite lockable parking station. It could be basement and ground level and nicely screened with planting. Upper level could be rentable function space, or PV . I reckon you could fit 40cars onto an average size block doing this. These would then be allocated to surrounding blocks allowing them to do away with onsite carparking. People might actually meet their neighbours when walking to their house which a lot of people will really like. There would be massive savings because you aren't creating all these private roads on every block for relatively few cars.

DRAFT

My notes in blue

Typical layouts for terrace houses

There are a range of alternative siting layouts for terrace houses that may be used depending on specific conditions such as planning controls, solar orientation, site slope, adjoining buildings, block dimensions and shape.

Some typical layout examples for terrace are outlined below and on the following pages. These examples may not be compliant with zoning specifications and regulations such as parking requirements, setbacks, easement clearance and site coverage. They are aimed at demonstrating various concepts and not necessarily a holistic design outcome, and will not guarantee a development approval

Question: if someone sudivided their block that has an 18m frontage into three 6m wide blocks could they put in 2 extra drive crossings?

If street to south: not so bad.
If street to north: terrible.

MID-BLOCK INDIVIDUAL PARKING

Is this cars on driveways or in garages?

Front loaded terraces with parking in front



Figure 27: Terraces with individual parking from street. Individual parking from street can be appropriate on terraces with wide street frontages where dominance of garages on the frontage can be avoided. The site layout creates high amenity backyards for all dwellings.

WARNING

Big houses on small blocks!!!
324m2 houses isn't my idea of missing middle.
It is more of the same but this is what most people will end up doing because it will have the highest ROI and it doesn't require the complexities of block consolidation. I suggest there needs to be some sort of mechanism to stop this happening.

Figure 28: Terra with individual car parking in laneway. This ens res a high quality street front with private backyards.

MID-

Fron

People are just going to subdivide their blocks that have a 19m+ frontage (this is a pretty common width) and have two seperate driveways each leading to a 4.7m or more wide double garage door. This will comply with the technical specs. People who want a 324m2 house tend to want two cars so this will be the preferred business model.



Figure 29: Terraces with shared access to consolidated parking area at the rear maximises the quality and size of private of open space for each dwelling.

Terraces with basement parking

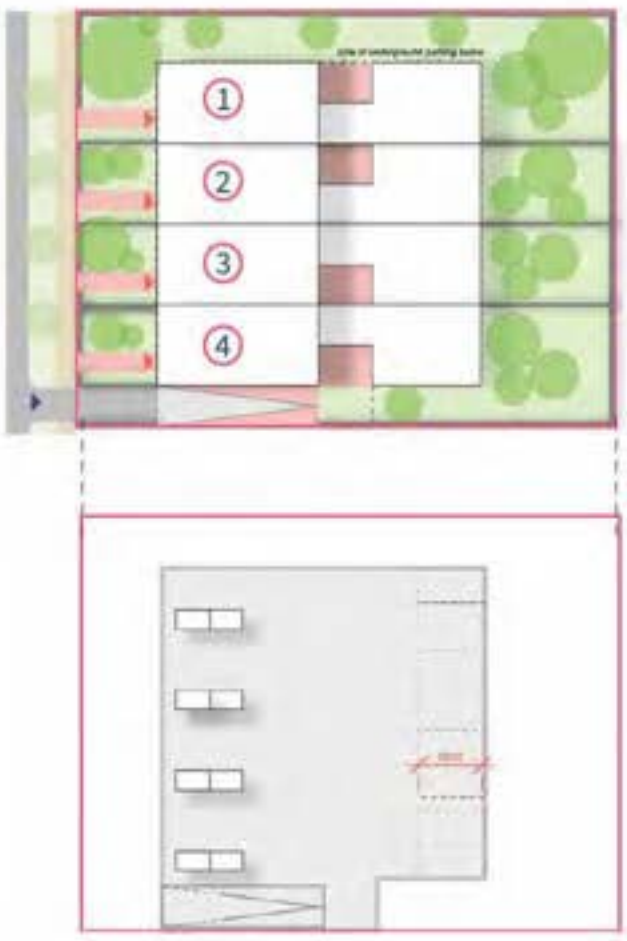


Figure 30: Terraces with underground parking from primary street. Minimises the negative impact of parking on each dwelling and on the streetscape.

Suggested changes to Residential Zones Technical Specifications to enable better developments on blocks with **long northern boundaries.**

Front setback can be reducted to 3m for up to half of front boundary on east or west front boundaries

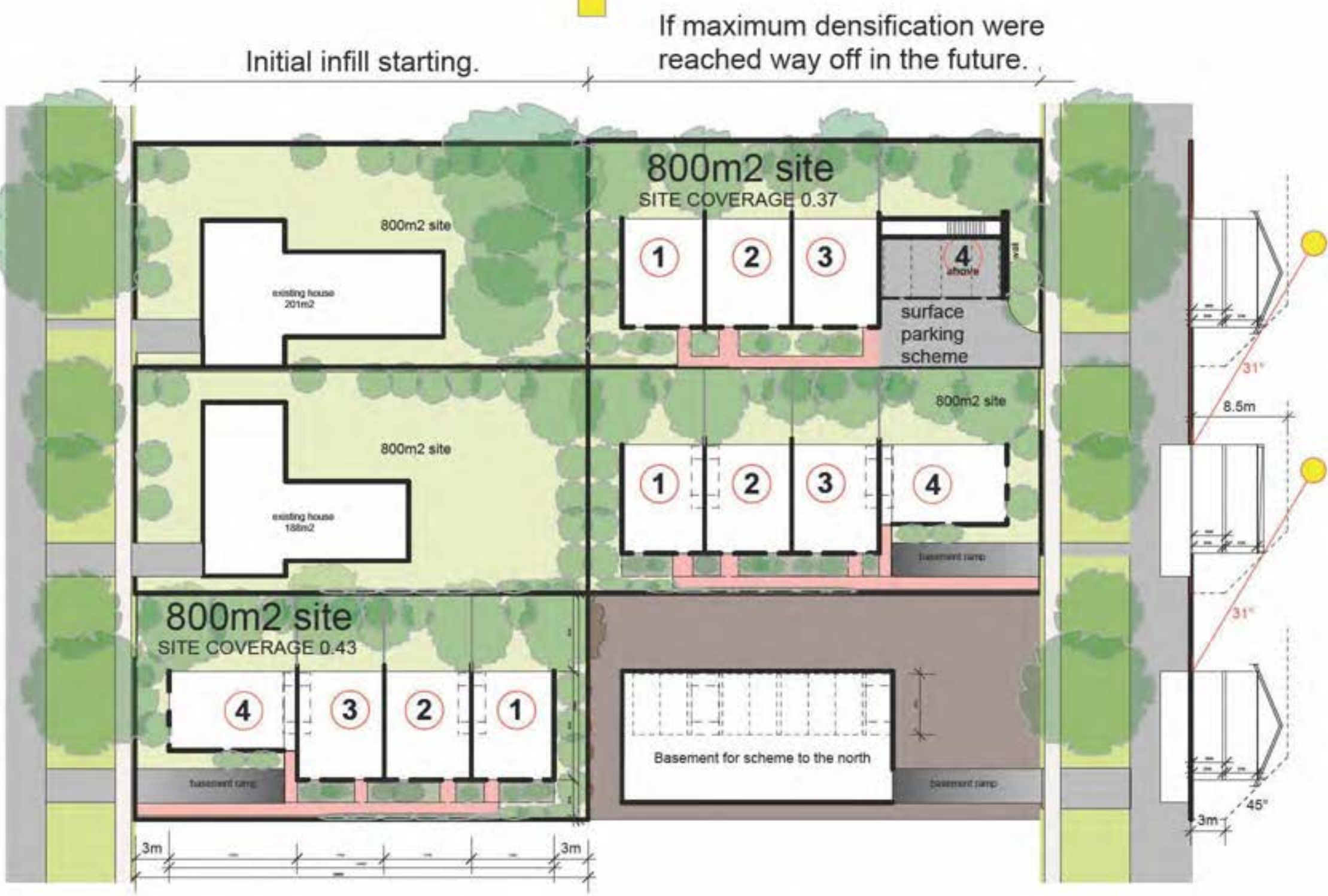
Setback can be reduced to 3m for up to half of rear boundary on east or west boundaries.

Upper level setback in rear zone to be same as PBZ for external walls and high screened windows for side boundaries to the south. Solar fence in the rear zone same as PBZ

Keep height mandatory at 8.5m in RZ1 and RZ2; don't change to 10.5m. Instead move the solar fence to 3m going up at 45° for both RZ and PBZ

VITAL

NORTHISH



Note: The current/proposed planning approach (supported by the current/proposed technical specs) is to concentrate building mass towards the street and have green space at the rear. However this approach doesn't work very well for blocks that have a long northern boundaries unless there has been multiple block consolidation. If the majority of RZ1 and RZ2 redevelopment is going to be on single blocks it would be better to stretch developments east to west along blocks that have long northern boundaries.

Submission to ACT Missing Middle Housing Reforms 2025

To ACT Environment, Planning and Sustainable Development Directorate

We wish to express some of the discussions within our local community on the Draft Missing Middle Housing Reforms amendment to the Territory Plan.

About the Tuggeranong Community Council

The Tuggeranong Community Council (TCC) is an incorporated, voluntary, not-for-profit, non-political, community-based association operating within the Tuggeranong District of the Australian Capital Territory. The TCC is formally recognised as the peak community body representing the interests of the local residents and communities within Tuggeranong Valley.

Key Points

- In principle, we support the Missing Middle Housing Reforms and provide suggested recommendations to ensure a considered implementation for the Tuggeranong region to better improve their successful adoption. All aspects of the Reforms should be undertaken with open engagement of potentially affected residents.
- If private developments do not deliver the anticipated Missing Middle portion of new dwellings by 2030, further targeted developments may need to be undertaken by the Government.
- One aspect of the affordability of new Missing Middle homes is the challenge homeowners face in navigating the complexities of Development Application (DA) processes which may result in fewer Missing Middle developments being constructed. Developments may fall to medium-to-large property developers, who would be better placed to build mid-to-higher density projects around urban hubs.
- The increase in densification must see a corresponding increase in infrastructure and services to address the impacts from a growing population.

Meeting Housing Targets

The National Housing Accord set a target of 30,000 new homes in the ACT by 2030. The bulk of the 30,000 new dwellings will be delivered through planned land releases (25,948 dwellings according to the ACT Housing Supply and Land Release program), but that leaves **4,052** dwellings to be delivered by private development in approximately 50 months from now. The relaxation of planning laws through the Missing Middle reforms may result in new dwellings in an ad-hoc nature, across Districts, but there is no guarantee of meeting the 4,052 number being achieved over the 5 year period by market forces alone.

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A better planned and considered approach, to compliment the salt & pepper approach adding to existing suburban streets, could be that the ACT Government specifically rezone lower residential areas or buyback several areas of public land in Tuggeranong and undertake Missing Middle development projects through procurement of suitable vendors, to ensure the building of these types of homes in specific areas, without detracting from amenities or community facilities.

In addition to allowing for private suburban infill development and planned land releases, the ACT government focus on targeted densification around urban hubs, where the majority of new housing stock is being delivered to ACT residents over the course of the next 5 years, and gives greater guarantee of the 2030 target being met. We support the Missing Middle as an additional method of increasing housing stock, but Missing Middle cannot distract from the proposed larger increases of mid-to-high rise developments around urban hubs.

Recommendation 1: ACT Government must monitor its modelling on the delivery of types of housing in Development Applications to ensure we are on track to achieve housing targets and adapt reforms based on District Plans. The breakdown in types of Housing should be included in ACT Housing Strategy Report Cards.

Affordability

A key pillar of the Missing Middle Reforms is affordable housing. As well as supply in general, in order for new housing to be affordable to the homebuyer, the development must be affordable to the developer.

Current home-owners may not be (a) in a financial position to fund a multi-dwelling project with the ongoing cost of living crisis and high interest rates, or (b) may not have the experience to navigate the development application process including the criteria of the Design Guide and other requirements to undertake such a project.

Recommendation 2: Simplify the Missing Middle designs into a number of Pattern Books, similar to NSW recent reforms, with pre-approved designs to reduce high costs for individuals seeking architecture services on a case-by-case basis. We support development of these designs taking into consideration the unique character of each District.

Recommendation 3: Consider further Government Assistance to applicants to navigate the Design Guide and the broader Development Application process.

Additional prohibitive costs may come from the increased demand for building certifiers, with an anticipated strong increase in the number of developments. Private building certifiers brought in by private developers may not provide an impartial and independent assessment. The ACT Government should re-introduce public servant building certifiers, or public certifiers.

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Recommendation 4: We support the re-introduction of Public Certifiers to increase the number of building certifiers corresponding to an increase in developments.

We note that the Lease Variation Charges and Block Consolidation Fees are cost prohibitive in providing 'affordable' housing stock. In a community engagement session, Minister Steel stated there were no proposed changes to these costs under this proposal but advised they could be delayed somewhat, so not necessarily payable upfront when commencing a project. Retaining current charges may be a factor.

A significant increase of Strata title managed housing complexes is likely to result from this proposal. Strata title costs will not add to building costs, but may add to cost of ownership. Controversies surrounding Strata management have made Stata title less appealing. We note that the Report from the ACT Inquiry into the Management of Strata Properties is not finalised, and no date for the final report has been given. It would be best to table this Report before the finalisation of the Missing Middle reforms, with the implementation of its recommendations undertaken in tandem with the Missing Middle reforms, or else continuing Strata issues might be exacerbated.

Recommendation 5: A Strata Commissioner and other recommendations resulting from the ACT Inquiry into the Management of Strata Properties should be tabled and implemented prior to the implementation of finalised Missing Middle developments.

Currently the likely result is that medium-to-large private developers will be left to develop, fund, and build the vast majority of new dwellings under Missing Middle Reforms if the process is too complex for regular home-owners, which could result in inappropriate developments. In a community engagement session, Minister Steel stated that the cost of building townhouses/villas/low-rise apartment dwellings is cheaper than stand-alone stock, therefore more affordable. However, this also incentivises private developers to focus their developments on wide-scale low rise apartment projects rather than high rise apartment complexes in precincts designated for high density. For example, a private developer with capital to purchase multiple blocks and rebuilding them into low rise apartments could become prevalent across the outer suburbs, which will undoubtedly change the character of a suburb and put strain on services and infrastructure.

The ACT Government has noted there may be consideration in the assessment of the development application if the development does not meet the character of the district or overextends the infrastructure and services of the local area. This seems subjective and it is unclear how and when this will be determined in the development process. Open engagement with local residents can help avoid conflicts and undesirable consequences.

We prefer a 'salt and peppering' approach whereby regular home-owners redevelop their properties. Currently, the incentive structure is not fit for purpose and the criteria to maintain the character of the suburb are unclear.

Recommendation 6: Develop clear criteria to ensure the Character of the District and to ensure a salt-and-peppering approach to Missing Middle reforms.

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Impact on Infrastructure and Services

The densification of existing suburbs using infill development will see more people accessing and impacting existing infrastructure and services. Despite low growth forecasts for the Tuggeranong region, our generally larger block sizes, quiet streets, and close proximity to urban open areas and reserves could see Missing Middle developments attractive in our region. It is therefore imperative that the cumulative impacts on infrastructure and services be closely monitored and steps taken proactively to ensure population growth impacts are in lock step and are elevated as ongoing Planning Priorities.

Infrastructure impacts will see more road users, higher traffic numbers, more utility connections, increased demand on the energy grid, water and sewerage, and increased NBN connections. Additional demand may be seen for existing public transport, which may require additional coverage to more suburban streets, and more frequent local and rapid bus route services.

Service impacts will see more people needing to access local medical services, with some local practices already at capacity with doctors not taking on new patients. Local schools may see additional student numbers, especially if newly located families settle and grow, without a corresponding increase in teaching staff. Community facilities and gathering spaces may be in greater demand, especially as other nearby Regions (especially Woden) are seeing a reduction in sporting and community facilities, resulting in increasing pressure on facilities in Tuggeranong.

Impacts on local shopping centres could be two-fold; increased demand commercially, and overflow car parking if multi-dwelling developments are built nearby (already being seen at Tuggeranong Bunnings by those accessing adjacent medium/high rise apartment & commercial complexes). Higher density development and reduction of onsite green spaces will see a higher reliance on existing green spaces, play spaces and open areas for recreation.

We support infill densification of housing. However, a general consequence of infill densification could see a sporadic but gradual build-up of these infrastructure and service impacts over time, and the cumulative impacts may not be evident until a 'tipping point' is reached, with considerable negative effects being felt by local residents. TCC would like the Government to provide an open guarantee of a corresponding increase in investment for greater infrastructure and services in areas of densification, and protection of community facilities and green spaces currently, to bring the community along with development.

<u>Recommendation 7:</u> Close regular monitoring of cumulative impacts on existing infrastructure and services from suburban infill development, and pre-emptive steps to bolster these facilities to keep pace, prior to capacity being reached.

Car Parking

The Tuggeranong region has, and will continue to have for decades to come, a high reliance on private car usage. The light rail transport system, if extended to service the Tuggeranong region is still some decades away, and bus transport routes under the current 'hub and spoke'

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model discourage many commuters due to longer journey times and other unsuitability factors. Therefore, the reality is that any suburban dwelling development will see additional cars in our suburbs. Under the proposed Missing Middle reforms, the reduction in car parking to just one parking space per dwelling as a minimum will result in properties being built lacking car parking facilities leaving owners with no choice but to park their cars on the street, or across pedestrian footpaths and verges. This will impede access to other road and footpath users, delivery vehicles, emergency vehicles, garbage and recycling collection, home deliveries etc and may increase rates of vehicle crime and theft.

In addition, car parking consideration is proposed to be done on a case-by-case basis. However, identifying when an existing street has reached "capacity" is highly subjective in nature. If multiple DAs are lodged across one street, or across one suburb over time, a case-by-case basis may lose sight of the cumulative effects of growing vehicular impacts stemming from multiple developments. A considered planning approach should directly involve local residents in consultation on to determine parking needs.

Recommendation: 8: Increase the proposed minimum parking space requirements per dwelling, and consider the cumulative impacts of vehicle density on existing streets when approving DAs.

Conclusion

TCC supports an increase in housing to be achieved by infill through the Missing Middle Reforms. TCC notes the growing population of Canberra will require more homes. TCC does not support an expansion into greenfield areas, in particular the Murrumbidgee River corridor.

However, TCC holds concerns about the approach taken by the Missing Middle Reforms. We want to see these reforms enacted in a managed and considered way to ensure affordability and access, as well as adequate infrastructure and services that grow in tandem with the area.

Additionally, noting that Tuggeranong is some 20 kms or more from the City Centre and suburban in nature, TCC is concerned that the reforms may substantially change the Character of the District and do not appreciate the high reliance of cars for the area. The Reforms seem to be generic in nature and propose the same urbanisation across all of Canberra. Our recommendations are intended to address the specific concerns for Tuggeranong and retain the unique character of the District while supporting more dwellings.

This reform process is more likely to succeed by incorporating, at every stage of proposed developments, from design to implementation, with close and open engagement of local residents that will be affected by these reforms.

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Thank you for the opportunity to submit our views on the Missing Middle Housing Reforms and we welcome the opportunity to contribute to ongoing discussions.

[redacted]

Tuggeranong Community Council

5/8/2025

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RE: Missing Middle Housing Reform Submission **01 August 2025**

We thank the ACT Government for the opportunity to provide a submission on the proposed Missing Middle Housing Reform (MMHR) which aims to expand housing options for Canberrans and respond to population growth by encouraging more compact, efficient, and sustainable residential development. The purpose of this submission is to show in-principal support for addressing the current lack of medium density housing stock in the city of Canberra and to provide recommendations about how the current MMHR policy could be adapted to ensure public health is a primary consideration along with increasing housing choice and supply, housing affordability and environmental sustainability.

The analyses undertaken for this submission were conducted at the Visual and Decision Analytics (VIDEA) Lab within the Health Research Institute at the University Canberra. The views shared by the author are supported by and align with the strategic vision of the Health Research Institute of building a healthier future for Canberra, Australia and the world by improving access to good health, wellbeing and healthcare for all.

Local destination accessibility

Public health importance and relevance to MMHR

There is now established evidence supporting the public health benefits of living within more walkable neighbourhoods characterised by higher levels of residential density, pedestrian connectivity and a diverse range of destinations within walking distance. These benefits include increased physical activity through active travel known to reduce the risk of non-communicable disease, hospitalisations and hospital costs associated with obesity, cardiovascular disease and diabetes (1-4). This evidence supports current ACT Government policy including the ACT Active Travel Plan 2024-30, which has a key strategic priority to build and maintain a walking and riding network linking neighbourhoods, public transport, key destinations and town centres (5). Furthermore, the Healthy Canberra ACT Preventive Health Plan 2020-2025 and associated Action Plan has a key goal of reducing the prevalence of chronic disease with a priority area of

enabling active living through improved urban design, active transport options and access to recreational facilities (6).

Public health evidence has also found living in low density environments, referred to as *obesogenic environments*, characterised by high automobile reliance, poor pedestrian infrastructure and limited access to local shops and services reduces the likelihood of engaging in health supportive behaviours such as walking, cycling and recreational physical activity (7). There is also emerging evidence that local destinations such as social infrastructure are important for social interaction and mental health, thus low-density environments are increasingly being linked with loneliness (the subjective feeling of being isolated) and social isolation (objectively few social relationships or infrequent social contact with others) (8-10). The MMHR policy aimed at increasing density has the potential to be a powerful intervention for improving public health in Canberra if combined with improving local access to facilities.

The suburban zone (RZ1) makes up 79.7 percent of Canberra's residential land and has typically included mainly single houses (11). An analysis conducted by VIDEA Lab is shown graphically in Figure 1. The chart shows the current residential Lease Variation Charge (LVC) for 2 dwellings as reported in *Planning (Lease Variation Charges) Determination 2025 (No 2)* for each suburb in Canberra (12) plotted against the Local Living Index, a key measure of local destination accessibility associated with walking for transport (13). Our analysis identified 69.5% of all RZ1 blocks as having low destination access, defined as having three or less shops or services within 800m. No RZ1 zoned blocks in Canberra achieve high level destination access. An estimated 30.5% of RZ1 blocks have between four and nine destinations and are classified as having medium local destination access.

If the MMHR is approved in its current form, 69.5% of RZ1 blocks located in low destination access areas become eligible for increases in residential density subject to a range of site-specific provisions. Based on 2021 population statistics (14), this represents a total of 266,065 persons already at risk to the public health impacts of low density (current estimate of above 300,000 persons in 2025). Given the future projections of population growth in Canberra, this represents a potentially significant growth in the population at health risk to urban environments which are low in residential density without access to local shops and services within walking distance.

The unintended health risk of increased density in areas with low destination access could be minimised by adapting the MMHR policy to limit the number of RZ1 blocks that are

eligible for increases in residential density. Specifically, our analysis suggests that to minimise the future population exposed to low destination accessible environments, only 30.5% of RZ1 blocks be considered eligible for increases in density as part of the MMHR policy.

Over time, a more targeted investment in local infrastructure designed to enable additional RZ1 blocks to improve their level of destination accessibility and become eligible for increases in density under the MMH reforms (which would include the proposed recommendations referred to here) would thus support further housing choice and population growth in these areas.

We support the continued investment of ACT Government in local infrastructure particularly in areas already experiencing low levels of destination accessibility. Combined with major transport infrastructure initiatives such as light rail to Woden (stage 2b) designed to improve regional accessibility (e.g. number of jobs within 30mins of public transport and improving commute time by public transport), the impact on active travel will be synergistic.

Intentionally planned when compared to other Australian cities, Canberra has excellent access to public open space (see Figure 2, (15)). Currently, 87 percent of registered or approved RZ1 blocks are within 500m of a large public open space (≥ 1.5 ha) important for recreational physical activity and mental health (16, 17). However, investing in pedestrian and cycling infrastructure including extending and connecting parts of the community path network and providing improved safety for active travel such as protected cycle lanes remains critical. Greater linkage of existing policy goals of the Active Travel Plan and the Healthy Canberra ACT Preventive Health Plan with the MMHR policy will require a more strategic, transparent and equitable approach to the investment in local infrastructure than adopted by ACT Government previously.

Recommendation 1 (see also Table 1 for detailed list of destination types)
We recommend ensuring RZ1 blocks do not increase in residential density unless they already have a medium level of access to local destinations defined as having between four and nine destination types within 800 metres. This would limit the negative health impact of a lack of access to local destinations that encourage walking and cycling.

Recommendation 2
A more strategic, transparent and equitable approach to the investment of local infrastructure to ensure that areas of low density achieve improved levels of access to local shops and services.

Figure 1: Local Destination Access (Local Living Index) by Lease Variation Charge (2 dwelling)

Suburbs with a Local Living Index <4 are considered as having low local destination access. The vertical hatched line indicates the cut off between low and medium destination access. Larger dots indicate higher relative proportion of RZ1 blocks per suburb. The coloured dots indicate the district in which the suburb is located within.
For example 95% of Griffith (green) residential blocks are classified as RZ1 whereas Macquarie (red) is made up of only 46% RZ1 blocks.

We recommend only RZ1 blocks with 4 or more destinations within 800m be considered for increases in residential density. We also recommend targeted local infrastructure investment in areas which currently have low local destination access.

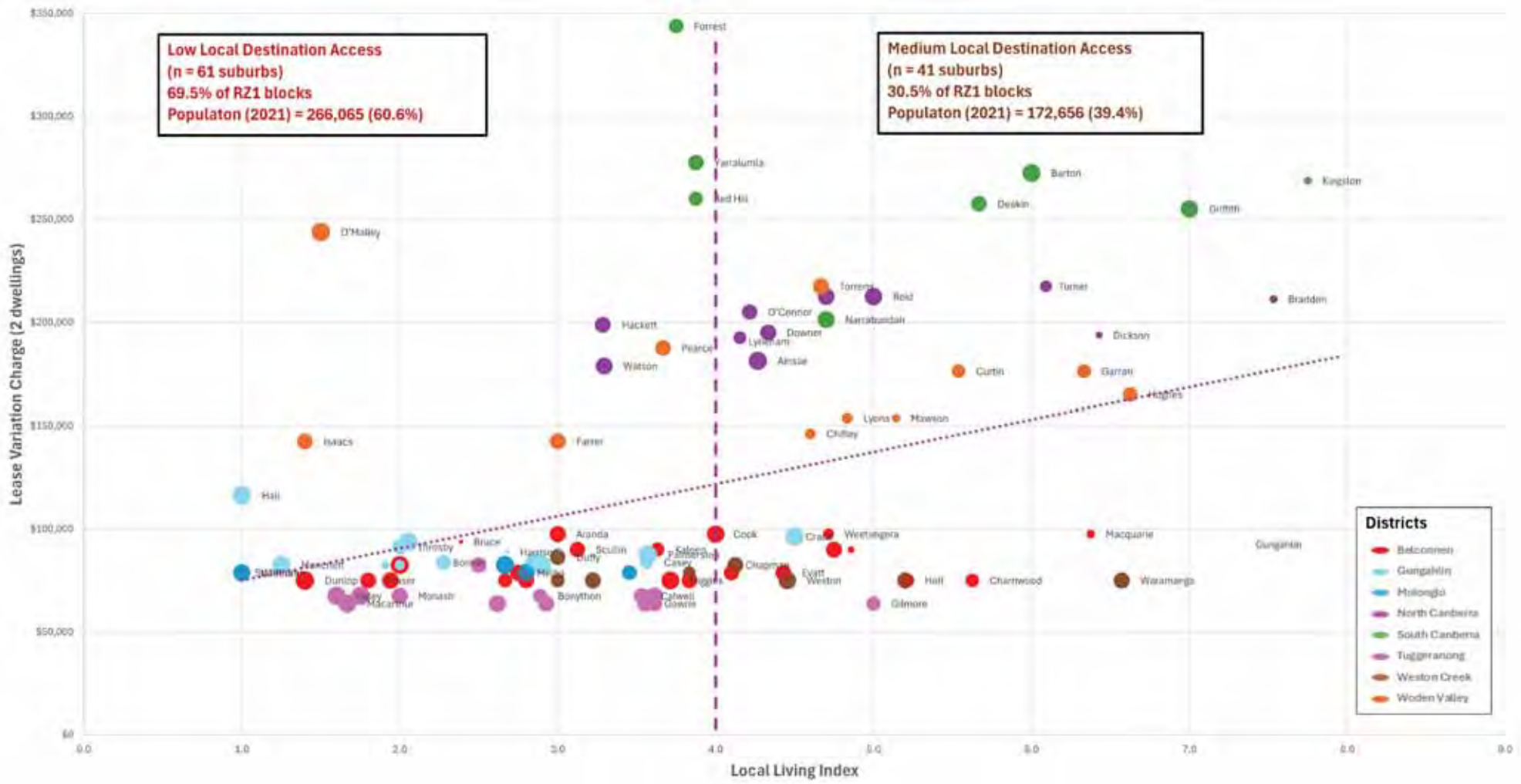
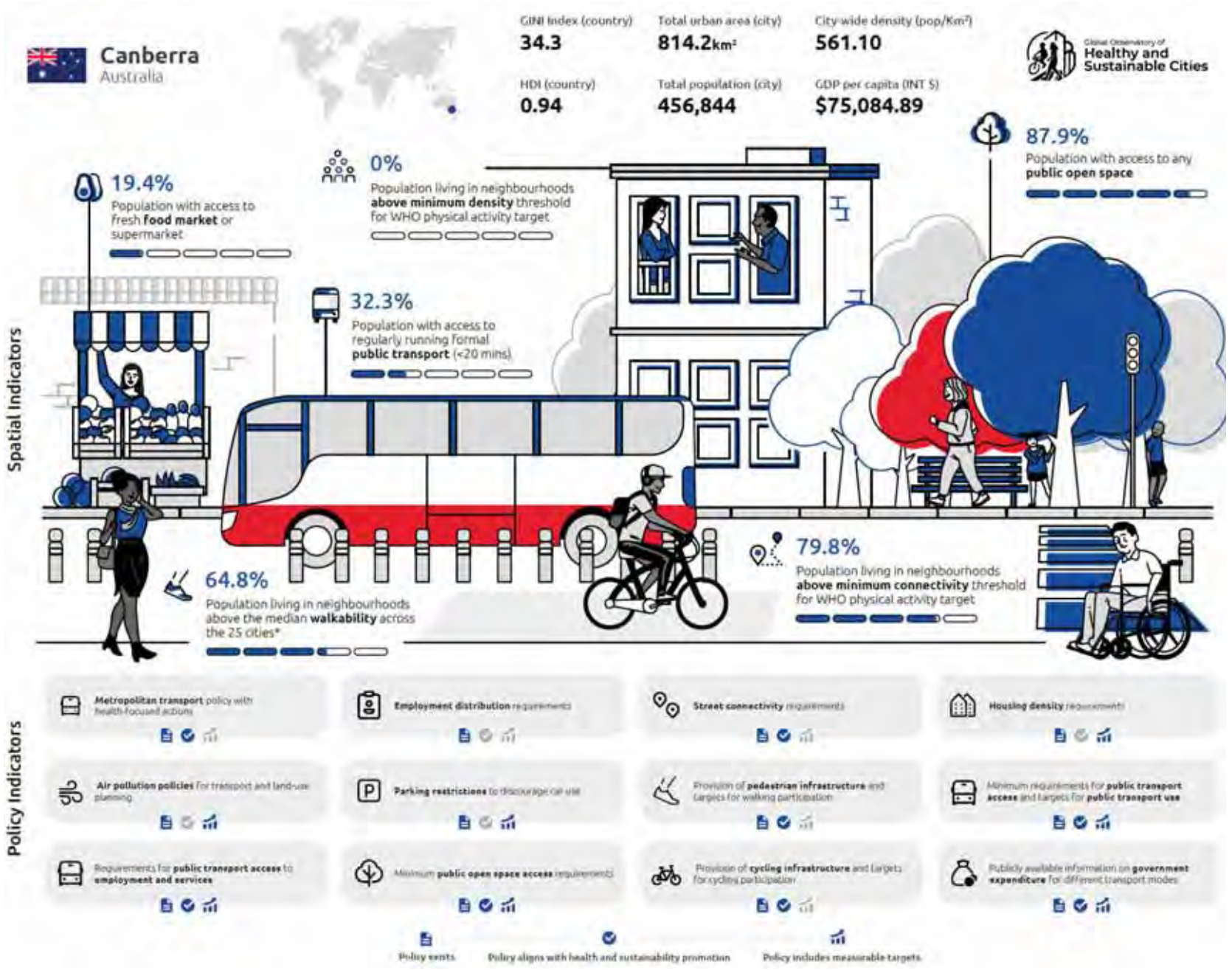


Table 1: Summary of Recommendation 1

As part of the Residential Zones Policy for RZ1 – Suburban Zone, integrating the following "local destination access" provision:

Proposed Territory Plan provision RZ1 Suburban Zone	Reason for change
Local Destination Access: Minimum Local Living Index	Ensure RZ1 blocks do not change in residential density unless they already have medium access to local destinations (score ≥ 4) including any four of the following destination types: Bus stop/light rail Market/grocery/specialty food Supermarket Library Community centre/hall Childcare GP or walk in centre Allied health (dentist, optometrist, physiotherapist) Pharmacy Convenience store Post office Bank/ATM

Figure 2: Scorecard for Canberra – 1000 Cities Challenge (2024) - https://www.healthysustainablecities.org/canberra/



This submission was prepared by:

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Dear Sir/Madam

Please find my response to the Middle Missing Reform draft.

I have concerns re the draft including:

The use of the term 'generally' used in the documents implies that the criteria/regulation may easily be overcome.

The quality of builds will drop due to the removal of certain words (eg 'excellent' and 'ensure'in Snapshot document) allowing for lower standards of build. As has been demonstrated by some developers and not noted by inspectors, good quality builds cannot be guaranteed leaving owners with substantial repair costs.

Likewise the permeability of existing storm water drains/rain water run off areas. As has been demonstrated by some developers and not noted by inspectors, good quality builds cannot be guaranteed leaving owners with substantial repair costs.

The new storage requirements for new builds is woefully inadequate.

Green canopy. The draft proposes a decrease in residential canopy and an increase in the overall ACT canopy. The plan proposes a major increase in builds which will result in canopy removal. While there will be some trees etc in apartment /MUH open spaces, I do not see how the proposed canopy area can be achieved, particularly when the current target is behind to start with. That is, the target we should be at now, not the yearly target which I believe has not also not reached now and in the best.

I fail to see how the open space of MUDs,and other new builds, would be adequate for existing builds and those in the MDUs/higher rises.

Privacy for existing/new occupants has been decreased

substantially.
Parking on the streets will be substantially increased with the accompanying increase in accidents.
I fail to see how the above points improve community benefits.
There is also my concern regarding existing infrastructure. For example
As is already being demonstrated in Molonglo and Gungahlin, power is not adequate for the already existing dwellings. Our climate requires adequate power immediately, particularly due to the phasing out of gas.
While limiting car parking in new builds, there must be an increase in public transport; where frequency and travel commuting times are considered to encourage it's use.
These are just some of my concerns regarding the Missing Middle Reform Policy. Unless it is well governed, by eg adequate oversight and adequate financial penalties for developers who flout the regulations, it will increase housing to the detriment of everything else.

Submission to the ACT Missing Middle Housing Reforms Consultation

August 2025

Introduction

Dementia Australia welcomes the opportunity to provide input into the ACT Government's proposed Missing Middle Housing Reforms and Draft Major Plan Amendment 04 (DPA-04).

We support the ACT Government's goal to increase housing supply and diversity within the existing urban footprint and encourage the Government to consider the needs of older people, people living with dementia, and those with cognitive disability in its planning and design.

Dementia in Australia

Dementia is the term used to describe the symptoms of a large group of complex neurocognitive conditions which cause progressive decline in a person's functioning.

It is the leading cause of death for women in Australia, the second leading cause of Australians overall and is the leading cause of disability in Australians aged 65 and over. It is not a natural part of ageing and can affect people in their 40s, 50s, and even 30s.

There are many types of dementia, including Alzheimer's disease, vascular dementia, frontotemporal dementia and Lewy body disease. Dementia is not just memory loss - symptoms can also include changes in speech, reasoning, visuospatial abilities, emotional responses, social skills and physical functioning.

In 2025, there are an estimated 433,300 Australians living with dementia, including an estimated 29,000 people with younger onset dementia. Without a significant intervention, the number of people with dementia is expected to increase to an estimated 812,500 by 2054[1].

[1] Dementia Australia (2023) Dementia Prevalence Data 2024-2054, commissioned research undertaken by the Australian Institute of Health and Welfare.

© Dementia Australia

In the ACT there is an estimated 6,100 people living with dementia. This figure is projected to increase to an estimated 12,300 by 2054.[2]

Dementia-enabling design in the missing middle housing design guide

The Missing Middle Housing Design Guide provides good practice guidance for creating well-designed homes and incorporates the adoption of LHA Silver standards as a foundation for accessible design in homes. However, the Design Guide as well as the LHA standards primarily address physical disability and mobility needs. Dementia-friendly housing is an essential component of accessibility. To ensure housing is inclusive of all abilities and life stages, we recommend the Guide be expanded to include cognitive accessibility and dementia-enabling design principles.

A well-designed, dementia-enabling home environment supports people with cognitive impairment to:

- Remain independent and safe
- Engage in daily activities and routines
- Feel oriented and familiar in their surroundings
- Avoid premature admission to residential aged care
- Reduce stress for both people with dementia and their carers

Dementia-enabling environment principles

To assist in the design of dementia-enabling environments, Professor Richard Fleming and Kirsty Bennett developed ten dementia-enabling environment principles. These principles are evidence-based and have been designed to maximise enablement and wellbeing for people living with dementia.

Principle 1: Unobtrusively reduce risks

Principle 2: Provide a human scale

Principle 3: Allow people to see and be seen

Principle 4: Reduce unhelpful stimulation

Principle 5: Optimise helpful stimulation

Principle 6: Support movement and engagement

Principle 7: Create a familiar space

[2] Dementia Australia (2023) Dementia Prevalence Data 2024-2054, commissioned research undertaken by the Australian Institute of Health and Welfare.

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Principle 8: Provide opportunities to be alone or with others

Principle 9: Provide links to the community

Principle 10: Respond to a vision for way of life

Dementia-enabling housing

"Our common goal is the person living with dementia maintains a good quality of life and confidence to maintain their independence for as long as possible. Small (and big) changes around our homes, wherever that may be will achieve this…One thing I have in the back of my mind, is that there aren't many purpose-built disability homes built let alone those which incorporate accessible dementia principles." – Carer

Dementia-enabling environment principles are frequently incorporated into the construction or modification of residential aged care facilities. However, as people with dementia increasingly wish to remain in their own homes and avoid transitioning to residential aged care, the availability of dementia-enabling housing stock within the broader community is critical. Housing that is dementia-enabling provides a safer and engaging environment for people living with dementia. It can facilitate participation in daily activities and foster independence. Dementia-enabling housing also supports carers, who can be reassured knowing their loved one is safe.

"It just makes you more independent. My wife goes to work knowing that I'm in a safe environment." – Person living with dementia

Community connection

Around 70% of people living with dementia live in the community. Our communities need to support people with dementia to live, participate and be included in their own communities. We need accessible environments and communities that support meaningful connection and engagement.

For many people with dementia their physical environment can have a significant impact on their ability to continue to access everyday activities such as shopping, banking or using public transport.

Refer to our **Toolkit for Councils** for dementia friendly design recommendations.

"People experiencing dementia should not feel isolated at home. People living with dementia should be supported within the community. Specific designs should exist within society, enabling people living with dementia, to participate in society..." ~ Dementia advocate

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Ageing in place

As medium-density housing increases in established suburbs, consideration must be given to how planning and redevelopment may displace older residents or reduce access to essential supports and services. The reforms aim to “offer flexible and diverse living arrangements” that accommodate “a wider range of household sizes, ages, and income levels” with an emphasis on housing that allows people to choose the “best fit” for their life stage and personal circumstances.[3]

However, there is no specific reference to ageing in place, accessible housing, dementia or cognitive disability. While the language suggests supporting multi-generational and life-stage-appropriate housing, there is no explicit commitment to accessibility or age- and dementia-friendly features. Additionally, the limiting of parking in RZ1 and RZ1 zones may have consequences for people with dementia accessing essential supports as the draft Major Plan Amendment (MPA) proposes reducing the minimum number of car parks required in these zones.

Dementia Australia recommends that the ACT Government promote housing that enables residents to remain in their communities in dementia-enabling homes, with access to appropriate support services.

Conclusion

The increasing prevalence of dementia, as well as community and government desire for people to age in place and avoid premature entry into residential aged care means that future housing stock needs to include dementia-enabling features. Dementia-enabling features improve quality of life and support independence, function and participation.

The Missing Middle Housing Reforms can shape Canberra’s future housing by ensuring reforms support dementia-enabling design.

[3] Environment, Planning and Sustainable Development Directorate – Planning. (2025). Draft Plan Amendment 04: Supporting report – Missing Middle Housing Reforms. ACT Government. https://yoursayconversations.act.gov.au/missing-middle-housing

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Green Building Council Australia

Building a sustainable future

5 August 2025

Missing Middle Housing Reforms
Environment, Planning and Sustainable Development Directorate
ACT Government

Via email: EPSDDcomms@act.gov.au

Dear Missing Middle Housing Reforms team

RE: Missing Middle Housing Reforms

The Green Building Council of Australia (GBCA) welcomes the opportunity to provide input to the consultation regarding the ACT's Missing Middle Housing Reforms. We commend the ACT Government commitment to removing barriers in the planning system to enable more housing types. More broadly, we applaud the ACT Government leadership in initiatives such as the timely implementation of National Construction Code 2022, preventing new gas network connections and releasing the Sustainable Buildings Pathway – all of which will contribute to the successful development of more sustainable housing in the ACT.

GBCA's purpose is to lead the sustainable transformation of the built environment. We do this primarily through our core functions:

- We rate the sustainability of buildings, fitouts and communities through Australia's largest national, voluntary, holistic rating system – Green Star.
- We educate industry, government practitioners and decision-makers, and promote green building programs, technologies, design practices and operations.
- We advocate policies and programs that support our vision and purpose.
- We collaborate with our members and other stakeholders to achieve our mission and strategic objectives.

GBCA notes that accelerating the growth of 'missing middle' housing will help to boost housing supply and deliver a range of other benefits to Canberra's existing suburbs and communities. Importantly, a focus on infill development and ongoing commitment to ACT Government's goal of 70% of new housing growth to take place in existing urban areas, also reduces the need to consider development on greenfield sites. This is a critical step in protecting nature and biodiversity and working towards a nature positive future.

We commend the development of the comprehensive Missing Middle Housing Design Guide (the guide) as a resource for anyone considering, planning, designing, constructing and landscaping a 'missing middle' type of home. We note the Sustainability and Environment chapter which provides guidance for considering a range of elements such as trees, landscaping and natural features, building design performance, natural resource capture and management, and climate change resilience.

Missing Middle Solar Analysis

Prepared by: [redacted] Green House Architecture.

Sun angles
21st June.
Canberra.

2025 Missing Middle Submission

[redacted]

Introduction

Providing urban design by identifying increased urban density on a block-by-block basis will inevitably fail. That is not a plan or design.

Firstly, we need to distinguish between "Missing Middle" and individual block urban infill, they are not the same thing as demonstrated by the plan (now deceased) to add a 120m^2 residence to an existing block.

I feel the term "Missing Middle" is being hijacked to benefit developers rather than provide a real housing solution by increasing urban infill without a package.

I sense very little ACT Gov commitment or direction for:

- How MM benefits a society, catering for societal needs like senior vs family needs.
- There seems little effort to include considerations for climate change and the environment.
- There seems little consideration for identifying suburban centres, district centres and town centres and any plan to make them "Town Square" areas with utility for local residents.
- The scheme, at this stage, looks like a free for all for developers & builders with very little benefit for the general population
- The current approval, tax and system complexity do not bode well for this scheme.

A number of these issues are mentioned but MM doesn't detail a plan to resolve these issues.

On a positive note, the shopping centre-based information services for MM at times and places to capture feedback have been very good.

The "Territory Plan" feedback sessions, which in my area were held on a weekday morning at 10 AM Cooleman Court meant working people were excluded from participating. The feedback "Listening Spaces" (what Utopia terminology, give me a break) were attended by a total of around 400 people. The plan for Weston Creek was not accessible on the ACT gov website. My concern is that this endeavor may return the same quality as the Territory Plan when the strategy is "accepted" on the same basis.

What we can do



What we will do

[redacted]

New housing in The Ponds, in western #Sydney.



5:54 PM · Apr 20, 2024 · **1.4M** Views

Risks

1 there is potential to dramatically increase the Urban Heat Island impacts by densified construction and lack of green areas & tree groves. There are methods to cover, retain water, mandate building techniques which can reduce warming effects which are not being utilized.

3 Given the approval of recent apartment blocks in Canberra the developers cannot be accused of delivering sociable, amenable, and beautiful architecture. These apartments have a reputation of being shoddily built, small and are suitably for some single people and couples. They have unusably small outdoor areas and poor solar orientation.

4 High risks of visual pollution, uncoordinated traffic & public transport amenity

5 Emphasis on "Middle". The plan does not seem to fit the concept of:

From the city centre High rise missing middle low density urban

The MM proposal allows, indeed encourages, a semi random construction process which will lead to a random, mixed density suburb layout.

The concept of "missing middle" is shown in a picture on the previous pages. The ACT proposition seems to be more consistent with the picture following (western Sydney) or a suburban mish mash of suburbs full of mixed level housing.

7 Construction Workers

There are nowhere near the numbers of workers required for current construction projects, the proposed federal residential commitment, the light rail and "wiring the nation" national infrastructure projects. Construction apprenticeship commencements are decreasing over time (3%) and completions are down by 7%). This will feed into a boom, inflation and bust cycle as has happened in the past.

These projects will also compete for material leading to material price inflation e.g. house wiring cable has doubled in price in the last 5 years.

“Missing Middles” Opportunities

1 the potential to create truly energy efficient residential buildings.

2. a capacity to include solar orientation and siting guidance for planning and construction

3. creating residential areas that suit a society and social needs rather than cramming buildings in to return the highest construction profit and rates return.

4. Adding beauty to the urban areas:

Design

a) Incorporate local materials and history into designs where practical. E.g. bricks were made in Yarralumla from local clays until 1976. There are several granite quarries operating in Canberra and our region which would allow stone for construction
b) Deliberately build including the concept of beauty by including: Symmetry Complexity, Curves, Nature, and the use of ornaments.
c) Utilize planting and design to make streetscapes attractive. The trees should be dense and deciduous to allow summer cooling and winter warming. The ACT Gov track record indicates eucalypts will be chosen which don’t shade, kill green undergrowth, and provide a volatile fuel for bushfires.
d) Water features, ponds and reedbeds provided to keep areas green and cool rather than the stormwater system currently in use.
e) European city residential apartments tend to have internal courtyards to allow parking and playground/BBQ areas. These encourage community activities and cohesion. ACT MM is saying – oh well, there will be more cars parked on the street.

Overseas Design Concepts

Some of the examples indicated in the MM drawings and ideas indicate European design concepts for buildings. It may be more appropriate to consider Middle Eastern countries as a reference to build, particularly apartment blocks, which use central water features combined with natural ventilation techniques to cool buildings.

Great care is needed when quoting overseas experience or example Auckland. Their missing middle plan was called Auckland Unity Plan (AUP). After this plan had been in effect for some time the following was noted

The disorderly nature of where post-AUP development occurred is hated even by the most strident supporters of the policy now living through it.

Summary

The missing middle has potential to create housing which is more affordable while at the same time building attractive buildings which incorporate genuine energy efficient design.

NIMBYS would be persuaded by a holistic suburb/area plan which demonstrated commitment to addressing objectionable issues.

This discussion has been started with - we will reduce your rights for objecting; you will have to just get used too cars in the streets etc. This will not win people over and they aren’t NIMBYs they are concerned with how the suburb, and their community, will end up. The Government track record for planning isn’t all that flash so I share their concern.

The Urban Forest Strategy is very weak and lacks ambition. Some areas of the ACT will become much hotter particularly where the tree canopy is already at less than 10% (Coombs). The choice of trees used for this project is likely to be eucalypt which is

described as “open canopy” These trees are highly flammable and aggressively block competition from other trees and shrubs. Typically, ideology will trump policy.

We need be aware that costs and restrictions in Canberra will only drive widespread development around the ACT creating a district of single level housing. Clearly, this is already happening.

The costs of lease variation, development applications and other government charges will potentially stagnate the projects.

There seems to be an aversion to building what society wants. For example, several friends and I would consider downsizing to units but have a need for storage and hobby space. This type of higher density arrangement isn’t even on the radar. In the meantime, we will stay in our 3- & 4-bedroom houses locking out home buyers.

An attempt to see where Canberrans see themselves in 10, 20 and 30 years may provide some insights for planning.

I am not confident that the opportunity to make Canberra a better and more beautiful city will come to fruition.

I would like to be kept in the loop on this and can say without fear of contradiction that the current ACT planning system is not looking far enough into the future. We are building a light rail, now, which will get to Regatta Point (1.8km for $600m) but have no agreement or plan to get any further. Disgraceful.

Missing Middle is an opportunity to add density, beauty, and livability to the city. With no evidence of an overall town plan, I see a fee cash cow for Government, a boon for developers and a destruction of building integrity and planning. A big loss for our society.

[redacted]

National Heart Foundation submission to the ACT Government's Missing Middle Housing Reform

5 August 2025

[redacted]

The Heart Foundation is Australia's trusted for-purpose organisation working to improve heart disease prevention, detection, and support for all people living in Australia. Cardiovascular disease is the cause of one in four of all deaths in Australia,[1] with more than half of the population having three or more key risk factors.[2] Physical inactivity is one such risk factor and remains a major health issue. It is calculated to cost Australia $2.4 billion each year in additional health costs alone.[3]

The Heart Foundation's 25-year vision, outlined in *Health for Every Heart: A generational vision for heart health in Australia 2025–2050*, is that heart health will be achievable by everyone in Australia by 2050.[4] A key goal underpinning this vision is to create environments and systems that enable healthy behaviours. We support the ACT Government's broad objective, through the proposed reforms, to create a more compact, liveable and sustainable city that limits urban sprawl and enables increased physical activity to support heart health.

Summary of support

The Heart Foundation is responding to the draft ACT Missing Middle Housing Design Guide, and supports the key objectives of the Housing Reform, as outlined below:

1. **Achieve a mix of low, medium and high density appropriate to different zones, demonstrating good design while respecting local character**
2. **Provide greater housing choice**
3. **Facilitate development in proximity to local services and amenity**
4. **Provide housing in areas with frequent public transport services**
5. **Increase canopy cover**

1. Density

Provision: Achieve a mix of low, medium and high-density housing (in different zones) in a manner that demonstrates good design outcomes that respects local character. Comparison table RZ1 – RZ5.

Position: Support. Aligns with the Heart Foundation's goal to create environments that enable healthy behaviours and our upcoming evidence paper *Designing for density – Delivering healthy, higher density neighbourhoods in Australia* (due for release in August 2025). The paper finds that increased residential density underpins the creation of vibrant, walkable neighbourhoods.[5]

Evidence:

The built and natural environments, together with transport mode choice, play a significant role in helping people engage in regular physical activity, thereby reducing their risk of developing cardiovascular disease.[6] Research shows that people who live in walkable communities are 1.5 times more likely to get sufficient physical activity for health.[7] The walkability of a neighbourhood has been found to be closely linked to cardiovascular health, with the proportion of people with healthy cardiovascular disease risk profiles 22% higher in neighbourhoods with high walkability when compared to neighbourhoods with low walkability – these are areas where walking is unsafe, inconvenient or difficult.[8]

Appropriate housing density is a critical enabler for walkable neighbourhoods, ensuring proximity of destinations, amenities, public transport and recreational opportunities.[5]

2. Housing choice

Provision: Provide for a range of housing choices. Comparison table RZ1 – RZ5.

Position: Support. Aligns with the Heart Foundation's Healthy Active by Design principles on the design feature for Housing Diversity

Evidence:

The provision of affordable housing depends on higher density living, as well as adequate supply of social housing.[9] Higher density and a mix of housing produces a diverse range of residents and this increased population, density and vibrancy tends to mean more services can be supported within walking or cycling distance. This encourages active transport and can improve heart health.

Diverse housing supply must also extend beyond affordability to accommodate the needs of people who live with frailty or disability, the elderly and younger generations. Flexible design can future-proof new developments, providing adaptable spaces that can respond to changing family or demographic needs, and can support ageing in place.

3. Proximity to local services and amenities

Provision: Facilitate development or redevelopment of sites that are generally in reasonable proximity to local services and amenities. Comparison table RZ2 – RZ3.

Position: Support. Aligns with Heart Foundation Healthy Active by Design principles on the design feature for Destinations, as well as with the upcoming evidence paper *Designing for density – Delivering healthy, higher density neighbourhoods in Australia* (due for release in August 2025). The paper finds that 'Density without local amenity is simply higher-density sprawl'.[5]

Evidence:

Where access to community services, everyday destinations and other amenities are located within proximity to residential areas, there are increased opportunities for physical activity and resulting heart health through walking, wheeling, and bike riding, as well as use of public transport.[5]

4. Public/active transport

Provision: Provide housing in areas with very good access to facilities and services and/or frequent public transport services. Comparison table RZ5.

Position: Support. Aligns with Heart Foundation Healthy Active by Design principles on the design feature for Movement Networks.

Evidence:

In Australia, areas of urban sprawl with low-density housing can have negative impacts on the cardiovascular health of people living there.[10] This is, in part, due to dependency on private vehicle transport which results in lower levels of physical activity and thereby higher risk of cardiovascular morbidity and mortality.[10]

Density creates improved viability for both effective and efficient public transport, as well as walking, wheeling and bike riding access to local services and destinations.[5] Active and public modes of transport improve levels of physical activity as well as reduce transport emissions and improve air quality – both of which have a positive impact on reducing cardiovascular disease and improving heart health.[11]

The availability and quality of transport also has a direct impact on issues of social equity as people's lives are affected by their accessibility to amenities, destinations and services, as well as transport affordability and options.[12]

5. Vegetation/urban greening

Provision: Increasing canopy cover to support Government's 30% canopy cover target. Comparison table RZ1 – RZ2.

Position: Support. Aligns with Heart Foundation Healthy Active by Design resources for urban greening to support climate resilience, amenity and health outcomes.

Evidence:

Recent research has shown that Australia's annual public health costs related to cardiovascular disease could be $19.3 million lower per 100,000 individuals for whom local tree canopy cover is increased from less than 10% to over 30%.[13]

Actions to improve air quality and mitigate climate change can improve the heart health of all people living in Australia.[14] Integration of increased tree canopy can reduce air pollutants[15] and provide shade and urban cooling, enabling more active lifestyles essential for heart health.[14]

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MISSING MIDDLE HOUSING REFORM
SUBMISSION FROM
THE CURTIN RESIDENTS ASSOCIATION

For any further information about this submission, please contact
Curtin Residents Association at mailto:info@curtinresidents.asn.au

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SUMMARY

The Curtin Residents Association supports densification / urban infill on the condition that it is done well.

The stated aim of the proposed Missing Middle Housing Reform is to supply more well-designed, sustainable housing in existing residential areas while maintaining Canberra's unique amenity and suburban character. This is a great aim; however, unfortunately, the proposals are very unlikely to achieve it.

Major issues with the current proposals, and recommendations to address them, are:

Failure to achieve the intended outcomes because of the focus is on redeveloping individual blocks

Recommendation 1

The Missing Middle Housing Reform should be paused while a more holistic planning framework for infill in residential areas is developed. This planning framework would cover scales substantially larger than individual blocks in order to address the issues arising from fragmented, piecemeal, small-lot subdivision.

Comprehensive negotiation with all stakeholders, including the surrounding community, and agreement on concept development plans early in the development process should be part of this new planning framework.

The high target dwelling density is not consistent with the objective of maintaining Canberra's unique amenity and suburban character.

Recommendation 2

The planning framework covering scales substantially larger than individual blocks referred to in Recommendation 1 should include a policy and related implementation mechanisms to reconcile the target dwelling density at the level of individual blocks with the objectives of a suburban setting which is primarily low density and maintaining Canberra's unique amenity and suburban character.

Failure to adapt the urban environment for climate change and mitigate its effects, particularly urban heat.

Recommendation 3

Adaptation to, and mitigation of the effects of, climate change should be added to Residential Zones Policy – Policy Outcomes. Assessment outcomes should reflect this Policy Outcome and contain concrete measures for assessing a particular project.

In the Missing Middle Housing Design Guide

Adaptation to, and mitigation of the effects of, climate change should be added to Key Factors in Developing Missing Middle

The Missing Middle Housing Design Principles should include specific references to key factors in adapting to, and mitigating of the effects of, climate change: for example *Contribute to healthy and safe communities through ensuring sufficient tree canopy cover to to provide cooling during the hottest part of the day*

The Technical Specifications should include, for all residential zones:

- a minimum of 35% tree canopy cover
- a minimum of 30% deep soil planting zone
- a minimum of 40% permeable area

Heritage housing precincts, such as the Radburn area in Curtin, must be protected
Recommendation 4

A separate residential planning zone should be introduced to maintain the character of heritage housing precincts.

Decreases in on-site car parking requirements are likely to result in increases in on-street parking with an adverse impact on existing suburban character and increased risk to community safety
Recommendation 5

Existing on-site car parking requirements should be retained to maintain the character of suburban streets and forestall risks to community safety from on-street parking.

Addressing increased housing choice and affordability
Recommendation 6

The recommendations of the ACT Government's Housing Choices Collaboration Hub should be reconsidered when revising the Missing Middle Housing Reform proposals.

Mechanisms beyond "leave it to the market" should be considered when responding to the recommendation:

For both infill and new developments, government should require and/or incentivise developers to deliver an increase in the mix of dwelling sizes and diversity of dwelling types.

Good, usable open space and dwelling size
Recommendation 7

The requirements for communal open space should be quantified.

The solar building envelope angle should remain at 31 degrees.

The building envelope plane should continue to be measured at 3.5m above the boundary.

1. The Curtin Residents Association (CRA) and its role

The Curtin Residents Association (CRA) has been advocating for quality planning outcomes and processes in Curtin since it was formed in 2016. The Association played a major role in representing community views to the positive development of the Curtin Group Centre Master Plan.

The Association represents actual community views, based on our frequent discussions with local residents, door-knocking and surveying on key issues, as well as regular public meetings to provide forums for discussion of planning issues such as the Woden District Strategy.

Our submission comes from this background of community engagement, and from the variety of our membership of all ages and economic circumstances, across Curtin.

2. Major issues - discussion and recommendations

The stated aim of the Missing Middle Housing Reform proposals is to supply more well-designed, sustainable housing in existing residential areas while maintaining Canberra's unique amenity and suburban character.

The CRA supports densification / urban infill on the condition that it is done well. This includes:

- Planning for the additional services, infrastructure and residential amenity needed when the population in an existing urban area increases must be an integral part of planning for infill. It must not be a separate after-thought. The need for additional community infrastructure - social, cultural, recreational and sporting - is particularly important.
- An overarching objective of urban infill must be adapting the urban environment for climate change and mitigating its effects. It is particularly important that the planning requirements for urban infill prepare Canberra's urban environment for increased heat as it has a direct effect in human health and well-being[1].

The stated aim of the proposed changes - to supply more well-designed, sustainable housing in existing residential areas while maintaining Canberra's unique amenity and suburban character - is a great objective; however, unfortunately, the proposals are very unlikely to achieve it.

2.1 Failure to achieve the intended outcomes because of the focus is on redeveloping individual blocks

Australian research has shown that:
Most infill redevelopment . . . is fragmented, piecemeal, small-lot subdivision, delivering a low yield of new housing, significant loss of greenspace, and no added services, infrastructure, or residential amenity[2].

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[1] (a) Bartholy and Pongrácz, A brief review of health-related issues occurring in urban areas related to global warming of 1.5^{o}C, *Current Opinion in Environmental Sustainability*, vol.30, pp 123 - 132 (2018)
(b) ACT Urban Forest Strategy 2021-2045

[2] Peter W. Newton and Stephen Glackin, Remaking Cities: Applying New Urban-Transition Concepts and Processes to Regenerate Greyfield Suburbia, Chapter 7 of N. Frantzeskaki et al. (eds.), *Future Cities Making, Theory and Practice of Urban Sustainability Transitions*, 2025

Consequently, the outcome of the proposals is most likely to be little new housing, significant loss of greenspace, and no added services, infrastructure, or residential amenity. This is simply not good enough.

Loss of green space would be a major problem - see 2.3 Failure to adapt the urban environment for climate change and mitigate its effects, particularly urban heat.

Successful redevelopment will require consolidation of multiple blocks as this enables diverse housing types and generous communal open spaces to allow the greatest possible area to establish tree cover and to provide play spaces for children close to their home.[3] The proposed changes allow for block consolidation; however, they also contain contradictory statements about consolidation.

Recommendation 1

The Missing Middle Housing Reform should be paused while a more holistic planning framework for infill in residential areas is developed. This planning framework would cover scales substantially larger than individual blocks in order to address the issues arising from fragmented, piecemeal, small-lot subdivision[2].

Comprehensive negotiation with all stakeholders, including the surrounding community, and agreement on concept development plans early in the development process should be part of this new planning framework.

2.2 The high target dwelling density is not consistent with the objective of maintaining Canberra's unique amenity and suburban character.

The target dwelling density is 57 - 67 dwellings per hectare in RZ1. This is 5 times the current density in Curtin and would result in a dwelling density similar to Kingston and Braddon.

The stated aim of the Missing Middle Housing Reform proposals is to supply more well-designed, sustainable housing in existing residential areas while maintaining Canberra's unique amenity and suburban character. The proposed Territory Plan provision is a "*suburban setting which is primarily low density*…" (emphasis added). The target dwelling density is **not** low.

A key part of any proposals for Missing Middle Housing Reform must be to address:

- how these contradictory objectives are going to be reconciled;
- who is going to do it; and,
- what criteria will be used

However, these requirements are not part of the current proposals. **This reinforces Recommendation 1**.

Recommendation 2

The planning framework covering scales substantially larger than individual blocks referred to in Recommendation 1 should include a policy and related implementation

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Also, Peter W. Newton et al, '*Greening the Greyfields – New Models for Regenerating the Middle Suburbs of Low-Density Cities'* Palgrave Macmillan, 2022

[3] Western Sydney Local Health District, *Healthy Higher Density Living for Families with Children,* 2024

mechanisms to reconcile the target dwelling density at the level of individual blocks with the objectives of a suburban setting which is primarily low density and maintaining Canberra's unique amenity and suburban character.

2.3 Failure to adapt the urban environment for climate change and mitigate its effects, particularly urban heat.

Climate change poses major challenges for people living in an urban environment. Urban heat is a particularly important challenge because of its adverse impact on health and well-being.

Increased heat in urban heat islands has a direct effect in human health and well-being[1]. Examples:

- asthma
- kidney disease, including kidney stones
- cardiovascular disease[4]
  - a 1°C increase in temperature is associated with a significant increase in cardiovascular disease-related death and illness[5]

Tree canopy cover is the most cost-effective way of mitigating urban heat. Tree canopy cover of at least 40% is needed to mitigate urban heating[6,7]. The proposal in the Missing Middle Housing Reform is to increase tree canopy cover on a block from 15% to 20% while reducing the minimum planting area and not limiting the impervious area. This is completely inadequate and, if adopted, would decrease health and well-being. It is not acceptable and must be changed.

Research also shows that addressing urban heating requires planning on scales of 60 to 90 m, which is greater than a single block[6]. **This reinforces Recommendation 1**.

Recommendation 3

Adaptation to, and mitigation of the effects of, climate change should be added to Residential Zones Policy – Policy Outcomes. Assessment outcomes should reflect this Policy Outcome and contain concrete measures for assessing a particular project.

In the Missing Middle Housing Design Guide

Adaptation to, and mitigation of the effects of, climate change should be added to Key Factors in Developing Missing Middle

The Missing Middle Housing Design Principles should include specific references to key factors in adapting to, and mitigating of the effects of, climate change: for example, *Contribute to healthy and safe communities through ensuring sufficient tree canopy cover to to provide cooling during the hottest part of the day*

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The Technical Specifications should include, for all residential zones:

- **a minimum of 35% tree canopy cover**
- **a minimum of 30% deep soil planting zone**
- **a minimum of 40% permeable area**

2.4 Heritage housing precincts, such as the Radburn area in Curtin, must be protected.

Heritage housing precincts may not be adequately protected. This is a consequence of the focus on individual blocks (see Section 2.1) and heritage controls only affecting advice from the ACT Heritage Council, which can be ignored by the planning authority.

Heritage housing precincts, such as the Radburn area in Curtin, must be protected. The simplest way to do this would be to introduce a separate residential planning zone.

Recommendation 4

A separate residential planning zone should be introduced to maintain the character of heritage housing precincts.

2.5 Decreases in on-site car parking requirements are likely to result in increases in on-street parking with an adverse impact on existing suburban character and increased risk to community safety.

The proposed decreases in on-site car parking requirements are likely to result in increases in on-street parking. This will result in an increase in on-street parking: substantial on-street parking is happening **now** with the existing car parking requirements.

> Mr Clarke [a member of the North Canberra Community Council] said the densification in some areas of Canberra's inner north has been appropriate, but it has also put strain on street infrastructure, like parking. "In north Watson, which is a much denser area than old Watson, there is already parking stress and people are finding it very difficult to park anywhere near where they live."
> *Concerns missing middle housing proposal could see 'hodgepodge of unsatisfactory development'. ABC News 5 June 2025*

Increases in on-street parking will damage the character of suburban streets as much as any damage from poor controls on built form or building setback. One aim of the proposed reforms is to maintain suburban character. Consequently, the changes should not result in increases in on-street parking and building approvals should explicitly need to consider local street and traffic conditions.

Poorly controlled on-street parking leads to decreased community safety; for example, with cars parked on both sides of the street, the street may be too narrow for access by emergency vehicles such as fire trucks. In some suburban streets parking is already restricted to maintain access for garbage trucks.

Recommendation 5

Existing on-site car parking requirements should be retained to maintain the character of suburban streets and forestall risks to community safety from on-street parking.

2.6 Addressing increased housing choice and affordability

Allowing more housing options in residential areas is one of the objectives of the proposed Missing Middle Housing Reform. Affordability of housing is also a significant issue.

The approach to these issues in these proposals seems to be "leave it to the market". This is unlikely to work. For example, a current "missing middle" redevelopment in Curtin involves replacing 3 stand-alone dwellings with 8 two-storey townhouses which are being advertised for ca. $2.25 million each. So, each townhouse will cost much more than the house they replaced. Important issues for the community, such as the desire of many existing residents to build single level age-in place housing, is not addressed.

The current proposals appear to be a response to anecdotal evidence that planning restrictions are preventing infill development. This assumption is not well-founded and so the proposed changes are not likely to transform the housing mix.

Many of the buildings in existing residential areas are owner-occupied family homes or single dwelling rentals. The financial and emotional barriers to down-sizing or redeveloping the family home are more significant than planning constraints. This emphasises the importance of enabling existing residents to build single level age-in place housing.

Evidence from the Auckland reforms is that after an initial burst of activity there has been little sustained increase in rates of densification and that the resulting developments have not maintained housing quality and amenity for residents.

Housing choice and affordability were addressed in 2018 by the ACT Government's Housing Choices Collaboration Hub. This discussion with the ACT community resulted in a number of excellent recommendations, including:

> *For both infill and new developments, government should require and/or incentivise developers to deliver an increase in the mix of dwelling sizes and diversity of dwelling types.*

Recommendation 6

> **The recommendations of the ACT Government's Housing Choices Collaboration Hub should be reconsidered when revising the Missing Middle Housing Reform proposals.**
>
> **Mechanisms beyond "leave it to the market" should be considered when responding to the recommendation:**
>
> > ***For both infill and new developments, government should require and/or incentivise developers to deliver an increase in the mix of dwelling sizes and diversity of dwelling types.***

2.7 Good, usable open space and dwelling size

Good, usable communal open space is an essential requirement for higher-density development, particularly to allow the greatest possible area to establish tree cover and to provide play spaces for children close to home[3]. However, there is any assurance of this in the proposals: the requirements for communal open space should be quantified.

In the proposed Residential Zones Technical Specifications:

- The change in measuring the building envelope plane at 4m above the boundary rather than 3.5m together with the reduction in front and side setbacks will enable larger dwellings which would be inconsistent with successful urban in-fill.
- The change in solar building envelope angle from 31 degrees to 45 degrees will increase overshadowing and reduce residential amenity. It will also make it harder to have good, usable open space as more will be in shade most of the time.

Recommendation 7

The requirements for communal open space should be quantified.

The solar building envelope angle should remain at 31 degrees.

The building envelope plane should continue to be measured at 3.5m above the boundary.

CONSERVATION COUNCIL ACT REGION

Submission to the ACT City and Environment Directorate

Submission on the draft Missing Middle policy

8 August 2025

The Conservation Council ACT Region (Cons Council) is the peak non-government environment organisation for the Canberra region. Since 1981, we have spoken up for a healthy environment and a sustainable future for our region. We harness the collective energy, expertise and experience of our more than 40 member groups to promote sound policy and action on the environment.

We campaign for a safe climate, to protect biodiversity in our urban and natural areas, to protect and enhance our waterways, reduce waste, and promote sustainable transport and planning for our city. Working in the ACT and region to influence governments and build widespread support within the community and business, we put forward evidence-based solutions and innovative ideas for how we can live sustainably.

At a time when we need to reimagine a better future, we understand that the changes we need will only happen with the collective support of our community.

For further information please contact:

[redacted].

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Introduction

The Conservation Council ACT Region (the Cons Council) is pleased to provide input to the public consultation on the draft 'Missing Middle' policy.

Key points

The Cons Council supports the proposed Missing Middle policy in its ambition to 'make better use of our existing suburbs and plan for a more compact, efficient and sustainable Canberra'. Increasing urban density is essential to both reducing the increasing sprawl of Canberra's suburbs with its resulting destruction of habitat as well as the increases in transport related pollution created by increased private car dependency.

The Cons Council notes several factors that could lead to poor results if this policy is not progressed in parallel and closely integrated with:

- integrated transport planning and
- urban water management and green space.

Done well, the policy could achieve an increase in urban density within Canberra's existing urban footprint, with the kind of vibrant mixed used suburbs such as the Inner North areas such as Braddon, O'Connor and Dickson. Done badly, there is the risk of cramped, poor-quality developments, isolated from shops, facilities and workplaces, exacerbating the worst of urban sprawl.

To avoid the latter outcome, the Cons Council urges proactive implementation of other key policies relating to urban planning, transport, water sensitive urban design and urban forests in parallel with the Missing Middle. Much of this policy framework exists, meaning that the challenge is to ensure the application of best practice rules to both public and private land as well as adequate investment by the government in implementation and enforcement.

Reducing Canberra's urban sprawl

The draft Missing Middle policy, enabling more dual or tri occupancies, townhouses and terrace homes, and low-rise apartments can contribute to reducing the pressure for outwards expansion of Canberra's urban footprint.

As noted in State of the Environment Report 2023, 'much of the growth in the ACT's urban area has been in the form of single low-density dwellings with fewer and fewer people living in them' (p.13). The ACT Commissioner for Sustainability and the Environment's Close to the Edge report states (p.13) that from 2004 to 2023:

> "the ACT's building footprint grew by 40 per cent, largely due to greenfield developments. Consequently, the extent of Box-Gum Grassy Woodland and Natural Temperate Grassland has declined. These are threatened ecological communities, which we must do everything possible to protect."

Urban development affected 30 of the ACT's 66 threatened species, including birds, mammals, reptiles, fish and insects.

Urban developments led to localised vegetation loss, especially in Gungahlin, Molonglo Valley and Jerrabomberra, where vegetation cover declined by more than 20 per cent in some areas.

The Cons Council is committed to preventing the further urban expansion of Canberra with the attendant impacts on the ACT's species and ecosystems, including through habitat loss, fragmentation and connectivity impacts.

The commitment by the ACT Government in April 2025 to introduce a hard edge to Canberra's sprawl is a significant step in the right direction. However, the specific placement of that boundary matters enormously, given the ACT Government has not ruled out the placement of this boundary beyond the Western Edge (being the 9,800 ha of undeveloped land to the west of Canberra).

Reducing carbon emissions

While Canberra has made significant progress in reducing its greenhouse gas emissions, there is an urgent need to work towards 'real zero' emissions as part of national and international efforts. According to the ACT State of the Environment Report 2023, in 2021-22, 58% of ACT's greenhouse gas emissions came from transport (p.11) making it an obvious focus for achieving reductions.

The Missing Middle policy can contribute to this: housing options that enable greater density lets more people live close to where they work, shop and play. This, in turn, enables a greater percentage of people to walk or ride to their destinations without needing to rely on private cars (with significant equity implications for those who can't drive – particularly the young, the old, or those living with disabilities).

Conversely, in the absence of increasing urban density, Canberra's sprawling new suburbs will lock in private car dependency, with resulting increases in emissions, as well as associated pollution from vehicle exhaust, heavy metals from brake dust, microplastics and other pollutants from tyres, plus increased traffic noise.

Implementation risks

The Cons Council notes that implementation of the policy raises several risks and encourages the ACT government to proactively consider measures to mitigate them.

Transport planning

If the policy is successful in encouraging urban infill, it is important that the higher densities are matched over time with complementary transport planning to ensure that the areas are served with reliable, accessible and convenient transport options for residents.

Failure to do so, when combined with the reduced requirements for provision of car parking spaces, risks perpetuating existing car dependency and pairing it with greater density resulting in traffic congestion and increases in illegal parking (often involving vehicles using green verges, bike lanes and public greenspaces, thereby compounding the harms).

To prevent this, transport planning needs to be proactive and lead demand, rather than retroactive and waiting for evidence of unmet demand. This applies to the addition of bus services in areas of anticipated growth, allowing public transport to trigger supply driven demand (in the same way building roads triggers supply driven increases in traffic). It also includes the acceleration of the construction of high-quality infrastructure for active travel, such as footpaths and protected bike lanes (with the Garden City Cycleway, which recently began construction, providing an excellent example of what is required).

Water management, urban forest and green space

Increasing the density of urban areas through the construction of additional buildings increases the urban heat island effects as roads, driveways and buildings store and radiate heat in summer. This is expected to increase with the effects of climate change and a hotter and drier environment.

Increased density also leads to increased percentages of impermeable surfaces, thereby increasing stormwater runoff, inhibiting the recharge of ground water, and decreasing soil moisture. In combination, these will act to decrease the amount of healthy vegetation cover (leaving aside the proposed reduction of mandated vegetation cover from 35% to a proposed 30% - Missing Middle Snapshot, p.9).

The Cons Council does not oppose these changes as the effects can be offset through the application of new requirements for installation of rainwater tanks and Water Sensitive Urban Design (WSUD) principles into established older suburbs (and noting the proposed increase in Tree canopy cover from 15% to 20%).

For individual developments, rainwater tanks capture runoff thereby reducing the amount of water Canberra draws from the surrounding environment, whilst enabling the continued watering of green spaces across hot summer periods.

For public land, the ACT Government should consider offsetting the increased density of the suburbs with an ambitious program of retrofitting Water Sensitive Urban Design infrastructure, including bioremediation structures, and runoffs and swales along road verges and median strips. This would enable the passive watering of the street trees comprising Canberra's urban forest that will be essential to combat the urban heat island effects. Combined with native planting of grasses and vegetation, these measures would not merely preserve but enhance the greenspaces, biodiversity, liveability and beauty of the suburbs as they increase their density over time.

Underlying disincentives and the risk of policy failure

The Cons Council notes several factors that may act to slow the number of people who take advantage of the possibilities of the proposed rules, thereby reducing its effect:

- The time, complexity and cost of gaining approvals for the developments, resulting in indirect incentives for 'greenfield' development on the outer fringe that are subject to less complex approvals.

- The impact of developers being required to pay rates assessments based on the estimated increase in value, before such time as those values are realised.
- The poor reputation of the building industry and resulting perceptions of risk.

These matters fall outside the Cons Council's areas of direct interest or expertise, so this submission offers no further analysis but suggests consideration of them in the context of the consideration of the draft rules.