ACT Government

Territory Planning Authority

CONSULTATION REPORT

Missing Middle Housing Reform

DRAFT MAJOR PLAN AMENDMENT to the TERRITORY PLAN 04

Residential Zones and Subdivision Policy

September 2025

This consultation report was prepared for the missing middle housing reforms and also serves as the consultation report as required under division 5.2.5 of the Planning Act 2023

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1. INTRODUCTION

1.1. Purpose

This document is the consultation report on the Missing Middle Housing Reforms and serves as the consultation report required under section 67 (3) of the Planning Act 2023 (the Act).

This document should be read in conjunction with the following documents which have been given to the Minister and are available on the Planning website:

- DPA-04
- Draft Missing Middle Housing Design Guide.

1.2. Outline of process

The Authority has considered comments received from agencies and the public as part of the Missing Middle Housing Reforms, including on DPA-04 and the draft Missing Middle Housing Design Guide, during the public consultation period. This consultation report has been prepared to provide an overview of the consultation process, to outline comments received and how those comments have been considered or responded to.

The amended version of DPA-04, along with this document and relevant background papers, has been given to the Minister for referral to the relevant Legislative Assembly Standing Committee.

More information about this DPA is provided in DPA-04 provided at Appendix 5 and available on the Planning website.

General information about the major plan amendment process is also available on the Planning website.

2. CONSULTATION WITH GOVERNMENT AGENCIES

In accordance with section 62 of the Planning Act the Authority has consulted with each of the following entities in relation to this DPA:

- the National Capital Authority
- the Conservator of Flora and Fauna
- the Environment Protection Authority
- the Heritage Council
- any land custodian or lessee of public unleased or leased land

The following ACT Government agencies were also consulted during the consultation period:

- CED – Transport and City Services (former TCCS)

- ACT Education
- Health and Community Services (ACT Health)
- Emergency Services Agency
- Suburban Land Agency (SLA)
- City Renewal Authority (CRA)
- Housing ACT
- Justice and Community Services Directorate (JACS)

A copy of the comments received from the above ACT Government agencies and entities and the Authority's response to any matters raised are provided in Appendix 1 of this document.

3. CONSULTATION WITH THE PUBLIC

3.1. Engagement numbers snapshot

16K We reached 16,053 people via YourSay	**547** YourSay Contributions, with 398 surveys and 149 'quick comments'	**6.4K** Number of downloads via YourSay	**74** Number of written submissions we received on Missing Middle Housing Reform
18 Number of engagement events held across Canberra	**539** Number of people we talked to at events	**68** We received 68 written comments at events	**125** Media mentions including print, radio, TV and online articles

3.2. Consultation objectives, program and approach

The proposed Missing Middle Housing Reforms represent a significant change to the application of the ACT planning framework, with potential implementation across Canberra. The reforms are the next important step on from the recent broad reform of the ACT Planning System and Territory Plan, and changes to enable more 'missing middle' housing were foreshadowed during community engagement on those reforms.

Given this, the objectives for community consultation on DPA-04 have been 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
- **actively 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.

The public consultation period for the Missing Middle Housing Reforms was conducted over 11 weeks from 20 May 2025 to 5 August 2025. Online consultation closed on 22 July 2025, with written submissions accepted for a further 2 weeks, until 5 August 2025.

During the public consultation period, 18 varied events were offered to provide a broad range of opportunities for the Canberra community to consider the proposed reforms and provide feedback:

- 2 x face to face community information / Q&A sessions ('town-hall' type events held in Tuggeranong and Belconnen)
- 1 x online community information / Q&A session (which was recorded and made available for viewing in full on YourSay)
- 2 x listening spaces (held in Belconnen and Woden)
- 8 x 'pop up' stalls across Canberra
- 2 x 'Meet with the Government Architect' sessions
- A community representative workshop
- An industry representative workshop
- An online listening space (this session was offered but not run as no public registrations were received)

The engagement strategy was designed to offer options for the public to find out information, ask questions and provide feedback both online and face to face, with events located across Canberra both during the week, on the weekend (on Saturdays and Sundays) and outside of work hours. 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.

The community was also invited to provide written feedback on the proposed reforms via 'quick comments', a detailed online survey, or by written submission. This feedback could be provided at any time during the consultation period.

In addition to the engagement activities advertised on YourSay, the Directorate also provided a detailed presentation and Q&A session to the Environment and Planning Forum (which includes a number of community council representatives).

Promotion of the missing middle housing reform consultation

A range of communication tools were used to ensure that the Canberra public and key stakeholders were aware of the community engagement for the Missing Middle Housing Reforms and how they might find out more information / provide their feedback:

- YourSay interactive engagement website
- Targeted promotion of engagement program via ACT Government social media channels, the ACT Government OurCBR newsletter mailout, and media releases.

The ACT Government social media campaign resulted in more than 16,000 people accessing the Missing Middle Housing Reforms YourSay page.

Details about the proposed Missing Middle Housing Reforms were also shared across Canberra via various media, including approximately:

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

In addition to the ACT Government social media posts, information about the proposed Missing Middle Housing Reforms engagement was also shared on Facebook by a number of media and community organisations.

The social media reach across Canberra and number of media mentions across the engagement period suggest that the broad community had a number of opportunities to hear about the proposed reforms and how they might be able to find out more information or provide their feedback.

3.3. Who we engaged

A range of Canberrans provided input during the engagement period. Participants included residents from across the various districts in the city and represented people of varying ages.

Geographic range: survey participants / community information sessions, and pop-up / listening space locations

People completing the survey or attending the face-to-face information / Q&A sessions (422 people) were asked which suburb they lived in.

District people live in:	No. of people engaged:
Inner North and City	98
Belconnen	97

Tuggeranong	60
Inner South	51
Woden	48
Gungahlin	32
Weston Creek	28
Molonglo Valley	8

Pop ups, listening spaces and 'Meet the Government Architect' sessions were also held across Canberra. 425 people collectively attended those sessions.

Location of event (no. of events)	No. of people engaged:
Belconnen (3)	117
Woden (3)	99
Inner North and City (1)	48
Tuggeranong (1)	42
Inner South (1)	68
Weston Creek (1)	51

Face-to-face events were not offered in the newer districts of Molonglo Valley and Gungahlin, where the proposed Missing Middle Housing Reforms are less likely to apply.

Age and gender

Accurate personal demographics were only available from people who submitted surveys. Of those:

- The majority of respondents to the survey 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.

Submissions received

Of the 74 written submissions received:

- 28 submissions were from general members of the public
- 16 submissions were from community council organisations or associates
- 8 submissions were received from the professional architecture and design community (88% supportive)
- 11 submissions were from representative organisations (including some related to health, conservation, environment and public transport)
- 6 submissions were from the development and building industry

3.4. Pre-consultation period engagement

The proposed Missing Middle Housing Reforms were drafted in response to community feedback during previous engagement about the ACT planning system reform, and in consultation with local planning and design professional experts. Extensive industry and agency consultation contributed to the development of the reforms, including engagement with a dedicated Technical Advisory Group and Pool of Practitioners with representation from peak industry organisations and ACT Government agencies.

3.5. Comments and feedback received and Authority response

This section summarises the comments received from the Canberra public on the Missing Middle Housing Reforms. The Authority has considered all of these comments in considering potential amendments to the DPA-04 and Missing Middle Housing Design Guide documents that were released for public consultation.

A detailed summary list of the comments / feedback received, and the Authority's response is provided in table form at Appendix 1.

Copies of the public written submissions received, together with feedback provided via the YourSay survey and through the 'quick comments' section on the YourSay website are also provided as Appendices to this document (Appendix 4, 5 and 6) and can be found on the Planning website.

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. Comments included concerns from reform opponents and constructive suggestions for implementation, including recommendations for potential future government action.

There was general support for:

- Enabling more housing choice across Canberra, making it easier for everyone to have access to appropriate housing close to amenities
- Making it possible for subdivision and block consolidation in RZ1
- Increased tree canopy cover requirements and keeping building site coverage the same
- Making it easier for non-developer land holders (eg 'mum and dad' investors) to sub-divide or redevelop their block for missing middle housing.

There was general agreement about:

- An assessment approach that valued (and enforced) the design of new homes that would be 'good neighbours', balancing the need for new housing with preserving neighbour amenity and good local urban outcomes (including the importance of solar access and considering appropriate setbacks)

- The opportunity to have a more targeted approach to providing appropriate missing middle housing for older Canberrans
- Ensuring that new infill development was designed to maximise good landscape outcomes that reduce the impacts of urban heat island effects
- The potential for the Missing Middle Housing Design Guide to help ensure quality design outcomes, and the need to ensure new homes were well-constructed
- The need for Canberra's public transport and active transit network (and associated bus stop / footpath and cycleway infrastructure) to be managed strategically to anticipate and meet increasing demand caused by more density in outer suburbs (and potentially less car parking)
- The need to ensure community infrastructure would be available to meet increasing demand over time – including schools, quality local centres, and public green space.

There was a division in relation to:

- How quality local character will be retained, with some members of the community deeply concerned about the loss of Canberra's unique character and 'Bush Capital' aesthetic, particularly in older suburbs and heritage areas, while others looked forward to an evolving neighbourhood character and increased vibrancy for local communities
- Opinions on the proposed reduction in car parking rates, with clear opposition from a number of Canberrans (concerned about the flow on impacts of on-street and verge parking), tentative support from others (where public transport and on-street parking infrastructure was designed to meet the demand of increased density), and full support from others (agreeing it should be up to the market to respond and that reduced parking would better support a shift to sustainable transport choices).

Some people also raised concerns about:

- Tree species and planting - Concerns that increased canopy cover requirements may result in inappropriate tree species being planted that could drop limbs, create unwanted shade on neighbours' gardens, or be unsuitable for the local environment and climate, and the potential for new homes (or trees) to overshadow established solar panels on neighbouring properties
- Impact on affordable rental supply - Potential reduction in supply of affordable family homes available for rent, particularly impacting low-income Canberrans and those waiting for public housing, as older properties suitable for rental are redeveloped into higher-value missing middle housing.

Those who didn't support the proposed reforms were typically concerned about:

- The potential negative impact on the local character of existing suburbs, including in heritage areas, and the loss of Canberra's 'Garden City' and 'Bush Capital' aesthetic and need for neighbour rights of appeal
- Overshadowing and loss of privacy caused by new neighbouring buildings
- A significant increase in cars parking on verges and on the street, and the resulting impact on neighbourhood character and potentially unsafe road environment
- Increased heat island effect due to more density and reduced planting area

- The proposed canopy cover not being sufficient (or the loss of established trees and time taken for new trees to grow)
- Loss of private garden space and outdoor areas where children can play safely at home, with concerns that reduced lot sizes and increased site coverage will limit opportunities for active play and outdoor recreation
- 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
- The lack of clarity in the guidance materials, creating uncertainty about preferred outcomes and potential for poor enforcement of aspirational design elements.

Perceived barriers to missing middle housing were mentioned by a number of Canberrans:

- The complexity and costs associated with strata management / body corporates, making it expensive and frustrating to live in unit titled properties.
- The impact that various fees and charges (including stamp duty and the lease variation charge) have on the potential feasibility of a missing middle project, including for non-developers and for older Canberrans thinking about downsizing
- Increasing building costs and construction skills shortages.

The consultation has also offered an opportunity for public recommendations for future innovations related to increased density, potential for aligned strategic policies, mechanisms for building inclusive local communities, and a renewed commitment to sustainability and climate resilience.

Recommended further consideration of:

- Potential for incentives for construction of more single level townhouses to increase housing options for people looking to age in place / downsize
- Incentivising more liveable / accessible housing to create more housing choice for people living with disability
- Providing greater certainty to communities about how potential increases in on-street or verge parking will be managed to minimise poor outcomes
- How best to ensure a streamlined, efficient and easy-to-navigate planning approvals system, with capacity for informed and consistent consideration of applications, and transparency in how decisions are made
- How to provide greater certainty to the community and potential developers about how decisions will be made (applying the outcomes-based assessment) and the mechanisms triggering third party appeal rights
- The need for robust data collection systems and regular evaluation of missing middle housing reform implementation to track uptake, monitor outcomes, and enable adaptive management of the policy over time.

4. CHANGES MADE AS A RESULT OF CONSULTATION

The Authority has considered the comments and feedback received from Government agencies and the general public and has subsequently made amendments to the version of the DPA-04, including the technical specifications that was released for public consultation.

Changes will also be made in a revised version of the Missing Middle Housing Design Guide, which is anticipated to commence at the same time as these changes to the Territory Plan and associated documents.

Key changes in response to the feedback are outlined below:

Residential zones building heights

- Height provisions have been simplified through removal of transitional height from RZ5 to adjacent zones. This is appropriately controlled through other outcomes within the Territory Plan and general considerations in the *Planning Act 2023*.

Solar access

- Solar access technical specifications have been revised to articulate differing guidance between multi-unit developments of four storeys or more and multi-unit developments of three or less storeys. Developments of three storeys or less are guided to achieve greater solar access minimums at the site level when compared to those of four or more storeys
- Additional technical specifications have been included to provide guidance regarding the protection of solar access to existing solar collectors (e.g. solar panels or solar hot water units) where located on the roof of adjacent residential developments
- Additional technical specifications included to protect solar access to the main living space and principal private open space located on neighbouring blocks.

Dwelling densities

- Technical specifications have been updated to clarify dwelling densities are maximums, rather than targets. Reference to additional allowable density where basements are proposed has been removed, to further clarify the intent of the provisions.

Subdivision

- Updates have been made to the Subdivision Policy to allow subdivision without the requirement for a lawfully constructed dwelling. This is supported by a minimum block size requirement of 350m^2, which applies where subdivision is to occur without prior development of a dwelling
- Clarification of titling/terminology through the technical specifications to indicate where provisions are intended to apply to estate level development versus subdivision of existing residential areas

- Removal technical specifications for subdivided/consolidated RZ1 blocks to have a street or open space frontage. This will provide greater flexibility for blocks to contain separately titled dwellings.

Fencing

- Updates to the technical specifications to outline that fencing and courtyard walls forward of the building line, closer to the front boundary, is permissible for multi-unit housing where it satisfies particular design requirements.

The amended documents are available on the ACT Planning website and all other changes to the Territory Plan proposed by the Major Plan Amendment are outlined.

The previous versions of DPA-04, technical specifications and the draft Missing Middle Housing Design Guide that were released for public consultation are provided at Appendix 5 to 9 of this document.

For further details about why these changes have been made, please see Sections 2 and 3.3 of this document, together with a summary of issues raised by ACT Government agencies and entities, and the public (Appendix 1). Copies of the public submissions and comments received during the consultation period are provided as appendices to this document (Appendix 2, 3, 4) and can be found on the ACT Planning website.

Further information about how the Territory Plan and other documents are proposed to be amended can be found in the DPA document that has been given to the Minister, available on the ACT Planning website.

INTERPRETATION SERVICE

To speak to someone in a language other than English please telephone the Telephone Interpreter Service (TIS) 13 14 50

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LANGUAGE	DETAILS
English	If you need an interpreter please call: **13 14 50**
Mandarin (Simplified Chinese) / 简体中文	**如果您需要翻译，请致电：13 14 50**
Arabic / العربية	إذا كنت بحاجة إلى مترجم شفهي اتصل بالرقم: **13 14 50**
Cantonese (Traditional Chinese) / 繁體中文	**如果你需要傳譯員，請致電：13 14 50**
Vietnamese / Tiếng Việt	Nếu bạn cần thông dịch viên, xin gọi**: 13 14 50**
Korean / 한국어	통역사가 필요할 경우 다음 번호로 전화하시기 바랍니다: **13 14 50**
Spanish / Español	Si necesita un intérprete, llame al **13 14 50**
Persian (Farsi) / فارسی	اگر به مترجم نیاز دارید، لطفاً به این شماره تلفن کنید: **13 14 50**
Dari / دری	اگر به یک ترجمان شفاهی نیاز دارید لطفاً به شمارهٔ **131450** زنگ بزنید.
Punjabi / ਪੰਜਾਬੀ	**ਜੇਕਰ ਤੁਹਾਨੂੰ ਕਿਸੇ ਦੁਭਾਸ਼ੀਏ ਦੀ ਲੋੜ ਹੈ ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਫੋਨ ਕਰੋ: 13 14 50**
Tamil / தமிழ்	உங்களுக்கு மொழிபெயர்த்துரைப்பாளர் ஒருவர் தேவைப்பட்டால் **13 14 50** என்ற எண்ணை அழைக்கவும்
Greek / Ελληνικά	Αν χρειάζεστε διερμηνέα, τηλεφωνήστε: **13 14 50**
Italian / Italiano	Se hai bisogno di un interprete, chiama: 13 14 50
Hazaragi / هزاره گی	اگه ده ترجمان ضرورت ده رید، لطفاً ده شماره **13 14 50** تماس بگیرید.
Thai / ภาษาไทย	หากคุณต้องการล่าม กรุณาโทรไปที่ **13 14 50**
Karen / ကညီကျိာ်	ဖဲနမ့ၢ်လိာ်ဘာ်ပှၤကတိၤကျိုးထံတၢ်တဂၤအခါဝံသးစူၤကီးဘာ်-၁၃၁ ၄၅၀ တကွၢ်.

Telephone and Interpreter Service **13 14 50** - Canberra and District - 24 hours a day, seven days a week.

APPENDIX 1 **Consultation comments and Authority response**

APPENDIX 1A **Entity comments**

APPENDIX 1B **Listening Report**

APPENDIX 2 **Public written submissions received**

APPENDIX 3 **Public comments received on YourSay – Quick comments**

APPENDIX 4 **Public comments received on YourSay – Survey responses**

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**

APPENDIX 9 **Draft Missing Middle Housing Design Guide released for consultation**

APPENDIX 10 **Missing Middle Housing Reforms - Comparison table**

APPENDIX 11 **Missing Middle Housing Reforms - Snapshot**

APPENDIX 12 **YourSay consultation page content and FAQs**

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
2. Comments / feedback relating to the **Residential Zones Policy (E1)** 5
3. Comments / feedback relating to the **Residential Zones Specifications (ZS1)** 8
4. Comments / feedback relating to the **Subdivision Policy (F1)** 11
5. Comments / feedback relating to the **Subdivision Specifications (SS1)** 11
6. General comments on the proposed **Missing Middle Housing Reforms** 13
7. Comments related to **implementation** 16
8. Comments related to perceived **barriers to implementation** of the reforms 20

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

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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

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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	Corroboree 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 38%*	No minimum area *Existing suburb is 35%*	No minimum area *Existing suburb is 44%*	No minimum area *Existing suburb is 38%*	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

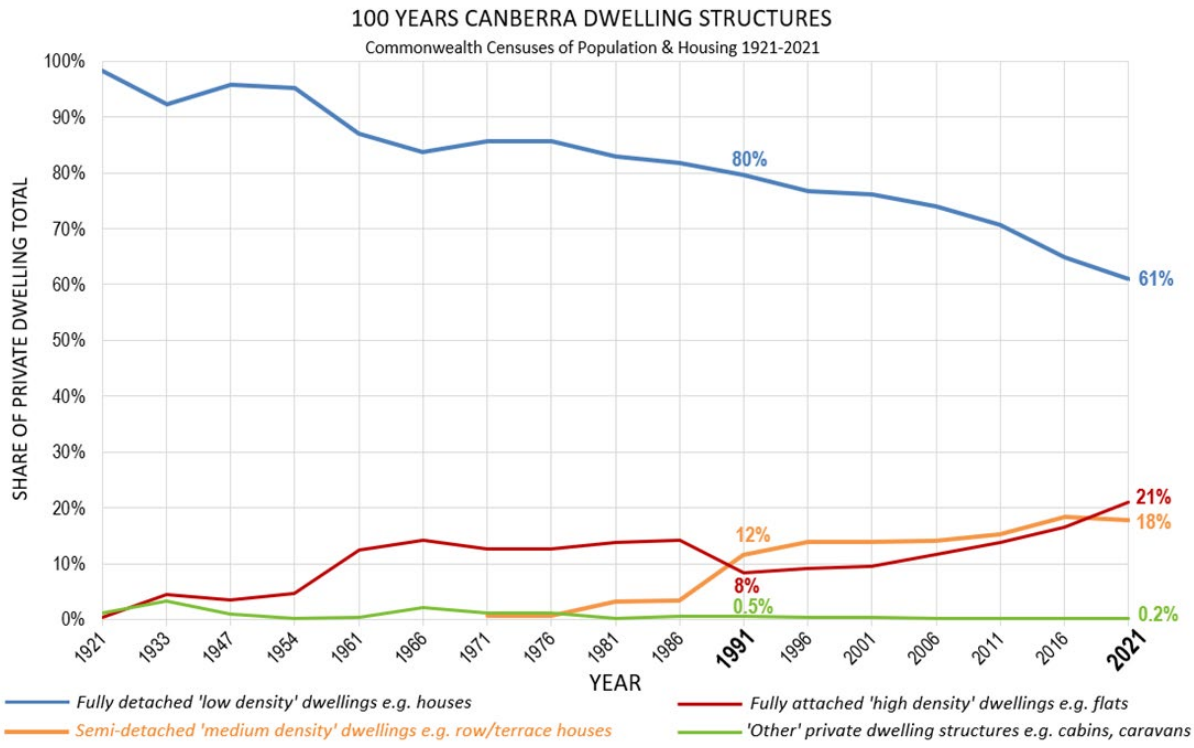
Principle 1 – Design Guideline:
Respond to neighbourhood context and character to create a sense of identity and reflect local styles.

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.

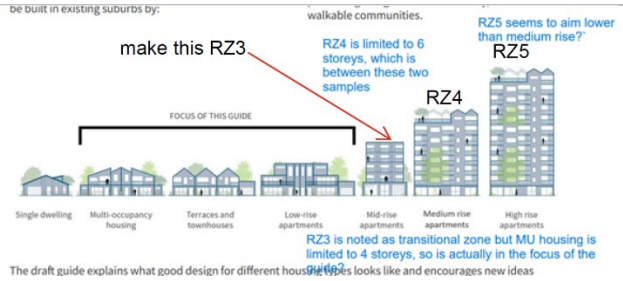
Further detail is provided in the Supporting Report and Sections 5.1–5.6 of DPA-04. Consequential amendments to technical specifications are outlined in Section 7.

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

Figure 3 – Existing and proposed naming of residential zones

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.

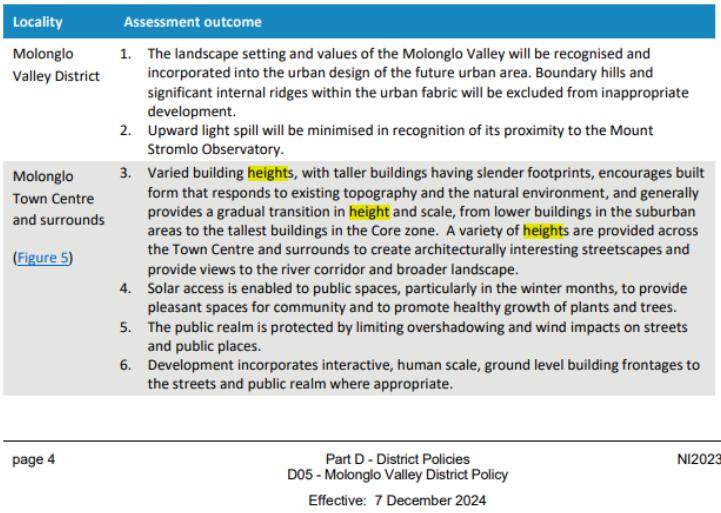
That RZ5 zoning could extend to permitting residential towers up to 48m (i.e. 16 storeys) rather than the proposed 24.5m (i.e. 7 storeys).

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.

<table>
<tr><td></td><td>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.</td><td></td></tr>
<tr><td>Place Delivery – Urban Estates</td><td>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.</td><td>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.</td></tr>
<tr><td>Detailed Comments on the MPA</td><td>The following comments focus on the proposed changes for Missing-Middle</td><td></td></tr>
<tr><td>Built Form</td><td>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:

<table><tr><th>Zone:</th><th>Minimum block size</th></tr><tr><td>RZ1</td><td><s>400</s> 350m²</td></tr><tr><td>RZ2</td><td><s>350</s> 300m²</td></tr><tr><td>RZ3</td><td><s>325</s> 275m²</td></tr><tr><td>RZ4</td><td><s>300</s> 250m²</td></tr><tr><td>RZ5</td><td>250m²</td></tr></table></td><td>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.</td></tr>
<tr><td>Built Form</td><td>DA and SDA requirements: Is it correct that proponents must respond to the Missing Middle Design Guide (MMDG) in addition</td><td>Allow DA exemptions</td></tr>
</table>

	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

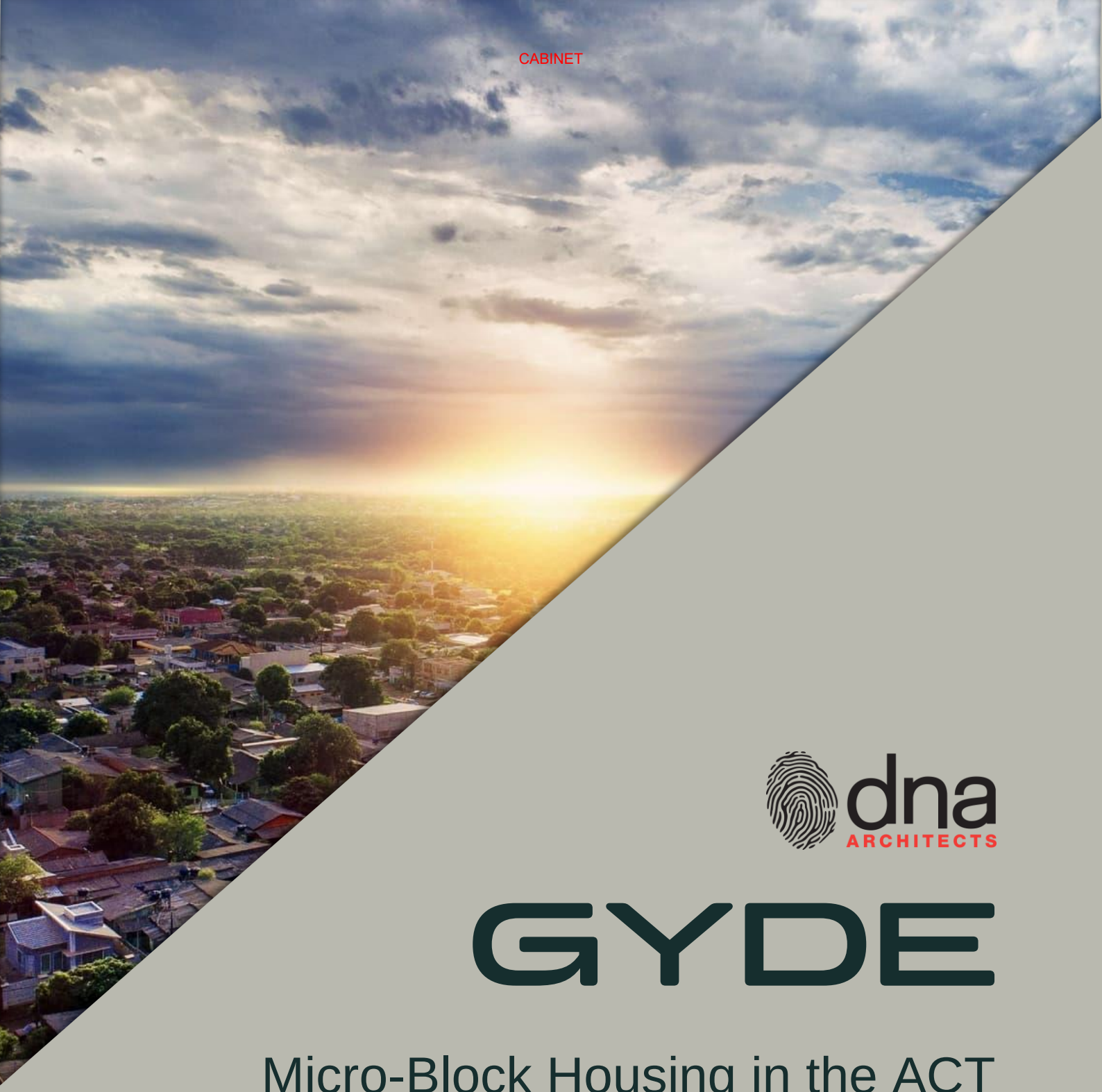
	that separately titled dwellings are preferred. SLA notes, however, that this may not be suitable for all target densities included in the missing middle reforms.	
Sustainability	**Parking** - The share economy is a growing element of the ACT Circular Economy Strategy, and it is critical to enabling 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

CABINET



dna ARCHITECTS

GYDE

Micro-Block Housing in the ACT

Submitted to Suburban Land Agency
on behalf of Gyde Consulting

27 June 2025

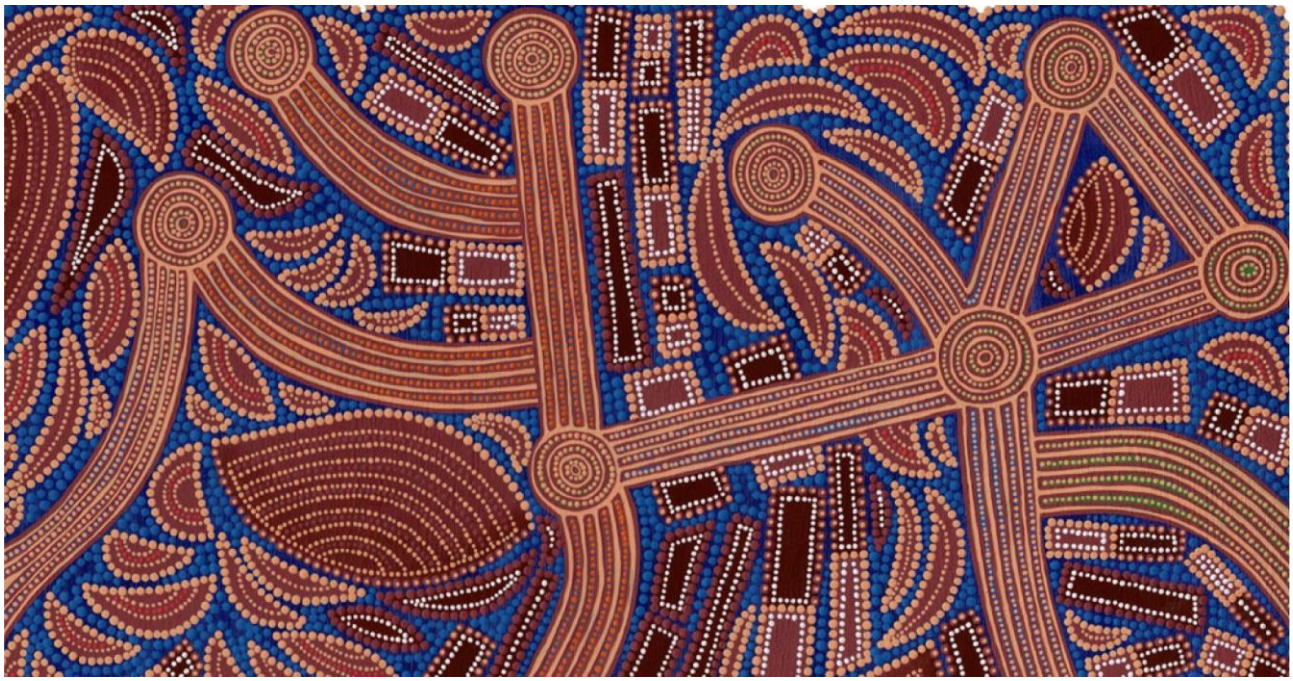
gyde.com.au
dnaa.com.au

CABINET

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

This report was prepared by:

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Disclaimer

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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)**

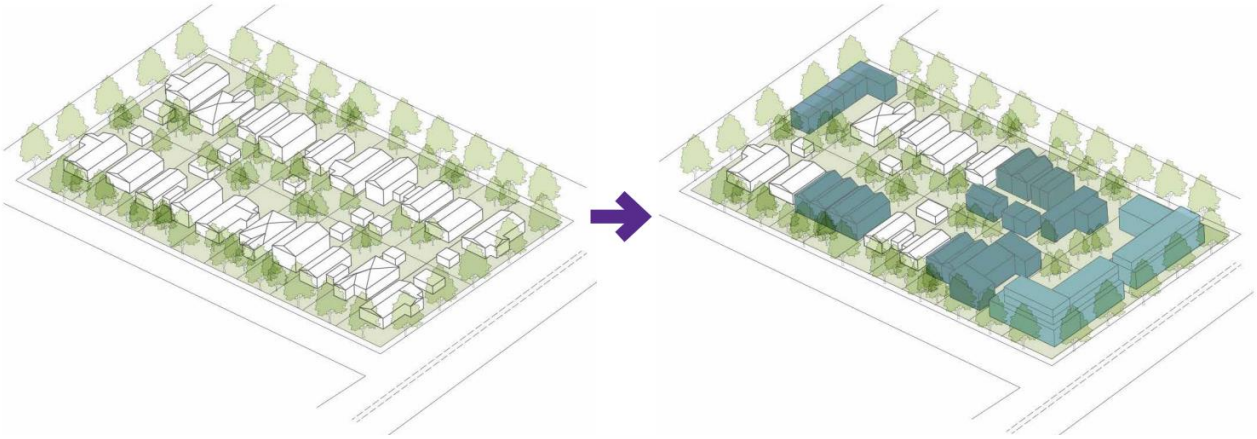


Figure 1 **Illustrated concept of missing middle infill development in an existing suburb (Source: ACT Government)**

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.

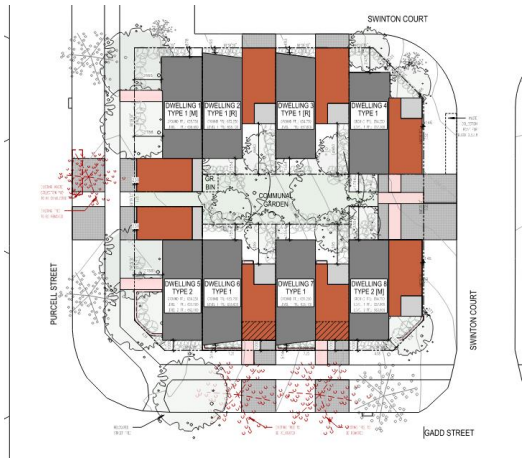


Figure 2 **Site Plan of Micro Blocks (Source: DNA Architects)**

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 44m² of living area on an 80m² block and ‘Renew’ with also 1 bedroom, 1 bathroom and 1 car space over two levels at 66m² of living area on an 80m² block. Both offerings are to a 6-star Greenstar rating.

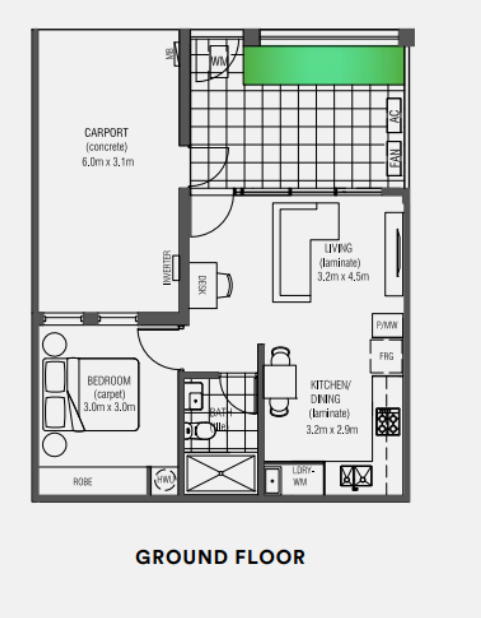


Figure 4 Canvas floor plan [Ginninderry]

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

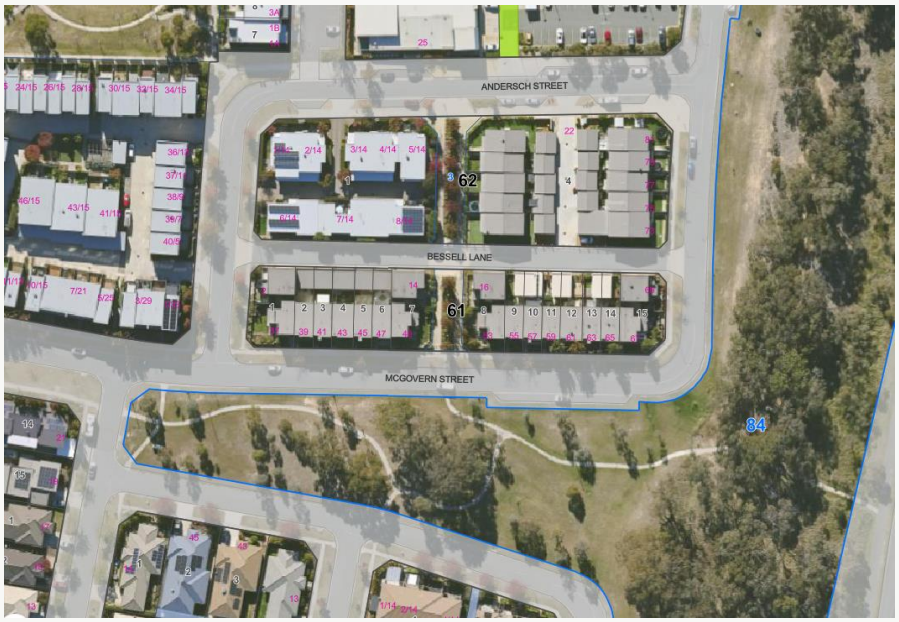
Example	Aerial Image
ACT Taylor – Sections 53, 57, 58 and 120 These are approved 140-150m^2 blocks with terrace housing and rear parking to be constructed.	
ACT Casey – Section 61 and 90 Section 61 is an approved and constructed 140m^2 block development with terrace housing and parking to rear. Section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

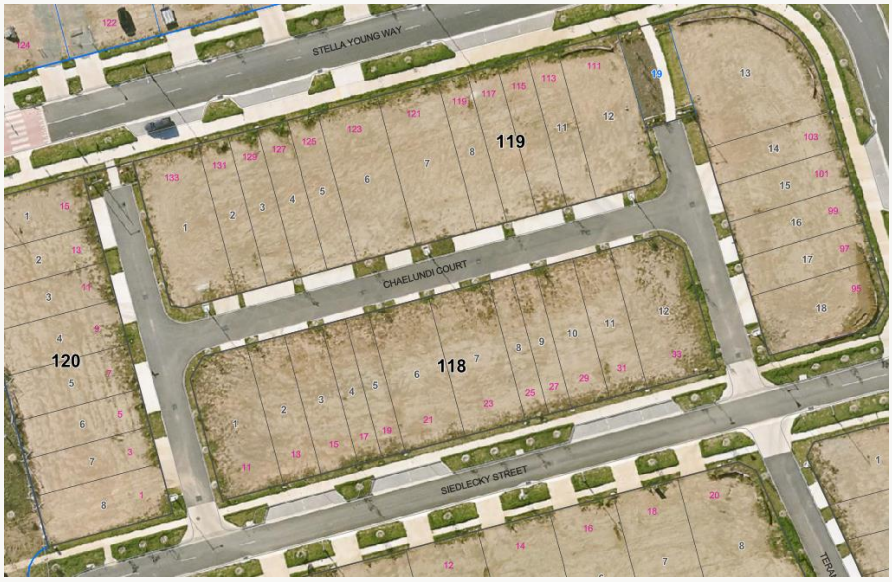
Example	Aerial Image
Denman Prospect Section 118 is an approved (circa) 130m^2 block development with terrace housing and parking to rear.	

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 <130m^2), 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.

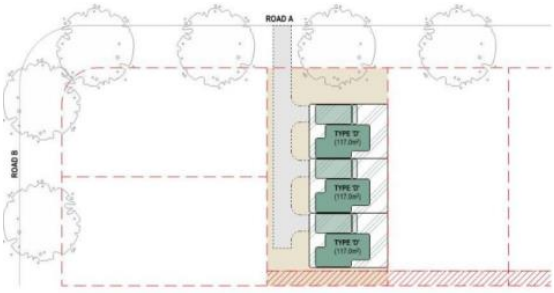


Figure 18 **Mid-block typology**

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.

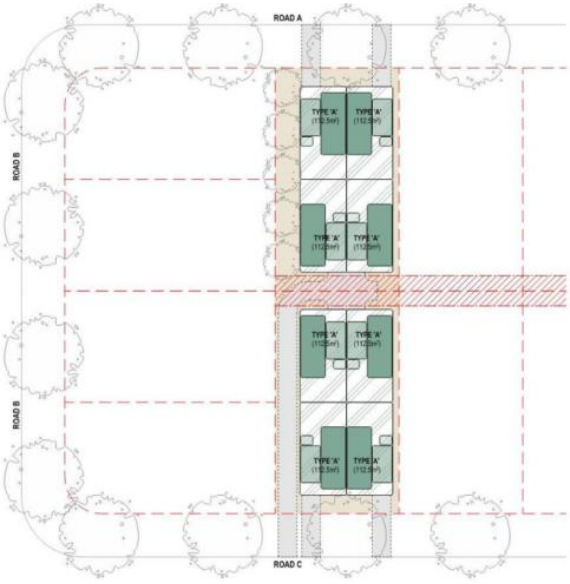


Figure 19 **Mid-Block Through site typology**

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.

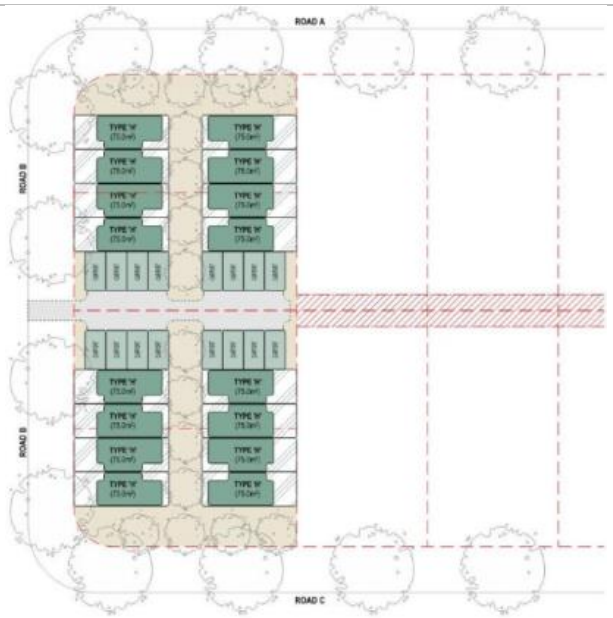


Figure 20 **Corner block typology**

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 130m^2 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 75m^2 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.

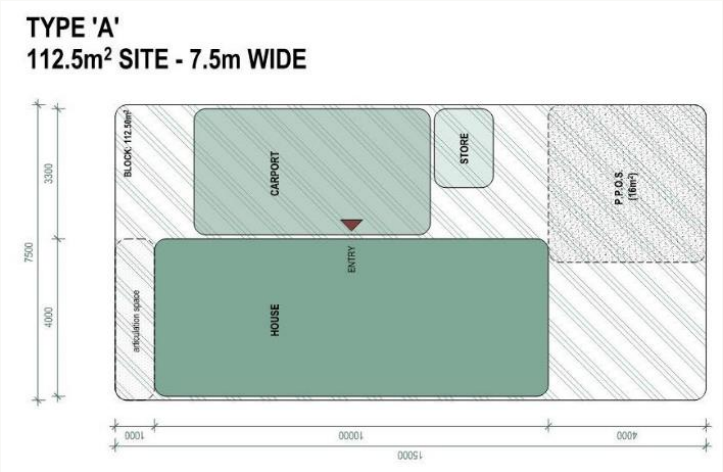
In some instances, configurations were too dense and did not provide a good design outcome. They lacked sufficient open space or visual relief from the bulk, which could potentially negatively impact amenity and neighbourhood character.

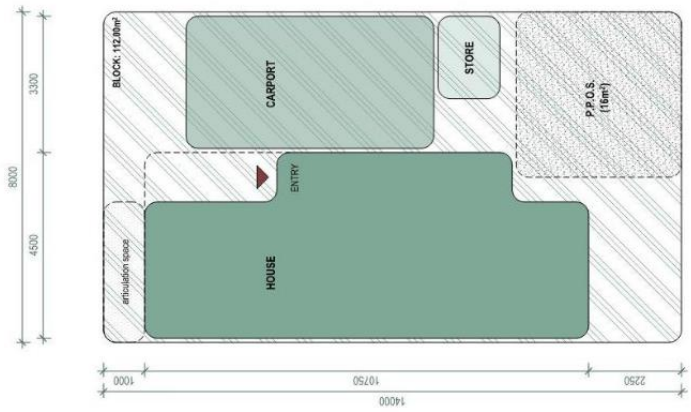
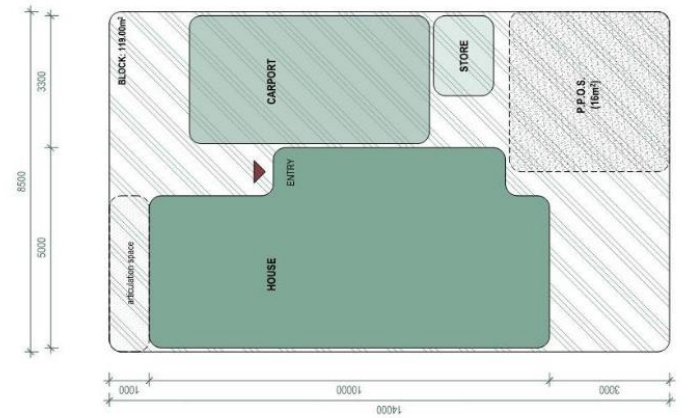
In contrast, where streetscapes are specifically **designed to accommodate micro block housing**, these typologies integrate more effectively and without significant design compromise.

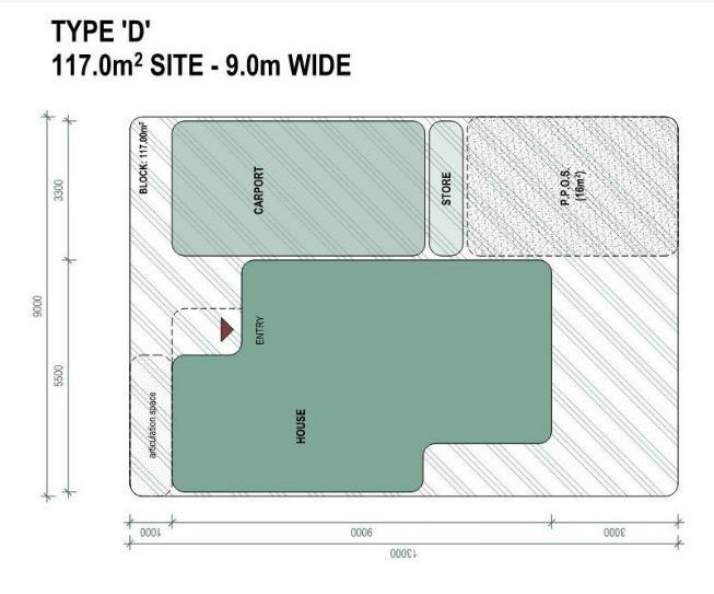
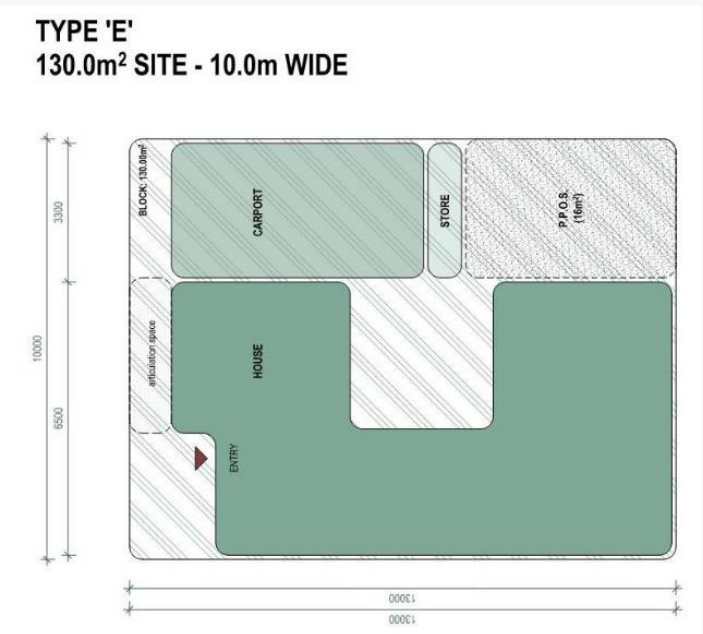
Annexure 1 includes a complete assessment of the housing typologies tested for micro block housing.

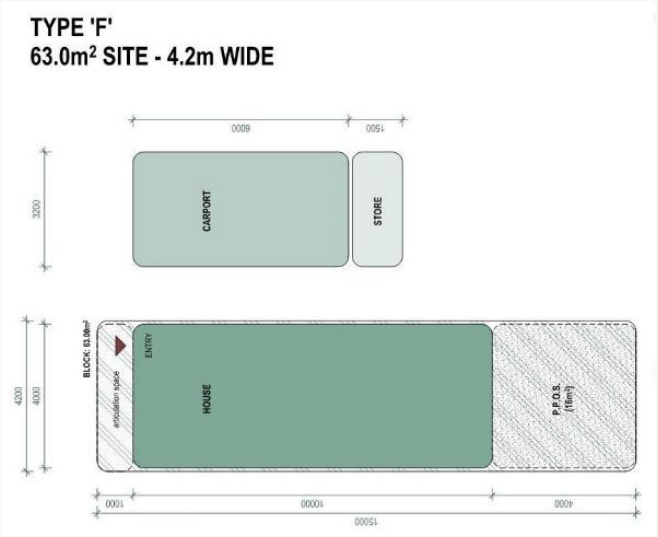
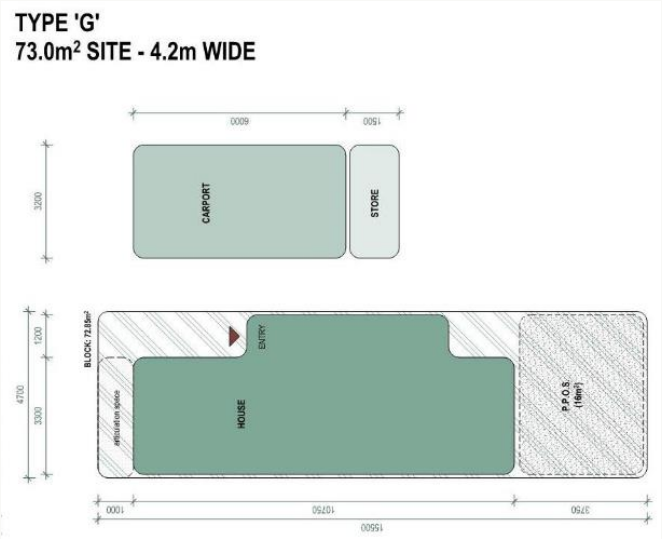
Table 12 below shows the typology options that have been prepared. In Table 13, these typology options have been inserted into different block scenarios to show layout and configuration options.

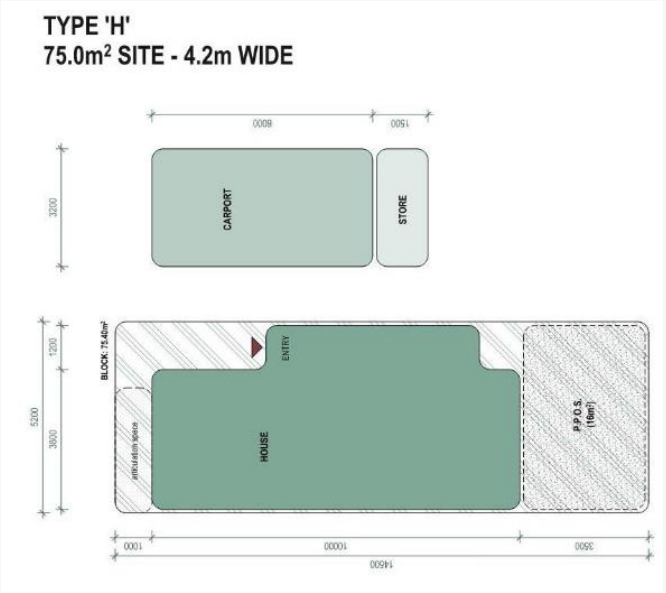
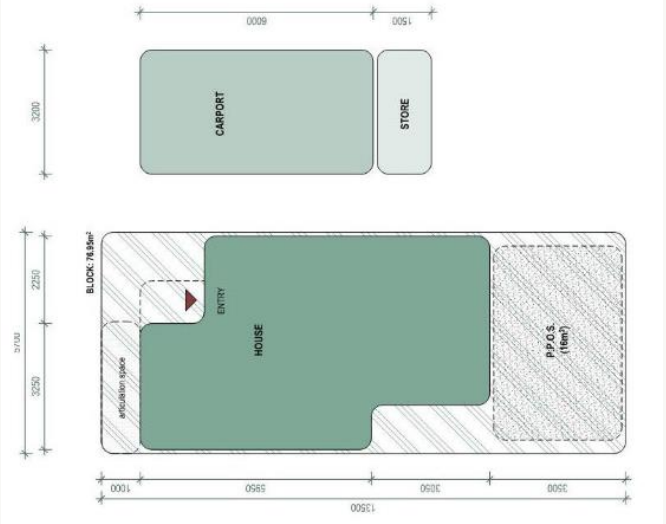
Table 12 Micro Block Housing Typology "Types"

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
TYPE 'B' 112.0m² SITE - 8.0m WIDE 	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
TYPE 'C' 119.0m² SITE - 8.5m WIDE 	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

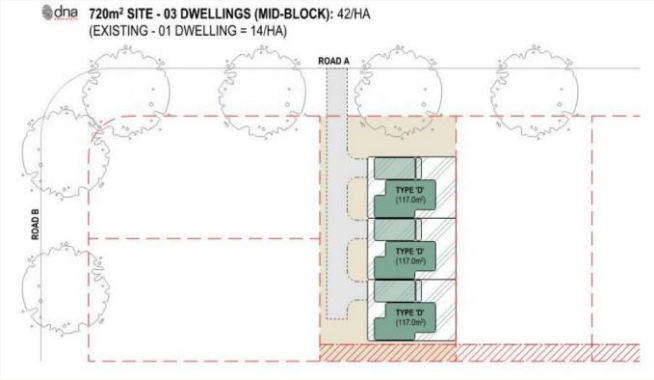
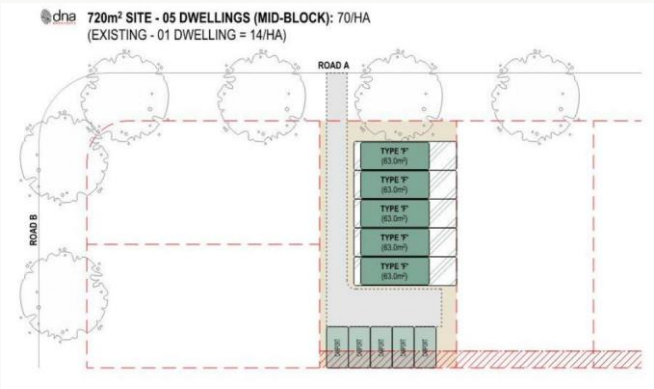
Typology Image and Description (Source: DNA Architects)	Planning Controls and Outcomes
Block Types (with car parking on community-title)	
TYPE 'F' 63.0m² SITE - 4.2m WIDE 	Block Area: 63.0m² Site Coverage: 63.5% Min. P.P.O.S: 16.0 m² Soft Landscape: 33% 2 storey dwelling footprint with front entry. Carport/store 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
TYPE 'G' 73.0m² SITE - 4.2m WIDE 	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

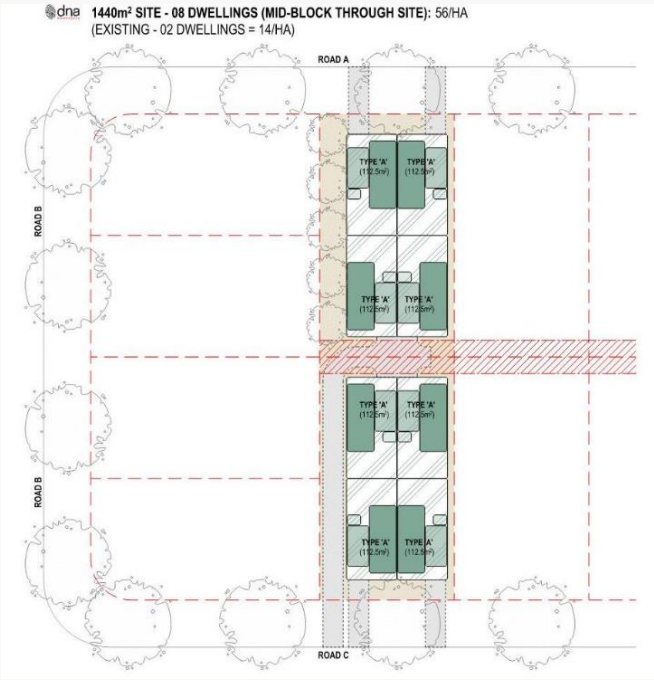
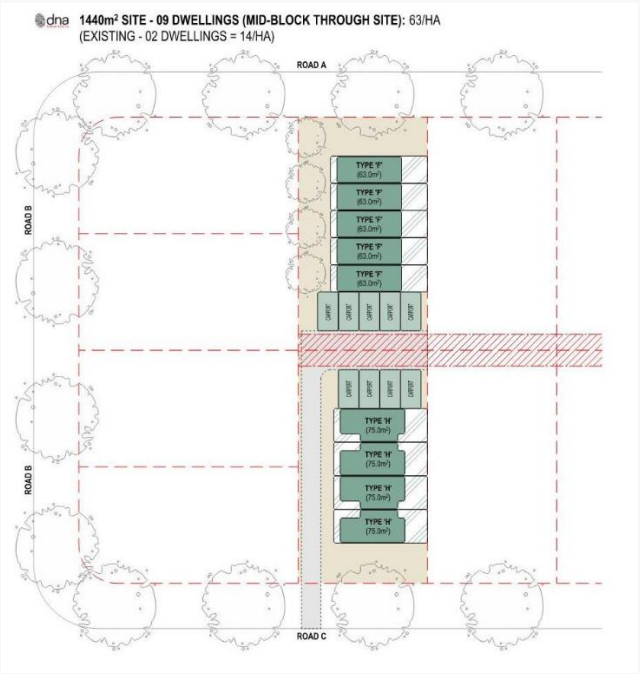
Typology Image and Description (Source: DNA Architects)	Planning Controls and Outcomes
	• 16m2 Min P.P.O.S. • 29% Soft Landscape Area
TYPE 'H' 75.0m² SITE - 4.2m WIDE  	Block Area: 75.0m² Site Coverage: 60.0% Min. P.P.O.S: 16.0 m² Soft Landscape: 29% 2 storey dwelling footprint with front entry. Carport/store 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
TYPE 'I' 77.0m² SITE - 4.2m WIDE  	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

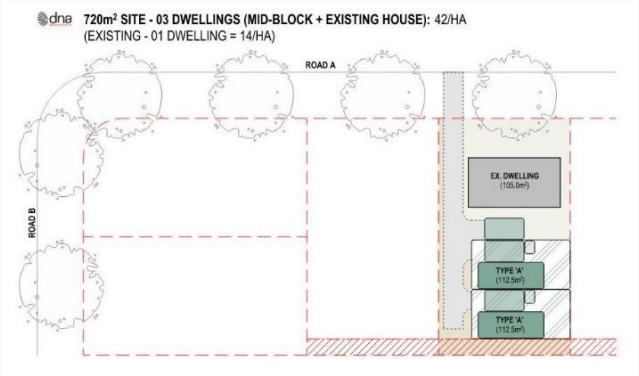
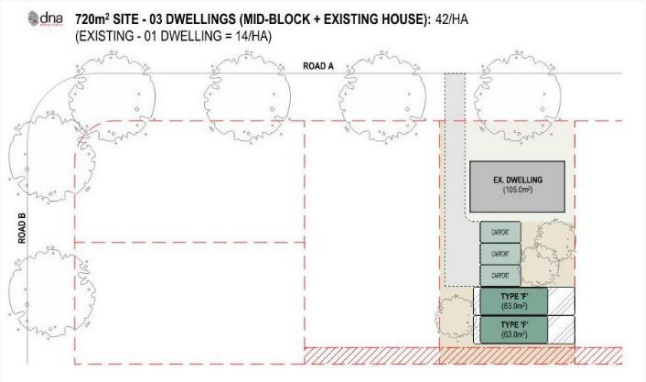
Typology Image and Description (Source: DNA Architects)	Planning Controls and Outcomes
	• 3.5m Rear Setback • 54.9% Site Cover • 16m2 Min P.P.O.S. • 30% Soft Landscape Area

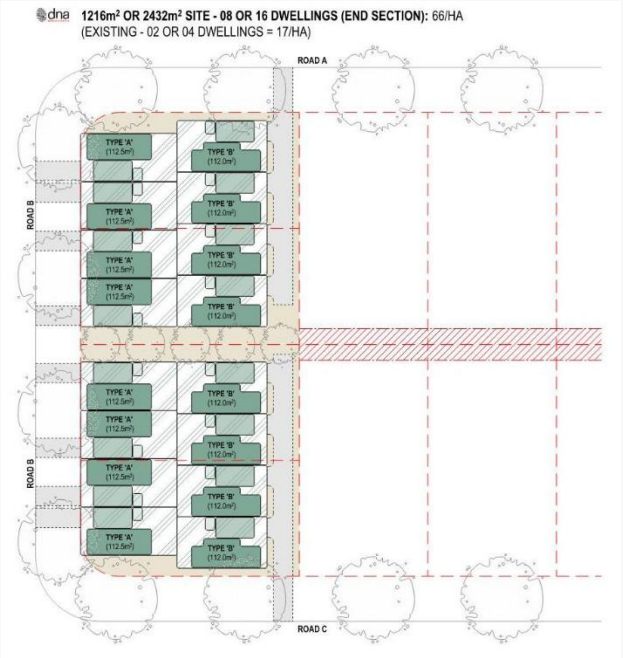
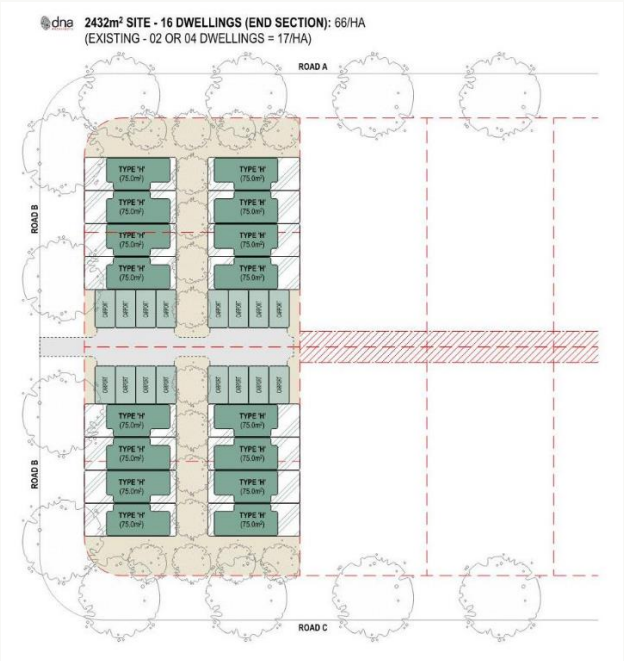
Table 13 Layout/ Site Configuration Options

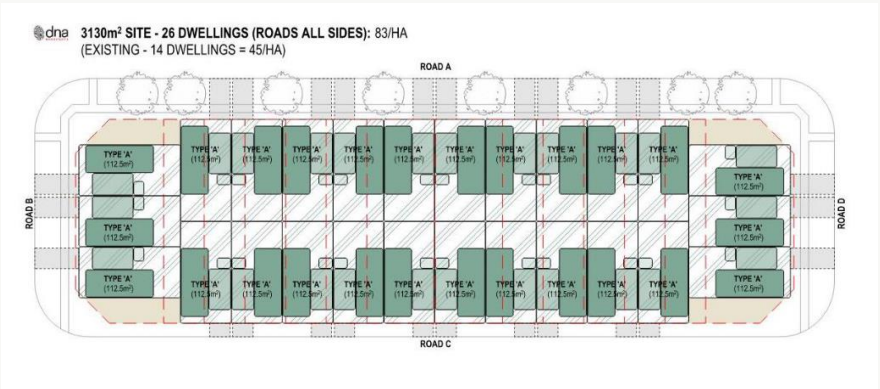
Layout Options and Description (Source: DNA Achitects)	Planning Requirements and Controls
Existing Suburban Street Corner Block	
 600m² Existing Suburban Street Corner Block 4x Type 'A' Blocks This design utilizes the 7.5m wide block (Type A), which allows for setbacks to front and side boundaries that 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.

Site Area: 3130m²

Blocks Area: 2554m²

Comm. Title: 576m² / 19%

Dwelling/Ha: 71

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.

Terrace Mid-Section Block

Site Area: 1680m²

Blocks Area: 1402m²

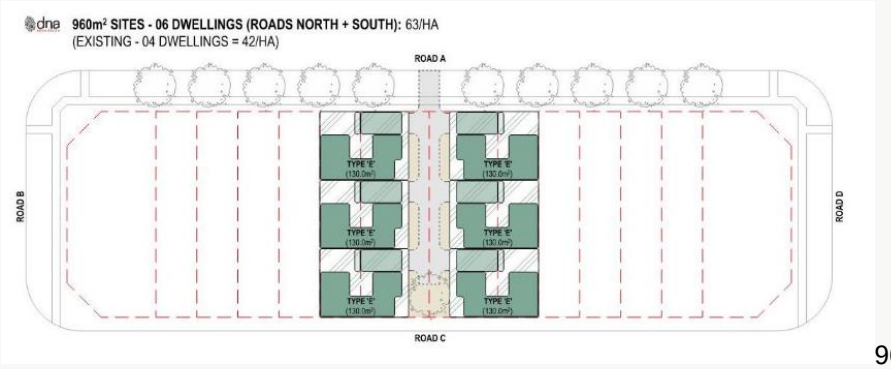
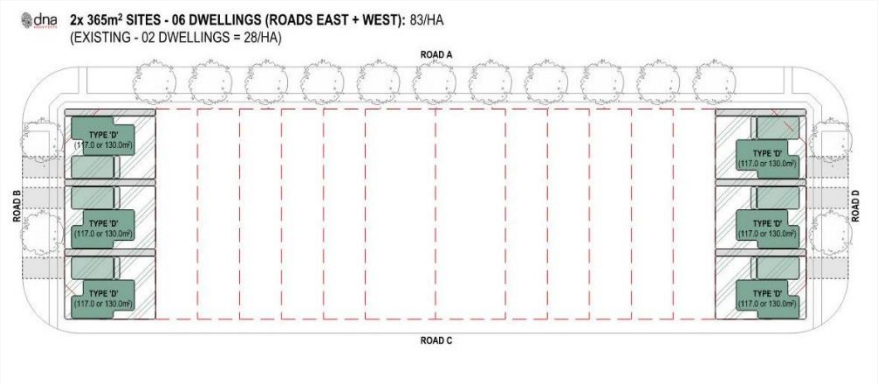
Comm. Title: 278m² / 17%

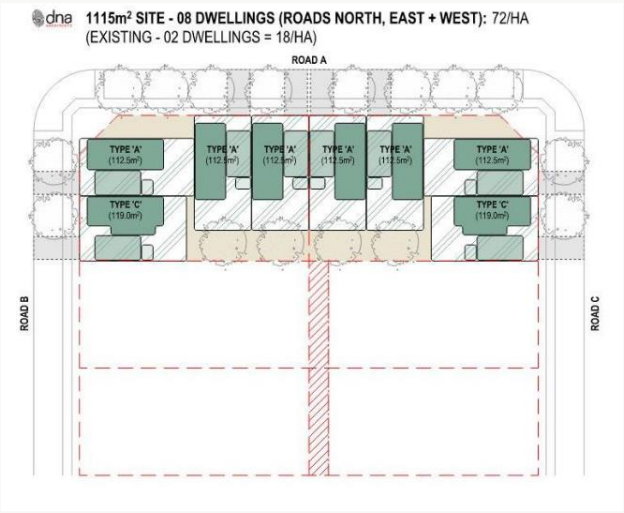
Dwelling/Ha: 71

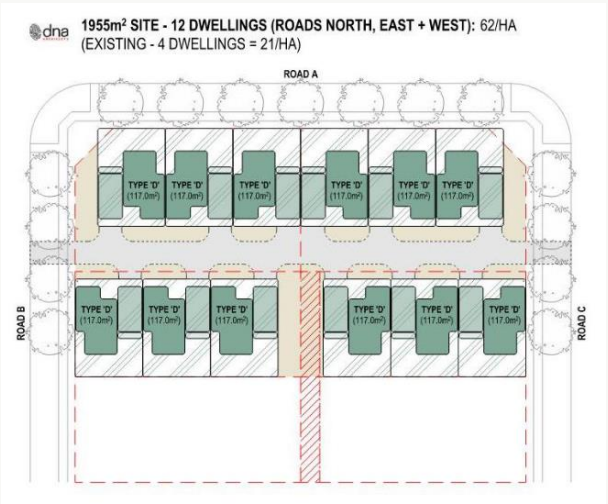
1680m²

New Terrace Type Subdivision with Roads to North + South

4x Type ‘A’ Blocks

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

CABINET

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

CABINET

dna ARCHITECTS

CABINET

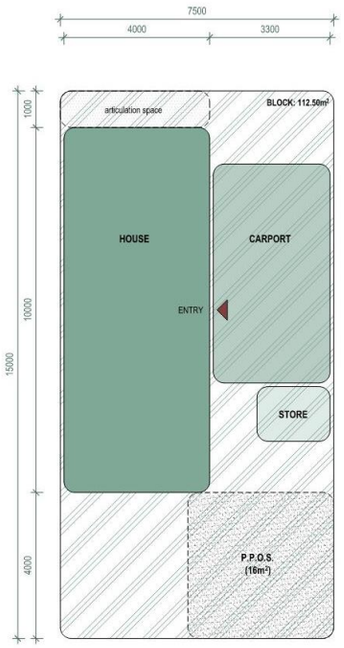
BLOCK TYPES (WITH CAR PARKING ON BLOCK)

MICRO BLOCK HOUSING IN THE ACT

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.

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.

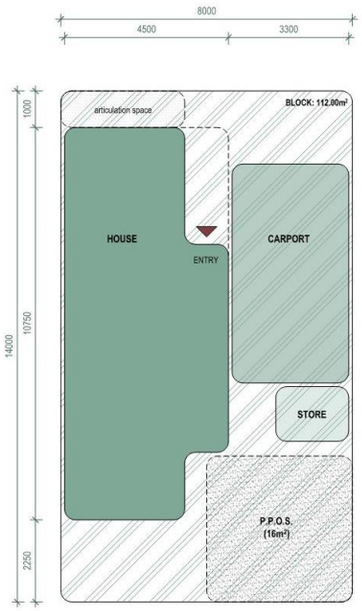
TYPE 'A'
112.5m² SITE - 7.5m WIDE



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

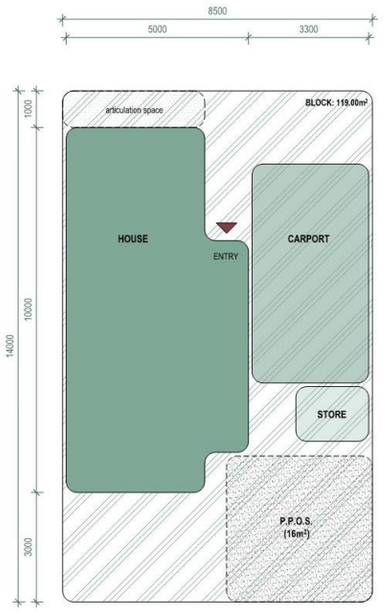
TYPE 'B'
112.0m² SITE - 8.0m WIDE



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

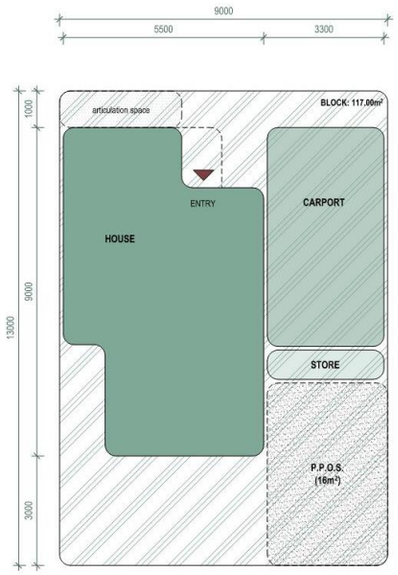
TYPE 'C'
119.0m² SITE - 8.5m WIDE



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

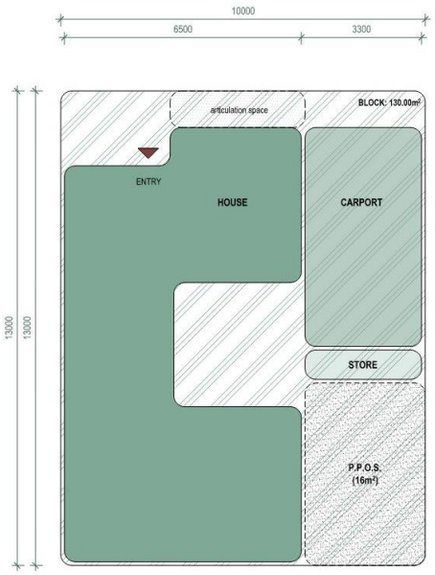
TYPE 'D'
117.0m² SITE - 9.0m WIDE



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)

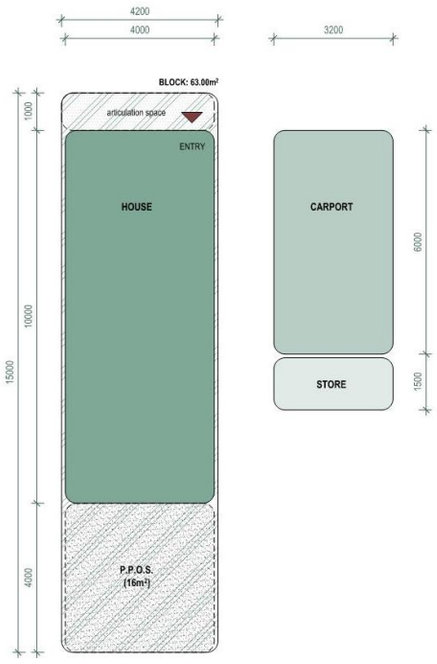
CABINET

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.

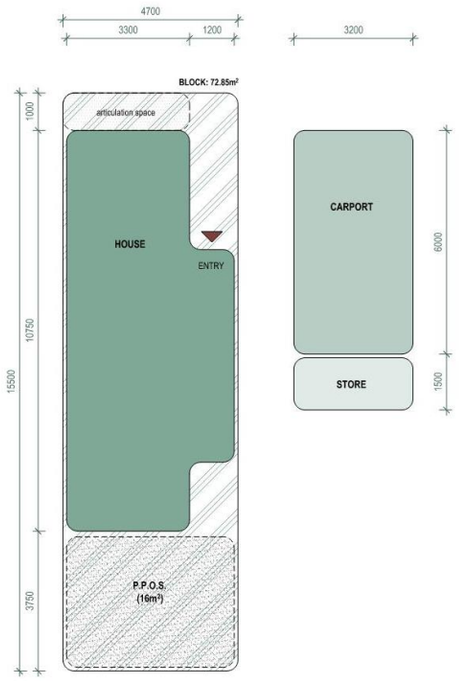
TYPE 'F'
63.0m² SITE - 4.2m WIDE



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

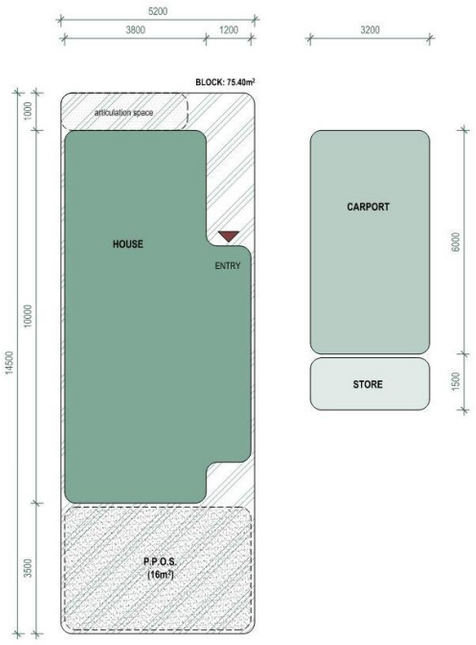
TYPE 'G'
73.0m² SITE - 4.2m WIDE



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

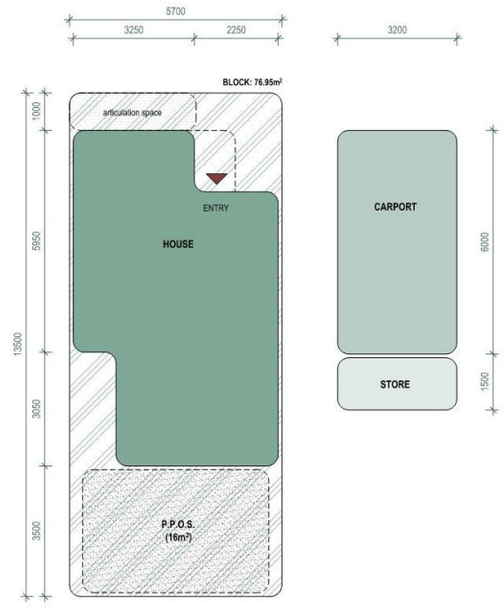
TYPE 'H'
75.0m² SITE - 4.2m WIDE



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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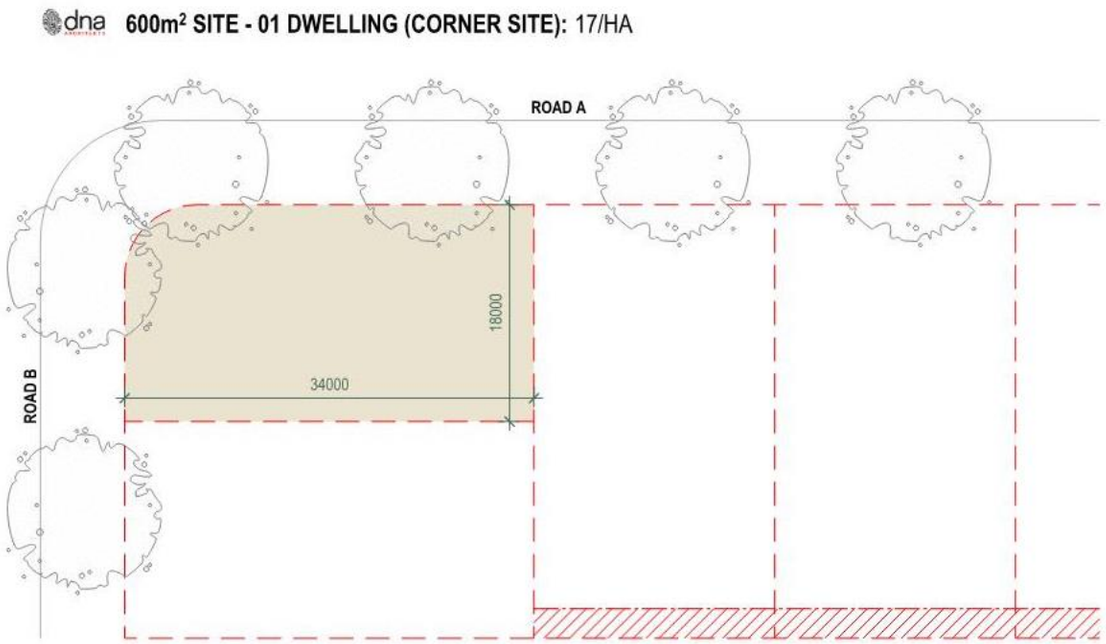
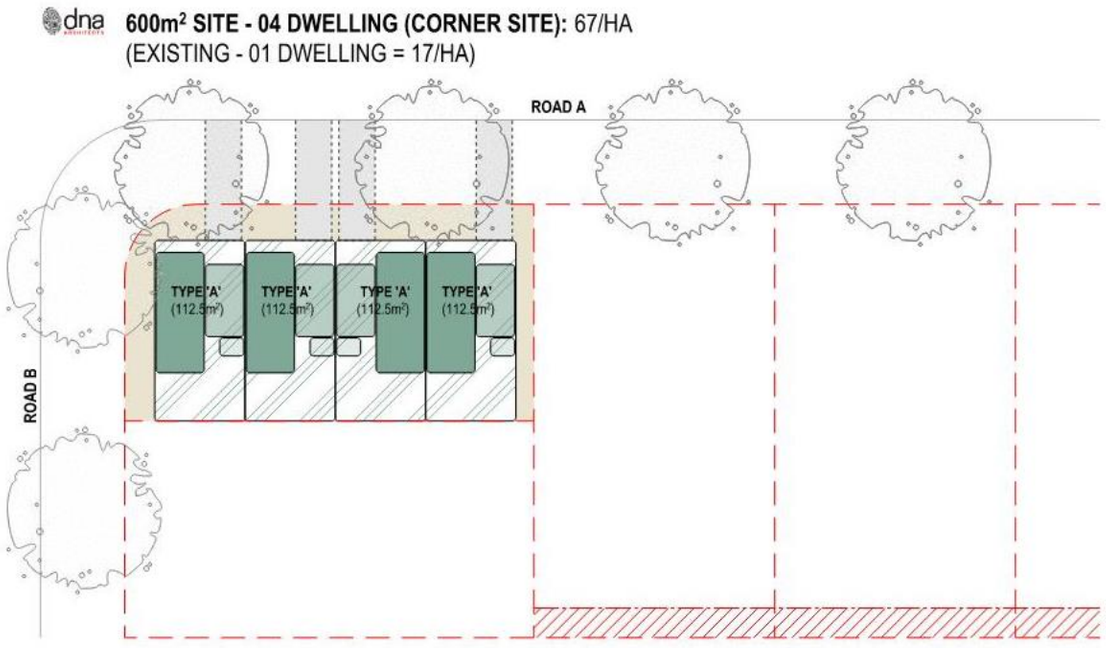
CORNER BLOCK CONFIGURATION



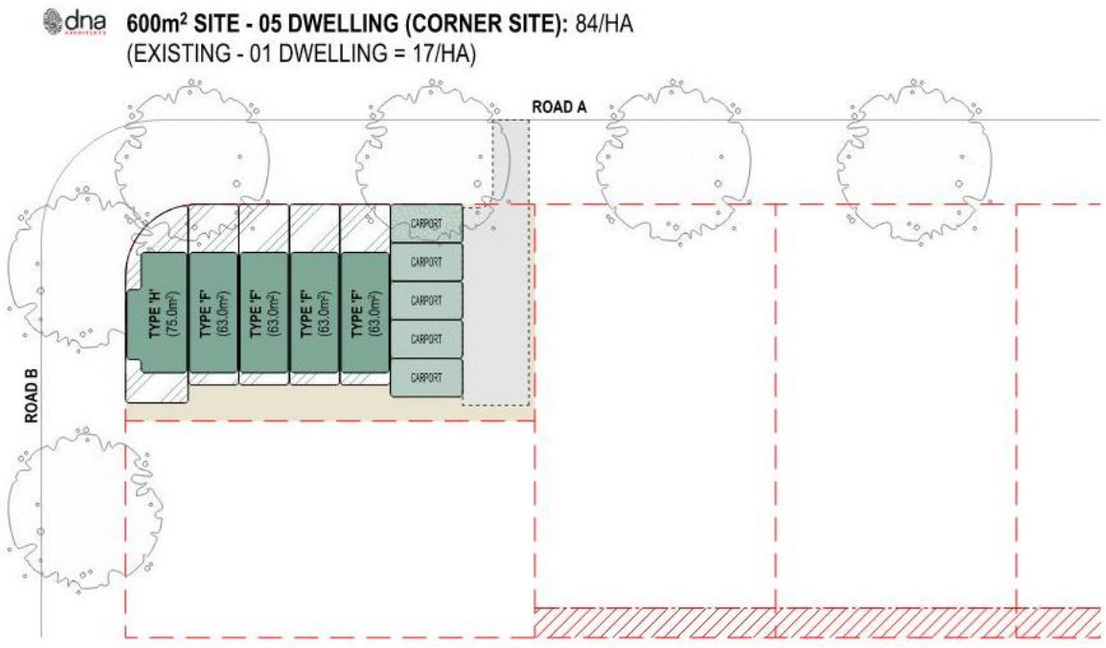


This design utilizes the 7.5m wide block (Type A), which allows for setbacks to front and side boundaries that are consistent with the current technical specifications for RZ1 blocks. Dwelling entry is off the street, allowing rear courtyards to be private. This layout fits well into existing streetscapes.

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.

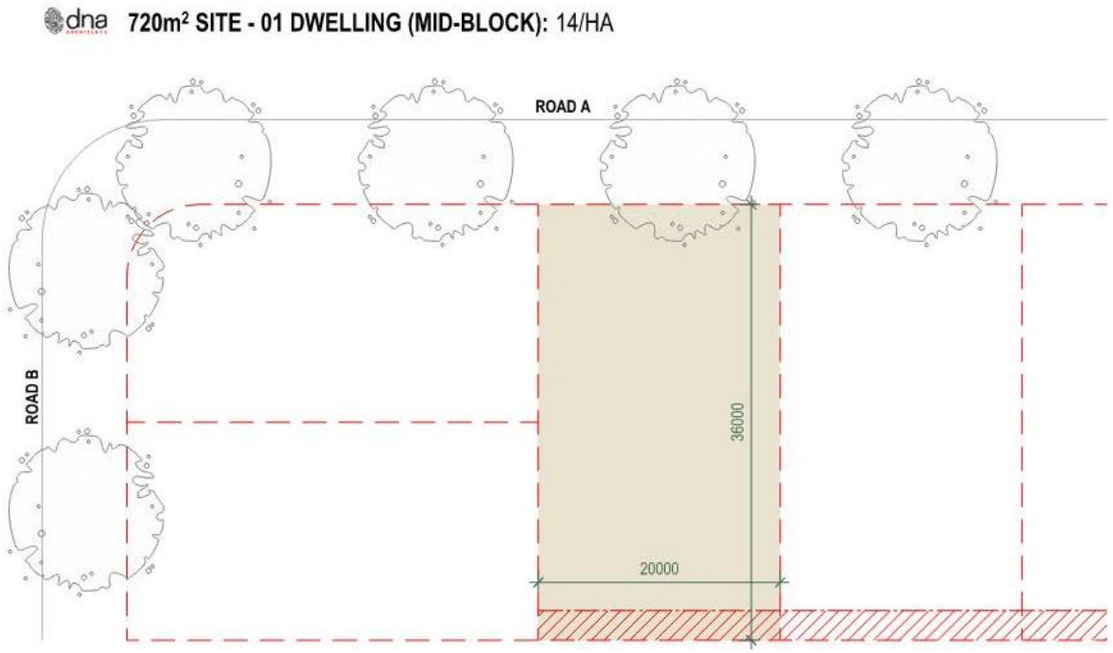


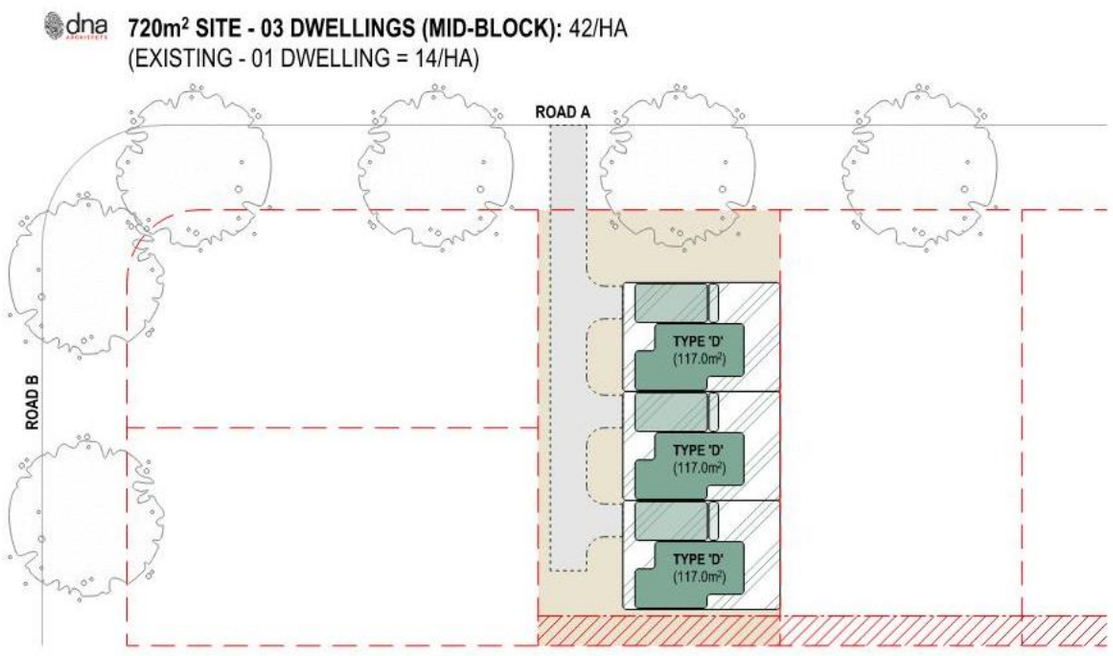
This design utilizes the 4.2m wide block (Type F) and locates parking together off a singular driveway. The rear of the site acts as a community title private open space (C.T.P.O.S.) area for access to dwelling entries. Front courtyards can be screened from the street. This layout fits well into existing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

dna ARCHITECTS

CABINET

MID-BLOCK CONFIGURATION



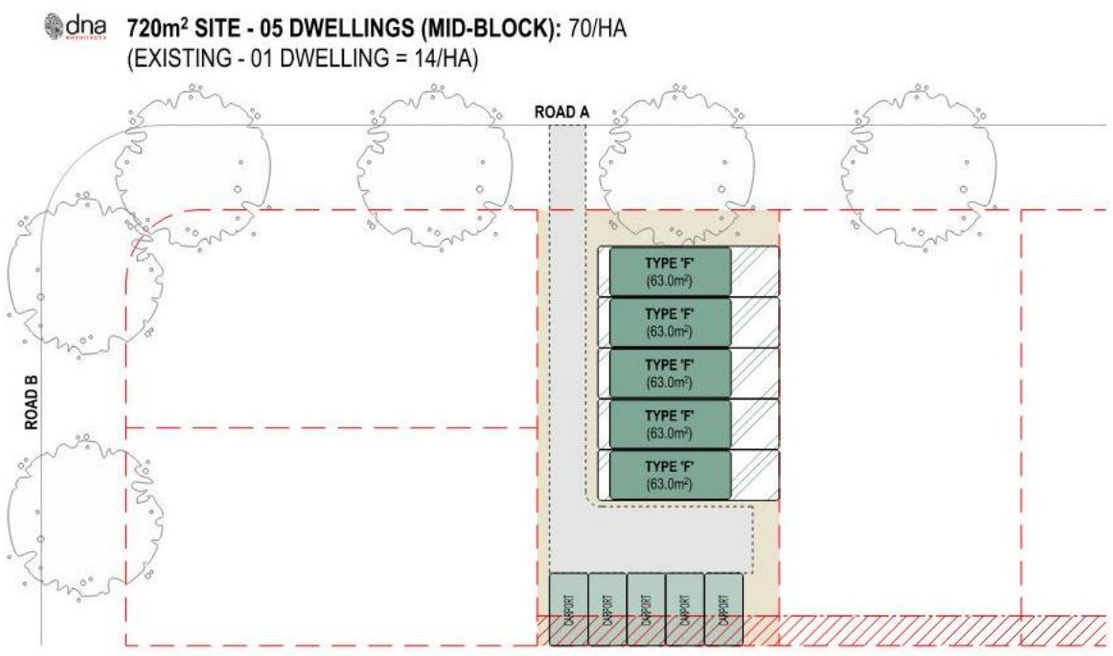


This design utilizes the 9.0m wide block (Type D), which allows for setbacks to front and side boundaries that are consistent with the current technical specifications for RZ1 blocks. Dwelling entry is via the community title side driveway/landscaped zone. This is a relatively inefficient layout but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

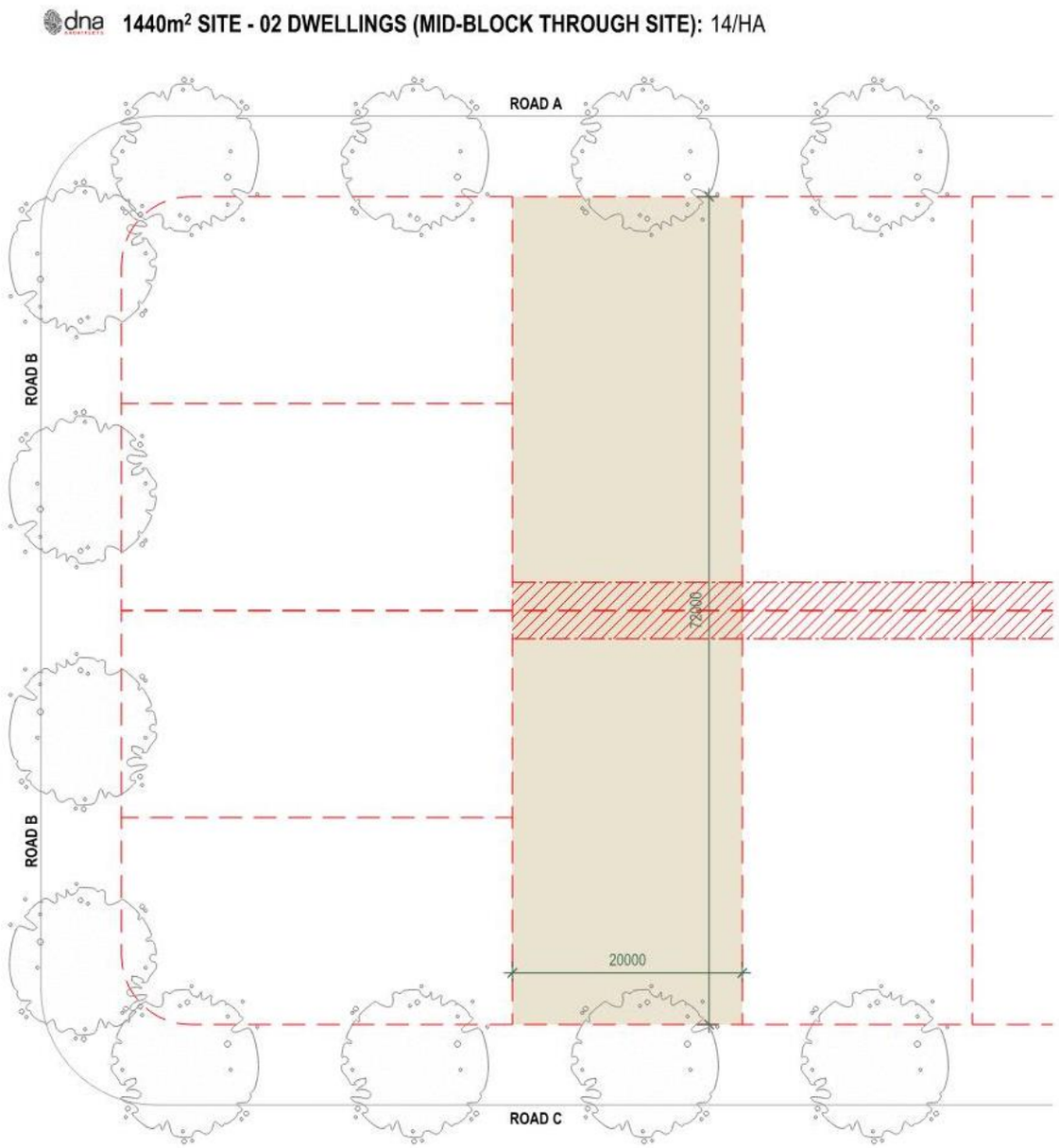


This design utilizes the 4.2m wide block (Type F) and locates parking at the rear of the site (in easement zone). Entries are off the driveway, and the front setback is further forward than typical. The outcome is achievable but doesn't offer high quality C.T.P.O.S. so proximity to public open space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

dna ARCHITECTS

CABINET

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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dna ARCHITECTS

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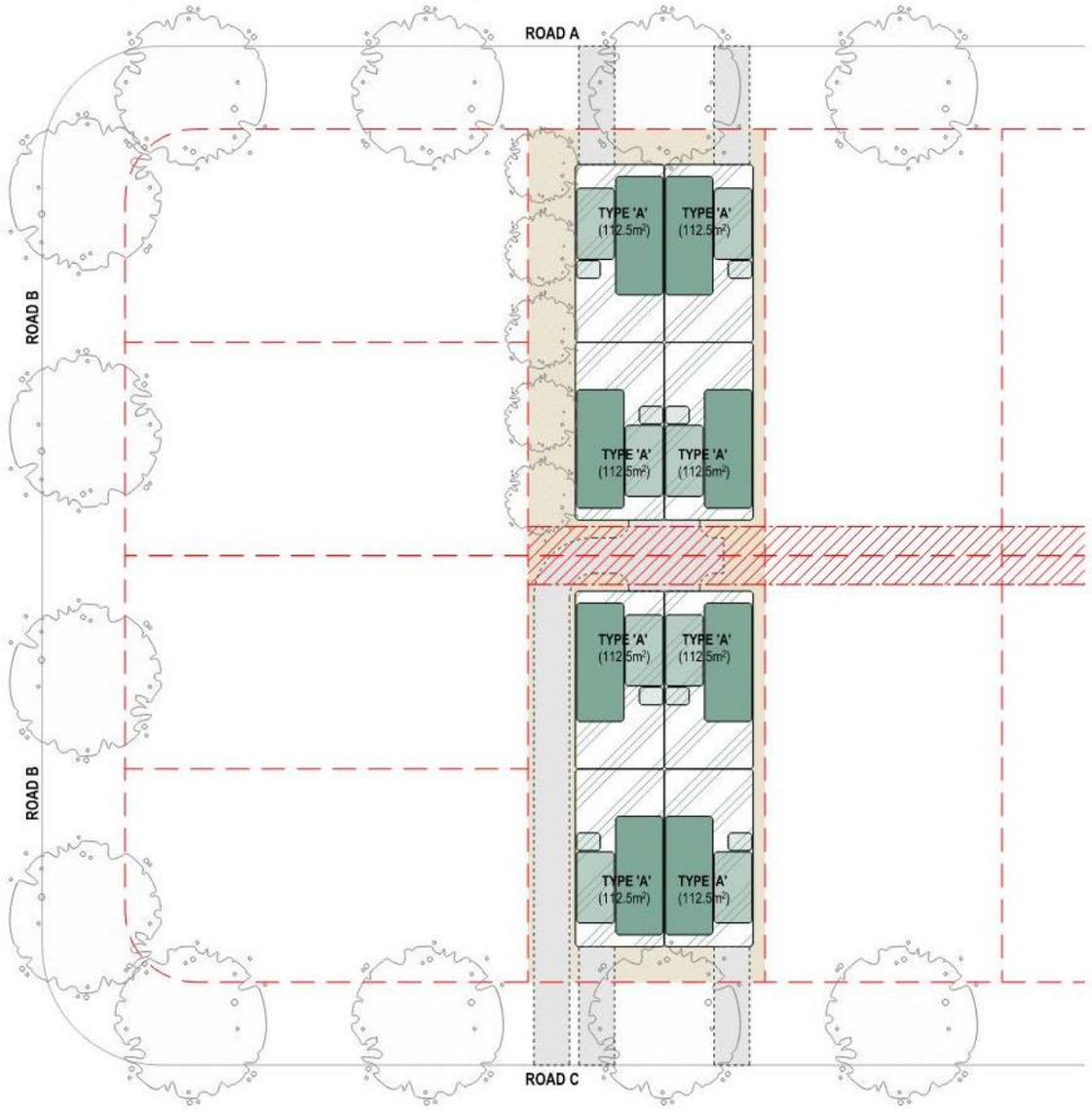
MID-BLOCK THROUGH SITE CONFIGURATION

1440m² SITE - 08 DWELLINGS (MID-BLOCK THROUGH SITE): 56/HA
(EXISTING - 02 DWELLINGS = 14/HA)

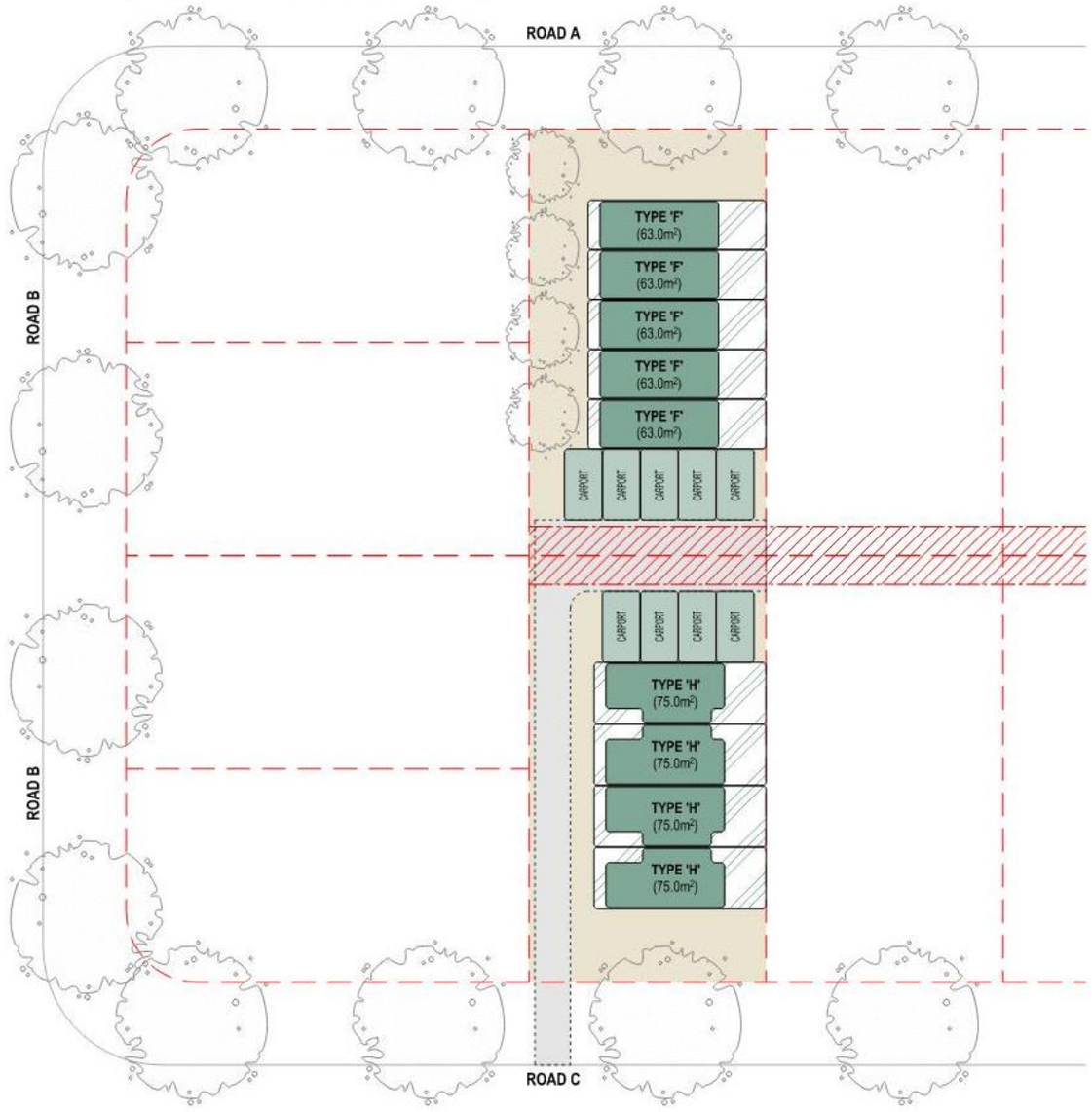


This design utilizes the 7.5m wide block (Type A), which allows for a singular driveway down one side to centrally located parking to rear loaded blocks. Residual block area provides a narrow C.T.P.O.S for residents. A slightly wider block type would improve the useability of this space. Dwellings have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

CABINET

MICRO BLOCK HOUSING IN THE ACT

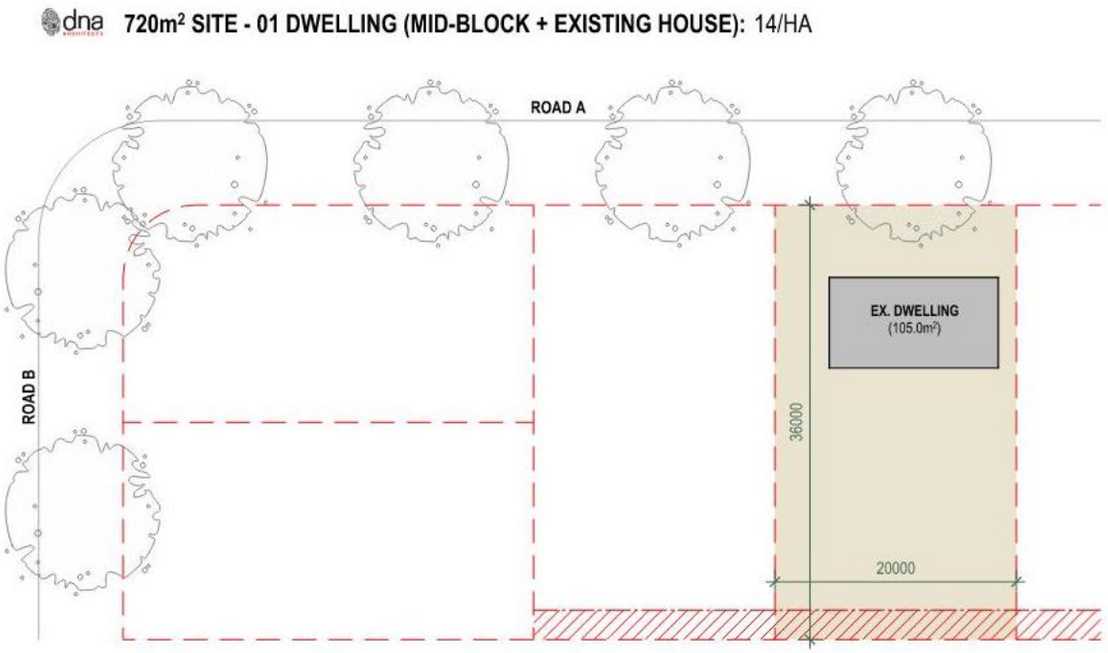
1440m² SITE - 09 DWELLINGS (MID-BLOCK THROUGH SITE): 63/HA
(EXISTING - 02 DWELLINGS = 14/HA)

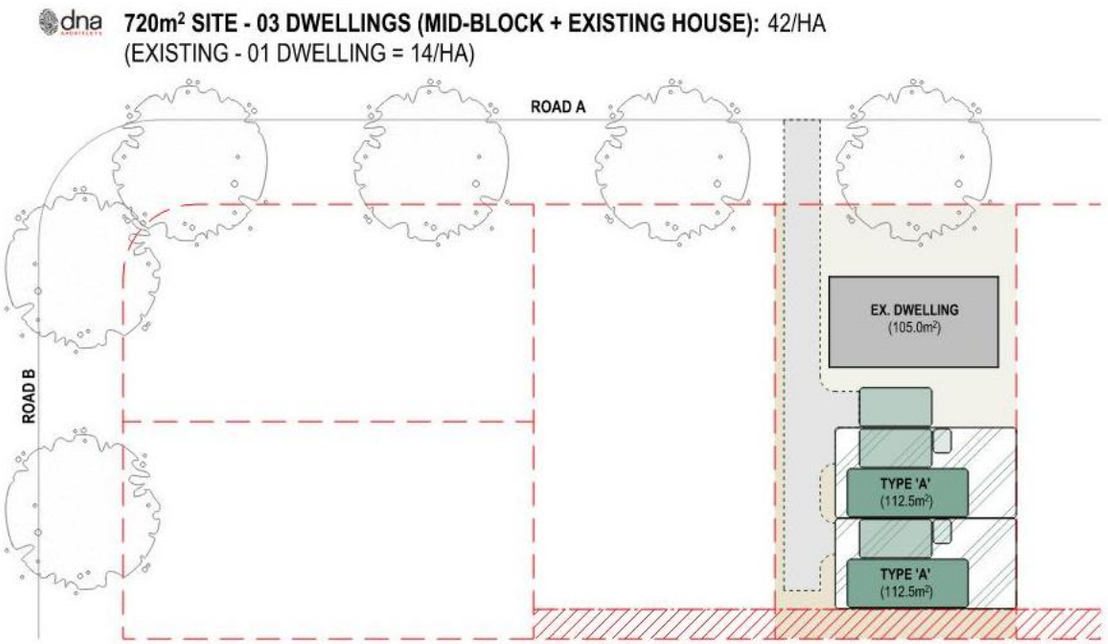


This design utilizes a combination of the 4.2m wide block (Type F) and 5.2m wide block (Type H) and locates parking in the centre of the site in the easement zone. Entries are accessed through the side C.T.P.O.S. areas. Front setbacks are consistent with the Technical Specifications allowing good streetscape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

CABINET

MID-BLOCK + EXISTING DWELLING CONFIGURATION



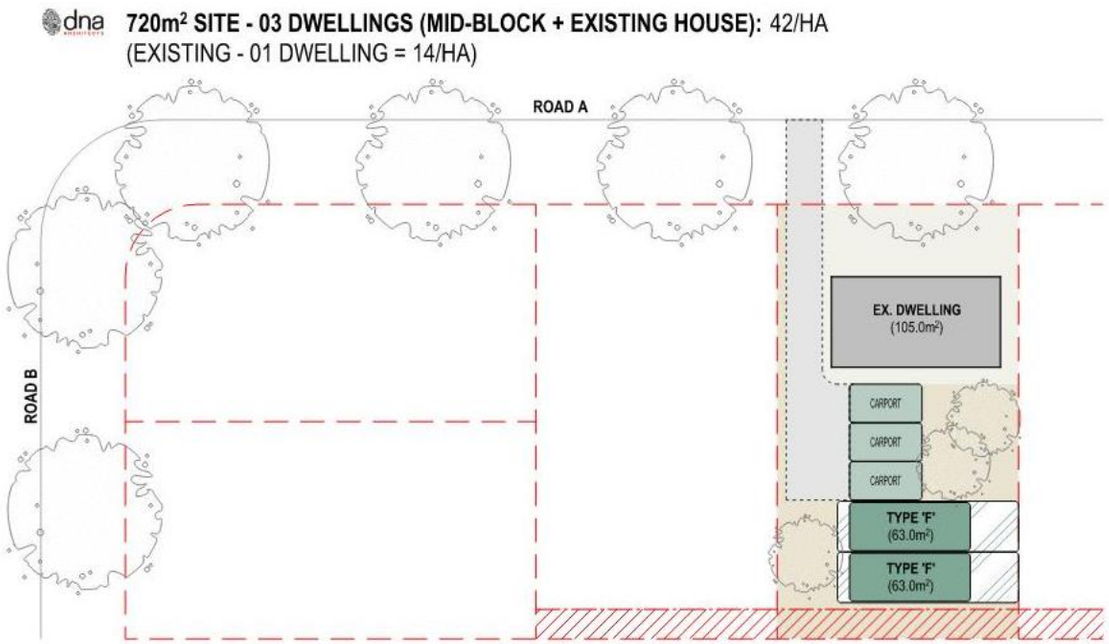


The ACT has many sites with existing ‘ex govie’ homes at the front of a typical generous block. This design integrates two micro blocks into the rear yard, utilizing an existing driveway down the side of the existing residence. New parking is provided to the existing residence, which would utilize the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

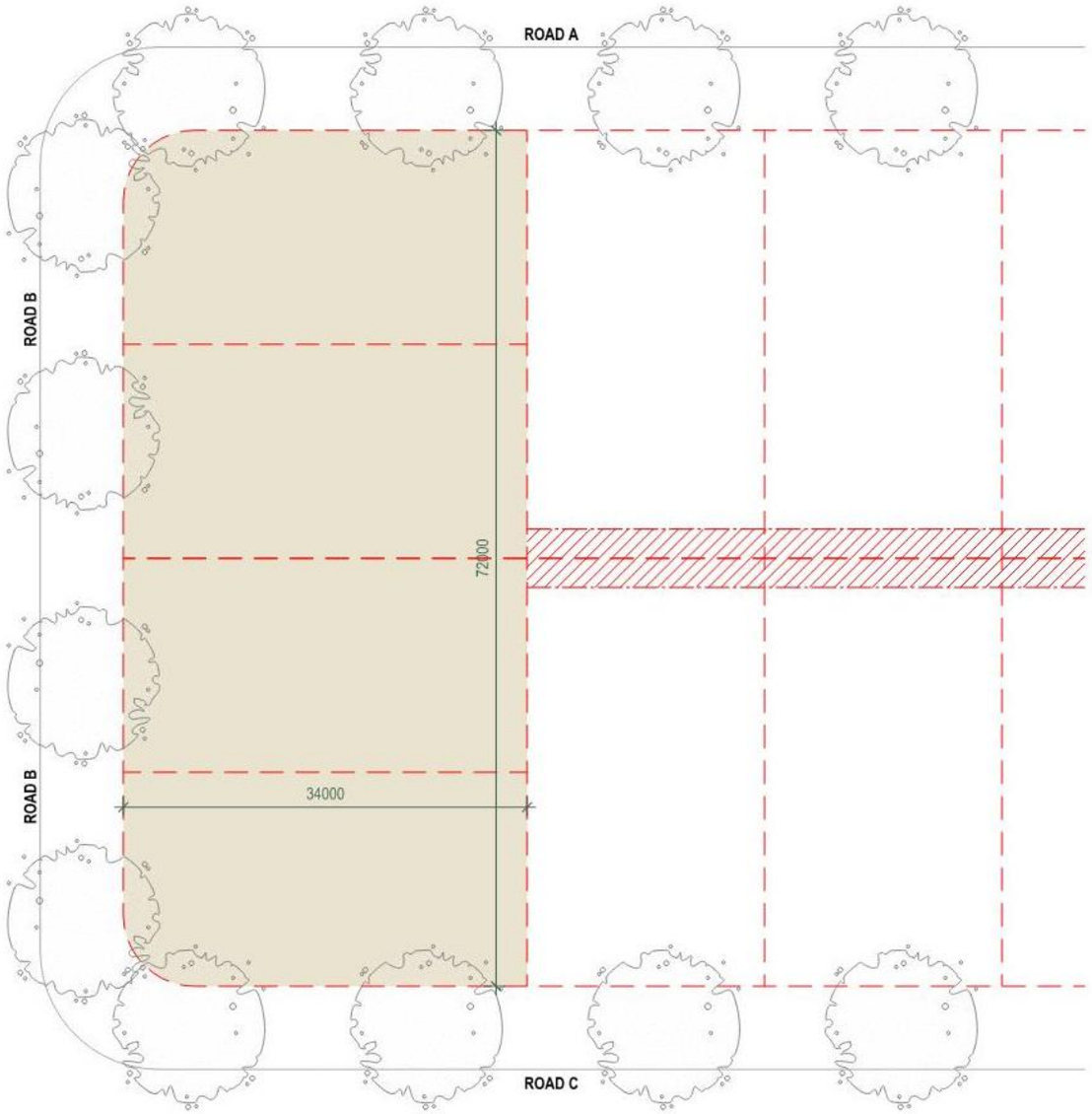


By using a narrower 4.2m wide micro block (Type F), a larger C.T.P.O.S. is afforded in the middle of the site which provides greater separation between the existing residence and new blocks.

dna ARCHITECTS

END SECTION CONFIGURATION

dna **1216m² OR 2432m² SITE - 02 OR 04 DWELLINGS (END SECTION):** 17/HA



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 ARCHITECTS

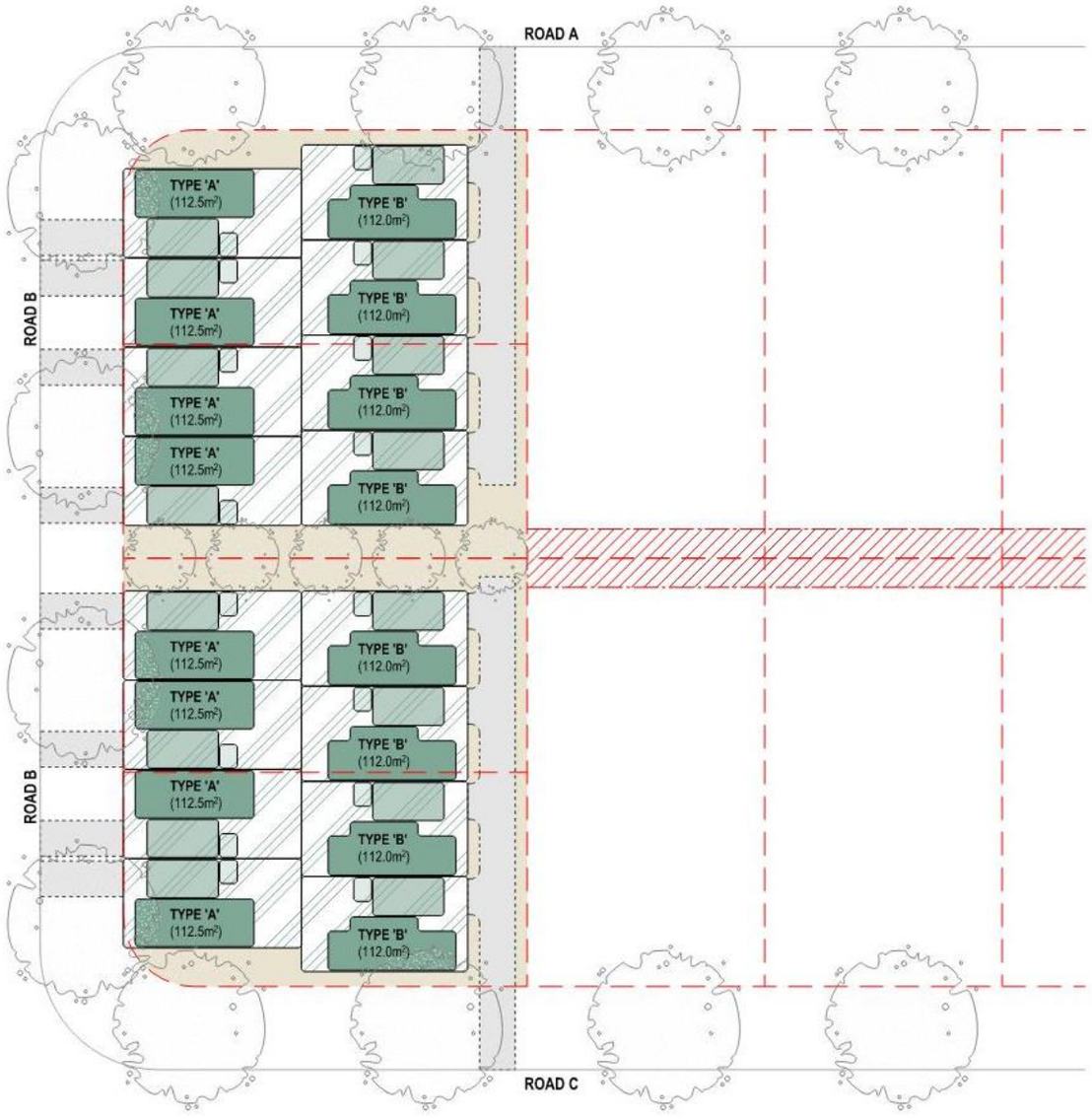
CABINET

END SECTION CONFIGURATION

MICRO BLOCK HOUSING IN THE ACT

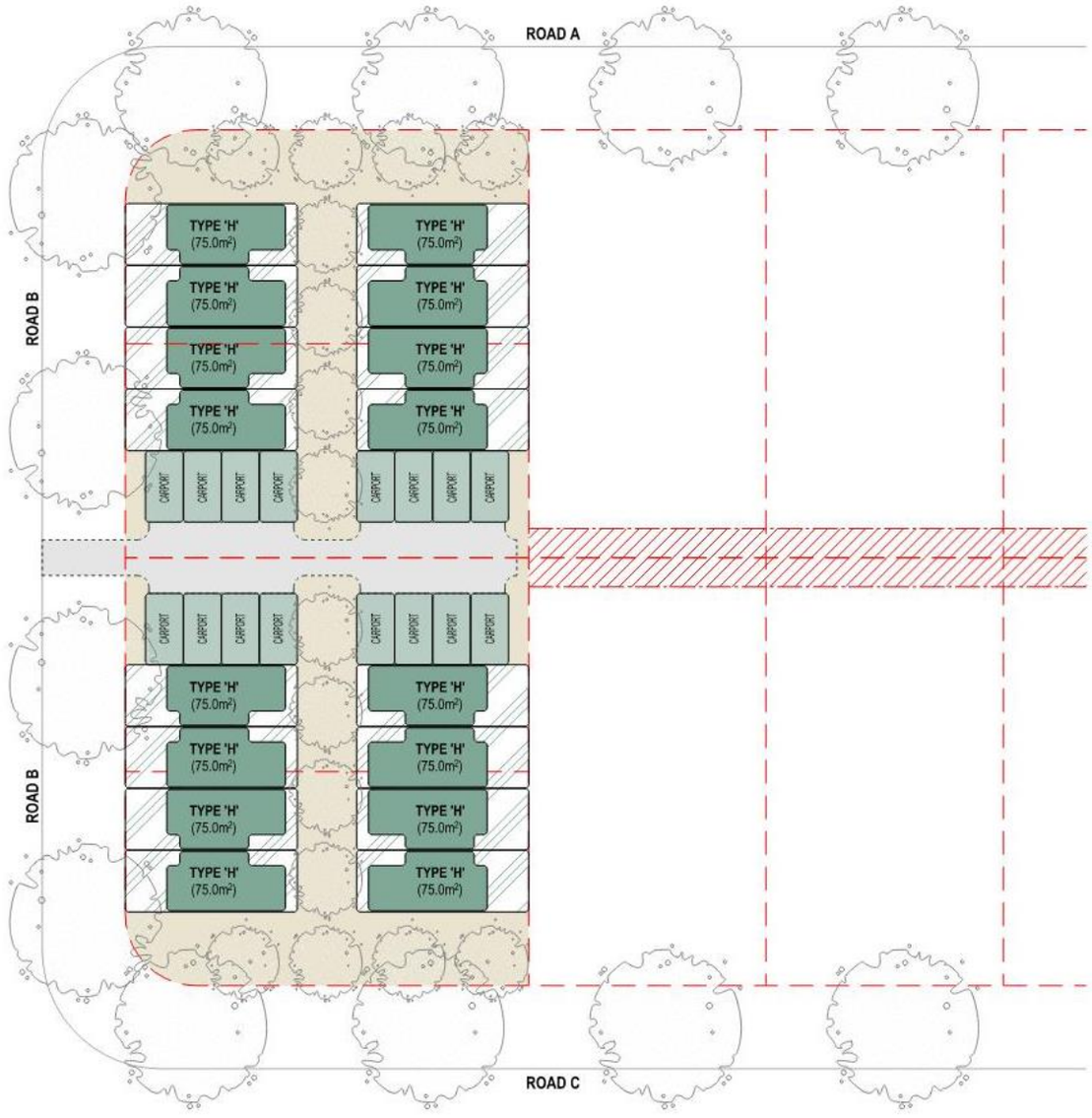
This collection of designs directly reference the typologies tested in the ACT Government's Missing Middle Housing Design Guide. Micro blocks are a suitable missing middle option.

1216m² OR 2432m² SITE - 08 OR 16 DWELLINGS (END SECTION): 66/HA
(EXISTING - 02 OR 04 DWELLINGS = 17/HA)



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.

2432m² SITE - 16 DWELLINGS (END SECTION): 66/HA
(EXISTING - 02 OR 04 DWELLINGS = 17/HA)



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.

CABINET

dna ARCHITECTS

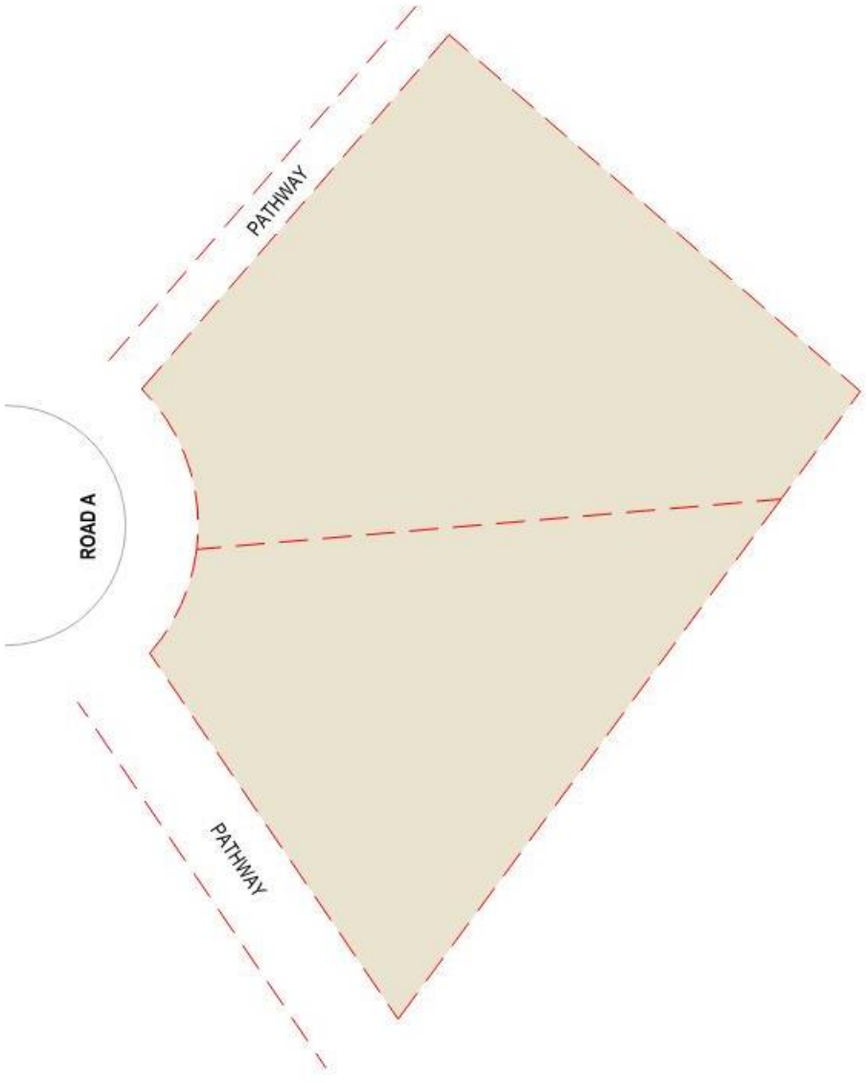
CABINET

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.

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



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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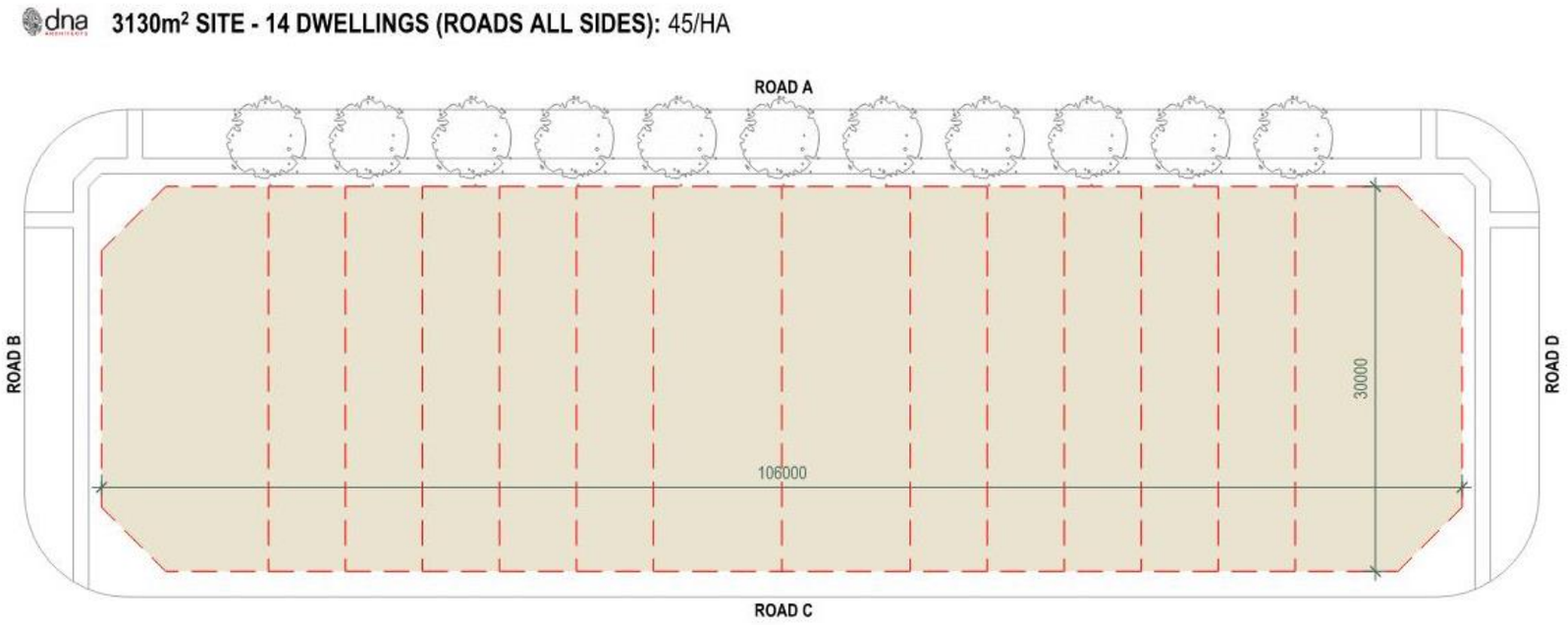
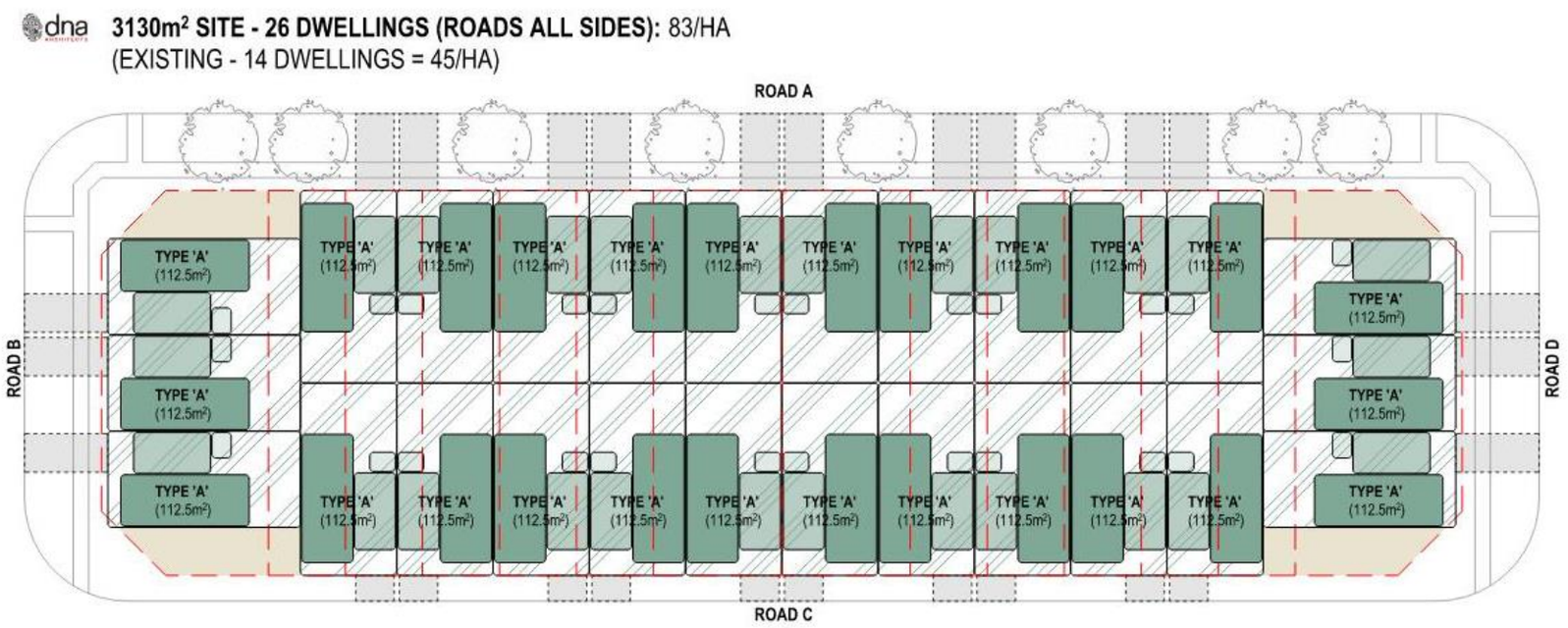
dna ARCHITECTS

TYPICAL TERRACE SECTION CONFIGURATION 1





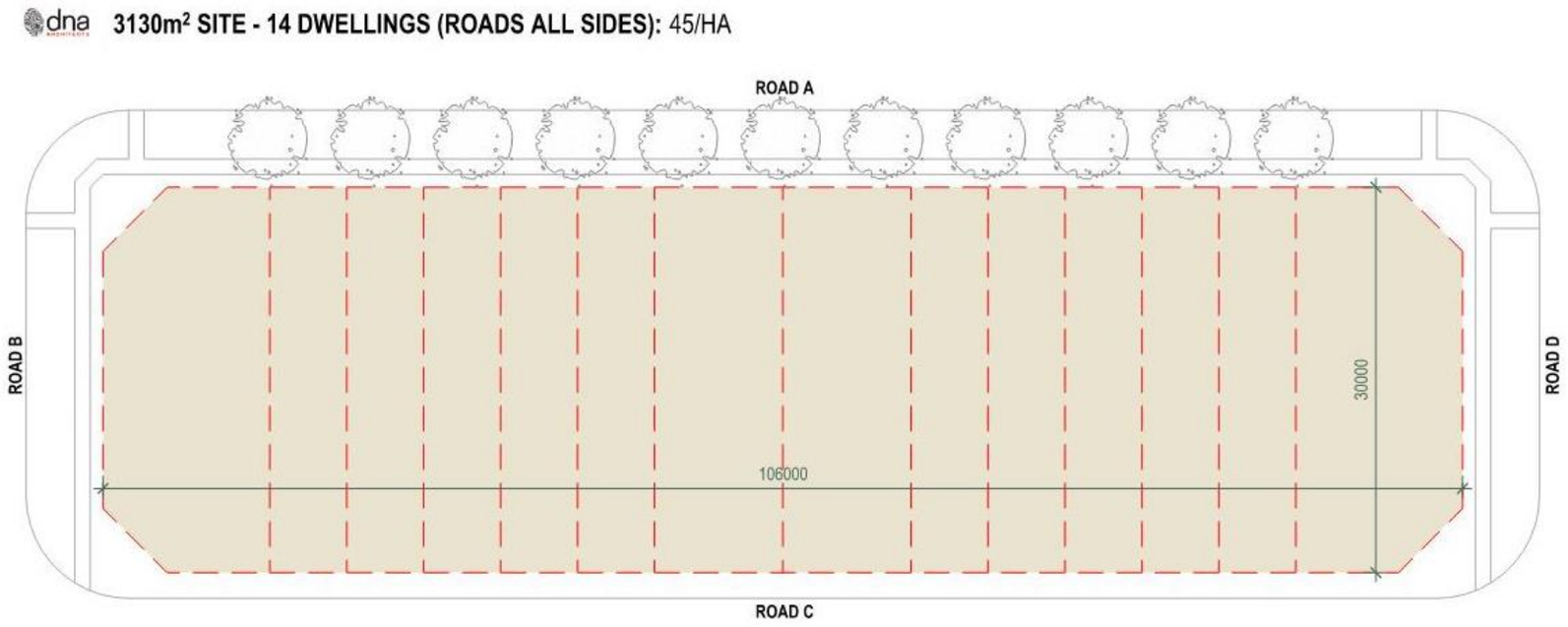
MICRO BLOCK HOUSING IN THE ACT

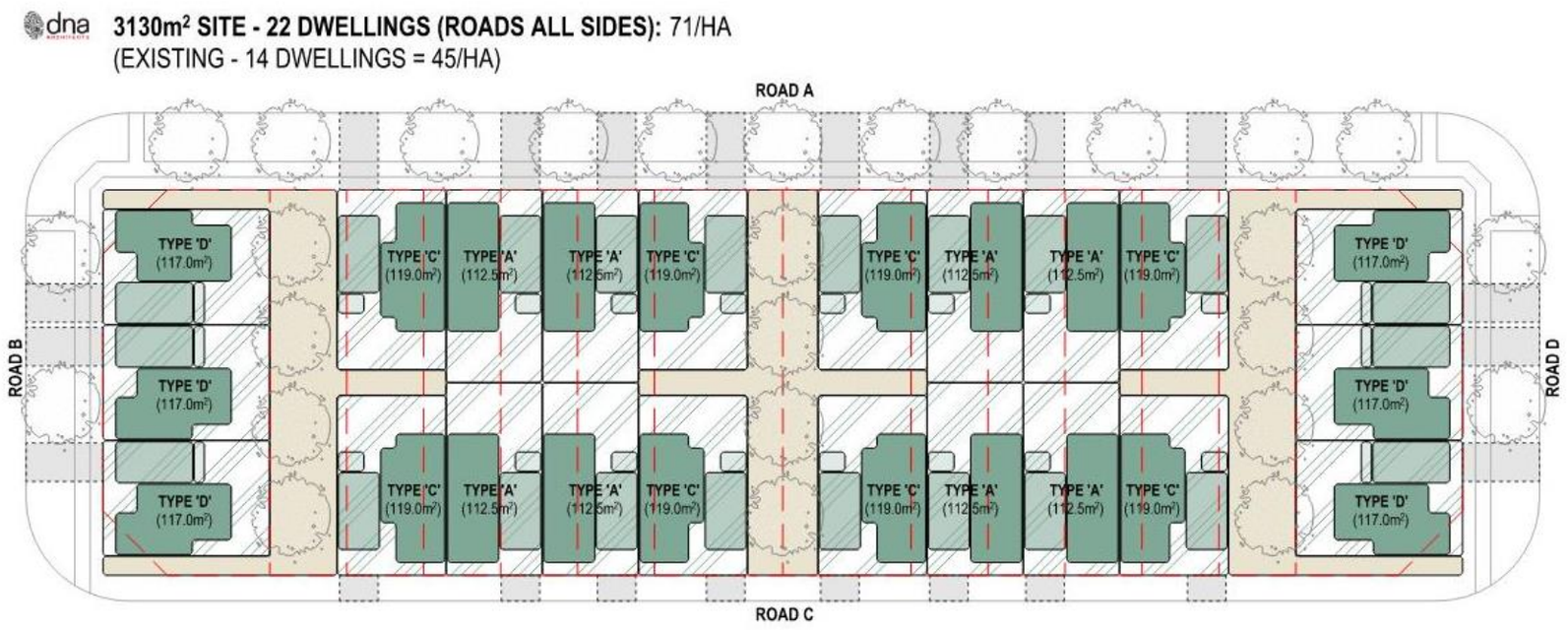
This collection of designs directly references section typologies used in greenfield subdivisions in the ACT by the Suburban Land Agency. Seen in suburbs such as Whitlam and Jacka, the terrace section is typically zoned RZ3 or RZ4 and provides a variety of block widths, predominantly with a dwelling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

dna ARCHITECTS

TYPICAL TERRACE SECTION CONFIGURATION 2





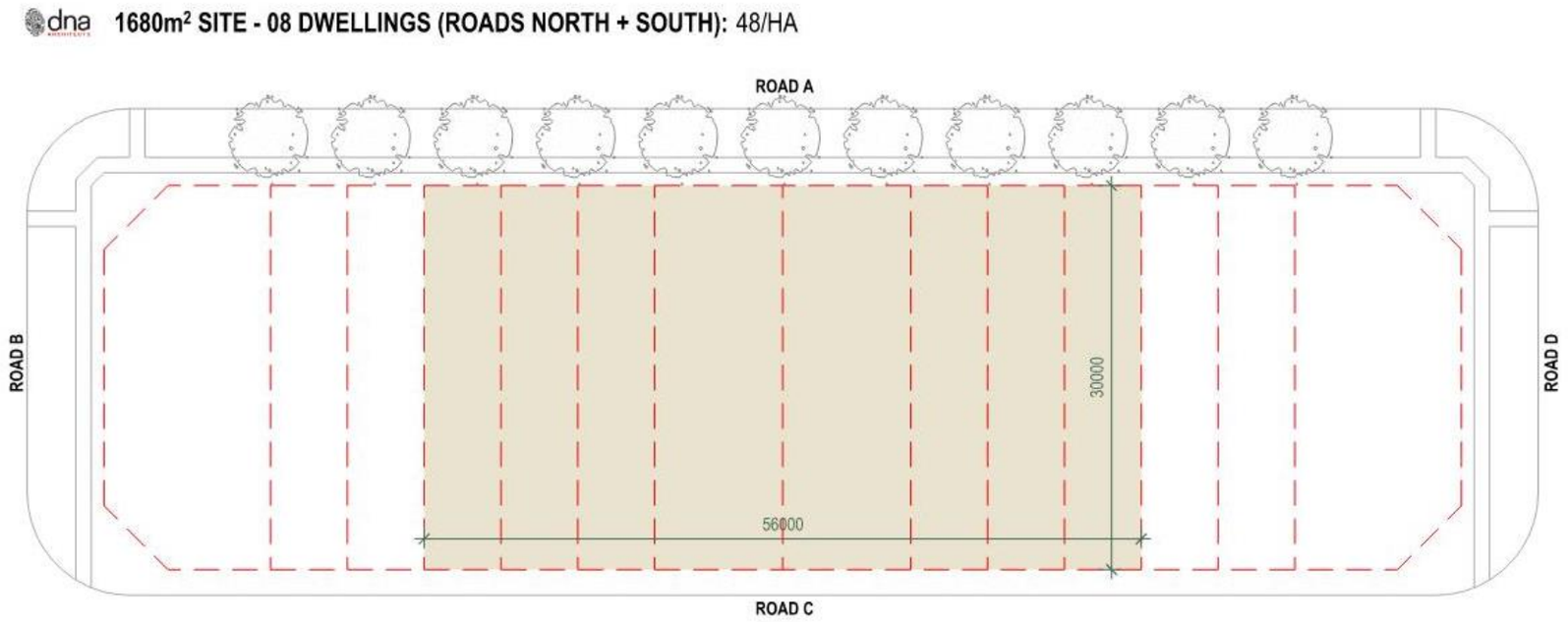
MICRO BLOCK HOUSING IN THE ACT

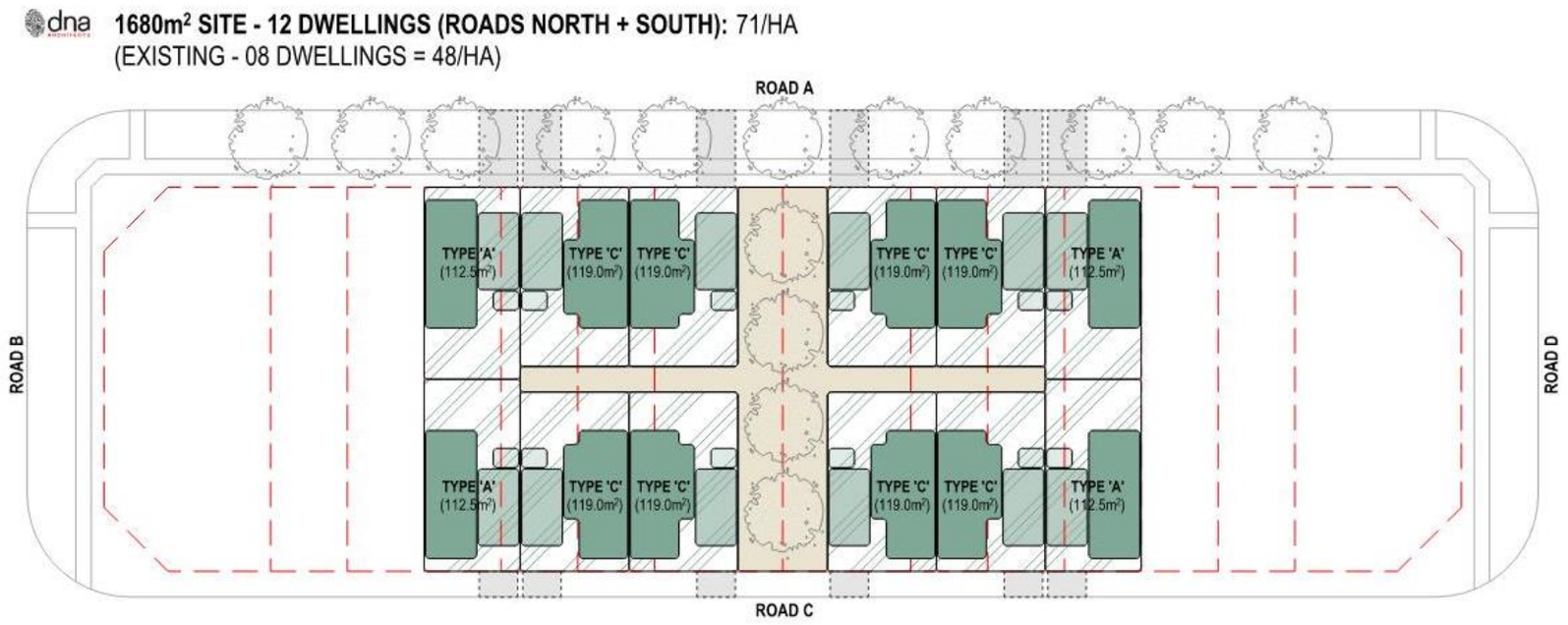
This collection of designs directly references section typologies used in greenfield subdivisions in the ACT by the Suburban Land Agency. Seen in suburbs such as Whitlam and Jacka, the terrace section is typically zoned RZ3 or RZ4 and provides a variety of block widths, predominantly with a dwelling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

dna ARCHITECTS

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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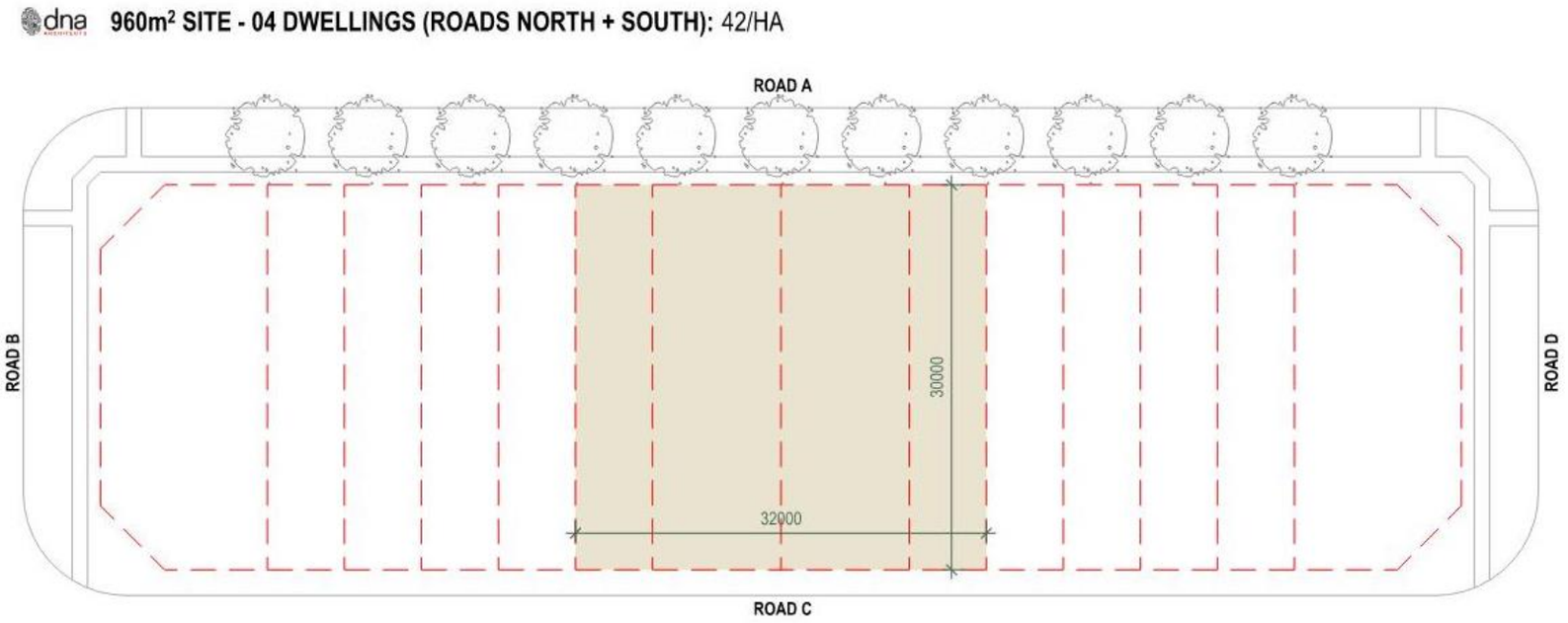
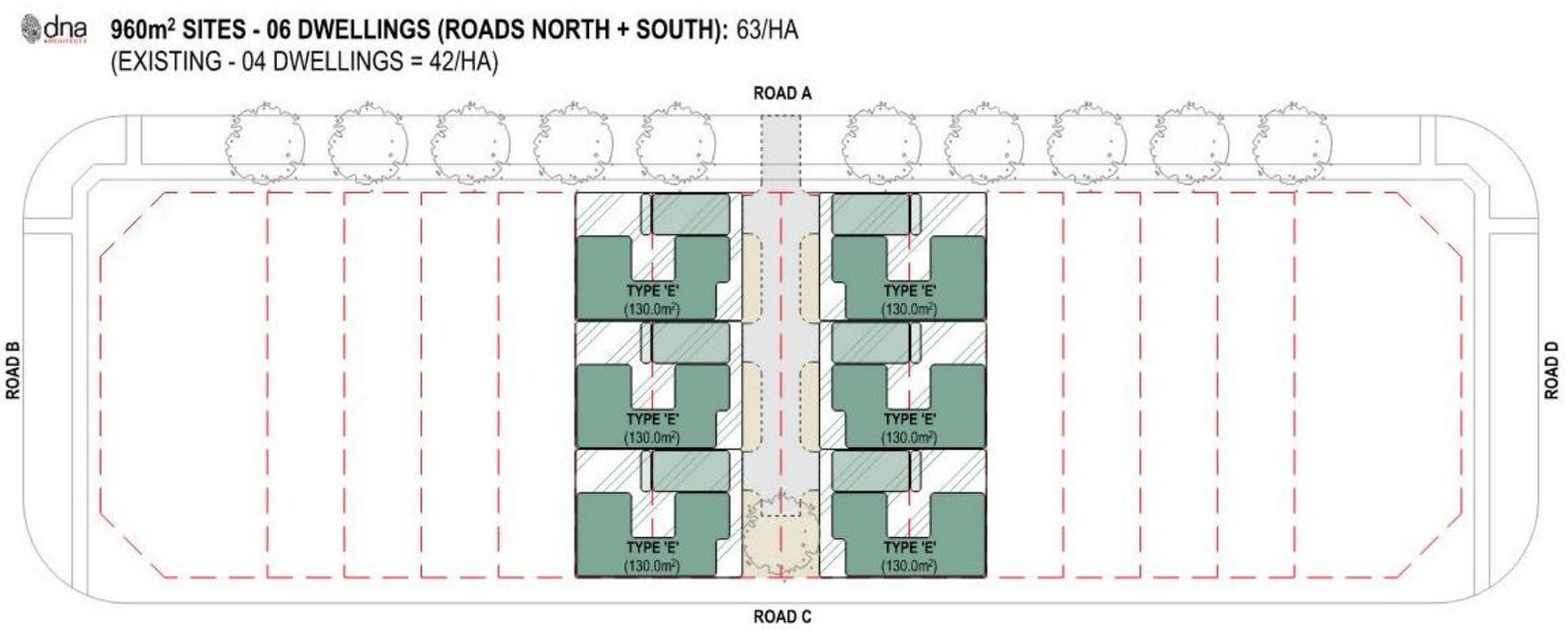
TYPICAL TERRACE MID-SECTION CONFIGURATION 2





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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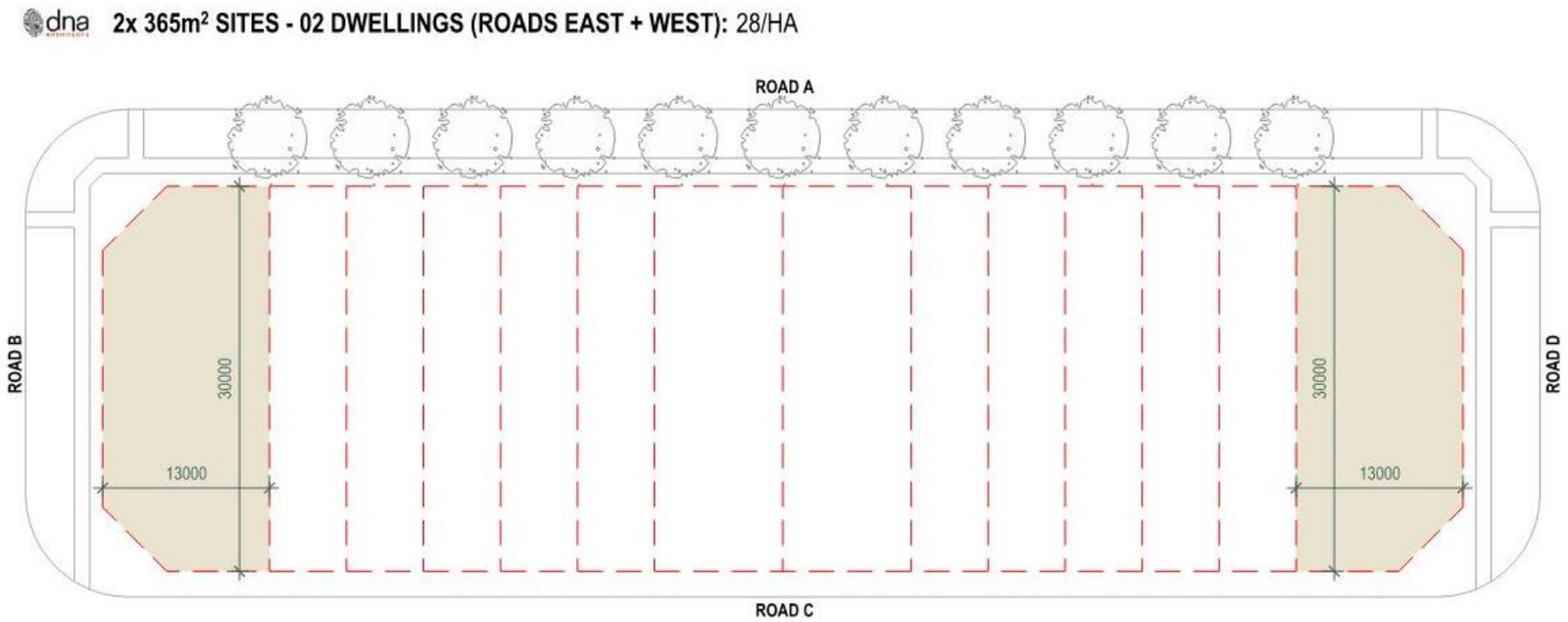
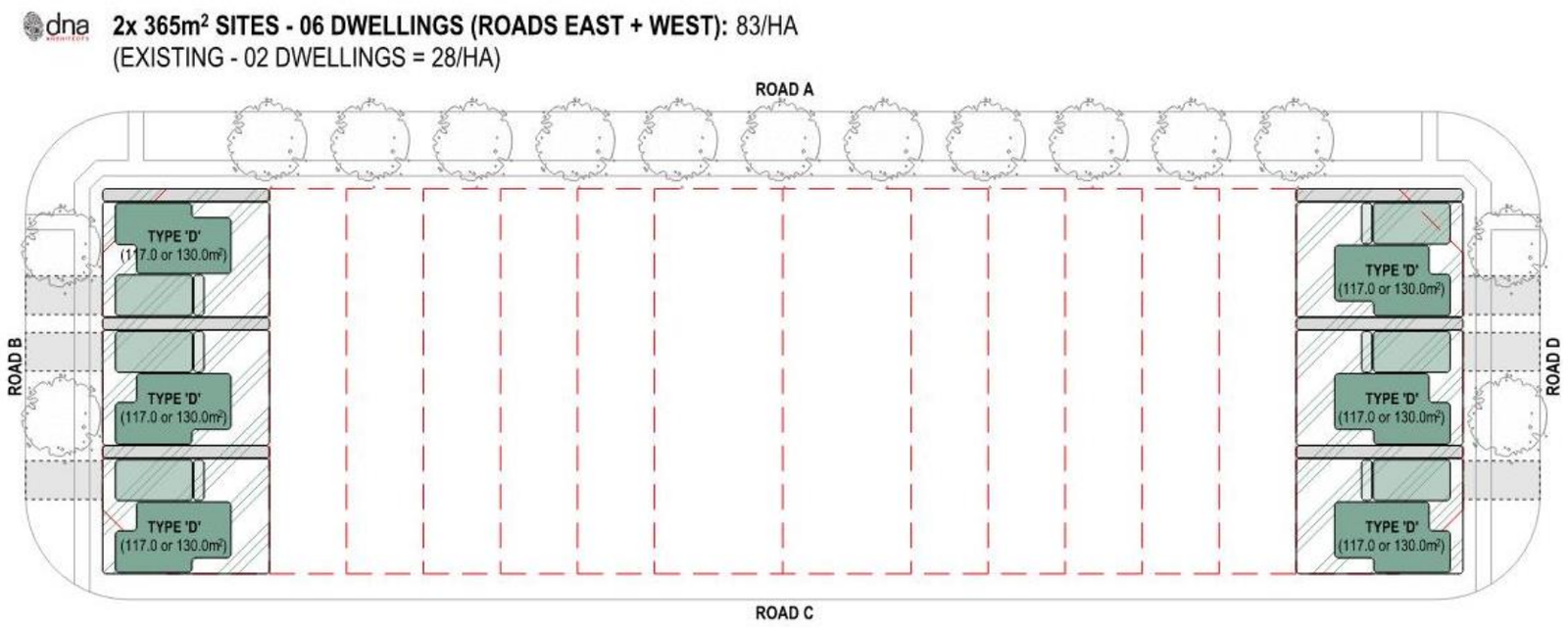
TYPICAL TERRACE END-SECTION CONFIGURATION





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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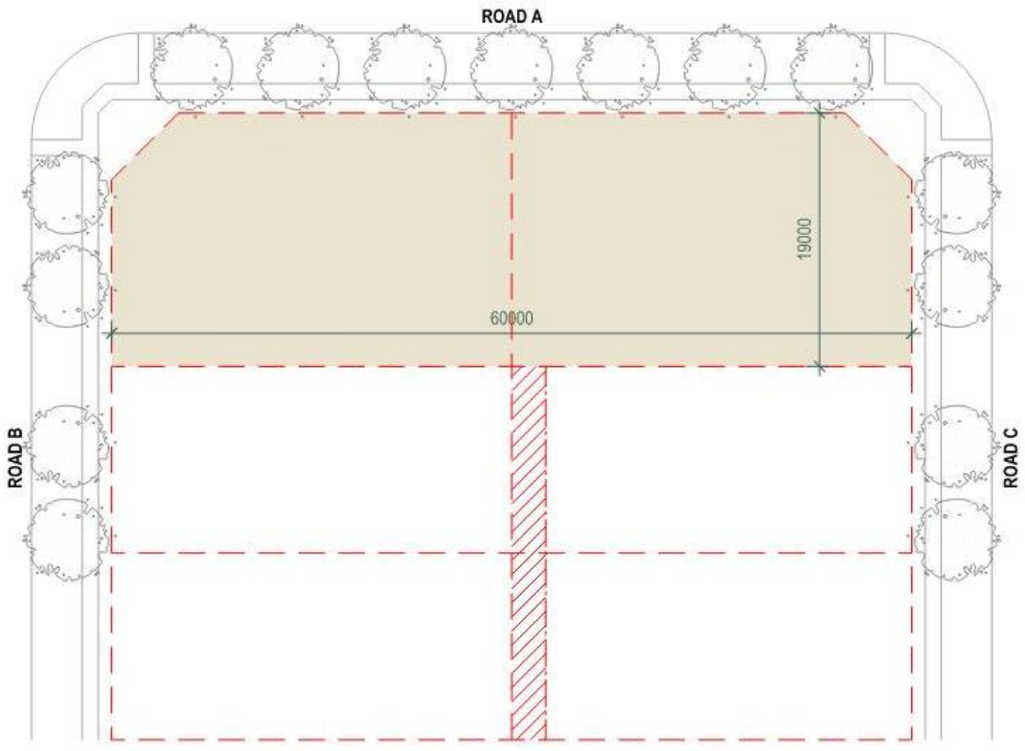
TYPICAL SINGLE RESIDENTIAL END-SECTION CONFIGURATION 1

CABINET

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.

dna **1115m² SITE - 02 DWELLINGS (ROADS NORTH, EAST + WEST):** 18/HA



dna **1115m² SITE - 08 DWELLINGS (ROADS NORTH, EAST + WEST):** 72/HA
(EXISTING - 02 DWELLINGS = 18/HA)

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.

CABINET

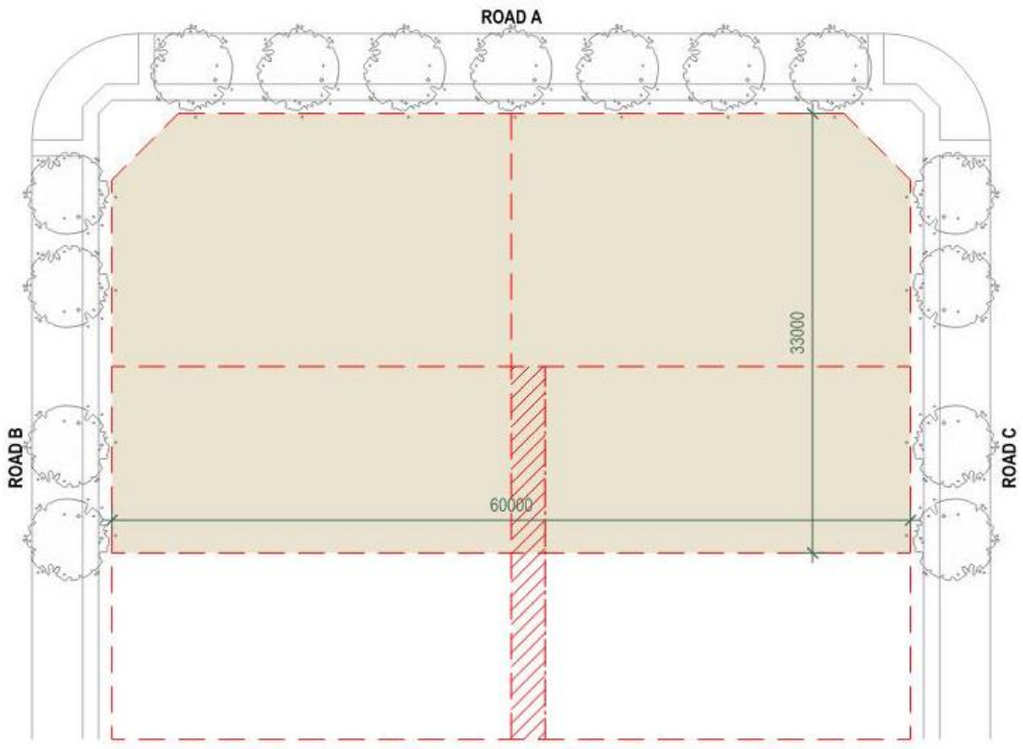
dna ARCHITECTS

TYPICAL SINGLE RESIDENTIAL END-SECTION CONFIGURATION 2

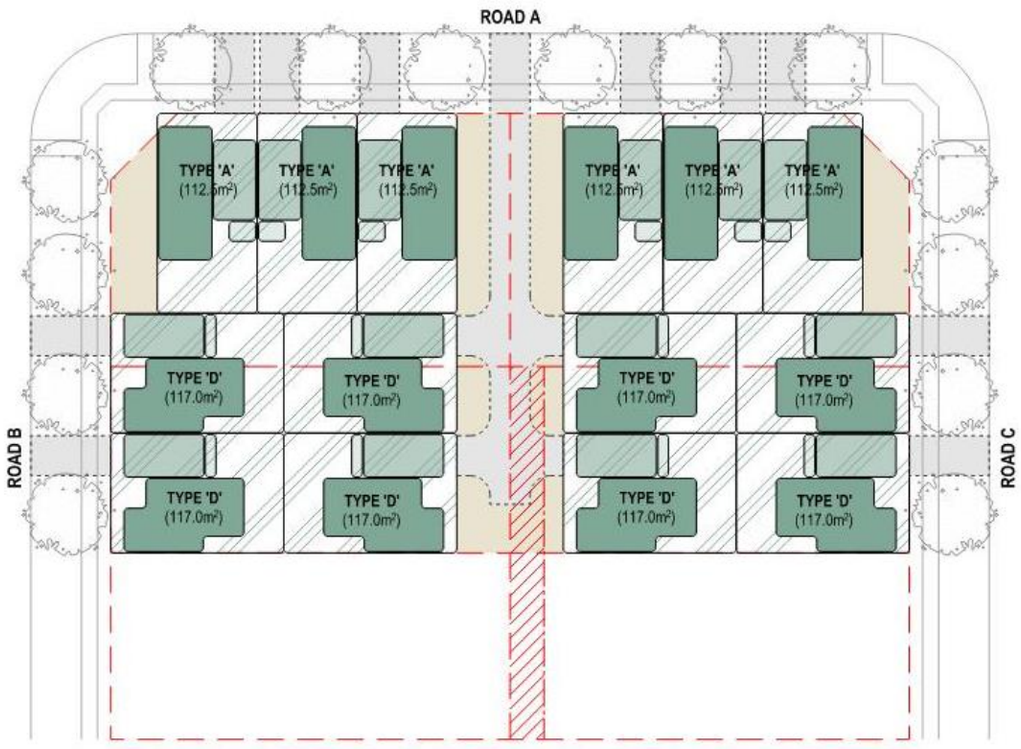
MICRO BLOCK HOUSING IN THE ACT

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.

1955m² SITE - 04 DWELLINGS (ROADS NORTH, EAST + WEST): 21/HA



1955m² SITE - 14 DWELLINGS (ROADS NORTH, EAST + WEST): 72/HA
(EXISTING - 04 DWELLINGS = 21/HA)



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.

dna ARCHITECTS

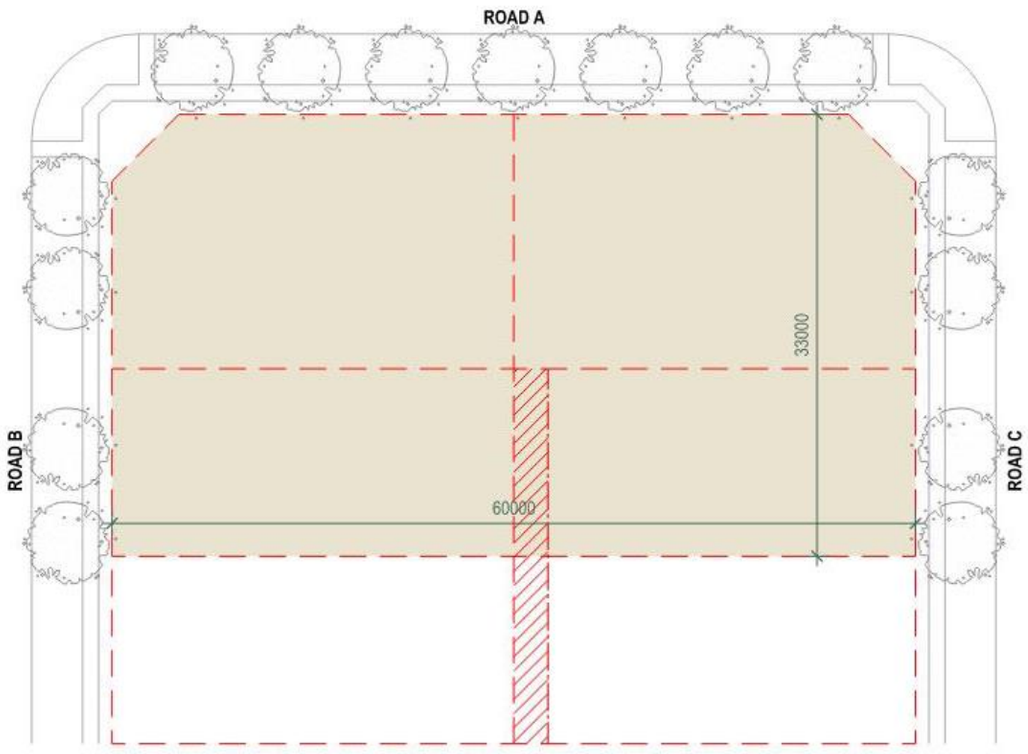
CABINET

TYPICAL SINGLE RESIDENTIAL END-SECTION CONFIGURATION 3

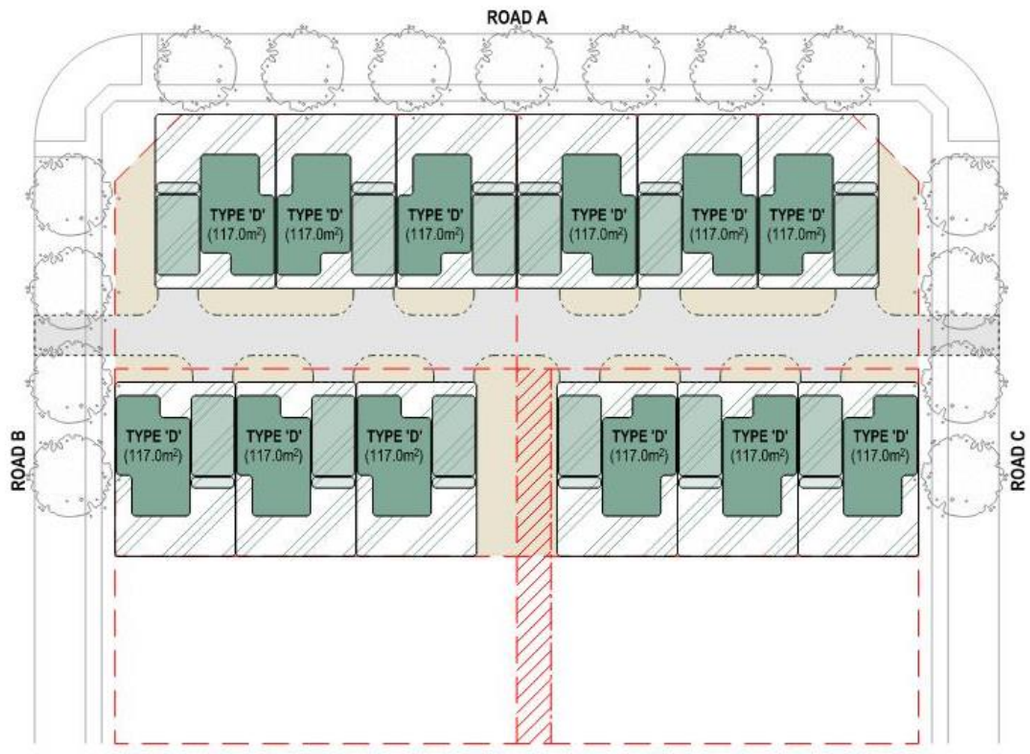
MICRO BLOCK HOUSING IN THE ACT

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.

dna **1955m² SITE - 04 DWELLINGS (ROADS NORTH, EAST + WEST):** 21/HA



dna **1955m² SITE - 12 DWELLINGS (ROADS NORTH, EAST + WEST):** 62/HA
(EXISTING - 4 DWELLINGS = 21/HA)



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

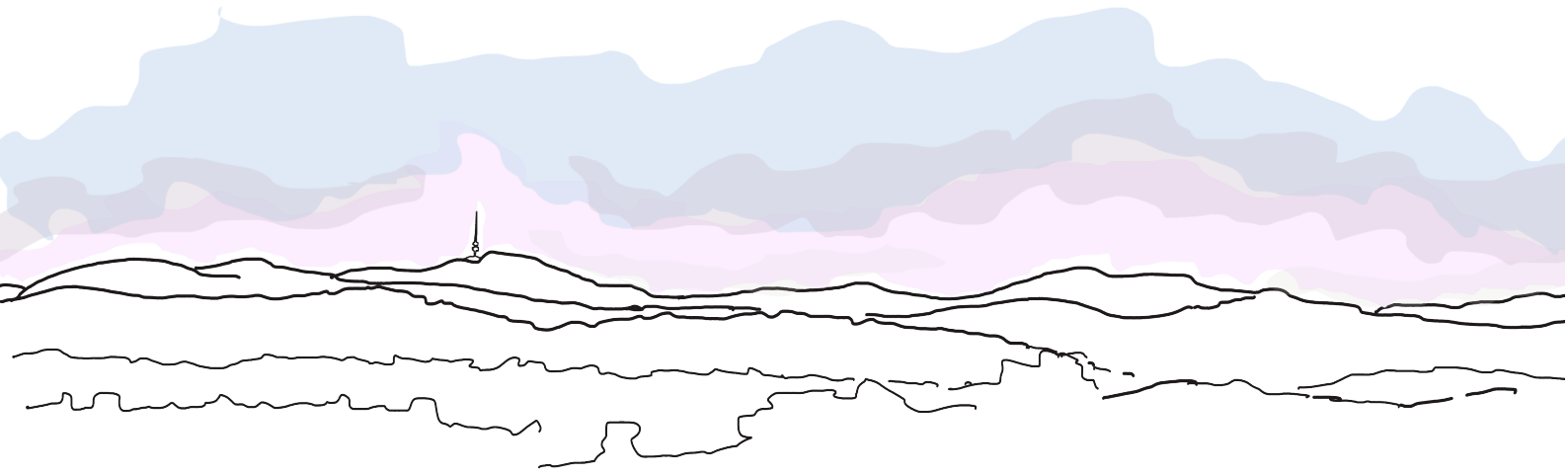
September 2025

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

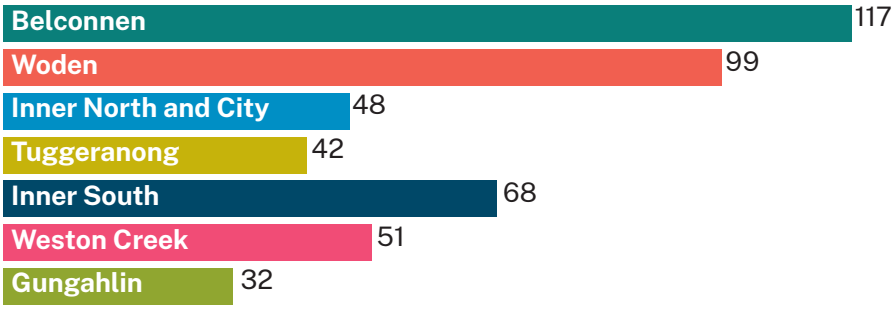
2 listening spaces

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

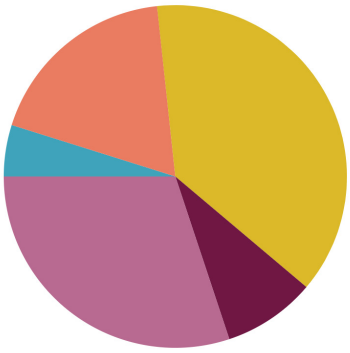
398 surveys

149 'quick comments'

Written feedback

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.

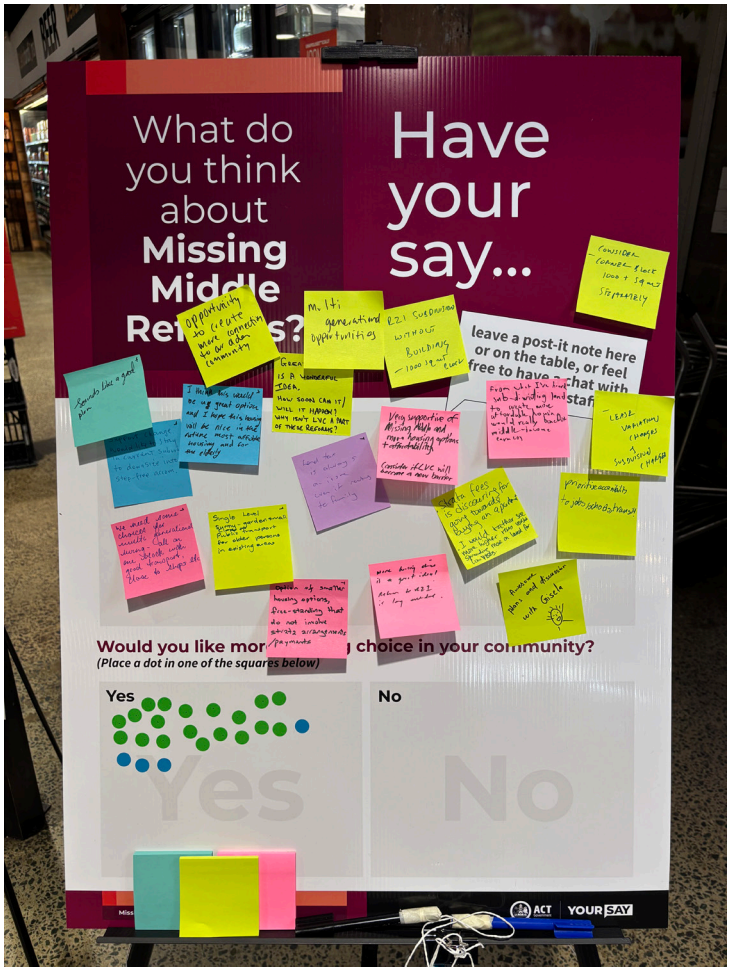
Recording public feedback

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

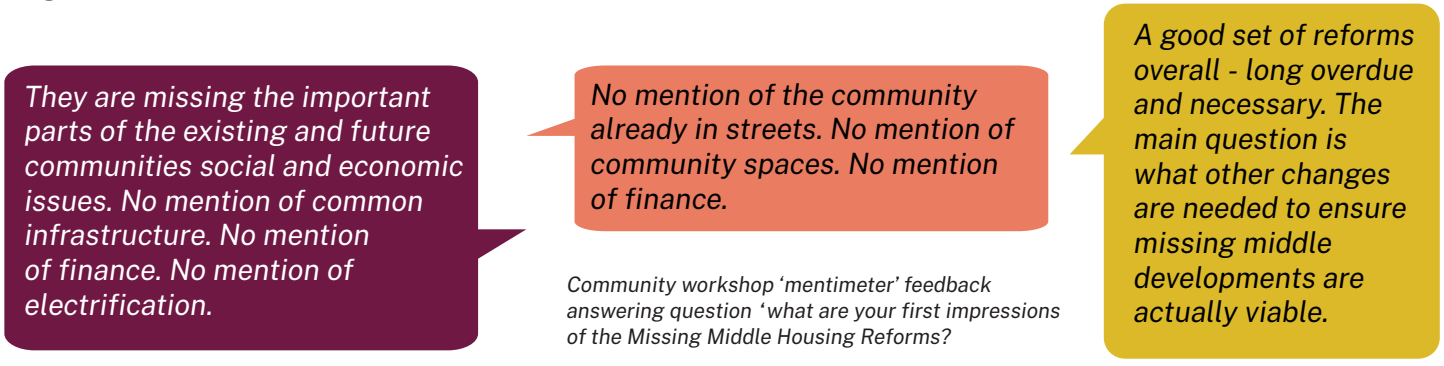
Discussion about whether reforms will succeed in reducing housing costs, or if new housing, even if more expensive initially, would have a "filtering" effect where buyers stopped competing for other properties, helping to suppress rents / housing prices.

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.

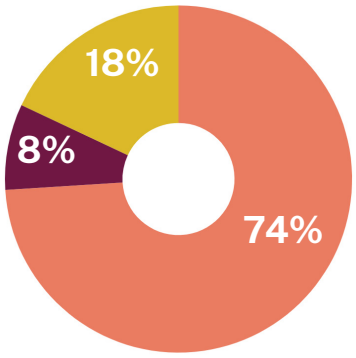
377 people spoke with us

8 pop ups across **6** districts

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)

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



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.

What does missing middle housing mean to you?

'A chance for people to afford to live in my community."

'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?

'People born after 1970, the future, the environment."

'Young people and some low income people and developers"

'Existing home owners"

what do you think about the missing middle reforms?

'Great Idea! Just ensure infrastructure is supportive! Public transport, roads, etc."

'Great. Hoping it allows people with house asset but little money to use some of their land to support housing."

'Very supportive of missing middle and more housing options + affordability. Consider if LVC will become a new barrier"

'We need some choices for multi generational living - all on one block with good transport, close to shops etc"

'Not too sure about it"

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

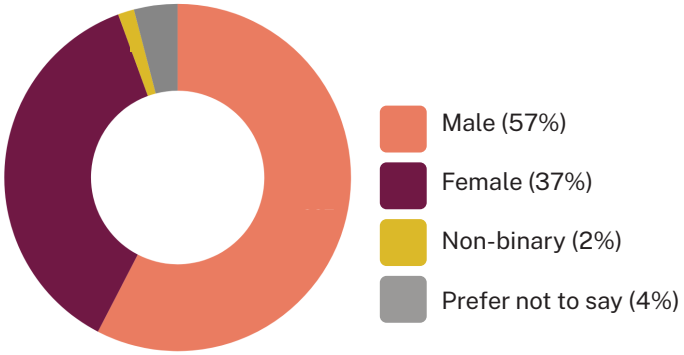
In addition to the option for people to leave short comments on YourSay, a survey was also offered, inviting more detailed feedback from the community on specific elements of the DPA-04 and draft Missing Middle Housing Design Guide. The survey was open for the duration of the engagement period.

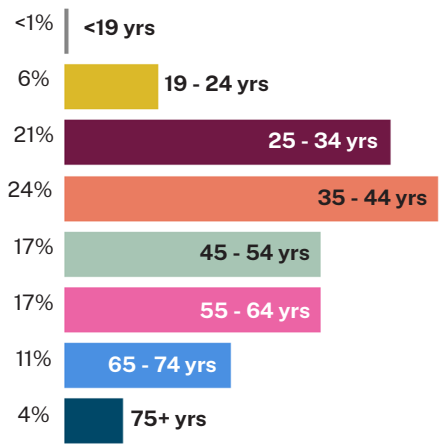
398 surveys were submitted. Responses were received from people living across Canberra and included input from people representing a range of ages, with various experiences in terms of home ownership. Not all people completing the survey provided responses to all the questions.

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

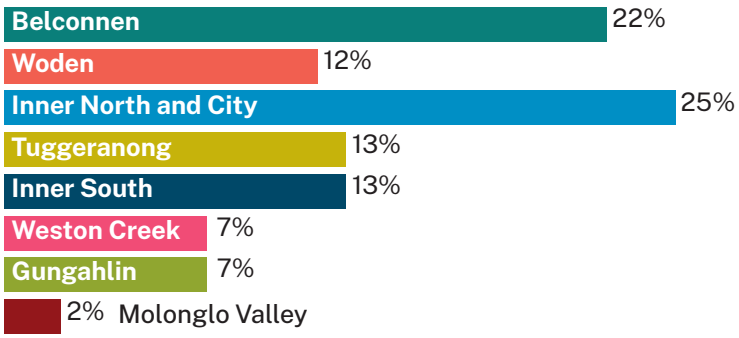
The majority of respondents were men (56%) and 37% were women. There was smaller representation from people identifying as non-binary (2%) and those who preferred not to specify. The age distribution showed strong participation from working-age adults, with the largest groups being 35-44 years (24%) 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.

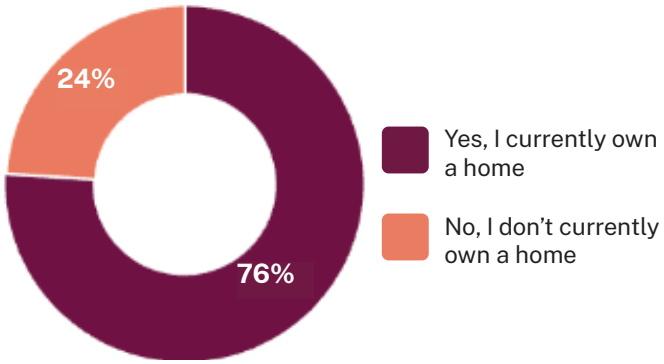




Geographic distribution and home ownership

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.



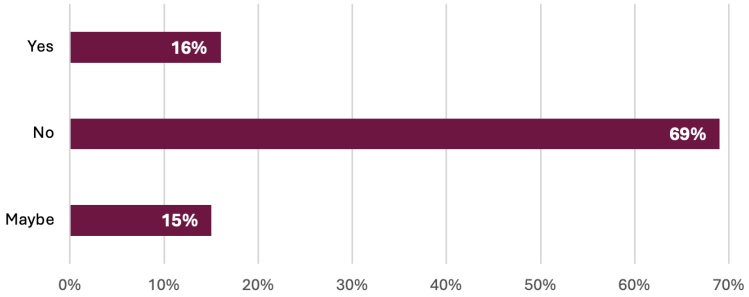


Purchase appeal of Missing Middle housing

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."*

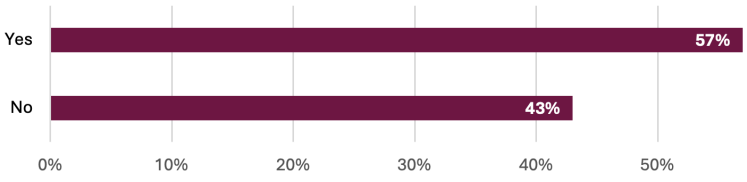
Other responses raised concerns about whether the proposed changes would genuinely provide meaningful choice, particularly given the potential for smaller housing options still being unaffordable. Comments also noted that although the reforms might increase diversity and choice, this may come at the 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.

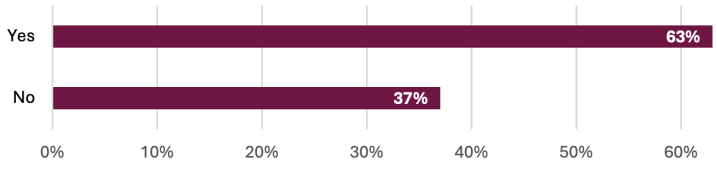
'Solar access and privacy is not always achievable on the older blocks. It may require mediation measures and definitely promote sustainable energy if possible, but not enforced if it's unaffordable for the elderly downsizers"

'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."

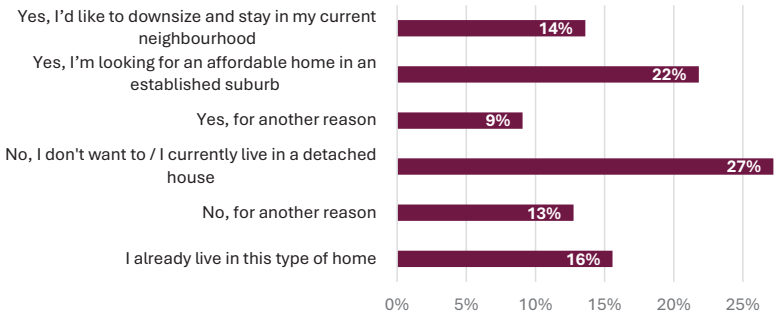
'The draft Missing Middle Housing Design Guide provides a solid and thoughtful foundation for achieving good design outcomes. It is structured around clear principles, integrates sustainability and amenity considerations, and supports context-sensitive development."

'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

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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

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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.

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.

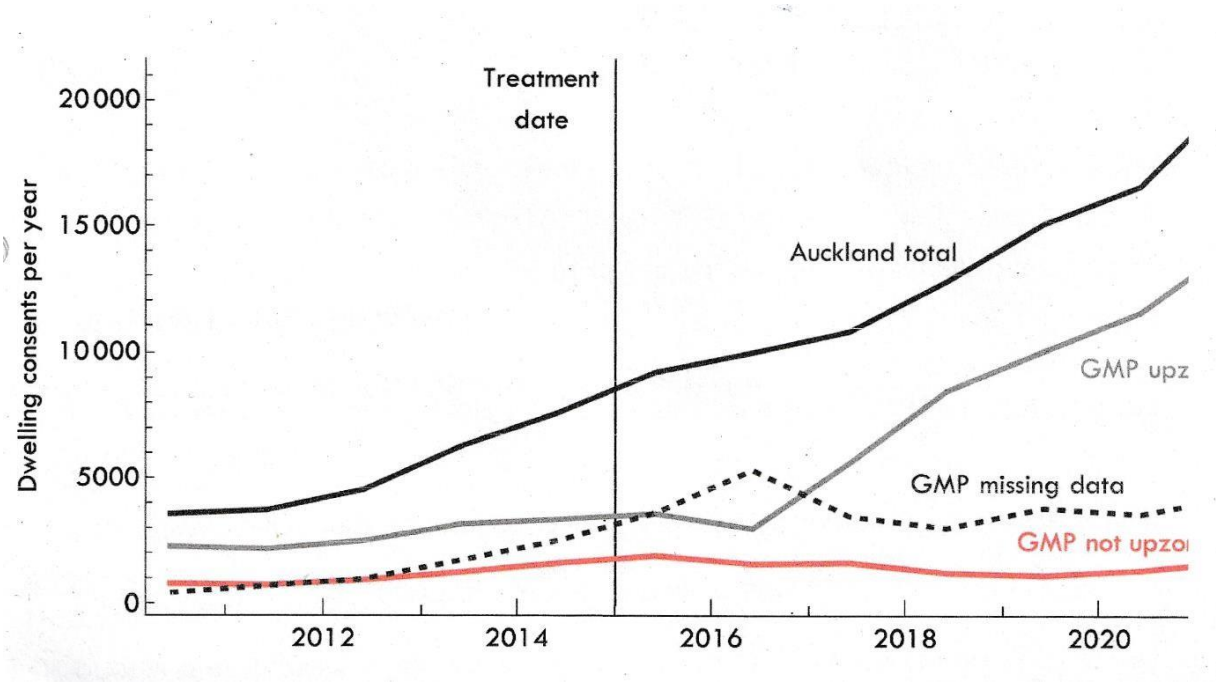
Table 1: Summary of Land Use Regulations by Residential Zone under the Auckland Unitary Plan

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)

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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.

[redacted]

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.

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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.

[redacted]

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

[redacted]

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

[You don't often get email from [redacted] Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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

[You don't often get email from [redacted] Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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.

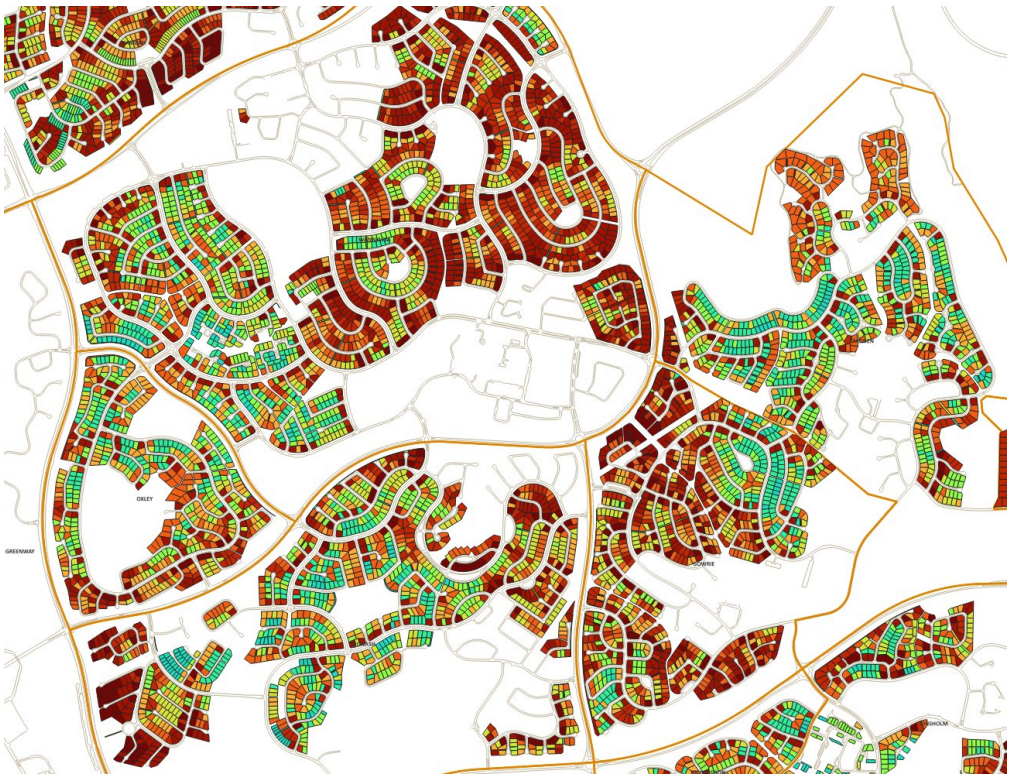

Figure 1 – Example of priority areas for missing middle development (PLANIT dataset)

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]

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.

<u>Recommendation</u>

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]

Australian Institute of Landscape Architects

31/07/2025

Attn: EPSDD Communications

EPSDDComms@act.gov.au

[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].

CONTACT DETAILS

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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 lplanting 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
steel@act.gov.au

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.

EPSDDComms@act.gov.au

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]

[redacted]

[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:

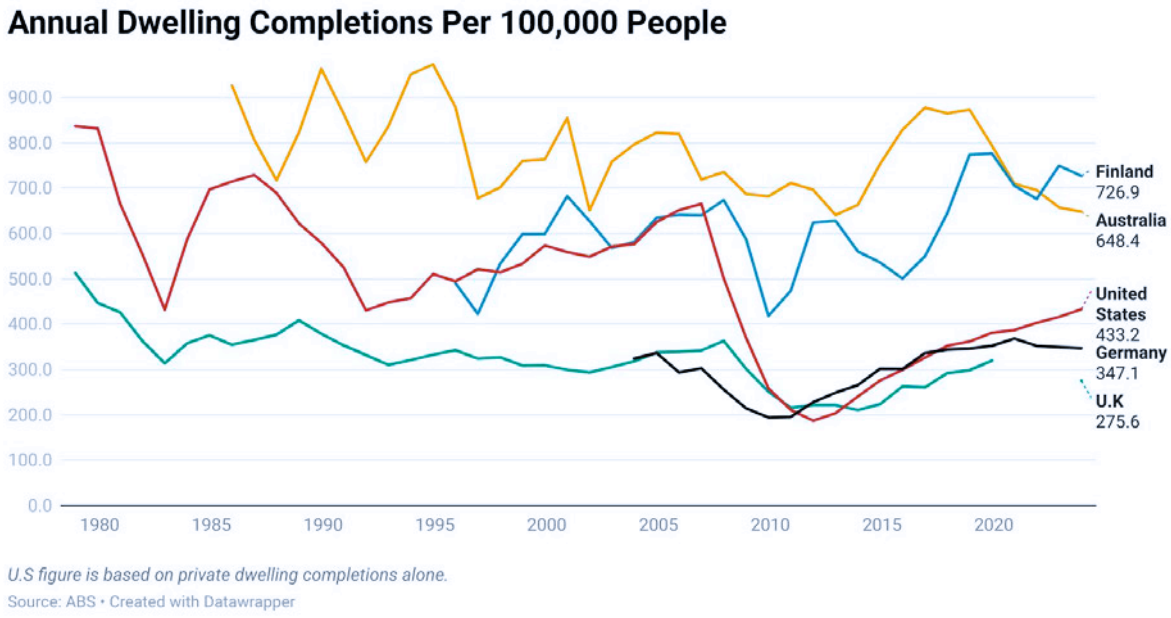
The proposed 'missing middle' reforms are attempting to propose a physical solution to what is primarily a monetary problem. They will have a very negative impact on people's privacy and amenity, and on Canberra's environment. Furthermore, they will not deliver the kind of housing that people actually 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.



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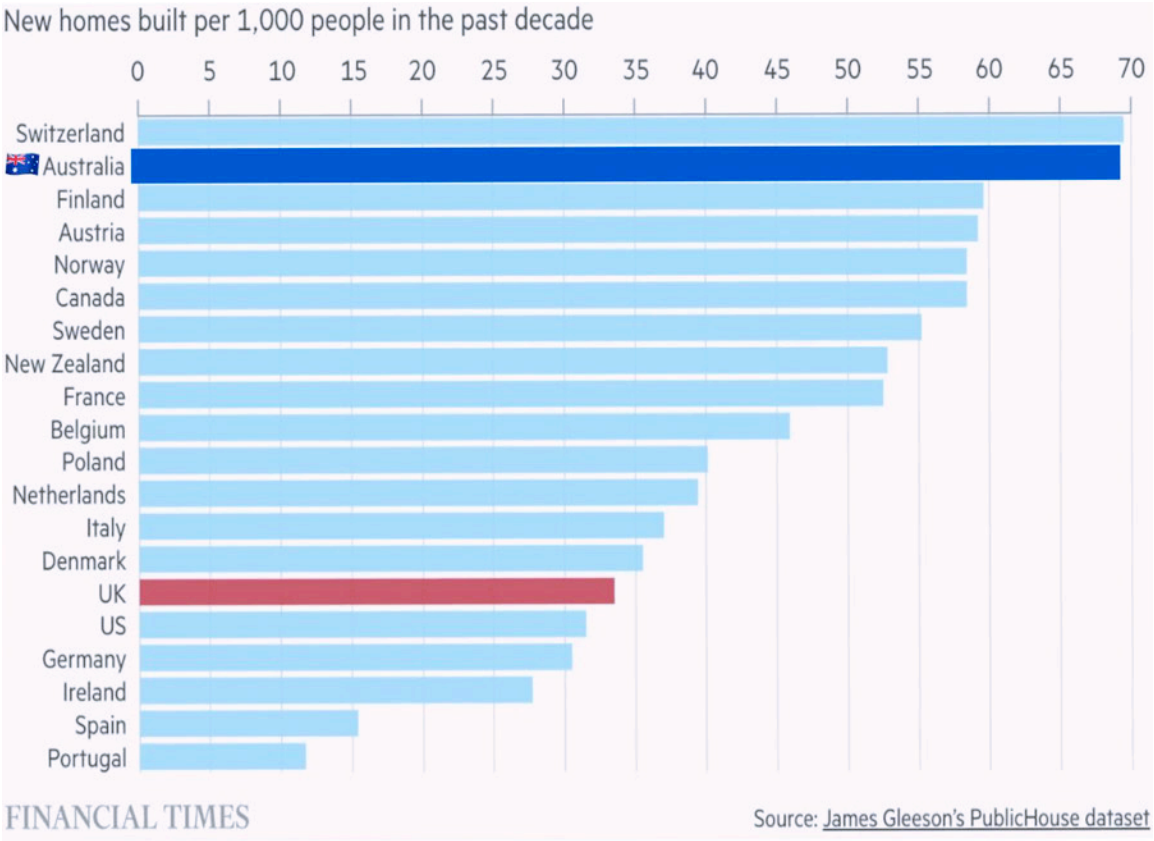
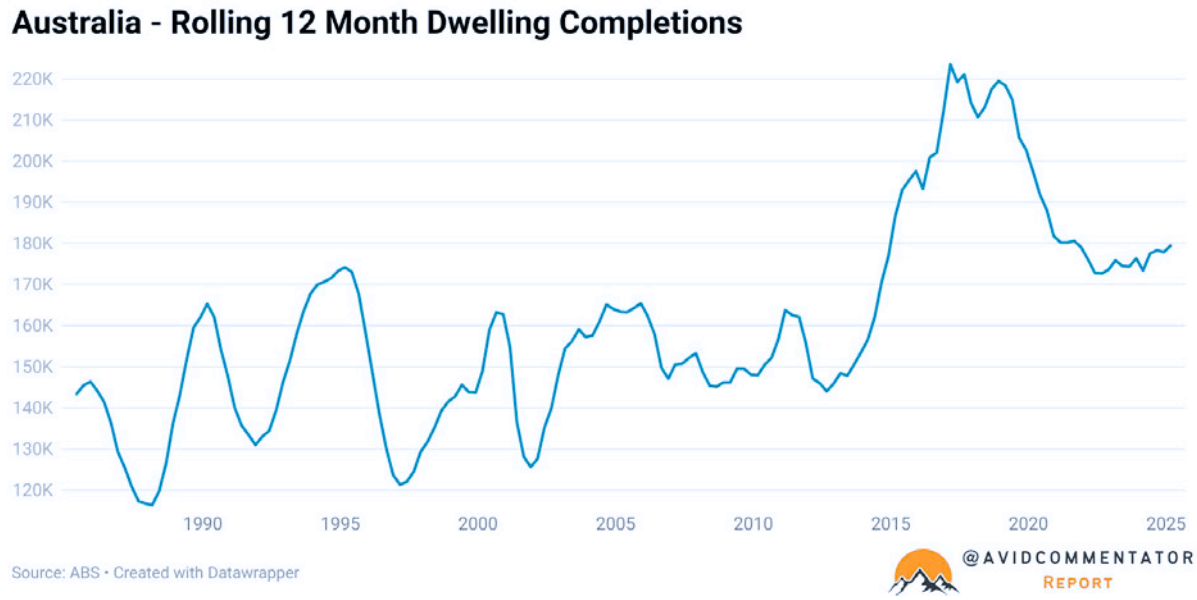


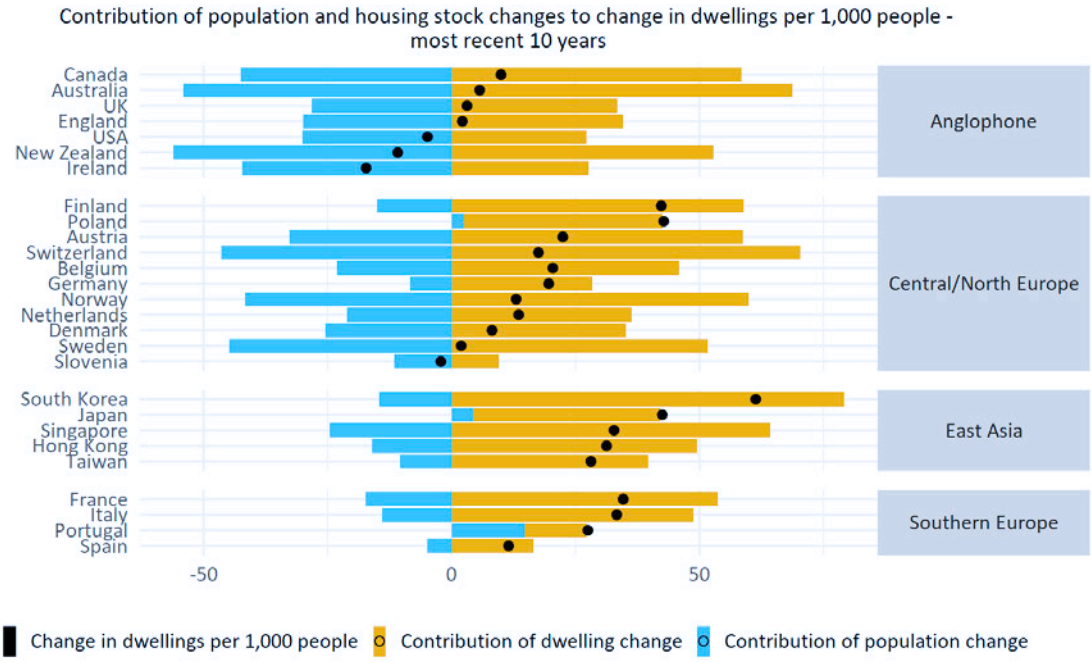
Source: https://www.ft.com/content/24117a03-37c2-424a-97ed-6a5292f9e92e

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:

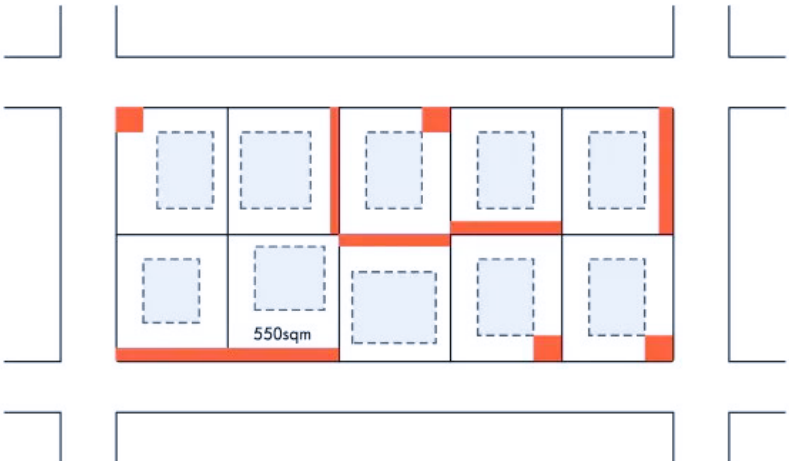
Weston, Massachusetts, where Ed Glaeser lives:

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.
> ...

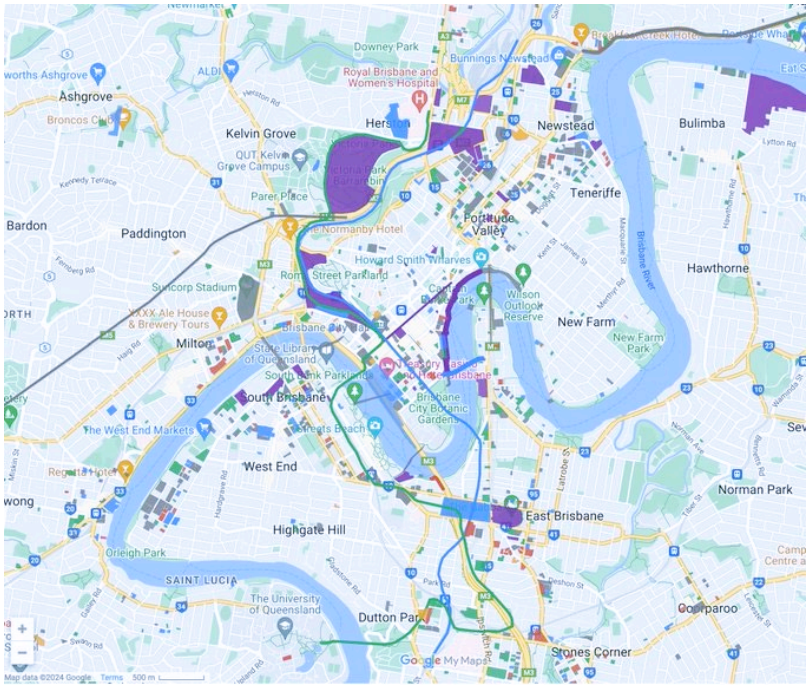
[2] https://www.sciencedirect.com/science/article/abs/pii/0166046289900252

> 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:

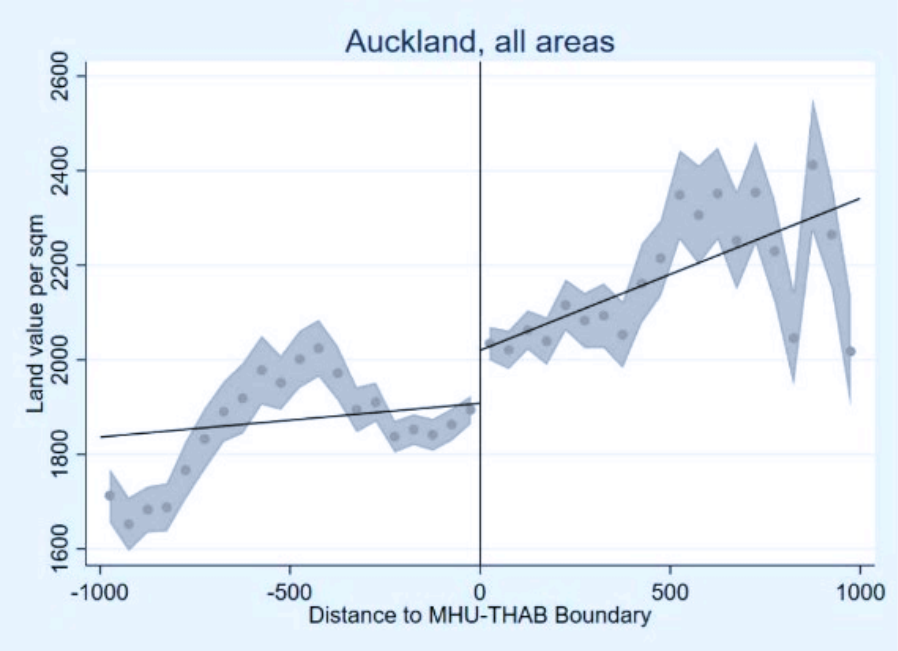
- Land and houses can be expected to produce a return across time to an investor
    - Hence time is an important factor
- Sentiment is important and speculation can occur
- Construction cost is not the sole determining factor of price
    - As an analogy, stocks cost a company almost nothing to create, 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

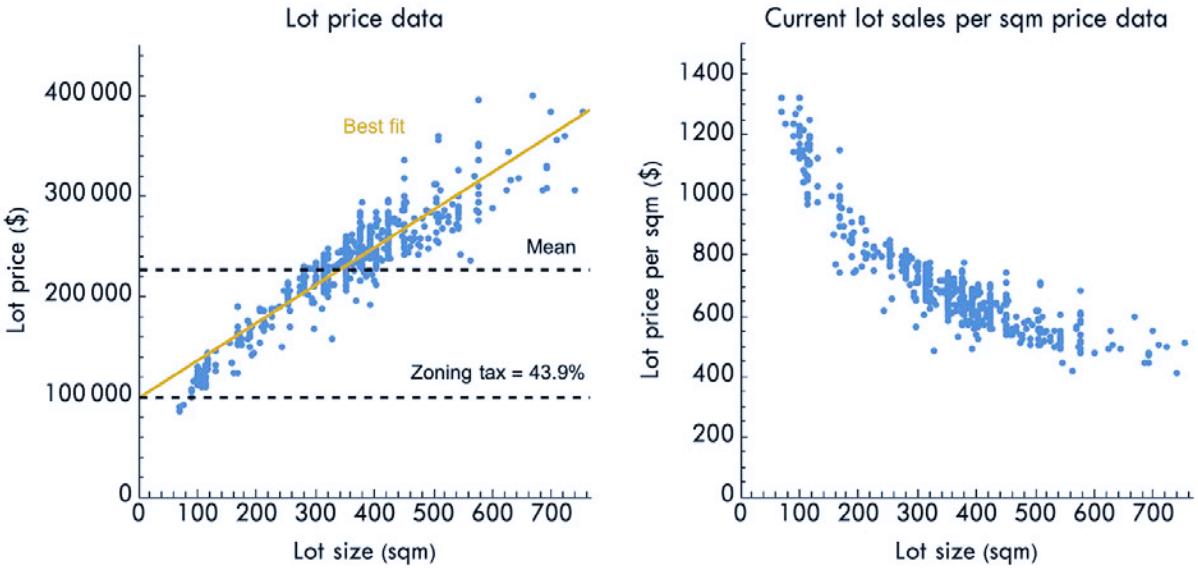
[17] https://www.fresheconomicthinking.com/p/please-stop-confusing-supply-and

[18] https://www.fresheconomicthinking.com/p/housing-confusions-builders-versus

[19] https://journals.sagepub.com/doi/abs/10.1177/0308518X20942874

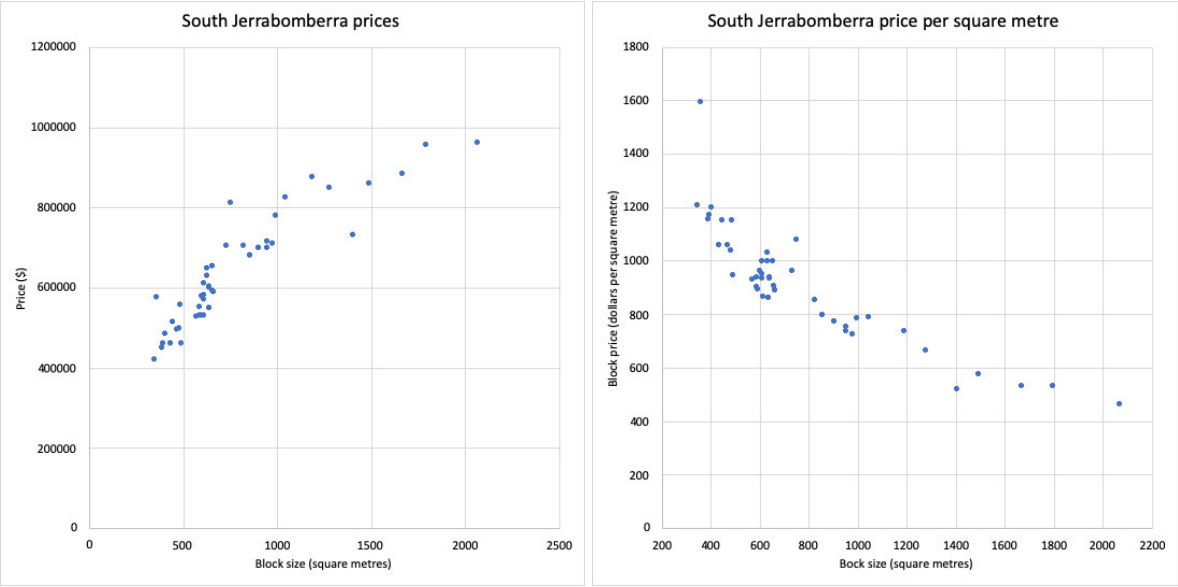
per square metre (i.e. the marginal cost is below the average cost), without having to resort to circular reasoning. Most importantly, it reflects that observable fact that *land* values in denser areas are often higher than those in less dense areas, whereas 'zoning tax' theory indicates that land values 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:

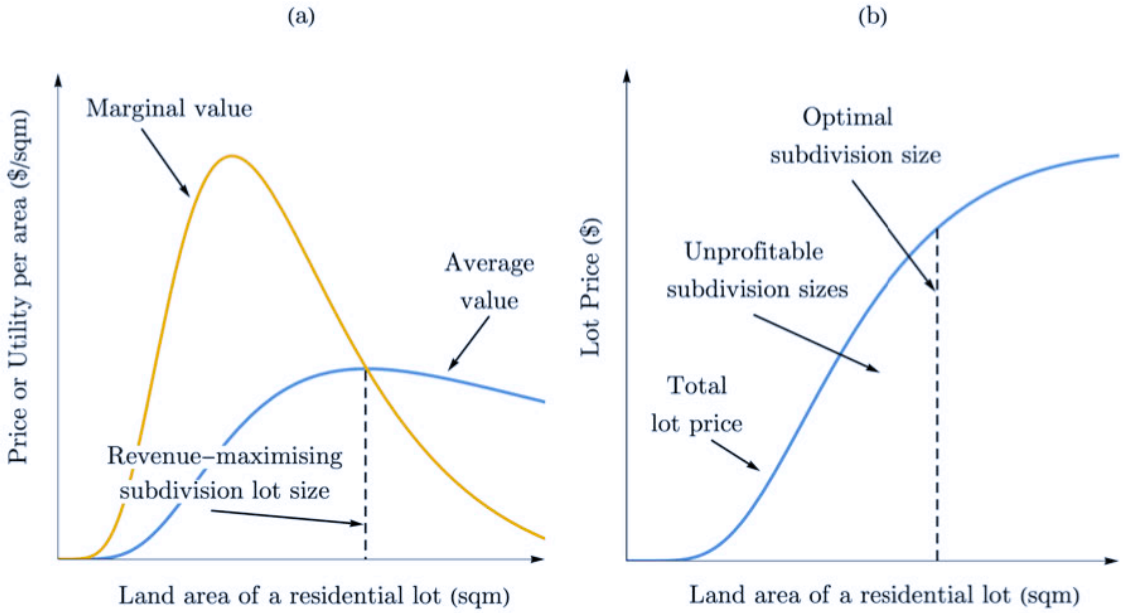
- Extremely small blocks have few uses. Their marginal utility is low, so their marginal value is low
- As blocks grow larger they may allow higher-value uses
    - E.g. a block may have enough room for a studio apartment, a bigger one for a three-bedroom house, a bigger one four bedrooms etc
- Maximum 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.

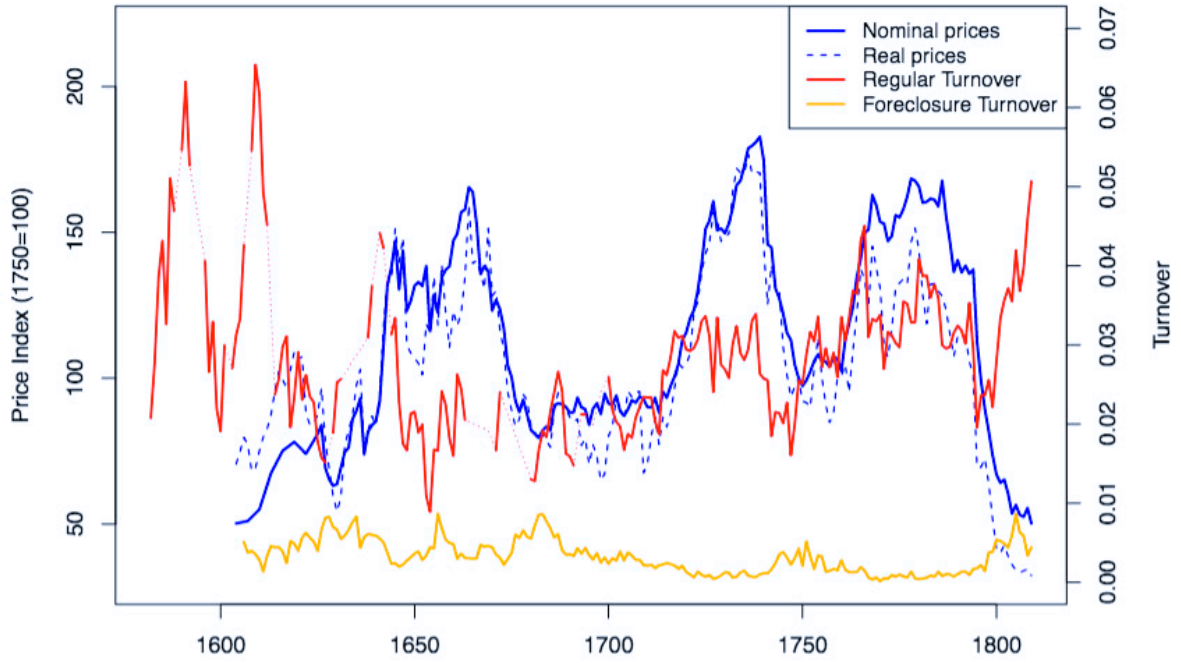
What else lies behind house prices?

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

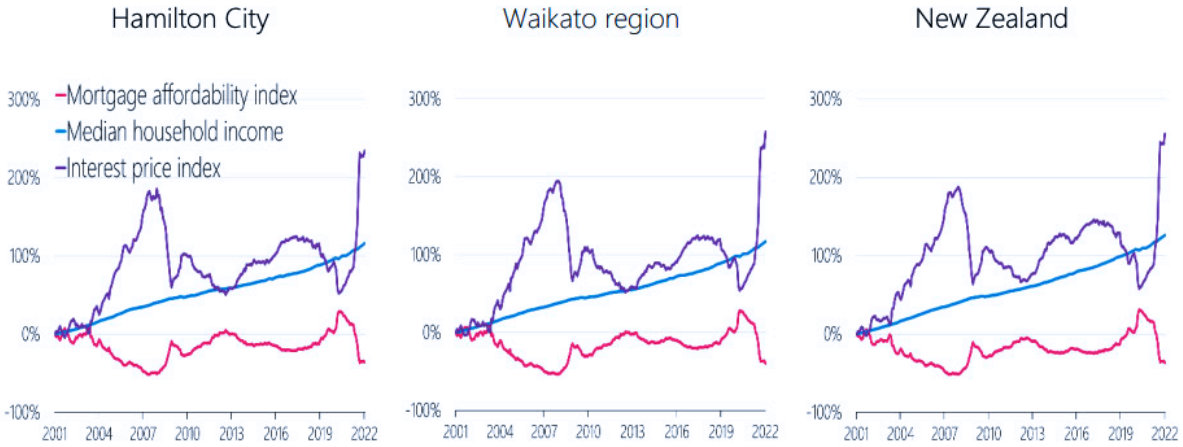
> The model suggests that much of the strength in housing prices and construction over the past few years can be explained by the fall in interest rates

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]:

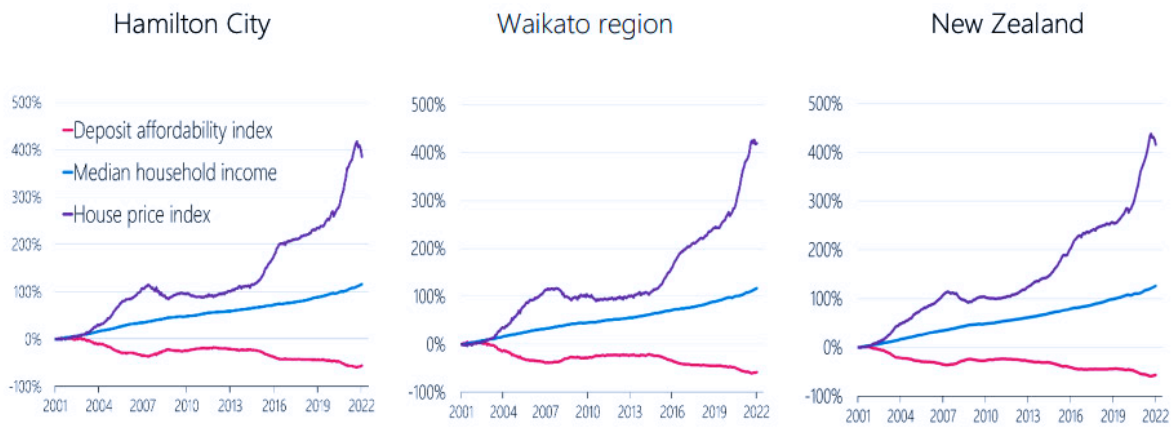
> We find that the rise in real house prices since 2000 can be explained almost entirely by lower interest rates. Increasing scarcity of housing, evidenced by real rental prices and their expected growth, has played a negligible role at the national level.

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):



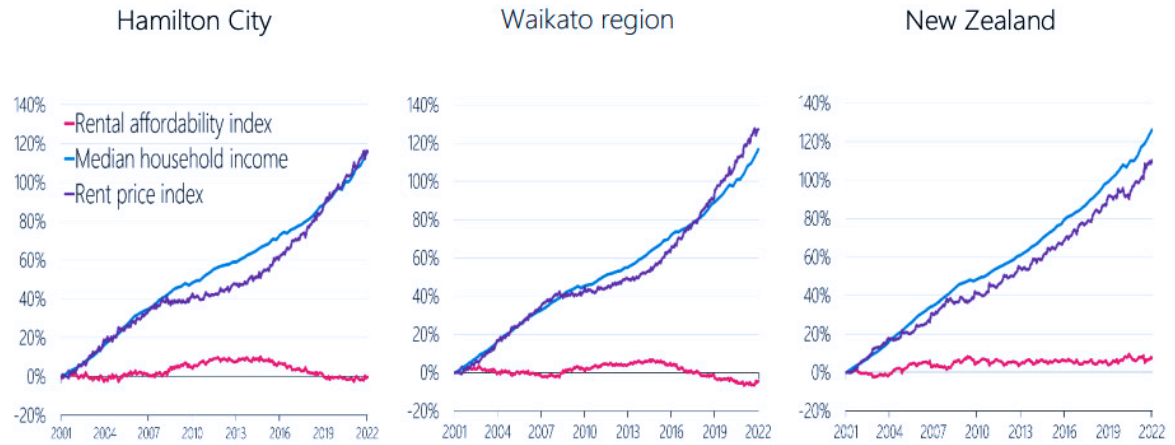
This means that people can more easily borrow more when interest rates are low, which will have the effect of raising prices. One side effect this has is raising the size of the deposit needed to obtain a mortgage. This is probably the main financial barrier to obtaining housing:

[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.

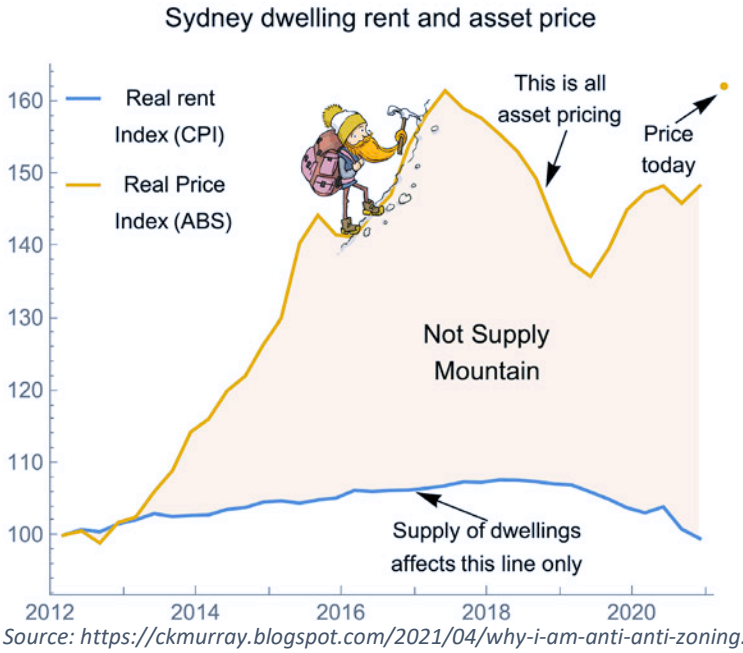
In comparison, rental affordability has varied much less, especially at a New Zealand-wide level. This was the case even before planning reforms:



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].

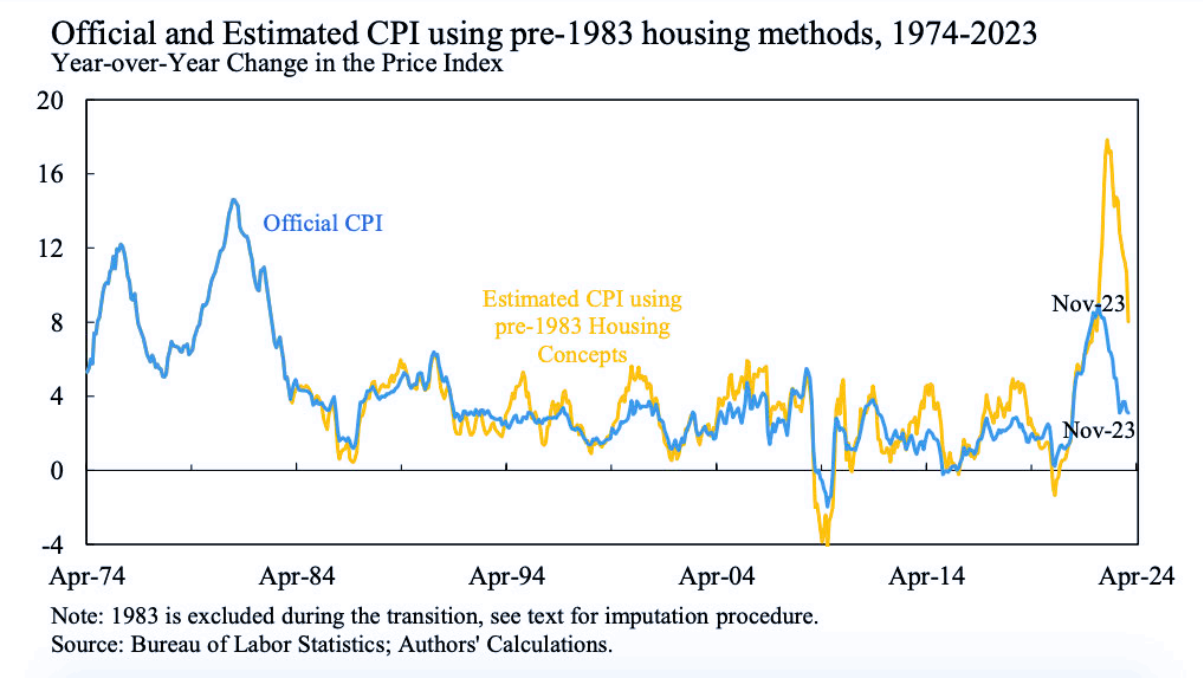
[27] https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4682572
[28] https://www.housing-critical.com/data/USR_057_DEFAULT/02_The_Role_of_Housing_Costs_in_Central_Banks_Inflation_Targeting_Regimes.pdf

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].

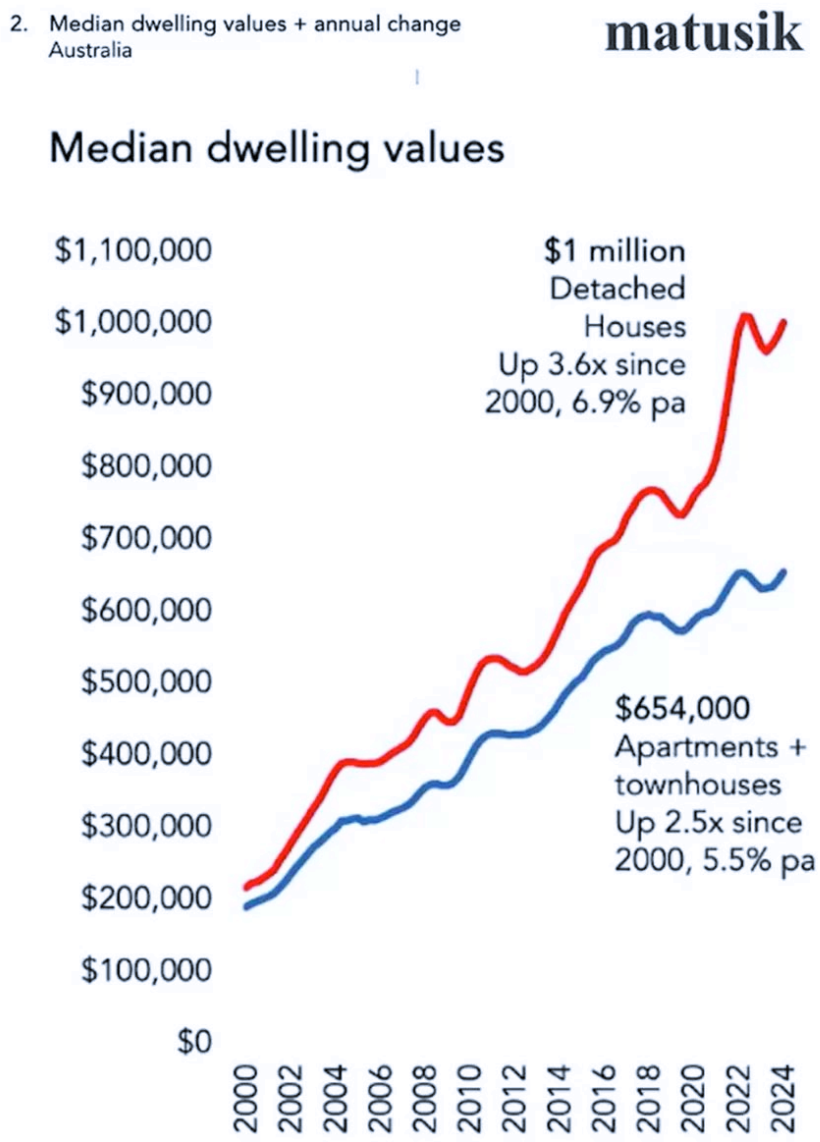
[29] https://onlinelibrary.wiley.com/doi/pdf/10.1111/jmcb.13059
[30] https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3118152

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.

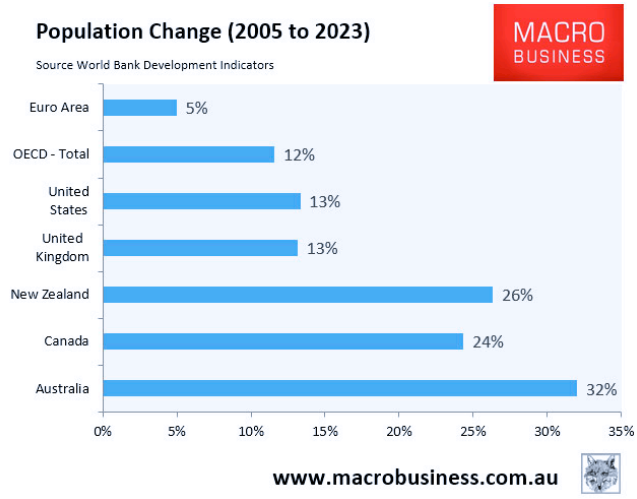
A recent paper published by the NBER has found that the primary factor in United States housing prices is income[33]. Using a series of simple, robust tests against different measures – including alleged measure of zoning strictness – income was consistently the most important explaining variable. One 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.

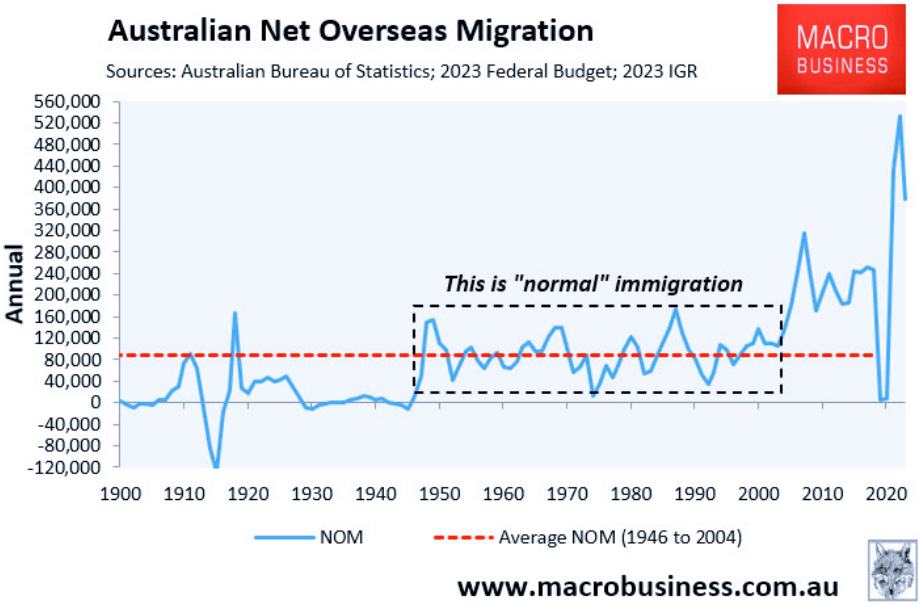
[32] https://region.com.au/please-look-after-my-wife-mental-toll-of-strata-sector-issues-laid-bare-at-public-inquiry/882160/
[33] https://www.nber.org/system/files/working_papers/w33576/w33576.pdf
[34] https://www.fresheconomicthinking.com/p/explainer-supply-constraints-do-not

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/

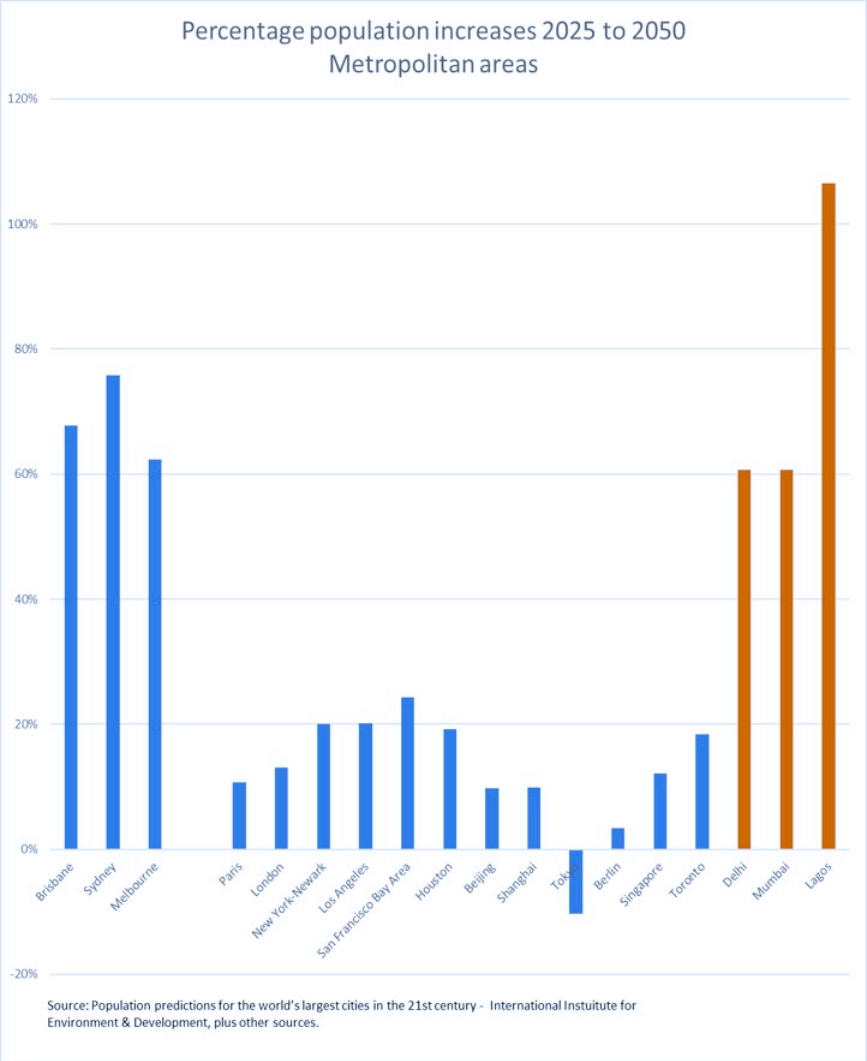
Since the reopening of borders after COVID, all three countries pursued a policy of extremely loose borders. In Australia, net immigration levels reaching record levels, several times more than the historic norm of 80-100,000 per year:



Source: https://www.macrobusiness.com.au/2025/04/how-the-australia-institute-transformed-into-immigration-propagandists/

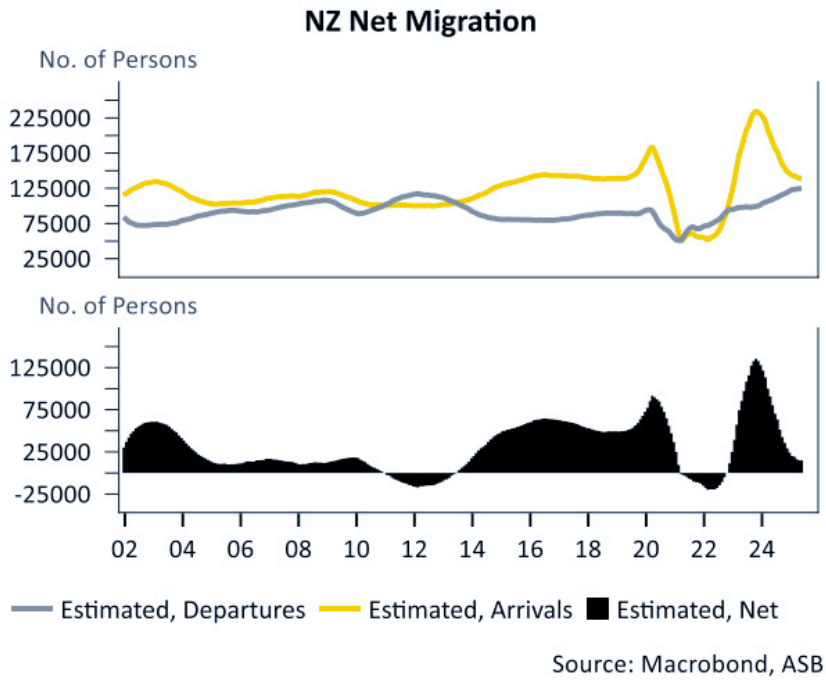
The growth rate of Australian cities between 2025 and 2050 is predicted to be equaled or exceeded only by cities in developing countries such as India and sub-Saharan Africa, which

have a much larger proportion of rural population so more intrinsic potential for urban growth:

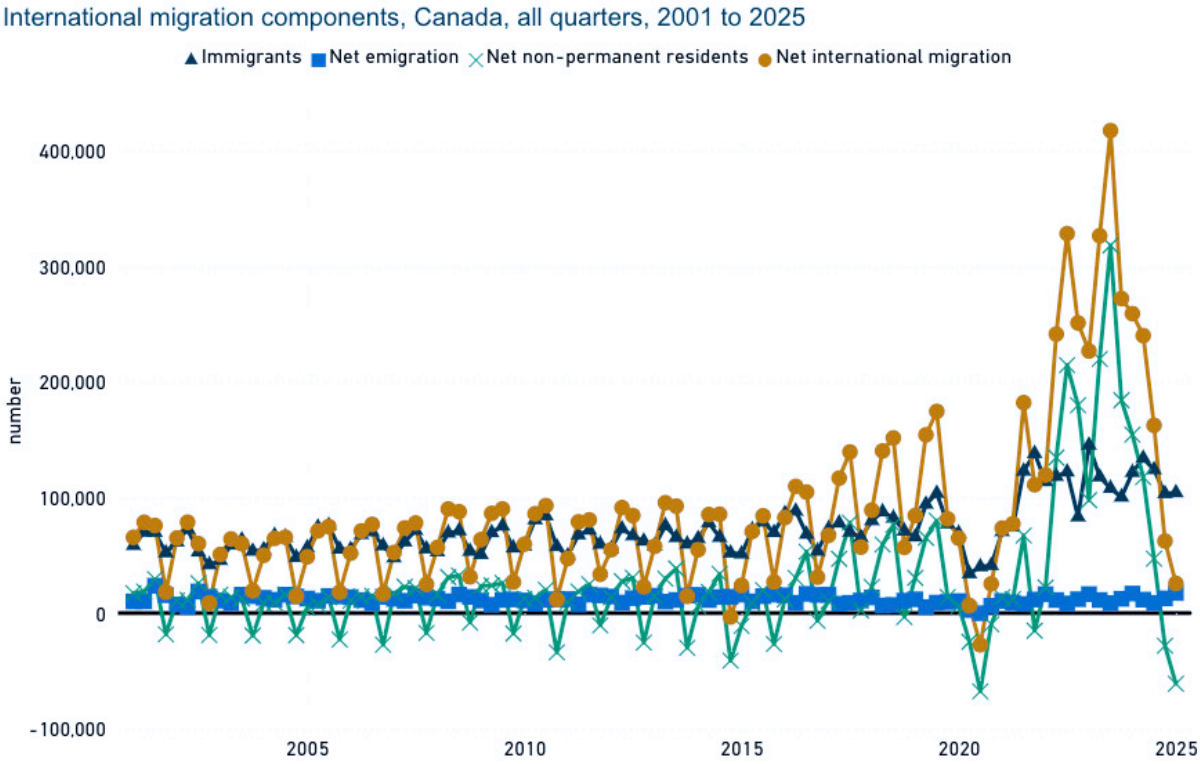


Source: https://thefingeronthepulse.blogspot.com/2023/08/population-growth-context-in-few.html

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.

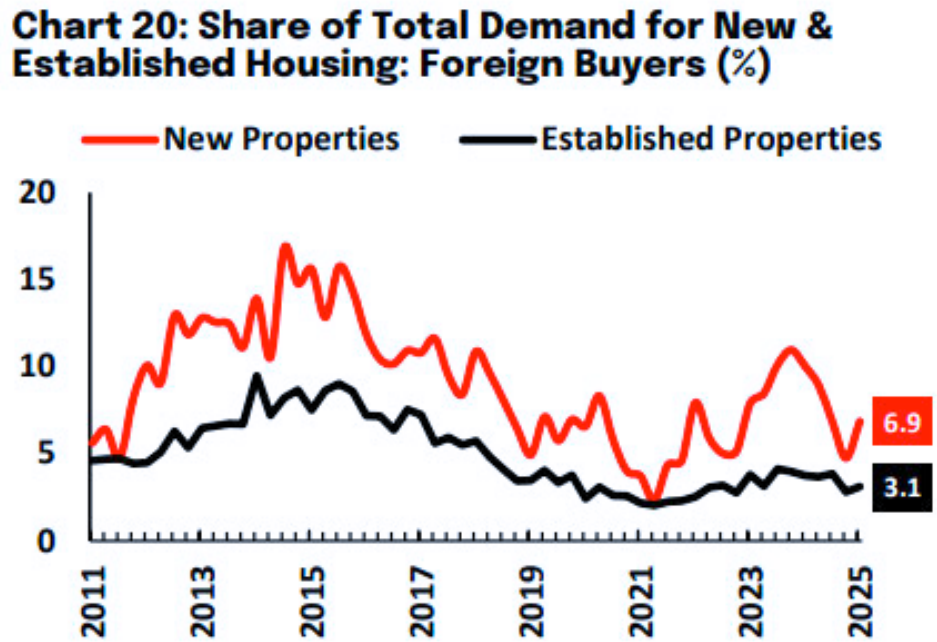
Foreign owners

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.

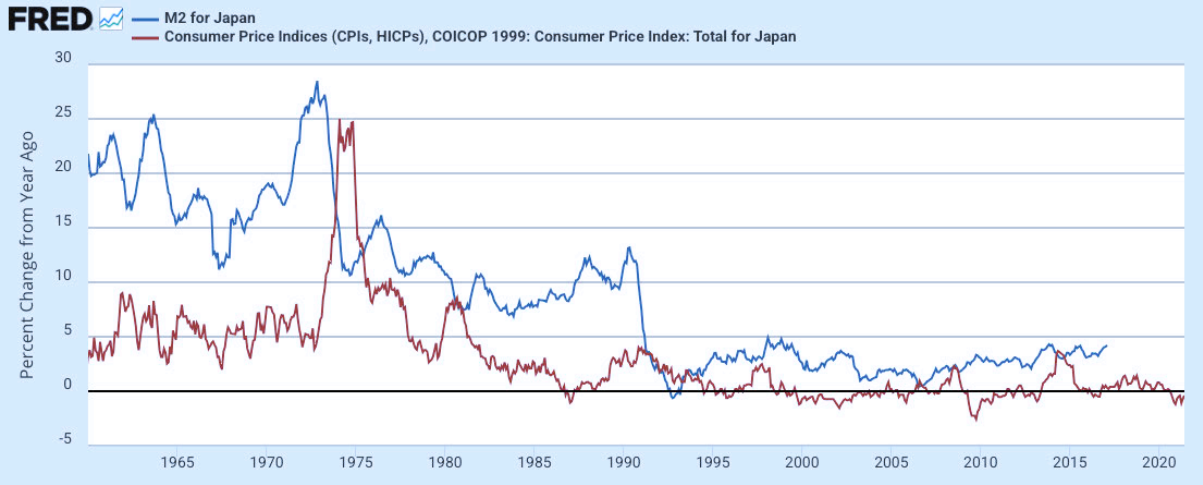
Tokyo

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



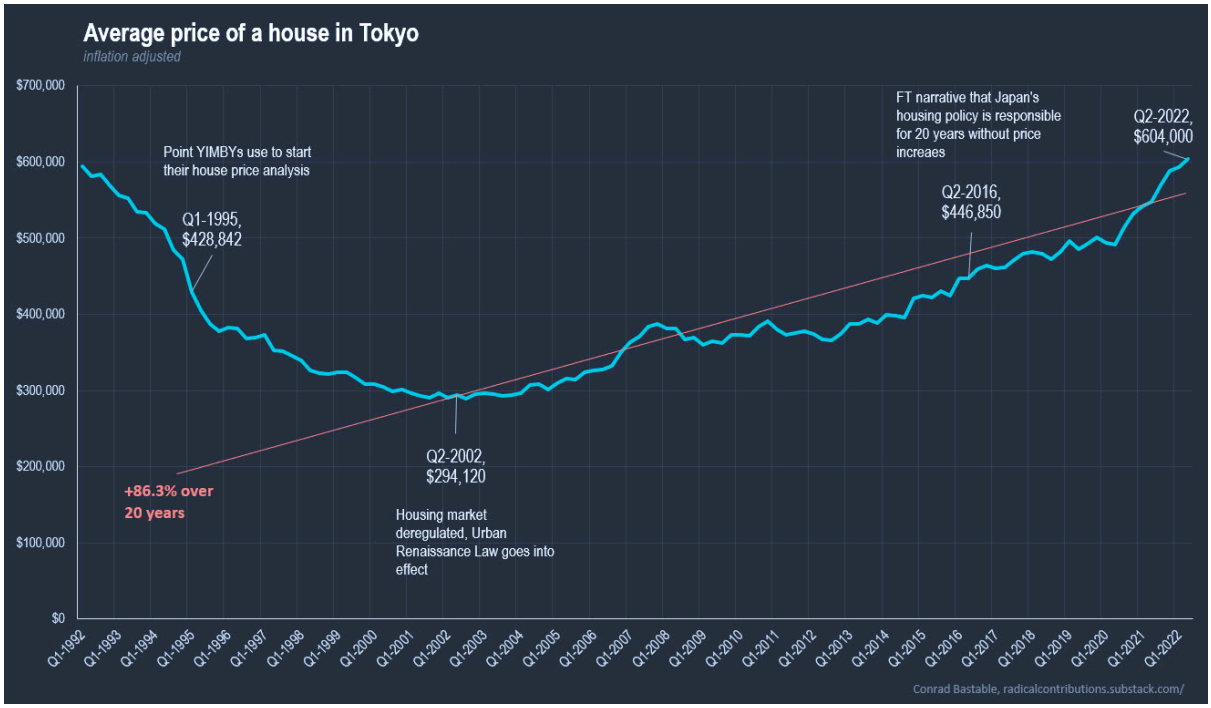
Source: https://fred.stlouisfed.org/graph/?g=WyxZ

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].

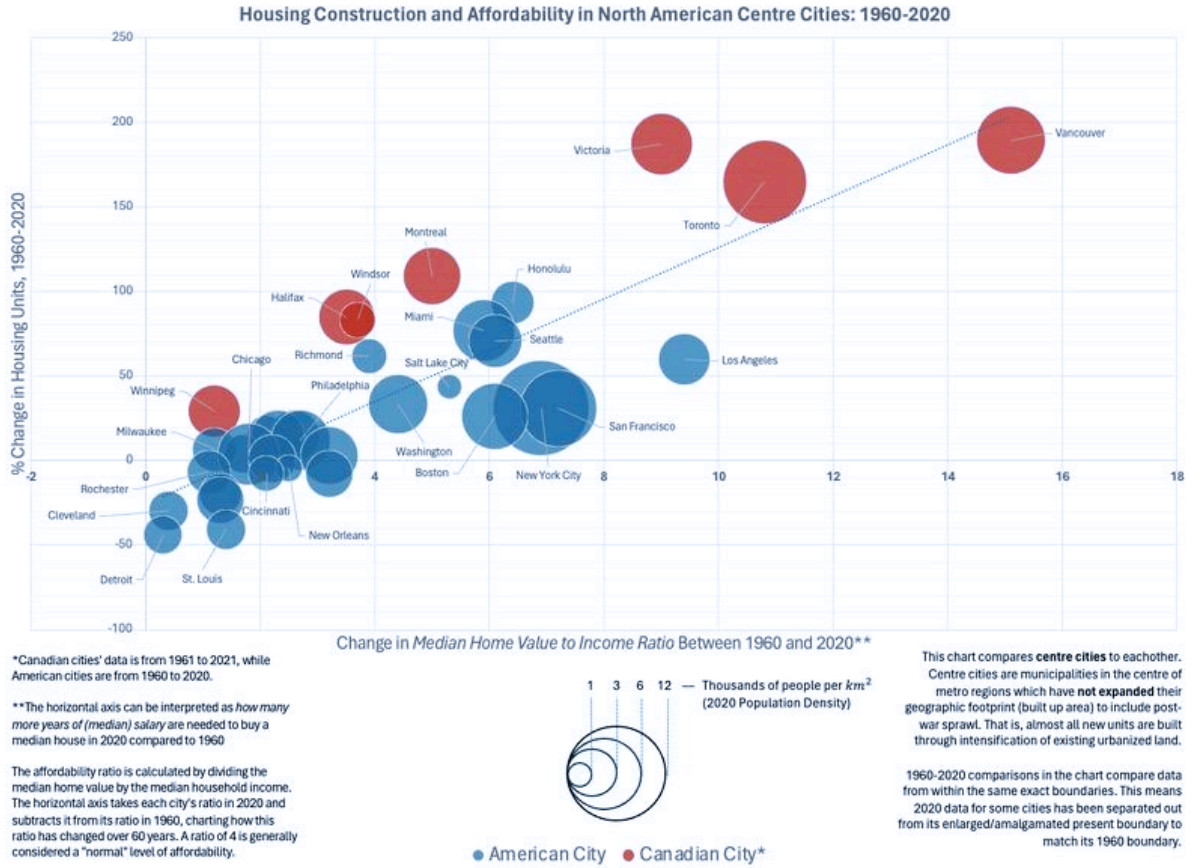
Vancouver

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

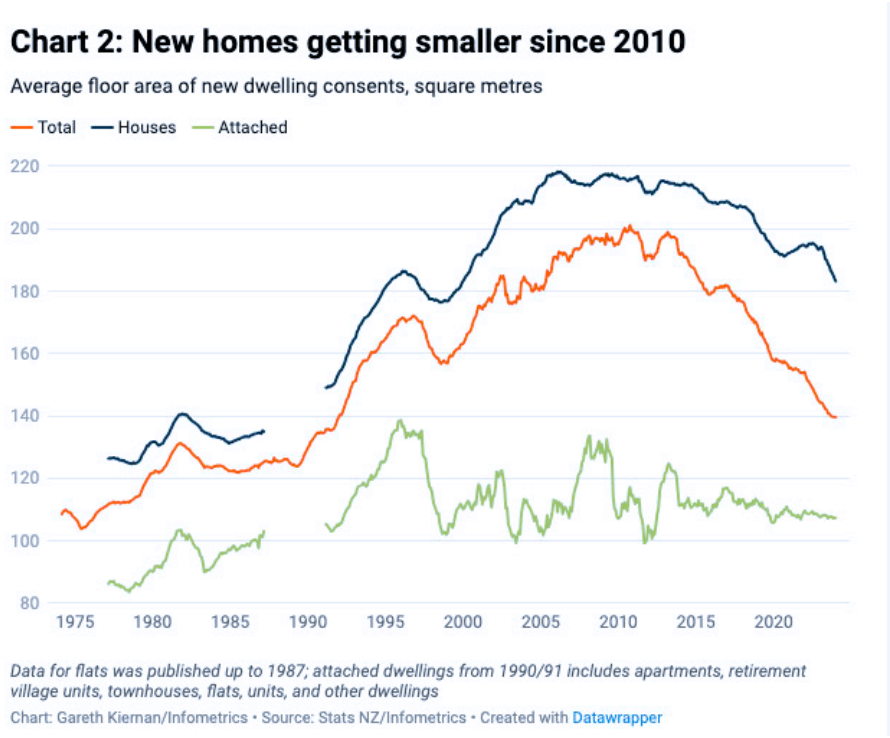
Planning reforms in Auckland and New Zealand are commonly cited as successful examples of housing affordability created by upzoning for 'missing middle'. However, this claim relies on downplaying a large number of factors:

- 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

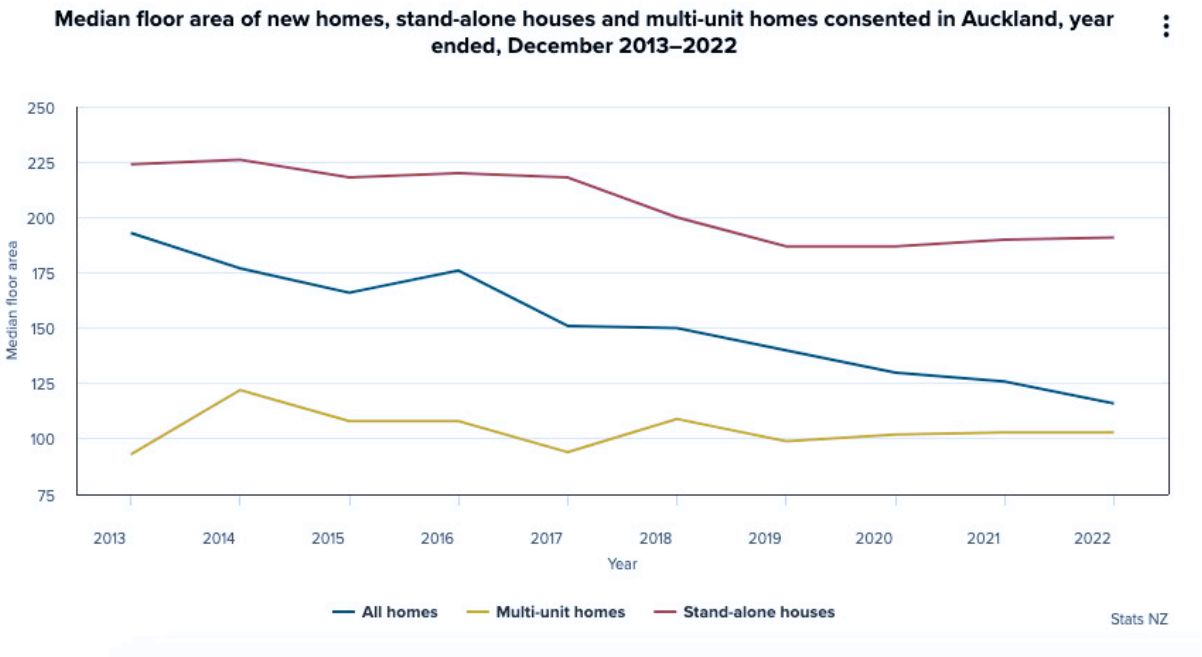
Pro-density New Zealand housing researchers recently produced several well-publicized studies that seem to consider these factors poorly. Supporters prefer to justify disregarding these factors and other weaknesses, such as claiming that picking from a series of linear trendlines is acceptable even though 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:



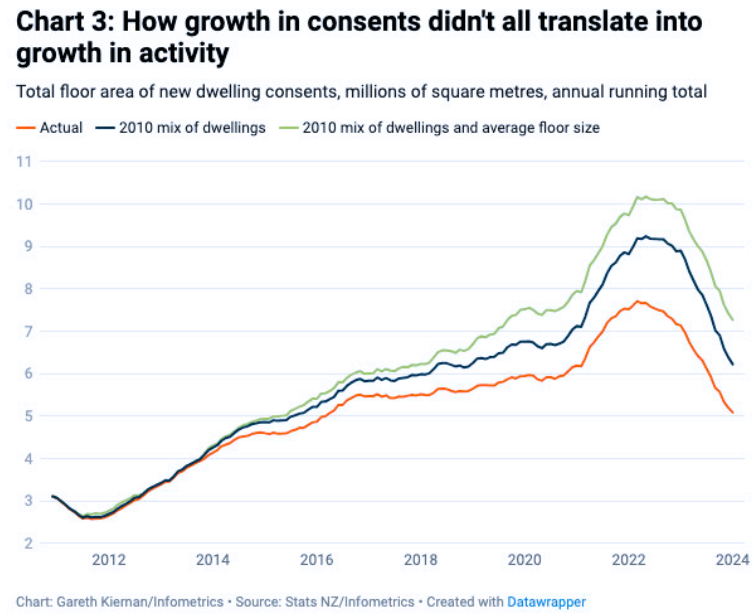
Source: https://es.infometrics.co.nz/article/2024-04-thirty-six-thousand-new-homes-isnt-what-it-used-to-be

[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/

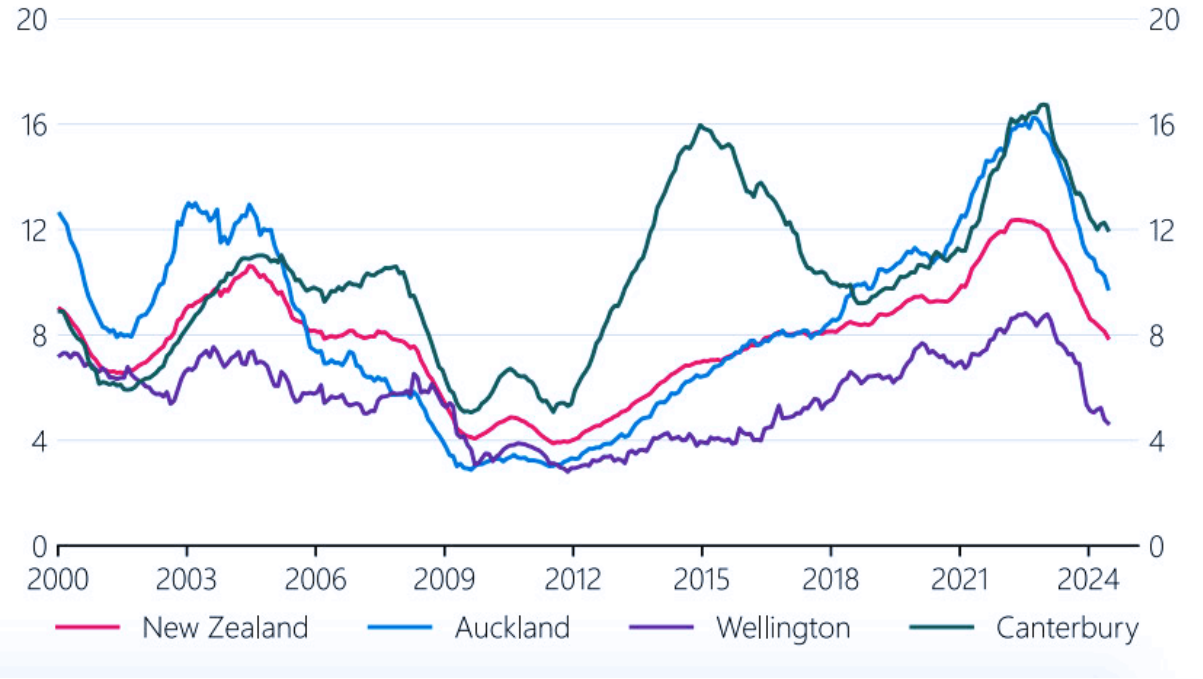
This on its own would reduce the price simply through compositional effects. A greater supply of a cheap, low quality product, will lower the average price of that product's class. Furthermore, producing a less desirable product (townhouses and units) instead of that preferred (detached houses) will 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.

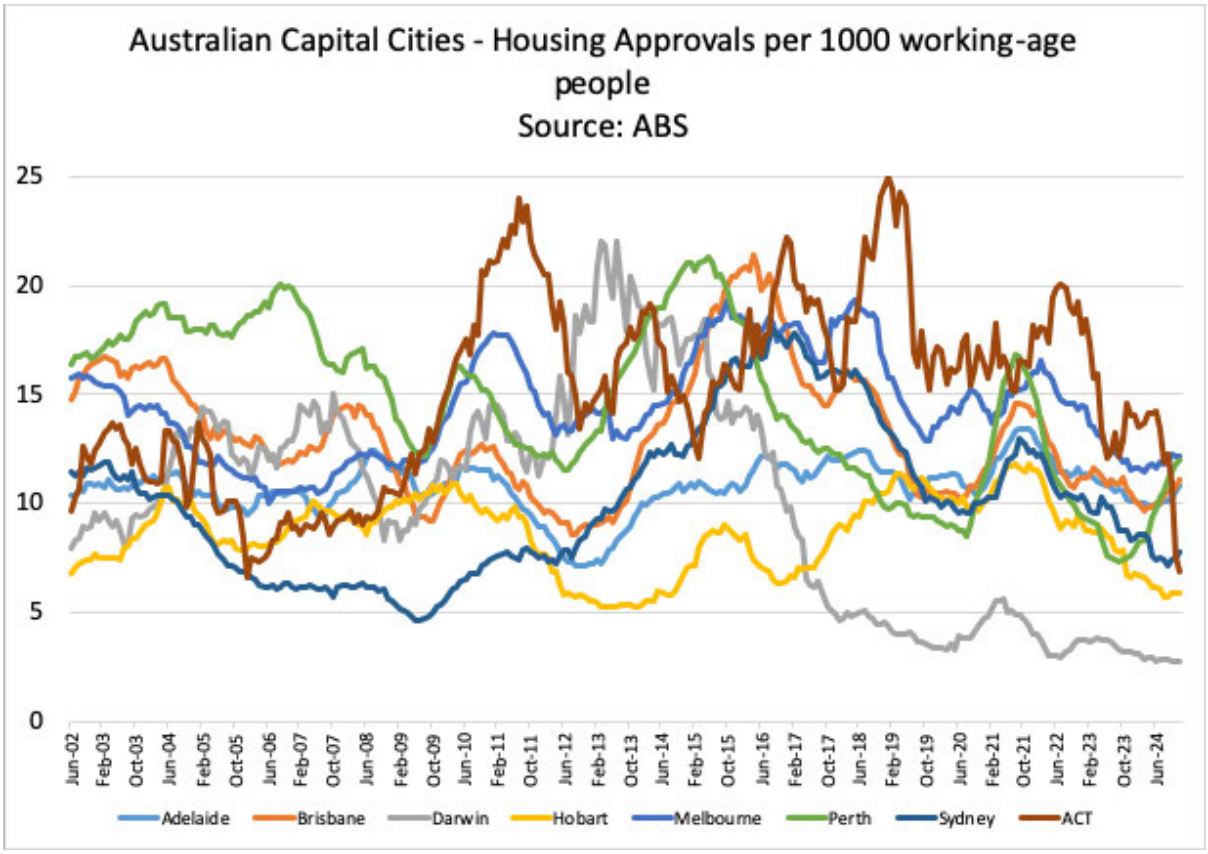
In their September 2024 Financial Stability Report, the Reserve Bank of New Zealand produced an analysis of the NZ housing market. It showed that in terms of new dwelling approved in comparison to working age population, the Canterbury Region had consistently outperformed all others, despite Christchurch 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.

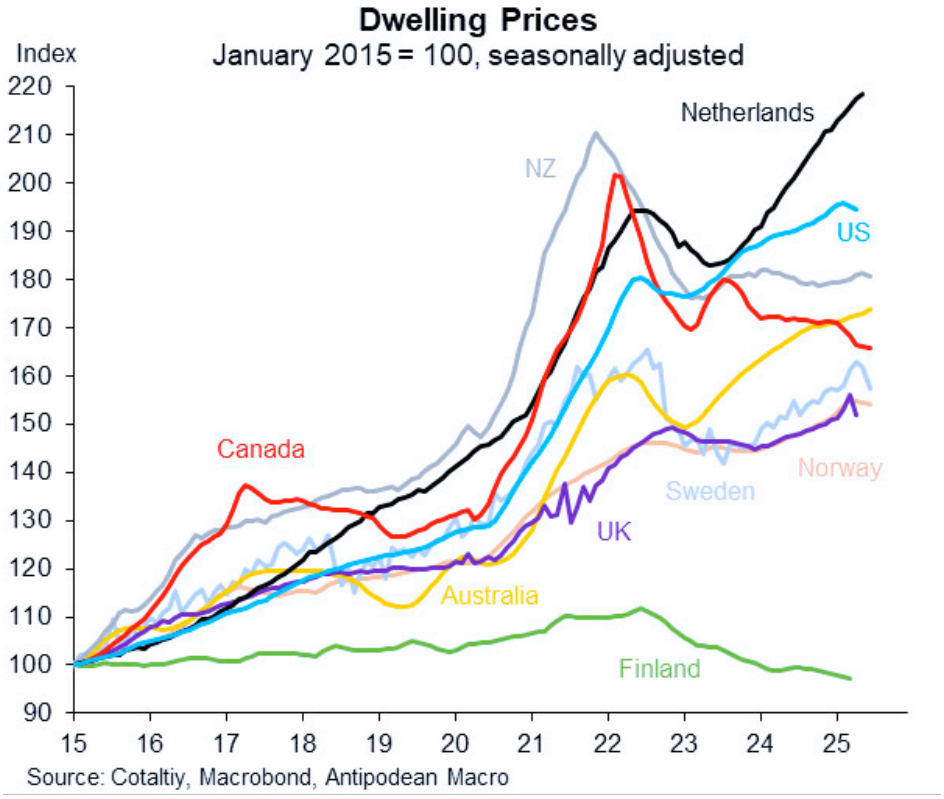
One final thing worth mentioning is that New Zealand's house prices are still extremely high, and appear to be stabilizing at levels well above those zoning theory advocates think should be the case. The rapid fall in new dwelling construction shows the asset nature of housing and that developers won't 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

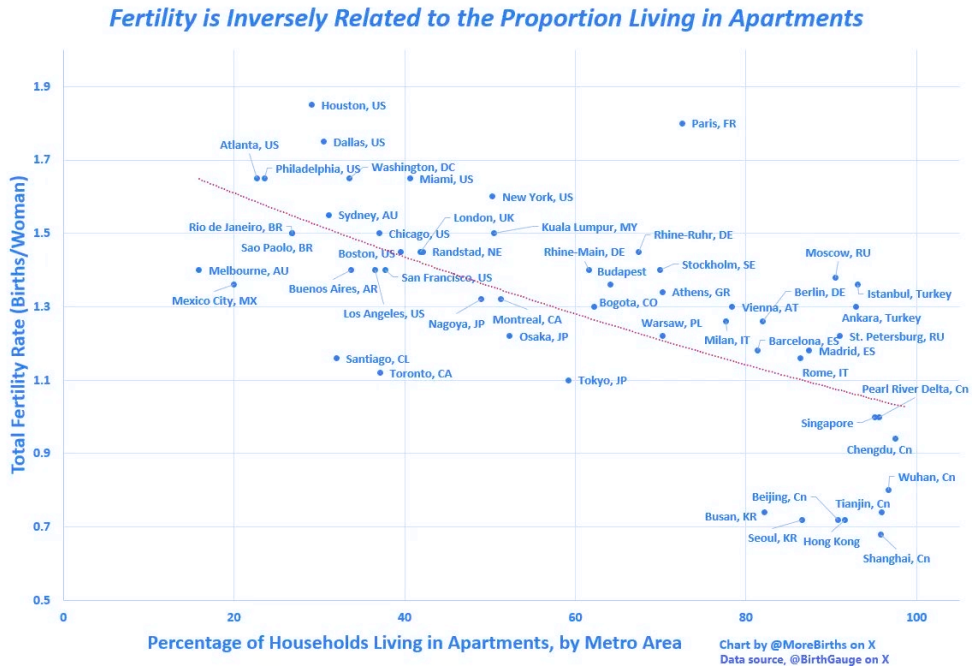
Any theory that claims New Zealand's house price fall was due to rezoning needs to account for Canada's where far less rezoning has taken place but there are many other shared economic factors.

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.

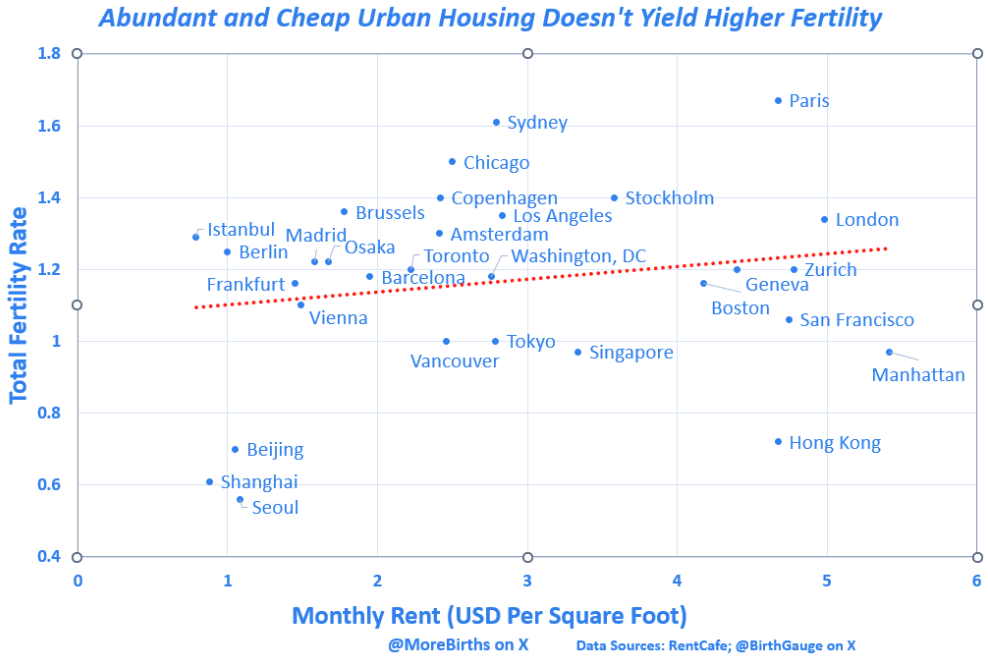
Apartments are devastating for fertility because people do not want to have children without sufficient room, and having a very high proportion of apartments and low

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:

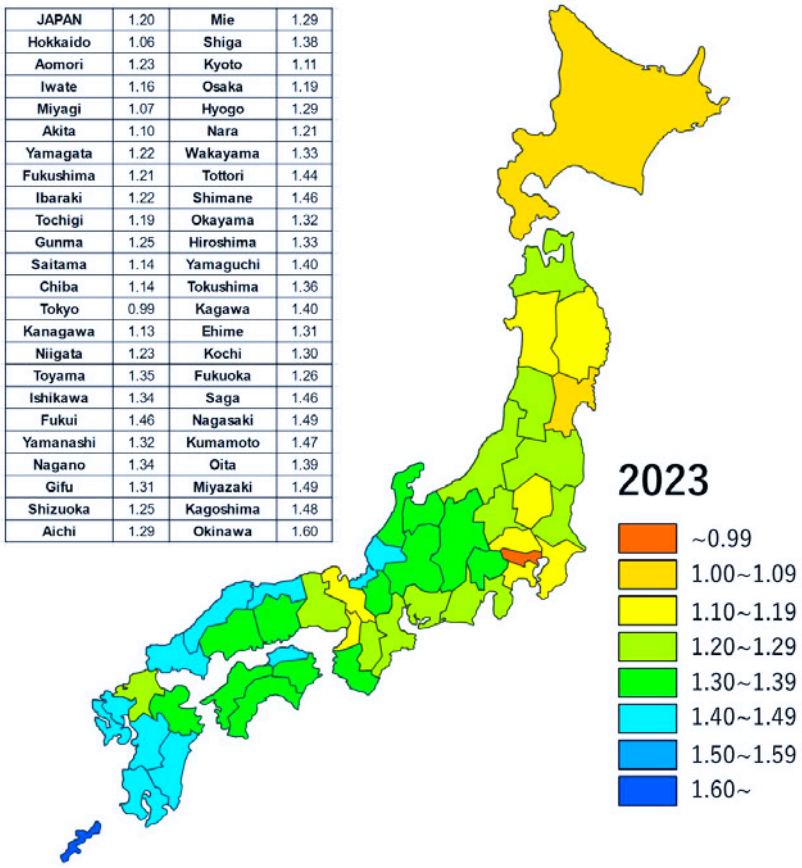


Source: https://x.com/MoreBirths/status/1911863872493142471

[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]:

JAPAN	1.20	Mie	1.29
Hokkaido	1.06	Shiga	1.38
Aomori	1.23	Kyoto	1.11
Iwate	1.16	Osaka	1.19
Miyagi	1.07	Hyogo	1.29
Akita	1.10	Nara	1.21
Yamagata	1.22	Wakayama	1.33
Fukushima	1.21	Tottori	1.44
Ibaraki	1.22	Shimane	1.46
Tochigi	1.19	Okayama	1.32
Gunma	1.25	Hiroshima	1.33
Saitama	1.14	Yamaguchi	1.40
Chiba	1.14	Tokushima	1.36
Tokyo	0.99	Kagawa	1.40
Kanagawa	1.13	Ehime	1.31
Niigata	1.23	Kochi	1.30
Toyama	1.35	Fukuoka	1.26
Ishikawa	1.34	Saga	1.46
Fukui	1.46	Nagasaki	1.49
Yamanashi	1.32	Kumamoto	1.47
Nagano	1.34	Oita	1.39
Gifu	1.31	Miyazaki	1.49
Shizuoka	1.25	Kagoshima	1.48
Aichi	1.29	Okinawa	1.60



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].

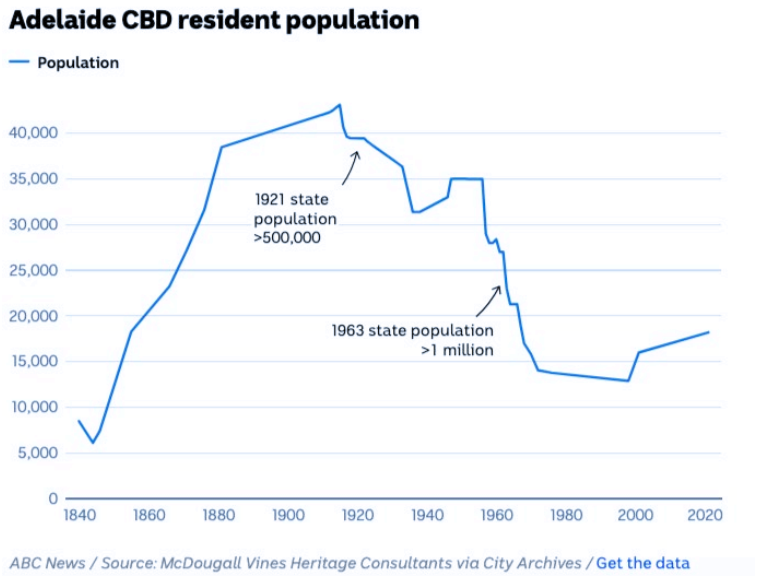
It is only a relatively small circle of people, predominantly young, single and university educated – especially in the arts or social sciences (including town planning and 'urbanism') rather than hard sciences – who desire apartment living. It is notable that many Australian 'YIMBYs', such as the founders 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.

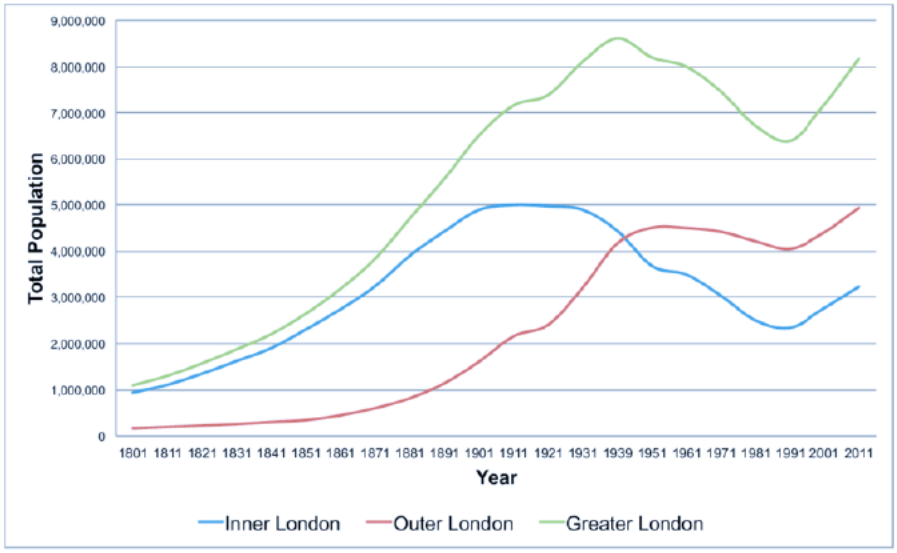
Most people do not choose to live in dense 'walkable mixed use' if they have less dense alternatives available. This has been shown time and time again across multiple continents. When mass suburbanization became possible in the inter-war period, population growth in the city centres halted. As the suburbs 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:

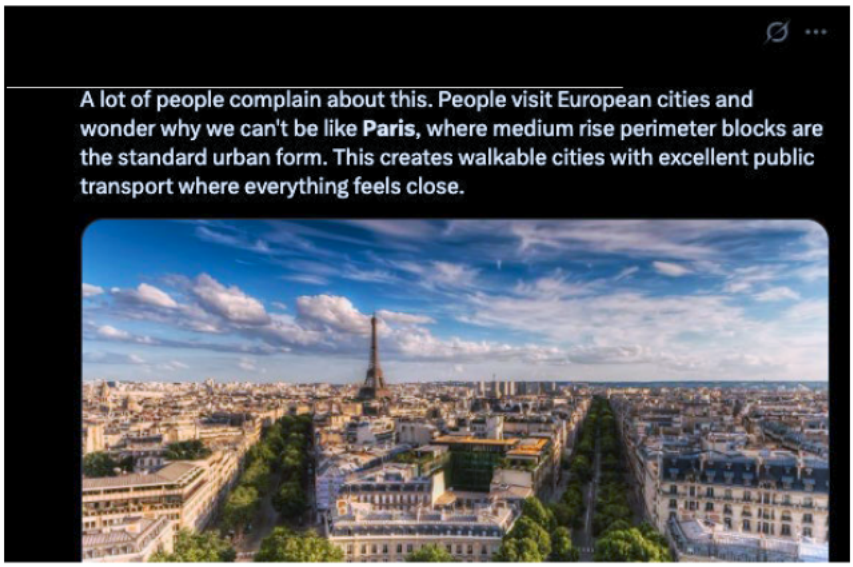
[47] E.g. https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(21)02603-9/fulltext
[48] https://ifstudies.org/report-brief/homes-for-young-families-a-pro-family-housing-agenda



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 <u>not</u> 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

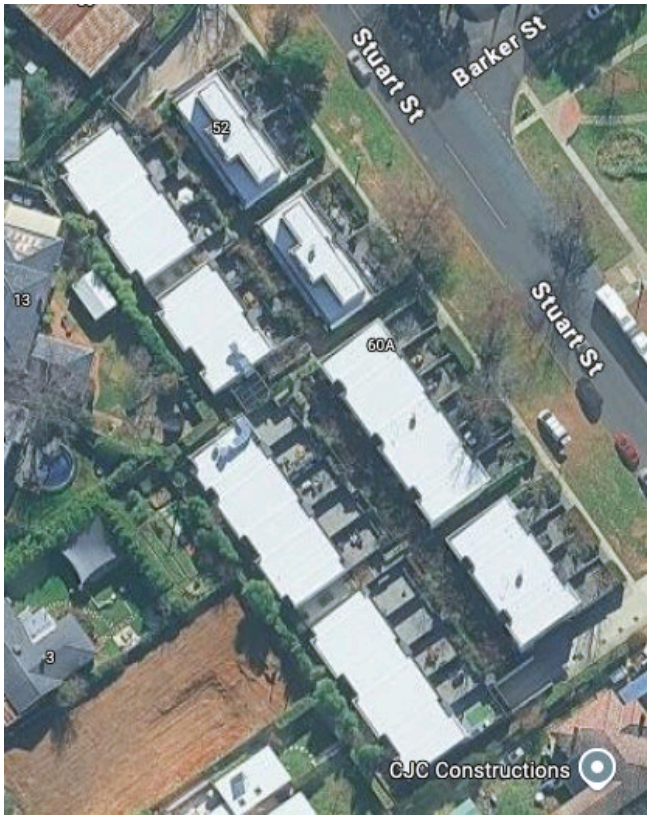
[53] https://www.fresheconomicthinking.com/p/missing-middle-housing-blame-economics.html
[54] https://www.houstontx.gov/planning/Demographics/docs_pdfs/updates/Types-of-Housing-Units_June2017.pdf
[55] https://www.tandfonline.com/doi/full/10.1080/01944363.2020.1852101?src=recsys

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.

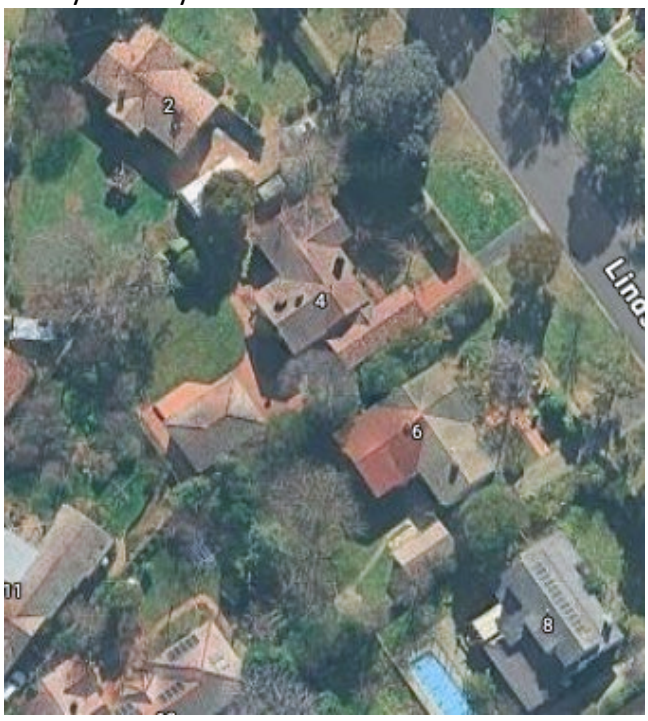
This, especially in the suburbs where the canopy is well developed, significantly mitigates the urban heat island effect and means that the suburbs are only a little warmer than the forested nature reserves. In comparison, areas of high-density development are much warmer. The expansion of rooftops (especially 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.

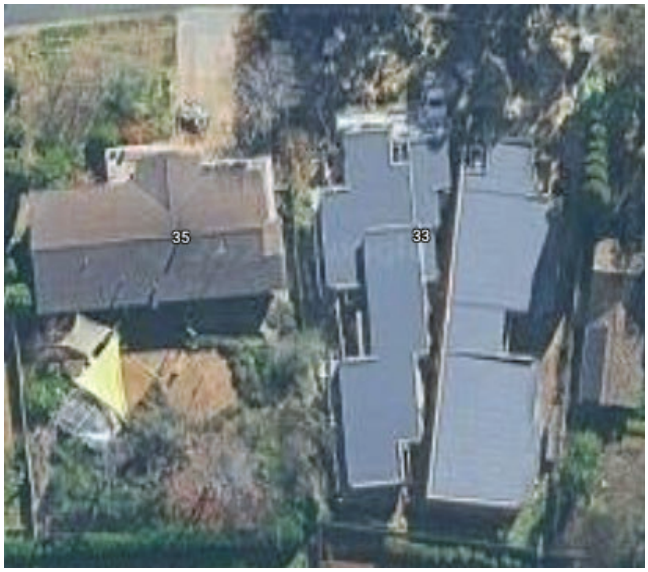
Missing middle development in Griffith. Note the lack of vegetation and high impermeable areas. All dwellings are two-bedroom units:



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.

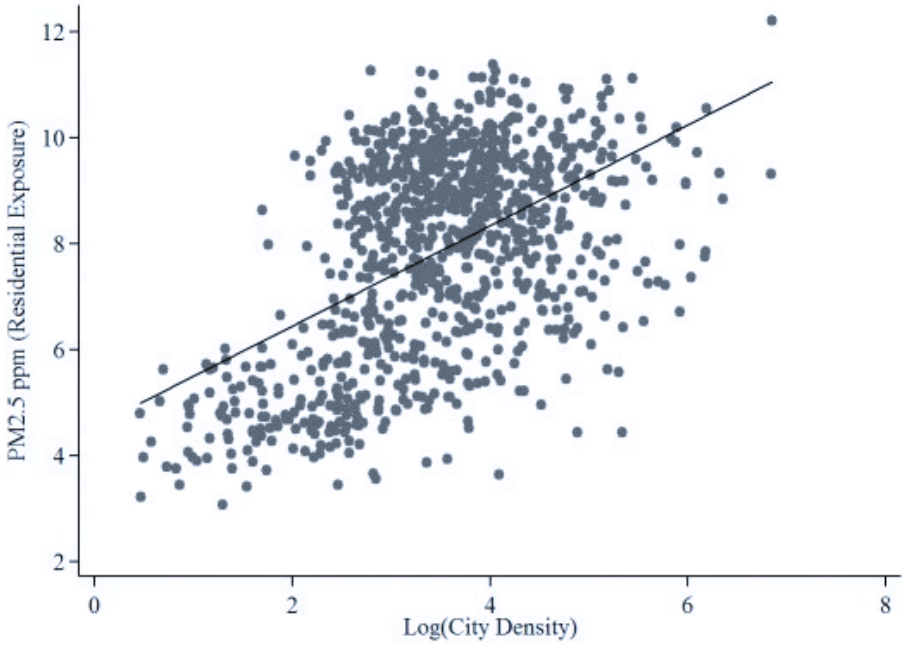
Pollution

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.

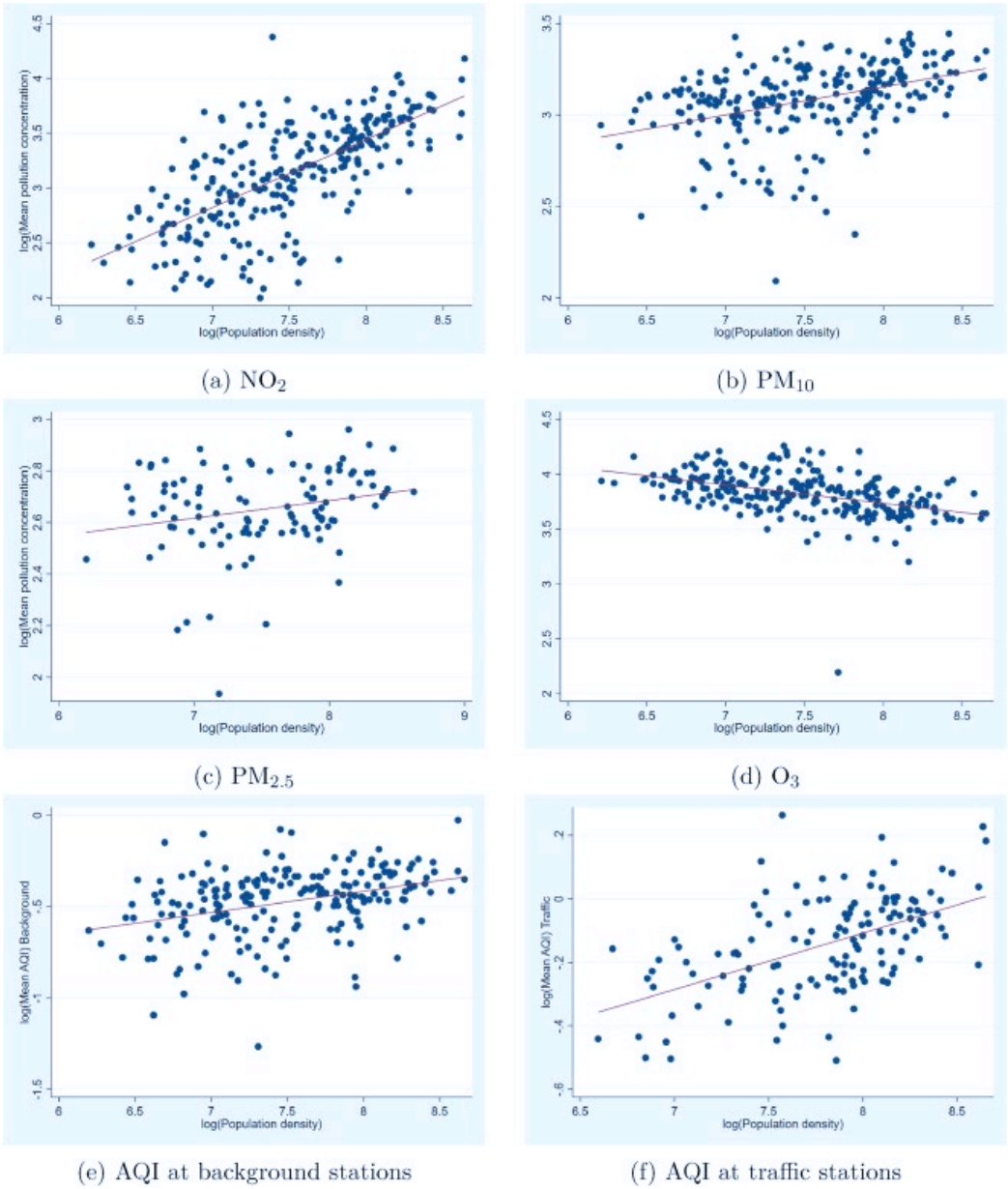
Australian cities, including Canberra, consistently rank much better than major western European cities in IqAir's air quality indices, based mainly around PM2.5 pollution. Paris, Barcelona and Amsterdam are commonly cited by urbanists and planning academics as ideal compact cities with transport policies 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.

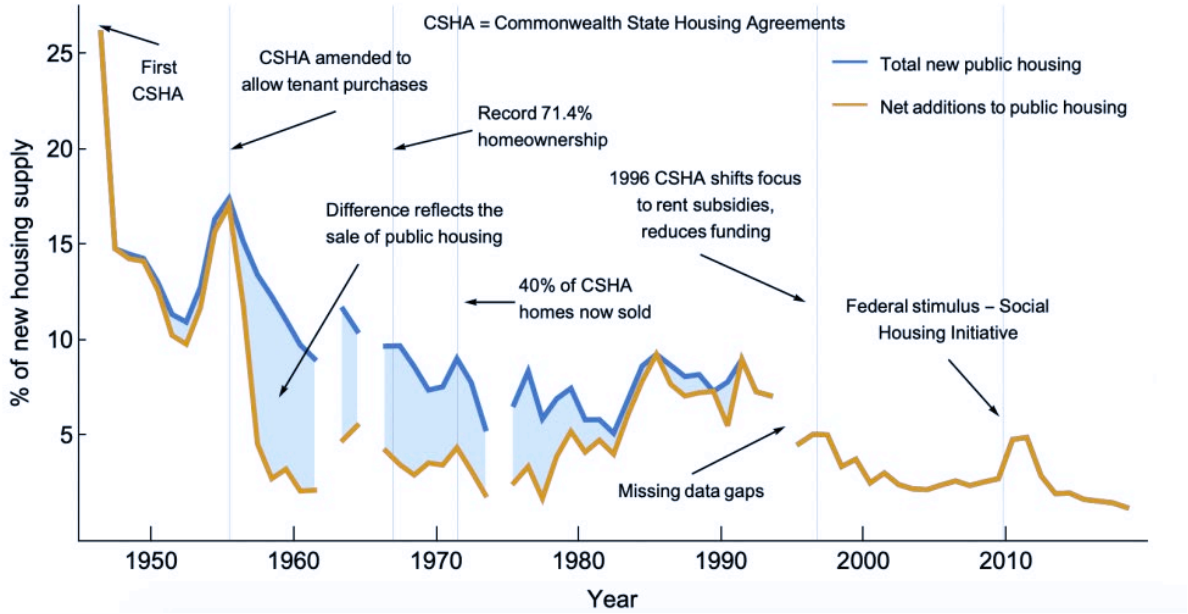
This also feeds into a further example of poor policy making by the ACT government. The original concept of betterment charges (like the ACT's lease variation charge) was to fund infrastructure to accommodate the increased usage by denser sites. However, in the ACT they are used only as a source of general 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

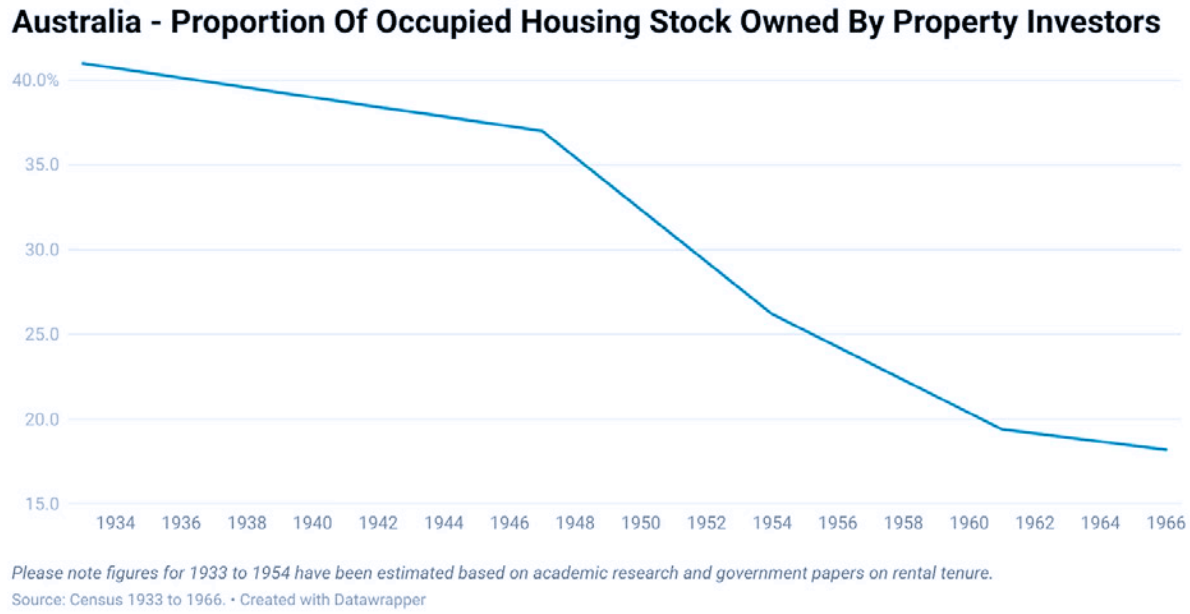
- Government housing construction: under the initial Commonwealth Social Housing Accords, the Chifley government provided funding for states to build social housing, and encouraged sales 'on favourable terms' to low income households. The Menzies government extended the sales provision to middle income 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

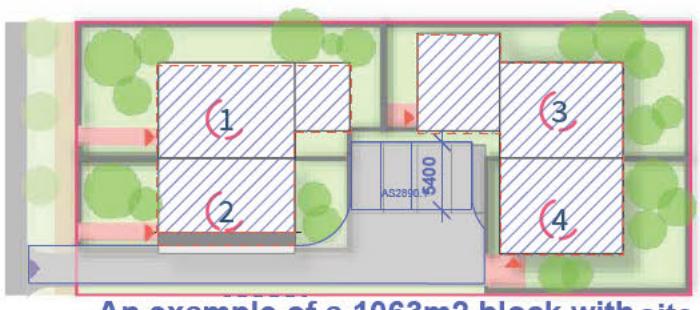
There are a range of alternative siting layouts for townhouses that may be used depending on specific conditions such as planning controls, solar orientation, site slope, adjoining buildings, block dimensions and shape.

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

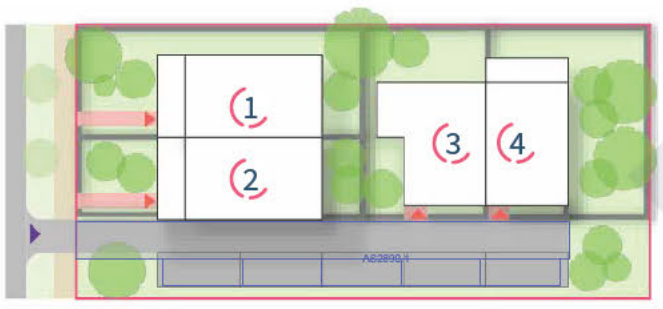
Note: 16,17,and 19 are quite low density and expensive to build. I doubt they will become very common.

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.

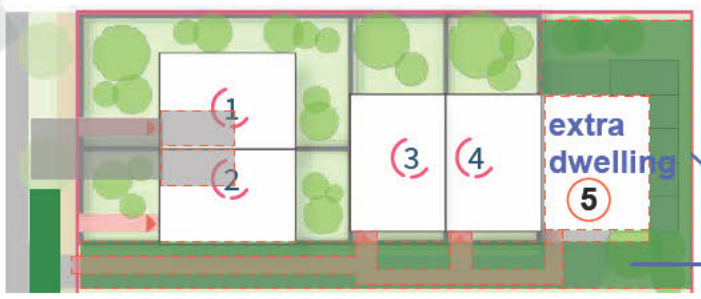
Shared parking to the side



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



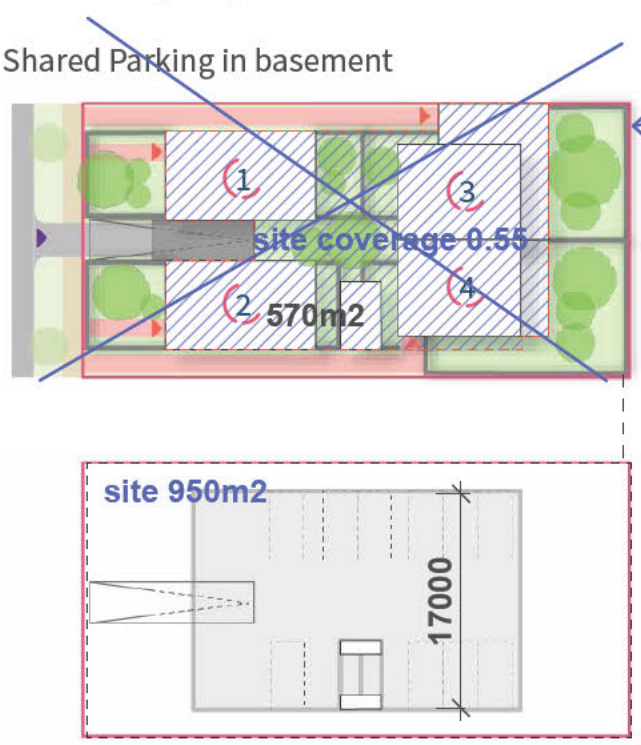
Dwellings 3,4 and 5 each have dedicated parking space(s) in offsite parking house.

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.

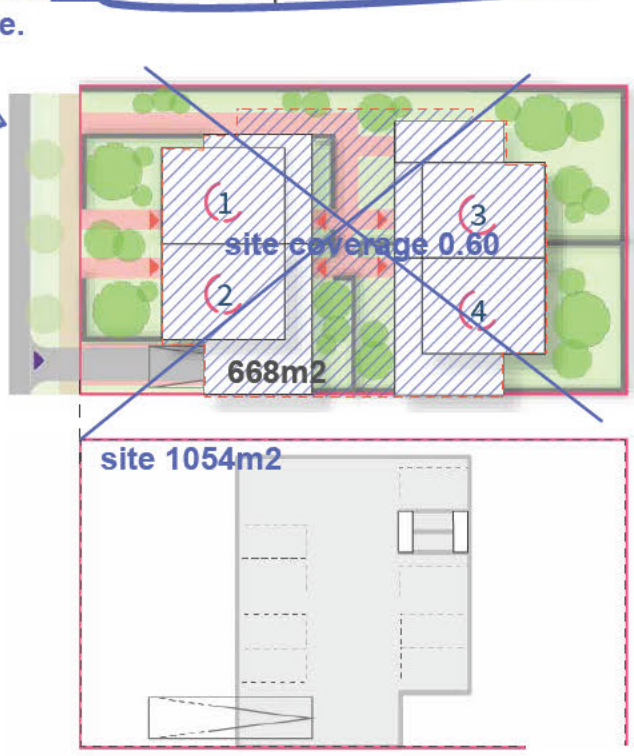


Figure 21: Small block with shared parking in basement. This minimises any negative effects associated with surface-level car parking and access.

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?

ront 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.

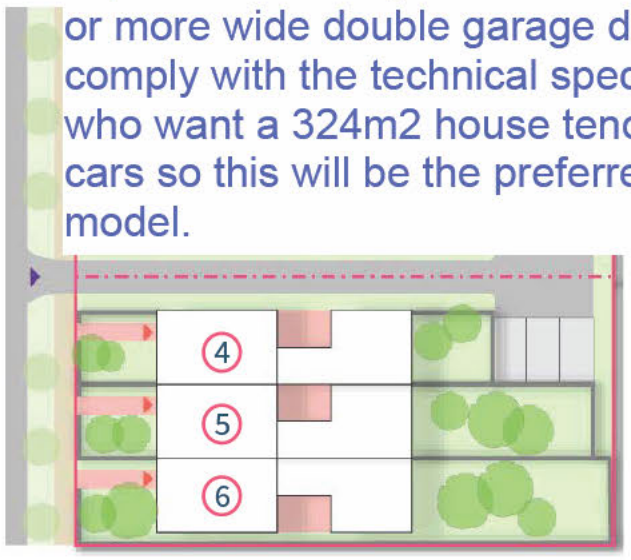


Figure 29: Terraces with shared access to consolidated parking area at the rear maximises the quality and size of private of open space for each dwelling.

Terraces with basement parking

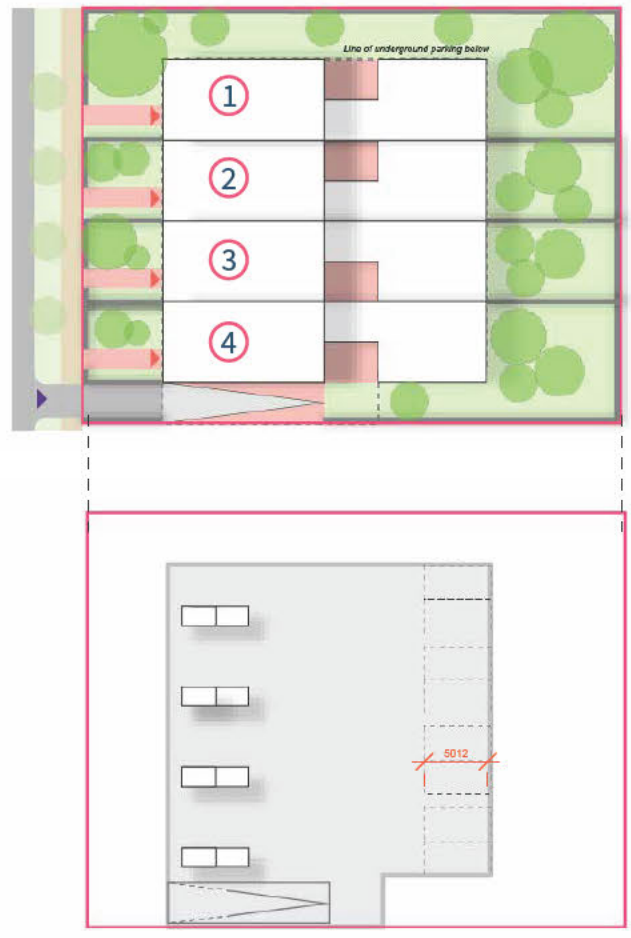


Figure 30: Terraces with underground parking from primary street. Minimises the negative impact of parking on each dwelling and on the streetscape.

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

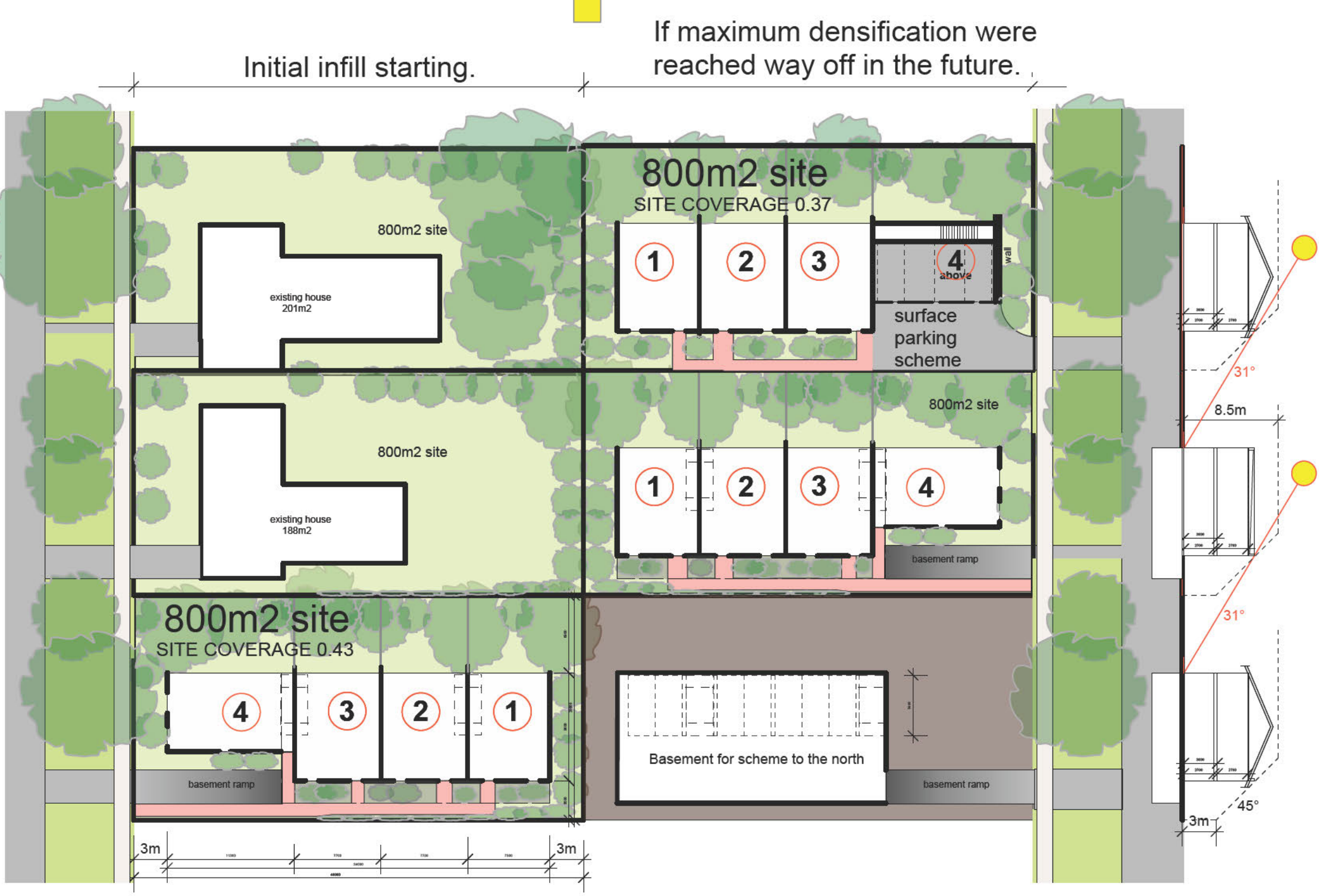
Setback can be reduced to 3m for up to half of rear boundary on east or west boundaries.

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.

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.

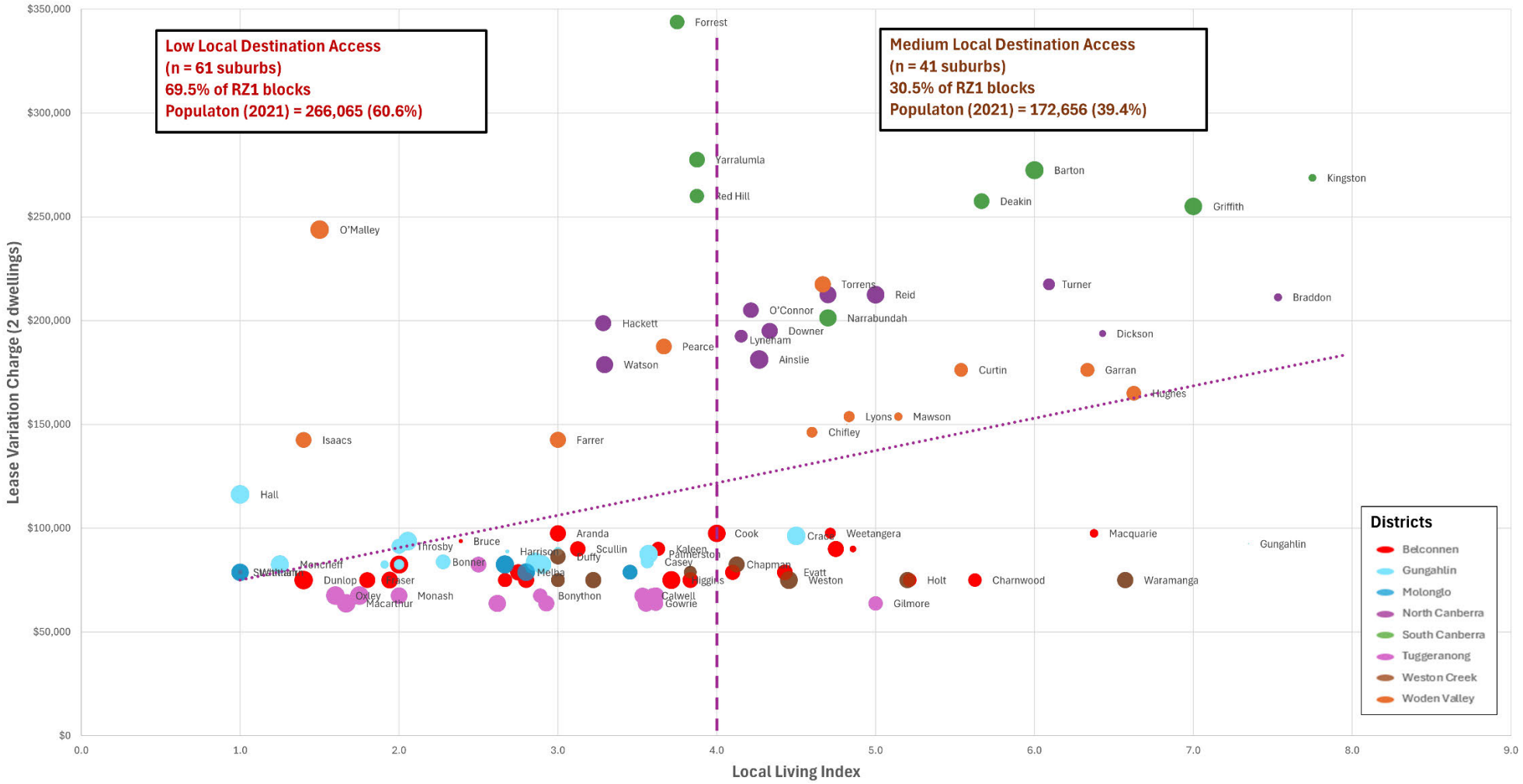
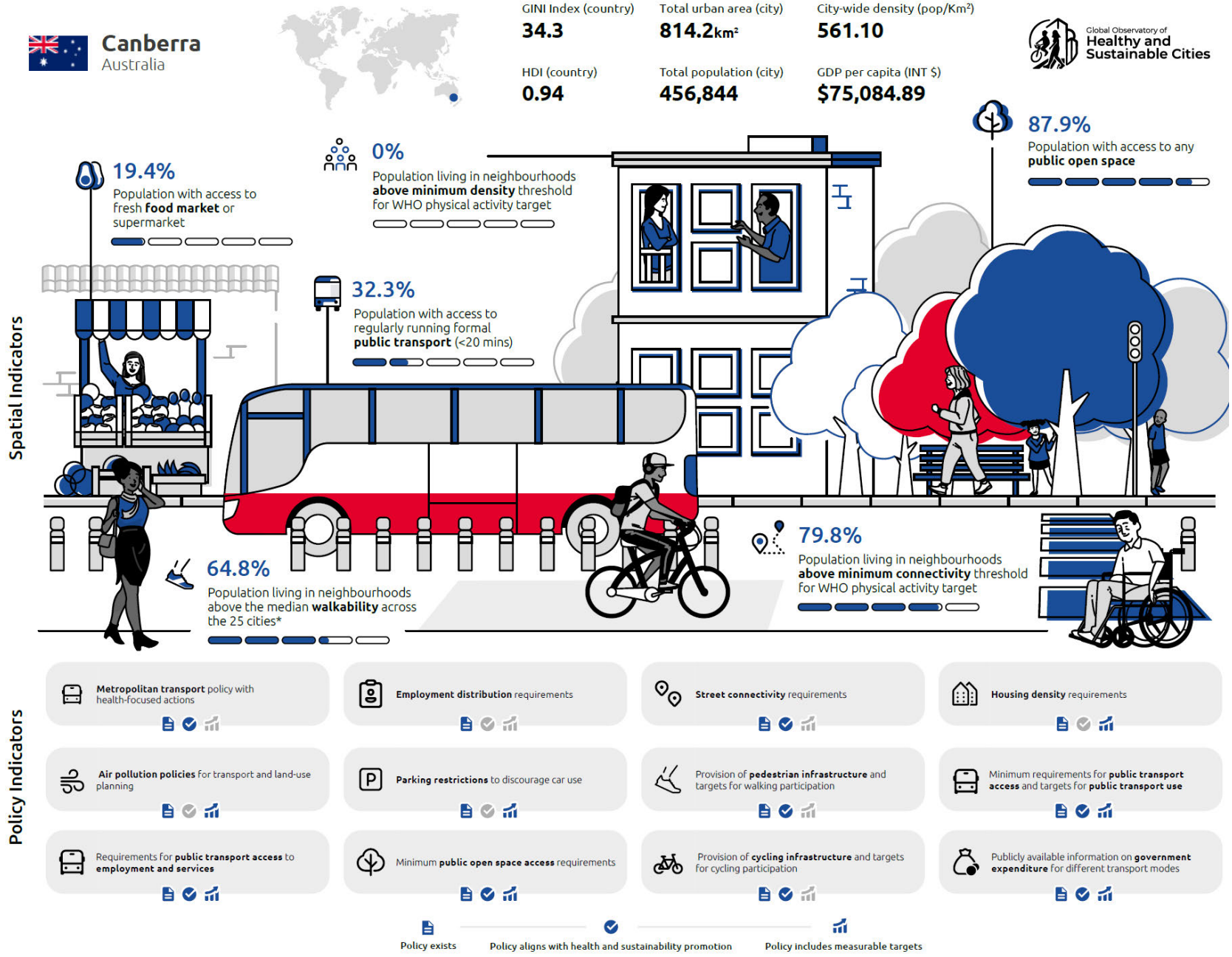


Table 1: Summary of Recommendation 1

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/



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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.

© Dementia Australia 2025

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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2. Major issues - discussion and recommendations

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   2.2 The high target dwelling density is not consistent with the objective of 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.

   2.4 Heritage housing precincts, such as the Radburn area in Curtin, must be protected

   2.5 Decreases in on-site car parking requirements are likely to result in increases in on-street parking with consequent risk to community safety

   2.6 Addressing increased housing choice and affordability

   2.7 Good, usable open space and dwelling size

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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[4] Liu et. al., High temperature and cardiovascular disease in Australia under different climatic, demographic, and adaptive scenarios, *European Heart Journal*, 2025

[5] Liu et. al., Heat exposure and cardiovascular health outcomes: a systematic review and meta-analysis, *Lancet Planet Health* vol.6, e484–95 (2022)

[6] Alonzo et. al., Spatial configuration and time of day impact the magnitude of urban tree canopy cooling, *Environ. Res. Lett.* 2021

[7] Carly D. Ziter et al, *Scale-dependent interactions between tree canopy cover and impervious surfaces reduce daytime urban heat during summer,* Proceedings of the National Academy of Science (USA), 2019

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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info@conservationcouncil.org.au www.conservationcouncil.org.au

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.

north canberra community council

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Protecting, promoting and enhancing the economic, cultural, social and environmental well-being of the residents of North Canberra.

The North Canberra Community Council receives funding and support from the ACT Government.

Dear Madam/Sir,

Please find attached the North Canberra Community Council (NCCC) submission on the proposed Missing Middle Housing Reforms.

This final version corrects errors in one paragraph of the previous version.

The proposed reforms raise a number of serious concerns. We would be happy to discuss these with Ministers, officials and/or a Legislative Assembly Inquiry.

If you have any questions, please feel free to contact info@northcanberra.org.au.

[redacted]

[redacted]

[redacted]
Deputy Chair

5 August 2025

North Canberra Community Council

Submission on Proposed Missing Middle Housing Reforms

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Executive Summary

North Canberra Community Council (NCCC) does not support the “Missing Middle” housing reforms to the Territory Plan (hereafter MMHRs) as proposed by the ACT Government.

NCCC considers that the MMHRs:

- are not based on a clear statement of objectives or compelling evidence that the MMHRs will deliver particular outcomes; and,
- are neither necessary nor sufficient to deliver the scale and diversity of housing the community needs; and,
- are likely to deliver a range of negative outcomes that have not been identified, assessed or explained to the communities most directly affected; and,
- would lead to haphazard, unpredictable development driven by developers rather than the community.

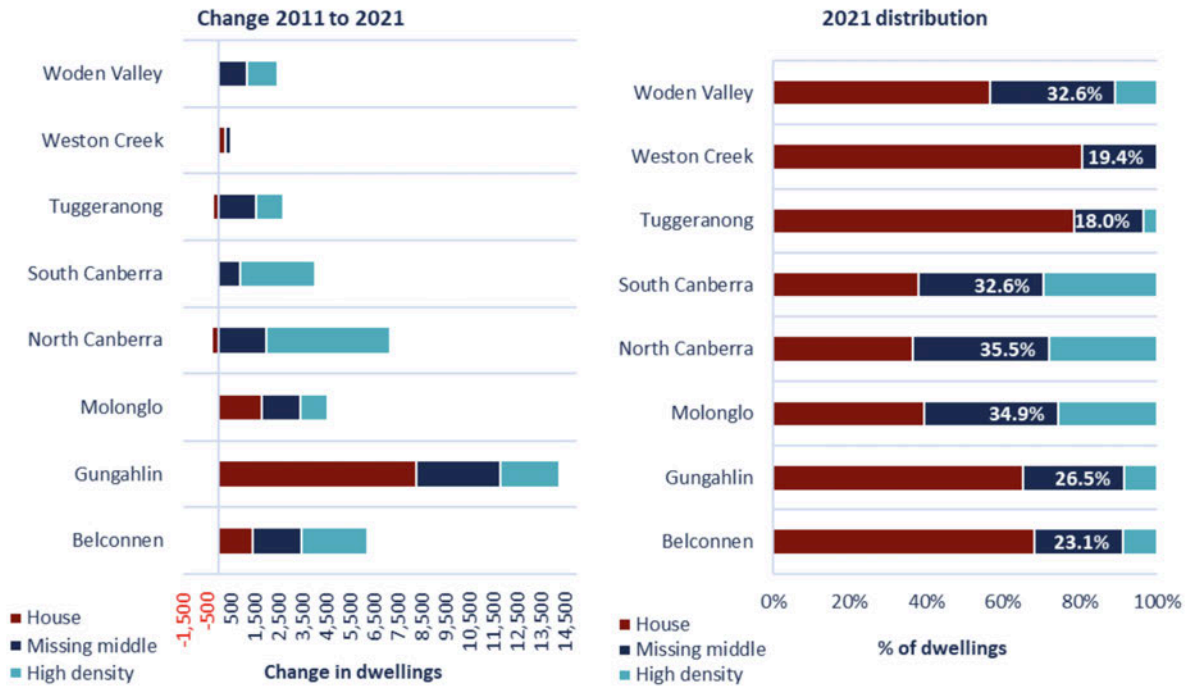
The NCCC supports appropriately planned and targeted dwelling density increases within existing suburbs with a commensurate increase in amenities and infrastructure such as schools and community services, health facilities and services, shops, parking, EV charging points, cycle paths and footpaths, playgrounds, facilities for recreation, waste collection, sewerage, maintenance etc.

The NCCC considers that decisions to relax rules in order to accelerate higher density housing in appropriate locations with appropriate support can be efficiently achieved through zoning amendments that incentivise medium density housing in RZ2, close to local shops and services, and more targeted adjustment to rules for residential zones RZ1, RZ3-RZ5. Under the existing zoning system, the ACT in recent years has delivered housing at a rate consistent with the Government’s target of 30,000 new homes by 2030. This housing has largely been delivered in appropriate locations with access to services and transport nodes, and within the Government’s stated goal of 70% of new dwellings being within the existing urban footprint. This development also has delivered a diversity of housing, as shown in Table ES1. This table shows a wide penetration of missing middle-type housing in almost all areas of Canberra, and a massive shift away from a focus on stand alone houses.

We note the rapid increase in population that has been accommodated in recent years in North Canberra, demonstrating that both the private sector and current planning system are capable of delivering urban infill in appropriately zoned locations in response to demand. We also note the potential for significant new dwelling construction in the Inner North at future redevelopment sites such as Thoroughbred Park and Yowani Country Club, thereby releasing substantial supply.

So, there seems no basis for the radical MMHRs, which represent sweeping changes to the newly minted Territory Plan, premised on assumptions that do not hold. These reforms essentially abdicate responsibility for significant planning decisions all across the city, without recognising the many costs to the community. This does not support orderly development of a well-planned and managed city, and would be in conflict with the role of the national capital to showcase best practice and sustainable planning.

Figure ES1 - Evolution of missing middle 2011 to 2021



Note: Sample excludes small and offshore locations, and other dwelling typologies such as caravan and improvised home. Source: Purdon analysis of ABS Tablebuilder, counting dwellings, place of enumeration SA3 by Dwelling Structure (2011 and 2016).

Source: Figure 8 of *Planning and Economic Feasibility: Integrating the Missing Middle in RZ1 and RZ2*, by Purdon Planning for EPSDD, October 2024

The proposal also poses substantial risks, especially:

- An inability to match infrastructure with ad hoc redevelopment, leading to inefficient use of infrastructure and infrastructure shortfalls for many areas
- Loss of valued urban character, with the character of neighbourhoods now driven by individual developer decisions rather than strategic planning with community input
- Rate increases affecting all lessees and occupants of residential land of 15-25% or more, even if they do not change their housing at all
- Proliferation of poor quality construction, noting the Missing Middle Design Guide is not mandatory, and compliance enforcement seems impossible, and noting that even the technical requirements are not mandatory
- Increased and unmanaged traffic and road congestion

- Loss of private open space quantity and quality for future residents, including substantial reductions in solar access and privacy for RZ1 and RZ2 (ie the vast majority of residential land)
- Reduced climate change resilience.

The MMHRs propose a raft of changes which, if implemented, would radically alter the amenity of most residential streets and suburbs. Much of the content is essentially deregulation of the planning system, and a shift in power that means the pattern of urban development would be largely unmanaged, being determined and driven by private land developers.

The NCCC also notes a number of technical concerns in the proposed MMHRs. These should be addressed even if changes are made to encourage higher density dwellings through the existing zoning system. These include:

- Site coverage limits of no more than 45%
- Appropriate minimum subdivision block sizes
- Clear and appropriate maximum height limits (not storey limits)
- Removal of frontage requirements for subdivided RZ1 blocks
- Removal of requirement for subdivided blocks to contain an existing dwelling
- Appropriate consolidation limits
- Minimum 30% deep soil zone requirements in all residential zones
- Requirements for at least 30% tree canopy coverage on all residential blocks
- Preserving the solar building envelope at 31° for multi-unit housing in RZ1 and RZ2
- Enhanced car parking rates

NCCC supports the government's purported interest in increasing housing affordability and access to suitable housing that delivers greater choice, but does not consider that the MMHRs will deliver these outcomes. There are more reliable approaches available to achieve these outcomes without embracing an unmanaged scenario, including working with federal government to reduce inflated housing demand, release of well-located blocks of land such as Thoroughbred Park, greater construction of public and community housing, and addressing shortages of qualified construction workers.

The NCCC finds that the government's approach to consultation on the MMHRs has lacked transparency and comprehensiveness, and has not engaged the communities most directly affected in ways that reflect the scope and magnitude of the changes being proposed. The consultation documents and YourSay page sometimes appear more as marketing exercises, and include a number of false or misleading claims, and lack any serious discussion of potential risks from the proposed reforms. A genuine attempt to engage the community's views on these complex issues is required.

A Legislative Assembly Inquiry could help to shed light on relevant issues. However, a longer-term and substantive approach to examining these issues is preferred, possibly through an independent assessment panel. Given that we are less than 2 years into a significantly restructured planning system, and that the new Territory Plan only took effect in late September

2024, it is appropriate to take more time to analyse and weigh up the impact of throwing out basic settings and safeguards in favour of letting private interests drive Canberra's planning.

Recommendations

Recommendation 1:

The ACT Government should provide a clear and logical rationale for its MMHRs, including information, supported by quantitative analysis wherever possible, covering:

- **What specific objectives the government is trying to achieve and evaluation of other options to achieve them.**
- **What the targets of the reform are, including a desired split between detached houses, missing middle dwellings and higher density apartments**
- **Modelling analysis of the timing and penetration of proposed changes, including the rate at which appropriate properties are likely to become available and the economic drivers for the proposed diversity and affordability of housing choices**
- **Descriptions of how the character of Canberra's neighbourhoods are likely to change if the MMHRs go ahead in an uncontrolled fashion**
- **Evaluations of the state of infrastructure across the Territory, how this will match up with developments under the proposed MMHRs, where there may be further infrastructure capacity, and how enhanced infrastructure in existing urban areas will be matched to unpredictable development under the proposed MMHRs**
- **Projections of housing prices into the future, and evidence on how the MMHRs are likely to affect prices, including examination of key drivers of housing availability and pricing**

Recommendation 2:

The ACT Government should undertake comprehensive consultation with the ACT Community that includes information such as that described in Recommendation 1, to ensure the community is well aware of how the proposed MMHRs may affect the character of all Canberra suburbs, what specific changes the reforms will deliver and what alternatives are available to achieve similar outcomes.

This consultation could include a role for a panel of experts and community representatives to ensure thorough consideration of all relevant issues and reasonable time for community understanding and input.

Recommendation 3:

The consultation process identified in Recommendation 2 should include consideration of the risks as well as potential benefits from proposed reforms. This should include, at least, alternative approaches to address building quality, matching infrastructure with development, how to handle losses in private open space, handling of impacts on traffic

and road capacity, and where the government expects major changes to current urban character.

Recommendation 4:

The consultation process identified in Recommendation 2 should also include information on what this proposal means for rates, and how Lease Variation Charges will be handled, so that residents understand how they are likely to be impacted. This should also include the likely impact of increased rates on house prices.

Recommendation 5:

The ACT Government should revise the Residential Zones Policy assessment requirements and tighten technical specifications for residential zones and subdivisions, including:

- **Site coverage limits of no more than 45%**
- **Minimum subdivision block sizes**
- **Clear and appropriate maximum height limits (not storey limits)**
- **Removal of frontage requirements for subdivided RZ1 blocks**
- **Removal of requirement for subdivisions to contain an existing dwelling**
- **Appropriate consolidation limits**
- **Minimum 30% deep soil zone requirements in all residential zones**
- **Requirements for at least 30% tree canopy coverage on all residential blocks**
- **Preserving the solar building envelope at 31° for multi-unit housing in RZ1 and RZ2**
- **Enhanced car parking rates**

1. What is the real objective of the proposed changes and the problem we are supposedly trying to solve?

Is there really a "missing middle"?

The rationale for the proposed reforms is not very clearly stated in the Government's documentation, and there are no specific targets identified to assess performance. The position starts with a recognition that more dwellings need to be built on a limited land footprint, and says 30,000 dwellings need to be built by 2030. This is a slower rate of growth than what has been achieved in the recent past in the ACT. This 30,000 figure also seems to be a bit of a magical number, as it was also the government's goal for housing construction over 5 years in 2022.[1]

The total number of dwellings in the ACT grew by 19% from 2011 to 2016 and 16% from 2016 to 2021. These are annual growth rates of 3.6% and 3.0% per year. To reach the 30,000 target from the 2024 level of around 192,000[2], would require an annual growth rate of around 2.9%. This is a lower rate than was achieved in 2016 to 2021 and more than a half percent per year less than was achieved from 2011 to 2016.

In 2022-2024, the rate of dwelling completion seems to have slowed somewhat, but is still around 2.1% per year. So, the 30,000 dwelling target is really a rate slightly above what's been achieved in the last few years and below recent history.

And it is worthy of highlighting, this 2.1% rate has been achieved while still achieving balanced urban consolidation. In 2023 and 2024, 73% of approvals were in the existing urban footprint, above the Government's stated target of 70%.[3]

So, with existing zoning rules, the government is roughly on track to achieve its targets both in terms of housing numbers and overall consolidation. The case for a radical shift in approach to residential zones across the board does not seem clear on this basis.

The next justification for these changes is about a need for more housing diversity, including "missing middle" housing such as townhouses, medium density apartments and dual- or tri-occupancies. This is supposedly to create more choice, improve the ability to change housing within a local area as people age and household sizes fluctuate, and enable a wider mix of residents. There are valid questions about how effectively the MMHRs might achieve these goals, but let us first look at the numbers.

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[1] "ACT government outlines plans to deliver 30,000 new homes over five years, including build-to-rent," 31 July 2022, accessed at https://www.abc.net.au/news/2022-07-31/act-government-outlines-housing-plan-for-30-000-new-dwellings/101285506

[2] Dwelling numbers in 2021 from ABS, combined with half yearly completions in 2022-2024 from 6-monthly ACT Land and Property Reports

[3] ACT Land and Property Reports. Data on consolidation was not available in earlier reports, and this data is for approvals rather than completions as that is how the data is presented.

It seems that the existing planning system is already also delivering more diversity. From 2011 to 2021, the percentage of total dwellings that were detached or semi-detached one storey houses fell from 82% to 72%, while “missing middle” housing’s share rose from 14% to 17%. High density apartments rose from 3% to 11%[4]. These are quite rapid changes given the large number of existing houses.

This trend has continued in recent years, with the largest number of new dwellings being apartments, and an increasing number of “missing middle” dwellings. The number of “missing middle” dwellings built in 2024 exceeded the number of detached houses built[5].

So, when the Government’s YourSay page states that, “[c]urrently, new homes in Canberra are mostly single houses or high-density apartments in our town and city centres”, this is technically true. But it would be more correct to say that new homes in Canberra are mostly “missing middle” dwellings or high-density apartments in our town and city centres.

Figure 1 on page 9 (from a 2024 report on the missing middle completed by Purdon Planning for EPSDD) summarises why the “missing middle” does not appear to be missing at all. This shows that for the areas of South Canberra, North Canberra and Molonglo, there is already a wide diversity of housing choices, with detached houses, “missing middle” and apartments all comprising roughly equal shares of dwelling numbers. In 5 of the 8 regions of the ACT, “missing middle” already accounts for more than 25% of dwellings and in Belconnen this looks likely to happen soon. The slower growing areas of Woden, Weston Creek and Tuggeranong show a quite different pattern, although in Woden, “missing middle” also accounts for a significant share of dwellings.

The left hand part of the figure confirms that, in terms of new construction, “missing middle” and apartments were clearly dominating new development in almost all parts of the ACT from as far back as 2011, with significant growth in detached houses only appearing in Gungahlin. Tuggeranong and North Canberra have both shown a decline in detached house numbers.

This Figure visualises how different areas of the ACT have quite different situations in terms of dwelling stock and flow. This would be even more true if a more granular level of analysis was made. This supports the view that a Territory-wide approach without differentiation is neither justified nor wise.

The current system is delivering rapid increases in dwelling numbers, along with major shifts in diversity, with detached houses accounting for smaller percentages of housing and higher density apartments increasing rapidly. Again, the rationale for any dramatic shift in the approach to residential zones and their basic settings is not apparent. It is not clear that the “missing middle” is actually missing at all.

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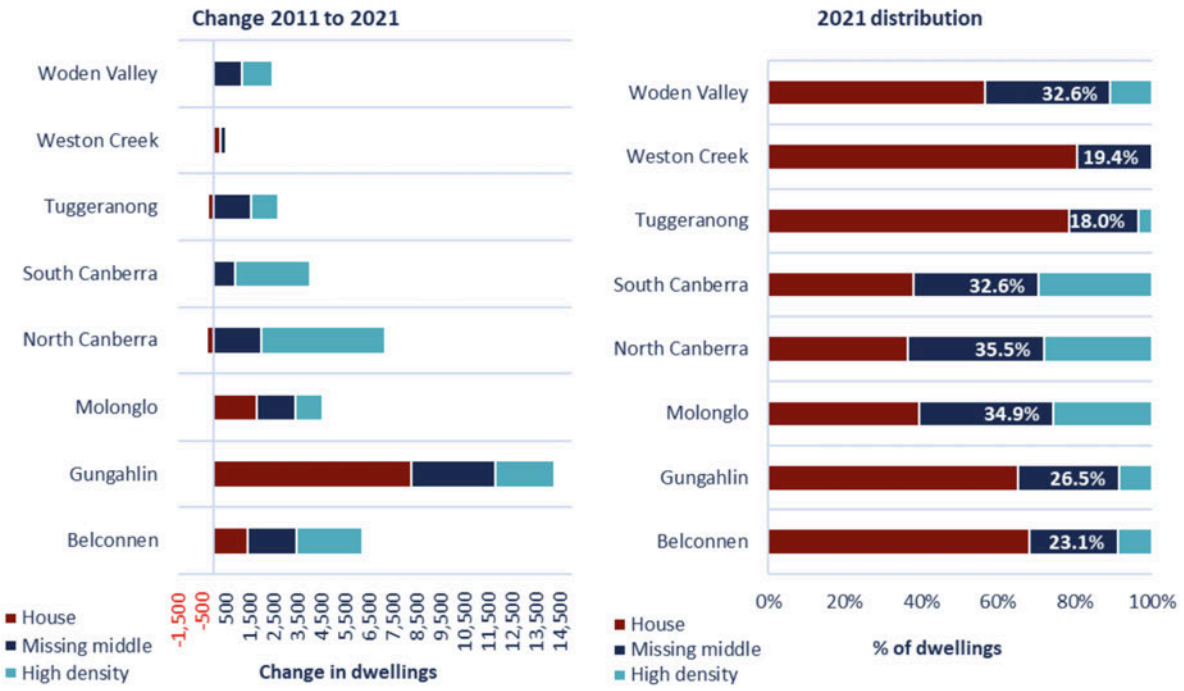
[4] *ABS Census of Population and Housing* 2011 and 202. Note that these are percentages of occupied dwellings rather than total dwellings as the ABS does not break down unoccupied dwellings by type. The nu

[5] ACT Land and Property Reports. Note that these documents use different sources of data for total dwelling completions, and multi-use developments. So, some extrapolation is required.

Figure 1 - Evolution of missing middle 2011 to 2021



Note: Sample excludes small and offshore locations, and other dwelling typologies such as caravan and improvised home. Source: Purdon analysis of ABS Tablebuilder, counting dwellings, place of enumeration SA3 by Dwelling Structure (2011 and 2016).

Source: Figure 8 of *Planning and Economic Feasibility: Integrating the Missing Middle in RZ1 and RZ2*, completed by Purdon Planning for EPSDD, October 2024 [6]

The existing planning system also seems to be delivering higher density housing in appropriate areas. Table 1 shows the share of different housing types in North Canberra. This shows quite clearly that those suburbs closest to the city and along transport corridors have high levels of apartments and missing middle type housing. Those suburbs farther out and less well located have lower percentages. This seems exactly the pattern of development that a well-planned city would provide.

[6] Note that the definition of missing middle used for Figure 1 includes all semi-detached housing while the number quoted above in this submission does not include 1-storey semi-detached, explaining the different percentages. The inclusion of one-storey detached housing affects mostly the stock numbers in 2021, not the changes over time, as there has been no net increase in this dwelling type since 2016.

Table 1 - Percentage of Housing Types in North Canberra Suburbs

	Houses	Townhouses	Flats and Units
City	0%	0%	100%
Acton	0%	0%	100%
Braddon	5%	14%	81%
Turner	13%	14%	73%
Lyneham	27%	36%	37%
Dickson	30%	22%	49%
Campbell	51%	11%	38%
Watson	58%	30%	12%
O'Connor	66%	16%	18%
Downer	67%	16%	17%
Ainslie	73%	17%	10%
Hackett	76%	14%	9%

Source: Allhomes.com.au - accessed 28.7.25.

Table 1 also shows that a number of suburbs — City, Acton, Braddon, Turner, Lyneham and Dickson — already have very high percentages of townhouses and apartments. In the first 4 of these suburbs, there is actually very little diversity of housing already, but this is due to the near absence of houses. If one of the goals is to promote diversity and enable people to move through their lifecycle within a single suburb, this may already be impossible in these suburbs as there are virtually no family homes to draw on during the stage of having multiple generations living in a single home.

This is where the goal of increasing dwelling numbers quickly on the one hand, and increasing diversity of housing types on the other, may be in conflict. Such conflicts are inherent in managing and planning city development. But they are best solved through evidence-based and careful active decision-making, not leaving it open to individual developers to decide the fabric of suburbs.

Table 1 also demonstrates again the ability to meet housing needs quickly without abandoning control of the planning system. While we are unable to gather quantitative data, it is clear that much of the development of apartments and townhouses in Inner North suburbs has taken place in the last decade.

The ACT Government's population projections suggest that, from 2022 to 2060, North Canberra will grow by many more people than any other area of Canberra, at a growth rate higher than any other area except Molonglo (which of course was starting from a comparatively low base). North Canberra and Molonglo are the only areas projected to comprise a greater percentage of the population in 2060 than they do now.[7] This projected growth is likely to place significant

[7] *ACT Population Projections, 2022-2060*

pressure on infrastructure in North Canberra that in the absence of urban management, could easily result in a dominance of apartments and townhouses without the diversity that the MMHRs claim to seek.

Meanwhile, among the major districts, Tuggeranong is expected to see population stabilise or decline, raising questions as to the efficiency of population spread across the Territory. Also, Woden Valley and South Canberra see only modest growth over the 40 years, despite the government's plan to build light rail to Woden. It seems quite peculiar that this massive investment in "city-shaping" infrastructure would not be expected to produce materially greater increases in terms of higher densities and population.

Overall, the Government's proposed MMHRs, despite their wide-ranging and radical nature, do not seem well supported with clear goals and rationale, compelling evidence or assurance that alternative approaches (including clearly targeted use of the existing zoning system with its inbuilt safeguards) have been carefully evaluated. For example, there is no real analysis of the complex issues affecting the rate of construction of new dwellings or to what degree the changes inherent in the proposed MMHRs would affect this outcome. Therefore, NCCC is of the view that much more detailed analysis is required before committing to such significant changes to a new planning system that the Government has spent significant time and resources bringing in. It is also vital for the Government to engage in honest unbiased evidence-based consultation with the community, when fundamental changes to what can be built next door to any resident can be reasonably expected to transform Canberra's social fabric.

Why is the planning system changing so much after such a short time?

The proposed MMHRs would remove existing dwelling density requirements 16 to 21 in the Residential Zones Policy of the Territory Plan adopted in September 2024. The current zoning system seems to be delivering outcomes broadly in line with government targets. Why is there a rush to introduce radical change at such short notice?

In November 2023, new planning legislation came into force in the ACT following a 4-year process of review and consultation. At that time, the Government stated:

> Recent population projections show that Canberra needs 100,000 new homes by 2050. This *once-in-a-generation reform* will allow for this growth while leading to better outcomes for people.[8] [italics added]

Yet less than two years after this "once-in-a-generation" reform, and less than 9 months since the new Territory Plan came into effect, the Government is already seeking to re-define the residential planning framework by stripping away the protections that apply to almost 80% of all residential land in the Territory. The government states:

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8 https://www.planning.act.gov.au/professionals/our-planning-system/planning-act-2023#:~:text=The%20territory%20now%20has%20a,to%20consider%20their%20surrounding%20communities.

> These changes will help our city change over time, responding to housing demand and ensuring Canberra has a strong supply of well-designed, diverse, affordable and sustainable housing options for our growing community.

And the rationale for these changes is stated as, “Canberra is growing quickly. By 2050, we expect nearly 700,000 people to call our city home.”[9] So, the same justification is given for this latest change as was given for the original planning system change.

Such a significant change after such a short time with the new system raises a number of questions:

- Did the government do a bad job of designing a new planning system in 2023, following 4 years of consultation and policy development, thus requiring big changes now?[10]
- If such significant changes are needed so quickly, what assurance is there that these latest changes are well thought through?
- Has the new planning system been given enough time to assess whether it is effective at delivering the outcomes the community wants?
- What new information has arisen since the introduction of the new planning system that means a radical shakeup is needed?
- If a “once-in-a-generation” planning system lasts less than 2 years, how much faith should the community have that current rules and systems will not change dramatically on a regular basis?

The MMHRs are a radical change to the system of planning in the ACT which will have major and long-term impacts on the character of Canberra, less than two years after the introduction of “once-in-a generation” reform of the planning system. Given the short period since the new Territory Plan took effect, the current proposal seems rushed. The documents supporting the proposals offer only a superficial and scant rationale, without any supporting analysis or evidence. The consultation is shaped as a chance to comment only on the detail of the changes (and even here, the opportunity seems limited) rather than the overall approach.

It is important to give the community a fair chance to understand the proposed changes, be able to ask questions to clarify what is intended and what that might mean in practice, and make their views felt. This would involve a deeper engagement process based on a clear delineation of advantages and disadvantages of the proposed reforms, rather than trying to “sell” the reforms

[9] https://yoursayconversations.act.gov.au/missing-middle-housing-reforms

[10] This question is even more relevant noting that the government’s moves to remove third party appeal rights for public housing and health facilities demonstrated that the government did not have a good understanding of the provisions for declaring Territory Priority Projects, which replaced call-in powers in the previous legislation. The Legislative Assembly Inquiry into this Bill suggested these provisions be revised.

to the community based on uncritical analysis of potential outcomes and far-reaching consequences. Until this has happened, it would be dangerous to implement such a wide-ranging package of reforms.

Recommendation 1:

The ACT Government should provide a clear and logical rationale for its MMHRs, including information, supported by quantitative analysis wherever possible, covering:

- **What specific objectives the government is trying to achieve and evaluation of other options to achieve them.**
- **What the targets of the reform are, including a desired split between detached houses, missing middle dwellings and higher density apartments**
- **Modelling analysis of the timing and penetration of proposed changes, including the rate at which appropriate properties are likely to become available and the economic drivers for the proposed diversity and affordability of housing choices**
- **Descriptions of how the character of Canberra's neighbourhoods are likely to change if the MMHRs go ahead in an uncontrolled fashion**
- **Evaluations of the state of infrastructure across the Territory, how this will match up with developments under the proposed MMHRs, where there may be further infrastructure capacity, and how enhanced infrastructure in existing urban areas will be matched to unpredictable development under the proposed MMHRs**
- **Projections of housing prices into the future, and evidence on how the MMHRs are likely to affect prices, including examination of key drivers of housing availability and pricing**

Recommendation 2:

The ACT Government should undertake comprehensive consultation with the ACT Community that includes information such as that described in Recommendation 1, to ensure the community is well aware of how the proposed MMHRs may affect the character of all Canberra suburbs, what specific changes the reforms will deliver and what alternatives are available to achieve similar outcomes.

This consultation could include a role for a panel of experts and community representatives to ensure thorough consideration of all relevant issues and reasonable time for community understanding and input.

2. Significant risks from proposed reforms

Inadequate Infrastructure

The supporting report notes the likely strain on existing infrastructure such as roads, schools, parks and public services and expects this issue to be mitigated through appropriate planning and investment in infrastructure. A common-sense approach would be to do this infrastructure planning at the same time as planning for increased density. Likewise, the investment in infrastructure should occur at the same time or even prior to investment in increased density. Failure to undertake such infrastructure planning and investment is comparable to establishing a new suburb with no planning or investment in roads, schools, parks or public services.

To date, we have not seen any planning or proposed investment for infrastructure to accompany the proposed dramatic increase in density. There are a number of examples where medium density developments have been built on rezoned community facility and sports and recreation land, reducing the availability of such land to meet the needs of a growing population.

The proposed reforms also leave many of the decisions on whether and where to build higher density housing to developers, as the proposed rules provide wide leeway for developments across all residential zones. So, it is unclear how infrastructure decisions can be well integrated with increased densities associated with MMHRs.

Loss of Neighbourhood Character

For RZ1, the MMHRs propose to retain the objective that “[d]evelopment respects valued features of the neighbourhood and landscape character of the area and does not have unreasonable negative impacts on neighbouring properties.” Notably, the only change is to remove the word “ensure” from the beginning of this objective, which may be telling.

More substantively, this objective seems incompatible with the key effects of the proposed reforms. The MMHRs would remove assessment requirements 16 to 21 in the Residential Zones Policy, which currently recognise the special nature of RZ1, and would effectively promote apartments in RZ1. These changes would significantly alter the neighbourhood and landscape character of the ACT.

And as mentioned above, it will have significant negative impacts on neighbouring properties. Our view is that these will in many cases be “unreasonable”, though for a government driven by other objectives, a different interpretation may be available.

For RZ2, a stated objective is to ”[p]rovide opportunities for redevelopment by enabling a limited extent of change in density”. Again, this seems a tad misleading when the purpose appears to be to achieve a significant change in density.

And the assessment question of whether MM housing will overwhelm existing suburban character and have significant impacts on neighbours can’t be undertaken block by block

because the impacts are cumulative along a street and through a suburb. The less development control undertaken by the Planning Authority the greater the impact will be.

The proposed changes to the Territory Plan are likely to disrupt the current design and streetscapes of existing suburbs. There are many examples of this across Canberra, as there has been a gradual process of up-zoning and rezoning to increase the scope of what is allowed in each residential zone for several decades.

The ACT Government's Missing Middle website https://yoursayconversations.act.gov.au/missing-middle-housing-reforms provides an interactive Housing Map with exemplars of well designed Missing Middle housing types that already exist across the ACT. The examples provided on the interactive map show that housing types being built in RZ3 to RZ5 residential zones will now be able to be built in RZ1 and RZ2 zones.

The examples selected and displayed in the MMHR documentation identify some of the better examples in Canberra, and generally are of dispersed "missing middle" housing. However, experience in Canberra and other cities shows that this type of housing does not always blend easily into existing neighbourhoods. When taken up more widely across a neighbourhood, it has a completely different character - see picture below.

Rate Increases

By increasing the range of housing available to be built on residential zoned land, the value of this land will rise. Increasing possibilities for subdivision and greater density in Canberra are likely to lead to property value increases of around 15-25% on RZ1 land.[11] The loosening of many other quality constraints in the proposed MMHRs mean figures are likely to be higher with the Government's proposal.

Rates in the ACT are determined based on the Unimproved Value (UV) of land, which "reflects the most valuable use of the property permitted by its Crown Lease purpose clause." While it may be argued that rates will therefore not increase until the Crown Lease is varied, in practice this does not seem to be the case. Valuers refer to sale prices for similar properties in an area as a way to estimate valuations. Buyers of properties would likely be willing to pay more if they anticipate higher value.

Therefore, the proposed MMHRs may lead to an increase in rates of 15-25% for all holders of RZ1 land[12] over the next few years. However, only some landholders - those choosing to knock down and rebuild with higher densities - will realise any actual financial gain from the policy change. Similar effects will be seen on RZ2 land. So, there may be a very significant tax increase for most residential land holders, while only some land holders will benefit from the change.

Those who do choose to rebuild at higher density may be subject to Lease Variation Charges. This should be made clearer in the information provided on the proposed MMHRs. It is likely that much of the extra value of land deriving from the MMHRs will be captured by the Government through taxes and charges.

Both of these impacts make it difficult for the proposed MMHRs to deliver lower cost housing. This is consistent with recent experience in North Canberra where considerable densification has also seen rapidly rising housing prices.

Building Quality

The MMHR documentation suggests that missing middle developments will all be high quality because there is a Design Guide available for developers. However, use of this design guide is not mandatory, while being long and complex. Therefore, assuming that this design guide will be followed with any consistency seems optimistic at best, and possibly plain foolish. In any case, where a developer appeals against a decision not to approve a development, it seems highly unlikely that ACAT would uphold a decision based on qualitative non-mandatory guidelines and interpretations of what "good design" means.

[11] https://www.environment.act.gov.au/__data/assets/pdf_file/0003/2354034/23_110921-Documents-001-008.pdf

[12] This increase is in addition to the rates increases already planned as part of the Government's ongoing tax reform.

In fact, under the new planning system, developers do not need to meet even quantitative requirements if they claim to be meeting the assessment outcomes. Therefore, not only is the MM Design Guide voluntary, but the technical specifications are also not mandatory.

Experience with planning and building regulations show that compliance is a real issue even with clear requirements, with many non-compliant proposals being put forward and many buildings failing to deliver quality and/or compliance with what is approved. Having a system based on non-mandatory guidance seems prone to massive problems.

Parking and Street Capacity

The proposed MMHRs will further reduce requirements for parking provision. This seems to follow a trend to seek to discourage car use through reduced parking. While the goal may be admirable, experience suggests that most people will retain their cars, and appear to be buying larger cars than ever. Missing middle dwellings may also have separate households with multiple cars. In addition, there are suggestions that missing middle will only be built where public transit is easily available. Aside from the fact that the ACT's limited public transit system makes this difficult, since the proposed reforms would be applicable in any location, this rationale is meaningless.

The impact of overflow parking and road congestion resulting from infill throughout the Northbourne Corridor has not been studied. A realistic analysis of congestion impacts and parking needs is required.

Many RZ1 neighbourhoods (including RZ2 zones near local shops and services) were constructed with detached housing as the expected dominant form. In many of these areas, the streets are not designed to support significant on-street parking or high traffic volumes. The proposed changes are likely to exceed the capacity of the existing street system, with safety, congestion delays, and noise consequences.

Similar issues are likely to arise in older neighbourhoods in relation to other physical infrastructure including stormwater and sewerage. This is especially so if the ratio of hard to soft ground covering increases, as it likely would.

Loss of Private Open Space and Reduced Climate Change Resilience

The Snapshot document states:

> 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.
>
> Setbacks, building and solar envelopes have been modified to enable increased building area where *impacts to neighbours is [sic] minimised*. Solar access and privacy requirements for neighbours continue to apply. [italics added]

This statement seems bold at best, if not misleading. The statement that “the quality of space…has increased” seems impossible to justify. There appears to be no element of the proposed reforms that increases quality of open space. Dimensions are reduced, overshadowing will increase, and large buildings may now impinge on private open space with no setbacks.

The second paragraph of the statement above says clearly that “[s]etbacks, building and solar envelopes have been modified to enable increased building area”, which is true, but the claim that “impacts to neighbours is [sic] minimised” is simply not the case. There are no steps to minimise impacts, which are likely in many cases to be significantly negative.

Recommendation 3:

The consultation process identified in Recommendation 2 should include consideration of the risks as well as potential benefits from proposed reforms. This should include, at least, alternative approaches to address building quality, matching infrastructure with development, how to handle losses in private open space, handling of impacts on traffic and road capacity, and where the government expects major changes to current urban character.

Recommendation 4:

The consultation process identified in Recommendation 2 should also include information on what this proposal means for rates, and how Lease Variation Charges will be handled, so that residents understand how they are likely to be impacted. This should also include the likely impact of increased rates on house prices.

3. Necessary revisions to Technical Specifications and Assessment Requirements

NCCC considers that the proposed approach is both premature and flawed, and that a more open and unbiased consultation addressing real issues should be commenced before such a significant change is introduced.

If the Government proceeds with the proposed MMHRs, there are a number of key details that require revision. In general, many of the technical specifications should be made mandatory as otherwise they are easily ignored, so the changes should also be incorporated into Residential Zones Policy as Assessment Requirements.

Site coverage

Site coverage should be limited to 45% for all zones, with possibly lower site coverage limits for zones that allow higher building heights. This will help to ensure adequate open space and separation between buildings.

Minimum size of blocks created by subdivision

The proposed MMHRs remove any minimum size block requirements for subdivisions. This will lead to loss of neighbourhood and streetscape character. There should be a minimum residential block size allowed to be created by subdivision under the Territory Plan. This minimum should vary by zone, recognise local circumstances and be determined in consultation with affected communities.

Height limits

There should be fixed height limits in the Territory Plan to provide adequate protection in terms of solar access and natural light for neighbours. Storey limits are unnecessary, and counterproductive. Some of the suggested changes to building heights in the proposed residential zones' technical specification 14.1 are dramatic, with the height of RZ4 increasing from 12.5m to 21m. This may not be appropriate in all RZ4 areas.

As currently drafted, specification 14.1 limits RZ5 to 14m if it is close to RZ1, RZ2, RZ3, CFZ, PRZ1 or PRZ2, but RZ4 has no similar restrictions. The lower height limits for single dwelling housing appear to be unnecessary.

Frontage of RZ1 subdivided blocks

The new technical specification 2.4 for subdivisions requires that RZ1 blocks have a street frontage or front onto an urban open space or the community path system. This specification will result in many long skinny subdivided blocks, as well as many verge crossings, which is unlikely to be the ideal block configuration. Using easements for property access to rear blocks, where appropriate, gives greater flexibility in achieving suitable subdivision configurations and may minimise verge crossings. We recommend this specification be removed.

Requirement that RZ1 subdivided blocks contain lawfully constructed dwelling

The proposed new assessment requirement 11 of the Subdivision policy requires that subdivisions in RZ1 are only permitted where each subdivided block contains a lawfully constructed dwelling. This requirement should be removed to allow existing owners to subdivide and sell vacant blocks of land. This would allow new owners to build more appropriate dwellings suited to their needs and avoid all subdivided dwellings in RZ1 being built only by property developers. Assessment outcome 2 is sufficient to ensure that the subdivided blocks are of an appropriate size and configuration.

Limits to consolidation

The new proposed standards for block consolidation in RZ1 appear to be arbitrary and unnecessary. Perhaps a more appropriate standard would be along the lines of a single development should not be of a size or bulk that dominates or overwhelms the surrounding neighbours.

Deep soil areas

The Territory Plan should require that a mandatory minimum of 30% of any residential block in all zones be deep soil areas to encourage healthy soils and root systems with adequate room for vegetation to grow and be maintained. The current proposal only requires this in RZ1 and RZ2.

Tree Canopy Coverage

The proposed rules would require 20% tree canopy coverage for RZ1 and RZ2. While an increase from the current 15%, this remains well below the government's 30% canopy cover target, even though this is referenced as a reason for making the change.

As RZ1 and RZ2 are likely to be the easiest zones to meet the 30% canopy cover target, there should be at least a 30% target in these zones, as well as 30% in all other residential zones. The provision for greater site coverage and higher buildings mean there will be fewer blocks that "over-comply" so strong canopy cover targets are required. Without strong tree canopy cover requirements, Canberra is under increased threat from climate change impacts combined with urban heat island effects.

Solar Building Envelope

The proposed MMHRs would reduce requirements for private open space, allow for reduced (sometimes to zero) setbacks and change the way overshadowing is calculated. Together, these will lead to drastic reductions in solar access.

The seemingly minor change from 31° to 45° means that light will be completely blocked to habitable rooms on the ground floor of adjoining north-facing dwellings during the coldest part of the year. This is both a loss of amenity and an increase in energy costs for residents of affected homes.

Car Parking

The proposed MMHRs would remove requirements for visitor parking and reduce requirements for on-site parking of residents. This appears to be based on an unrealistic assumption that people will forego cars because they live in a different kind of building. This assumption is contrary to evidence, and is particularly unwise given that, under the Government's proposal, there is no restriction on where these developments could happen. This will impose an externality on all neighbours through reduced safety, restricted traffic flows and degraded streetscapes.

This should be reviewed and at the least current requirements should be retained in the short term. With a more managed development pattern, car parking requirements could be tailored to more specific circumstances.

Recommendation 5:

The ACT Government should revise the Residential Zones Policy assessment requirements and tighten technical specifications for residential zones and subdivisions, including:

- **Site coverage limits of no more than 45%**
- **Minimum subdivision block sizes**
- **Clear and appropriate maximum height limits (not storey limits)**
- **Removal of frontage requirements for subdivided RZ1 blocks**
- **Removal of requirement for subdivisions to contain an existing dwelling**
- **Appropriate consolidation limits**
- **Minimum 30% deep soil zone requirements in all residential zones**
- **Requirements for at least 30% tree canopy coverage on all residential blocks**
- **Preserving the solar building envelope at 31° for multi-unit housing in RZ1 and RZ2**
- **Enhanced car parking rates**

4. Alternative approaches

Canberra's development should be managed, not left to private sector interests alone

NCCC is strongly supportive of development in Canberra that provides appropriate and diverse housing across the Territory, based on careful evaluation of the optimal areas for higher density, supported by efficient, timely and adequate infrastructure provision. Wholesale changes to the amenity protections that underpin RZ1 and RZ2 will lead to mismatches of development and infrastructure, allow poor quality and inappropriate development in many areas, create infrastructure bottlenecks, and reduce amenity for residents causing community friction and conflict. This approach will also lead to much of the future development of Canberra being determined by developers' interests rather than by pursuit of community interests.

As identified in Section 1, the proposed MMHRs seem to be aimed at solving a problem that doesn't really exist. Outcomes to date show that the existing zoning system has delivered development at the pace and diversity required, while ensuring 70% of development occurs in the existing urban footprint. "Missing middle" housing is already a large part of a diverse housing mix, and together with apartments is the dominant form of new housing development in almost every area of the Territory.

The NCCC believes that existing zoning approaches, coupled with evidence-based and good planning can deliver the urban form that Canberrans desire.

Addressing housing prices

While it seems intuitive that changing zoning to allow for MM type housing would increase the rate of dwelling construction and lower prices, there is also analysis that shows this is not the case, as there are other factors dominating the rate of dwelling construction. For example, a study of Brisbane over 20 years showed that increasing density had limited effects on housing supply and was associated with *higher* housing prices, stating:[13]

> Looking at these basic patterns in the activity-centre level data, there is no clear evidence that increasing zoned capacity increased new dwelling supply and reduced prices. …if anything, higher rates of new dwelling supply are related to higher price growth.

A study of changes in density and house/unit prices across Australia in the last 20 years indicated density had very little impact on house and unit values and rental prices, with the direction of the relationship varying. This report noted "high population densities provide virtually no explanatory power for house values with the coefficient of determination just .001 over the past 12 months and over the past decade".[14]

And recent evidence indicates that increased share of apartments and MM type housing is not leading anywhere near a situation where low- or even moderate-income people can easily access appropriate housing in the ACT.

NCCC recognises the growing challenges presented by housing prices and the need to make housing more affordable, especially for the most vulnerable members of society.

NCCC's submission on a proposal to remove third party appeal rights for public housing (see Attachment A) included a number of suggestions on how to increase the rate of public housing construction in the ACT, noting that the Government's current targets are manifestly inadequate. Increasing the rate of public housing construction is a key requirement for addressing the current housing crisis. Not only does it directly provide housing for the most vulnerable, but it also limits competition in the lower priced market.

But it is certainly not enough.

NCCC supports appropriate demand-side responses to stem the increase in housing prices, which could include considered changes to negative gearing and capital gains treatment to return housing to a human right rather than an investment opportunity. As part of its negotiations with the Federal Government, the ACT Government should seek to ensure such changes are implemented as part of a national housing strategy.

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[13] *Murray, Cameron & Limb, Mark (2023) We Zoned for Density and Got Higher House Prices: Supply and Price Effects of Upzoning over 20 Years. Urban Policy and Research, 41(2), pp. 129-147.*

[14] "Population density trends and what they mean for housing", Firstlinks, May 2024

NCCC also recognises the need for supply-side options, but is not convinced that unplanned densification, as proposed in the MMHRs, is an effective answer. There are appropriate areas for densification supported by infrastructure provisions and some of the proposed "rules" for densification could be applied in such areas.

Other approaches should include specific support for community housing. This is especially true given many commentators' views that there is insufficient capacity in the construction sector to build all of the housing Australia needs. In such a limited environment, it is important that the housing which is delivered goes to those most in need, while also addressing these shortages.

The Government should also take advantage of large tracts of land in the existing urban area that could be used for new housing. In North Canberra, for example, this includes Thoroughbred Park and the Yowani Golf Course; both are located directly on the light rail route. The first area alone could provide up to 5000 dwellings. These could be designed based on the proposed MM Design Guide, and include requirements for significant proportions of public and community housing.

Of course, this would require this land be given over to housing rather than its current uses. Given that the current uses are only realised by a relatively small subset of the community, this is a choice of priorities that the Government could make, if it really valued the provision of more housing with appropriate infrastructure highly. It is much more likely to generate the substantial increase in public, social and other housing that is needed to address the housing crisis than a random licence for individual developers to make their own choices about where and how to build higher densities.

5. Conclusion

It is beyond the scope of this submission to identify all strategies to reduce housing costs. But the proposed MMHRs will certainly not deliver affordable housing in Canberra.

NCCC recognises the need for increased housing supply as part of a broad and comprehensive strategy to address housing availability. We support densification in appropriate areas supported by matching infrastructure provision.

The proposed MMHRs would lead to haphazard development with a range of negative outcomes.

Given the complexity and importance of the issues the proposed MMHRs raise, a much more transparent and balanced dialogue with the community is essential.

Attachment A - NCCC Submission on Inquiry into the Planning (Territory Priority Project) Amendment Bill 2025 - 21 March 2025

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Executive Summary

On 5 February 2025, the ACT Government introduced the Planning (Territory Priority Project) Amendment Bill 2025, which would designate all public housing and public health facilities as Territory Priority Projects, effectively extinguishing appeal rights and administrative review by the ACT Civil and Administrative Tribunal (ACAT) for those two categories of development.

North Canberra Community Council (NCCC) opposes this legislation. **It would walk back a basic right in Western democracy for independent review of government decisions, make no significant difference to the rate of supply of public housing in the ACT, and lead to lower quality housing and neighbourhood outcomes.** The claimed rationale for this proposal is misguided, misleading, and misdirected. It risks opening the door to substandard public housing in the future, that would have been rejected otherwise.

The ACAT appeals process results in improved outcomes for the whole community, including public housing tenants, and helps ensure the proposals that government puts forward meet generally acceptable standards that the community has signed off on. Removing checks and balances from the system risks significantly poorer outcomes, impacting on tenants, the public housing stock and the wider community.

NCCC strongly supports more public housing in the ACT. The government's current *Growing and Renewing Public Housing Strategy* originally called for a mere 1.7% increase in the public housing portfolio from 2019-2024 when population growth was 8.8%; this extremely modest target was not met. The revised strategy calls for an increase of only 3.4% in the public housing portfolio from 2019-27 when population is expected to increase 13.4%. This ambition is simply too weak and NCCC supports a far more ambitious target. We recognise this presents budget challenges, but setting priorities is a key task for government, and we must look after the most challenged members of our society.

The government claims that appeals of public housing projects have caused considerable delays in completion, and that the outcomes do not justify this. However, the Auditor-General reported that from 2019-2023, only 7% of public housing projects were appealed to ACAT, and of these more than half were found deficient, requiring reassessment or redesign. As a direct result of the ACAT process, it is likely that many more projects were actually amended after the appeal was made, but before the case was heard. ACAT rules allow for plans to be amended while the case is being heard, and it seems that the government is incentivised to amend proposals when they realise that their decisions will be assessed through the ACAT process.

The possibility of appeals is an important check on the system. It should make government more likely to produce higher quality proposals to avoid the embarrassment of putting forward non-compliant proposals *and* approving them through the Territory Planning Authority.

The reasons why amendments and/or conditions were required through the ACAT process were varied and serious. They include inappropriate developments for people with disabilities (even in supportive housing), unsafe access, loss of privacy for neighbours, insufficient access to parking, insufficient clarity about clearance from electricity, and insufficient arrangements for effective stormwater and sewerage infrastructure management. Therefore, the appeals process helped ensure that housing provided to public housing tenants was safe, decent to live in, and met the needs of residents and the community. Without an appeals process, inappropriate substandard housing is much more likely to be built.

As to the causes for delay, while the appeals process does take time, it results in useful outcomes as discussed above. However, **the government itself has directly caused delays, without any clear benefits to the community**. For example, one of the cases that was appealed involved the demolition and rebuild of existing public housing where the previous tenants were expelled more than 4 years before a development application was lodged. In another case, a hearing process through ACAT was delayed for nearly a year, largely through waiting for the Commissioner for Social Housing to lodge revised plans. And the government continues to miss its own deadline for finalising decisions on development applications in nearly 1 in 3 cases. If reductions in delays are wanted, there are some better areas to look at than removing third party appeals. And we note that, despite the appeals process being in place, the government states it is "on track" to meet its targets in the *Growing and Renewing Public Housing Strategy*.

Minister Steel's comments seek to mollify concerns over the removal of appeal rights by stating "[a]ny new Territory Priority Projects will still be required to adhere to all planning and design requirements under the Planning Act" and "[a]s part of that process community feedback will be considered by the independent Territory Planning Authority." **These statements do not provide any comfort**. These are already the rules and yet appeals are successful more than half the time. Why would methods that already fail be more successful in an environment where there is far less scrutiny of outcomes?

Minister Berry has supported the proposed legislation stating that the government is "pull[ing] out all the stops to get homes built as quickly as possible". This is clearly not correct.

The government has:

- **adopted weak targets,**
- **proposed non-compliant developments,**
- **significantly delayed getting new developments up and running,**
- **failed to meet their own timelines for approvals, and,**
- **been a source of major delays in appeals processes**.

Rather than pulling out all stops, the government seems to be addressing only one relatively minor issue while not resolving more significant concerns. And they have chosen the most undemocratic approach available. In essence, **it appears the government wants to blame the community for expecting planning rules be followed, rather than work to improve the timeliness and ambition of their own actions.**

Given the clear need to provide much more public housing, some steps that could be more helpful without resorting to extinguishing third party appeal rights include:

1. **Propose housing developments that meet all relevant legislative and regulatory requirements.**
2. **Speed up the government's internal processes.**
3. **Speed up the approval process.**
4. **Increase the ambition of providing public housing and provide the resourcing to meet these targets.**
5. **Ensure appropriate penalties for providing incorrect information.**
6. **Streamline the appeals process.**
7. **Require all new multi-unit developments (above a certain size) to include public housing e.g. 10-15% of all units.**
8. **Support more tradespeople entering the Canberra market.**
9. **Consider ways to lower costs and increase speed of construction.**

More detail, including on possible solutions, is included in the following submission. However, NCCC notes that, as a volunteer organisation, we lack the resources to carry out a complete evaluation of these issues or to ensure all possible solutions are identified; this is the function of government. We have pointed out that the proposed

solution is not effective or well-targeted, will cause problems for the quality of public housing built, and is a serious reduction in the democratic rights of citizens.

We note that this submission includes no real discussion of public health facilities. The government has not provided any justification for removing appeal rights for these facilities, so it is hard to see what problem is being solved, or what impacts there might be. With a clear long-term strategy for developing health facilities, removing the appeals process does not seem necessary. Given the increasing number of developments and geographical areas that government and industry players want to quarantine from the appeals process, and the importance of appeals in ensuring good outcomes, NCCC opposes quashing appeal rights for health facilities as well as public housing.

1.0 Introduction

On 5 February 2025, the ACT Government introduced the Planning (Territory Priority Project) Amendment Bill 2025 into the Legislative Assembly. This Bill would declare all public housing and public health developments as Territory Priority Projects, effectively extinguishing appeal rights and administrative review by the ACT Civil and Administrative Tribunal (ACAT) for those two categories of development.

Ministers Steel, Berry and Stephen-Smith put out a media release explaining the new legislation (Attachment A). Based on this release, the arguments for removing this democratic right to review decisions made by government appear to be three-fold:

1. Public housing and health are priorities that need to progress expeditiously.
2. Appeals are frivolous and unnecessary, as other steps ensure good outcomes.
3. The number of public housing appeals is a significant source of delay in meeting public housing needs.

The NCCC agrees with the first point, and in fact supports much greater commitment to public housing. However, there are far better ways to do this, which are not un-democratic.

The other points are not supported by the evidence.

Each of the three points is discussed below in separate sections. These discussions are focused on public housing, as there is no justification or background given in the media release for including health facilities other than that health care is important.

Section 5 includes suggestions for steps the government might take to address current issues in public housing without resorting to an anti-democratic quashing of citizens' rights.

2.0 Public housing is an important priority

NCCC agrees that much greater attention and resourcing should be given to public housing in the ACT. Ensuring adequate housing for our most challenged residents should be a key focus. Increased homelessness and extended waiting times for public housing show that this should be a greater priority for the government. NCCC also supports the "salt and pepper" approach of ensuring that public housing is spread across all of Canberra's suburbs, does not create any concentrated areas of disadvantage in public housing and ensures a mix of housing types available.

As noted by many commentators, the ACT Government's approach to public housing provision has been lacking in both ambition and efficiency.

In 2019, the Government released its *Growing and Renewing Public Housing Strategy*.[15] This strategy committed the government to increasing the public housing portfolio stock from 11,700 to 11,900 from 2019 to 2024, after construction, sale, demolition and purchases. This was a projected net increase of 200 dwellings, and included a goal to build 1060 new dwellings.[16] At the end of the 2023-24 financial year, the actual number of dwellings constructed was 614, and the stock was 11,731.[17] So, these initial goals were not met, with the construction target short by 42%. The stock had increased by only 31 dwellings, or 0.3%.

Table 1 Growing and Renewing Public Housing - Original strategy for 2019-2024

	2019	2024 Target	Planned % Increase	2024 actual	Actual Increase	% of goal achieved
Public Housing Portfolio	11,700	11,900	1.7%	11,731	0.26%	16%
Dwellings to be constructed		1,060		614		58%

In 2020-21 and 2021-22[18], the strategy was extended by 3 years to 2027 and targets were increased to a stock of 12,100 (a net increase of 400), and construction of 1,120 new dwellings.

At December 2024, the public housing portfolio stock was 11,845, and 764 dwellings have been constructed.[19] So, even six months after the expected completion of the original strategy was reached, the original targets have not been met. The portfolio stock increased only 1.2%, over a period when the ACT population grew by around 9%.

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[15] See summary graphic What will be delivered?" on page 5 (there are no page numbers marked in this document) in Growing and Renewing Public Housing 2019-24, https://nla.gov.au/nla.obj-1207724353/view

[16] The document often refers to "houses" but given that virtually all new construction is multi-unit dwellings, we will use the term "dwellings". Note that the construction figure is much larger than the net increase as there were many demolitions/rebuilds at higher capacity, and many sales.

[17] Six monthly snapshot of public housing stock numbers, www.act.gov.au/__data/assets/pdf_file/0005/2554394/Public-housing-stock-snapshot-June-2024.pdf

[18] It is not clear precisely when these changes were made or how they were announced. The Parliamentary and Governing Agreement for 2020-2024 included a target of 400 additional dwellings by 2025 – see para B2i at www.cmtedd.act.gov.au/__data/assets/pdf_file/0003/1654077/Parliamentary-Agreement-for-the-10th-Legislative-Assembly.pdf

[19] Six monthly snapshot of public housing numbers, www.act.gov.au/__data/assets/pdf_file/0005/2795468/Public-housing-stock-snapshot-December-2024.pdf

Only 58% of the planned construction was completed by the original completion date, a shortfall of some 446 dwellings. Note that this shortfall is drastically larger than the number of dwellings that have been affected by ACAT appeals, so there were many other sources of delay.

Table 2 Growing and Renewing Public Housing - Revised Strategy for 2019-2027

	2019	2027 Target	Planned % Increase	Dec 2024 actual	Actual Increase	% of goal achieved
Public Housing Portfolio	11,700	12,100	3.4%	11,845	1.24%	36%
Dwellings to be constructed		1,120		764		68%

Table 3 Population of the ACT

	2019	2024	2027
	435,730[20]	474,132[21]	494,017[22]
% increase		8.8%	13.4%

To be fair, there have been a number of unexpected developments that have affected delivery of original targets, and progress has recently been faster. In its performance review of the program, the Auditor-General noted that increased costs and delays were in part due to:

- increased construction timelines and costs associated with the COVID-19 pandemic, disruptions to the Australian construction industry and atypical wet weather events; and
- ineffective implementation of relocation of tenants from public housing homes that were selected for sale or redevelopment. [23]

[20] ABS SLA Data Explorer, https://dataexplorer.abs.gov.au/vis?tm=quarterly%20population&pg=0&df[ds]=ABS_ABS_TOPICS&df[id]=ERP_Q&df[ag]=ABS&df[vs]=1.0.0&hc[Frequency]=Quarterly&pd=2019-Q2%2C&dq=1.3.TOT..Q&ly[cl]=TIME_PERIOD&ly[rw]=REGION&to[TIME_PERIOD]=false

[21] Estimated Resident Population – June Quarter 2024, www.treasury.act.gov.au/__data/assets/pdf_file/0008/644813/ERP.pdf

[22] Medium series, https://www.abs.gov.au/statistics/people/population/population-projections-australia/latest-release#australian-capital-territory

[23] ACT Auditor-General's Performance Audit Report No.3/2024 – Management of the Growing and Renewing Public Housing Program, www.audit.act.gov.au/__data/assets/pdf_file/0007/2448466/Report-No.3-of-2024-Management-of-the-Growing-and-Renewing-Public-Housing-Program.pdf

While not highlighted by the Auditor-General, its report did note that "[d]elivery of some new public housing homes has also been delayed by the time required to obtain approved Development Applications for complex or sensitive urban-infill developments". This report states that from July 2019 to June 2023, 13 of 184 Development Applications (DAs) submitted for new public housing were reviewed by ACAT. Of these, 4 required re-design and 3 required reassessment by ACTPLA.[24] So, 7% of all public housing DAs went to ACAT, and of these more than half were found to be deficient. The issue of the impact of appeals on public housing progress is discussed further in Section 4.

Even if we accepted there were valid reasons for massive underachievement of original goals, the ambition of the original and extended targets is simply inadequate. The original goal was for a 1.7% increase in the public housing portfolio when the population increased by nearly 9%. The extended goal is a 3.4% increase when the population is expected to increase by 13.4%. So, the ambition is a full 10% behind just keeping up with the population! Given the cost-of-living crisis we have seen over the past few years, a rate above population growth may be warranted.

In June 2023, the ACT Government signed an agreement with the Commonwealth Government for a Social Housing Accelerator Payment .[25] This agreement commits to an additional 20-25 medium-density social housing dwellings being built in the ACT at a cost of $20 million, or $800,000 to $1 million per dwelling. This document also indicates that 35-40 privately built dwellings would also be purchased at a cost of $30 million. Together, these 55-65 dwellings would cost $50 million, or $770,000 to $909,090 per dwelling. And the impact by 2028 would be to "reduce average social housing wait times by 1 week"! The current waiting time for public housing is 26 weeks for the highest priority, and 3-5 years or more for the vast majority of the 3,002 people on the public housing waiting list.[26]

The Auditor-General's report mentions that the homes being built as part of the Growing and Renewing Public Housing Program "are intended to meet the changing needs of older tenants and tenants with disability. Meeting these standards means the new public housing homes built under the Program are larger and cost more to build than a comparable typical home." This is rightfully an objective for public housing in the ACT.

However, a cost of up to $1 million per dwelling makes public housing targets very challenging. This is a difficult issue given the government's current budget difficulties and requires some hard prioritisation of efforts, since it is clear that the government's ambition for

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[24] ACT Auditor-General's Performance Audit Report No.3/2024 – Management of the Growing and Renewing Public Housing Program, page 40

[25] General background is at treasury.gov.au/policy-topics/housing/social-housing-accelerator. Details of the ACT program funding are given in the ACT Implementation Plan accessed from this page. We note that the ACT was the only jurisdiction to have not yet committed any funds under this program.

[26] Waiting lists for public housing, www.act.gov.au/housing-planning-and-property/public-housing/waiting-lists-for-public-housing

public housing does not nearly match the need. But the very small percentage of public housing developments affected by ACAT appeals is negligible compared to the gross inadequacy of the government's ambition.

3.0 Appeals serve a useful purpose

The ability of citizens to appeal against decisions that affect their lives and their community is a core tenet of a democratic society. It helps ensure that unfair or illegal decisions are overturned, and also provides an incentive for governments to make and justify good decisions.

The government's joint media release (Attachment A) suggests that appeals are unnecessary as "[m]ore than 75 per cent of these appeals are ultimately resolved through mediation or with ACAT agreeing with the original decision, meaning costly delays could have been avoided." This statistic is both damning and misleading.

First of all, if at least 25% of appeals are upheld, this means the government has failed to follow requirements in at least 1 of 4 developments, even when they knew the decisions would be scrutinised.

However, stating that the remaining 75% are resolved through mediation or support for the original decision mixes up two quite different things. Mediation only occurs after an appeal is made and many times mediation results in changes to a development plan to protect neighbours' rights, safety or the quality of the housing built. So, of the 75% that are mediation plus overturning, many also demonstrate that the original approval was deficient.

Outcomes from mediation are not made public so it is hard to know precisely what percentage of appeals lead to changes. But the Auditor-General's report notes that in the 2019-23 time period, 13 public housing projects were appealed to ACAT, and 7 required redesign and/or reassessment. This is a failure rate of 54%. There seems no reason to assume that things have improved in 2024 so this seems a more reliable figure for "successful" appeals.

It is also important to consider what it means for the public to "win" on appeal more than half the time. These wins mean that two large government agencies – Housing ACT and ACTPLA – <u>both</u> failed to follow the rules (since ACTPLA must examine the housing proposal before issuing an approval). This happens despite each agency having many years of experience and the resources of government. Community groups or members of the public in an ACAT appeal find themselves arguing their case against senior officials, solicitors and barristers funded by *their own government*. So, even when an appeal "loses" this may reflect lack of resources and a non-level playing field rather than the applicant's case necessarily being wrong. And, once an application is filed with ACAT, proponents frequently submit revised plans during the appeal; which means that they can wait to see if there is an appeal before ensuring things are as they should be.

So, two government agencies fail to follow the rules at least half the time when scrutinised. If, through this legislation, agencies know that no appeals can be made, they are even more likely to be careless in following what rules and design guidance exist under the current regime.

The government's joint media release seeks to mollify concerns over extinguishing appeal rights when Minister Steel states "[a]ny new Territory Priority Projects will still be required to adhere to all planning and design requirements under the Planning Act" and "[a]s part of that process community feedback will be considered by the independent Territory Planning Authority."

These statements do not provide any comfort. These are already the rules and yet appeals are successful more than half the time. Why would methods that already fail be more successful in an environment where there is far less scrutiny of outcomes?

Box 1 – Issues raised in appeals

There is limited detailed information on the outcomes of appeals of public housing projects. Of the 20 ACAT cases that the government has identified, only 4 have information available on the ACAT public database of ACAT decisions[27]. The outcomes of cases resolved through mediation are not public. However, the fact that cases are resolved through mediation suggests there were changes made to the development as a result of these mediations; otherwise, one or the other party would bring the case to completion.

What follows is a brief discussion of the outcomes of the cases that are publicly accessible.[28] These show a number of common elements:

- Original approvals were based on incomplete and/or inaccurate information. In all cases, amended plans and/or lease conditions were required.
- In one case, the approval was rejected even after amendments. In the others, approval was allowed based on the amended plans. So, in all cases, the original approval was found to be deficient.
- Provision of amended plans can be a significant cause of delay. In one case below, 'the hearing commenced on 21 October 2021…[but]… did not conclude until 14 September 2022 because the Commissioner sought a number of amendments to the DA." To attribute this delay to the appeals process is unfair as it is the delay in the government's provision of appropriate plans that was the real cause of delay.
- The reasons for rejection of approval, or for imposition of conditions, are varied and serious. These include inappropriate developments for people with disabilities (even in supportive housing), unsafe access, loss of privacy for neighbours, insufficient access to

[27] ACAT decisions, https://www.acat.act.gov.au/decisions2

[28] While there are officially 4 ACAT cases, 2 affected the same property and were heard together, so there are only three cases listed below.

parking, insufficient clarity about clearance from electricity, and insufficient arrangements for effective stormwater and sewerage infrastructure management.

ACAT is a quasi-legislative body. It assesses whether proposals should be approved based on the Territory Plan and other relevant legislation. The fact that in all of the cases below, ACAT overturned the approval or required changes to the original plan indicates that ACTPLA had approved non-compliant proposals.

Planning laws exist to ensure that approved buildings are safe, decent to live in, appropriate for the location and meet the needs of residents. There is no reason why public housing should not meet all these requirements. Yet, without an appeals process, in the following cases, public housing would not meet some or all of these requirements if not for the appeals that were made.

ACAT case AT 41/2022, DA 202139347 – 32 Sturt Avenue, Narrabundah[29]

This DA was to replace a single dwelling with three supportive housing dwellings. ACAT found the development was deficient in at least 10 aspects.[30] These included failing to meet requirements of the Multi-Unit Housing Development Code, relevant parts of the Parking and Vehicular Access General Code, and the Lease Variation General Code. Specific issues included lack of privacy, insufficient private open space, unsafe access for people with disabilities, inadequate parking (especially important for people with mobility issues), and lack of a lease condition guaranteeing the property would be used for supportive housing.[31] ACAT concluded that "[t]here appears to be no scope for the development to be changed to make it code compliant without substantially altering the development", and so ruled the approval must be overturned.

ACAT also raised questions about whether the development met requirements for supportive housing in terms of disabled access through visitability, manoeuvrability, ease of reach and ease of adaptation for possible future needs. ACTPLA had apparently assessed that 3 of 10 requirements were met, so this was enough, but ACAT indicated this was insufficient to state the development complied. ACAT did not finally rule on this as the DA was rejected for other reasons.

During this case, the government also provided updated drawings and plans to seek to address issues raised by the objectors. This is an interesting feature of the ACAT process where proponents can be changing aspects of the proposal even during the appeals process.

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[29] ACAT decision AT 41/2022
www.acat.act.gov.au/__data/assets/pdf_file/0008/2187296/GRIFFITH-NARRABUNDAH-COMMUNITY-ASSOCIATION-INC.-v-ACT-PLANNING-AND-LAND-AUTHORITY-Administrative-Review-2023-ACAT-13.pdf

[30] There were a number of other matters that may have been non-compliant but ACAT did not rule on these as there were already enough reasons to reject ACTPLA's approval.

[31] This is important as rules allow 3 dwellings on the block only if they are supportive housing, but the requested lease arrangements would have allowed for supportive housing or other residential uses.

In this way, proponents may sometimes claim that ACAT supported their proposal, but only for changes undertaken after the approval was granted.

For example, the initial set of plans and shadow diagrams used by the proponent was found to contain errors and discrepancies and were amended and corrected *overnight*. But errors identified in these amendments made ACAT decide they were "unreliable". Two attempts were apparently not enough to get things right, but ACTPLA was satisfied with the first set.

It's also notable that the plans that were approved indicated a large tree existed on the property even though it had been removed. It is surprising that consultants included this "error" and that ACTPLA did not notice it.

ACAT Case AT 63/2021 – DA 202138290 – 11 Lowanna Street, Braddon[32]

This DA was for the building of 10 units, including two accessible housing units.

While hearing began on 21 October 2021, it did not conclude until 14 September 2022. This delay was in major part due to the Commissioner for Social Housing making a number of amendments to the DA. The amended development was publicly notified on 28 April 2022, and the hearing then resumed on 13 September 2022. So, virtually all of the 11 months taken for the hearing of this case was due to the government filing amended plans, presumably as they realised there were deficiencies in the original plans.

The initial approval was based on including two supportive housing units. But the proposal did not provide the operational parking that is a requirement for supportive housing. During the ACAT hearing process, the Commissioner for Social Housing indicated that the development would no longer be supportive housing, so the operational parking was not required, which was accepted by both parties. However, this indicates the original proposal was not compliant with supportive housing requirements, yet was still approved as supportive housing.

Neighbours objected to a number of aspects of the original proposal, including claiming it impinged on their privacy and use of private open space. ACAT found that these issues were addressed only in the *amended* plans. They made tree planting and a privacy screen a condition of approval to deal with this. Given these changes, and the assessment of other objections, ACAT agreed for the approval to proceed, based on the amended drawings. So, even though they did not overturn the decision to approve, it appears they might have, based on the original plans that ACTPLA had approved. Again, we can only surmise that the changes were made in response to issues raised through the appeals process.

ACAT also imposed 23 new conditions on the approval, amended 3 and deleted 2. The new conditions covered a range of matters including the above trees and privacy screen,

[32] ACAT decision AT 63/2021
www.acat.act.gov.au/__data/assets/pdf_file/0010/2169865/ELLIOTT-and-ANOR-v-ACT-PLANNING-AND-LAND-AUTHORITY-and-ANOR-Administrative-Review-2023-ACAT-7.pdf

shortening a wall to allow room for parking access, and a number of matters related to sewerage and electricity infrastructure. For example, conditions required:

"Development is to comply with minimum clearances to overhead conductors and poles.

The location of the proposed or existing Point of Entry/Meter Box is to comply with Evoenergy's Service and Installation Rules.

An unobstructed access corridor minimum 2.5m wide and 2.5m high must be provided from the front of the block (street frontage) to and along the stormwater easement at the rear of the block, to the satisfaction of TCCS.

For all proposed structures close to the southwest easement (such as the proposed retaining walls), the loading zone of influence of the footings must be beneath or outside the southwest pipe and associated trench backfill. A structural engineer must certify that the structures close to the southwest easement will not impose adverse loads on the pipe, and that possible future trench excavations required to expose the pipe will not undermine, destabilise or damage the structures.

A metering equipment upgrade may be required. A licensed gas fitter should verify loads and metering equipment capacities.

A sewer maintenance structure is located on this block. Unobstructed 24/7 access a minimum of 1.5m wide is to be maintained across the land to the asset."

It is possible that these requirements would have been met in the development without conditions. But it is striking that ACAT felt it necessary to specify these requirements for safety and infrastructure management when ACTPLA did not.

ACAT Case AT 73/2023 and 81/2023 – DA 202240431 – 5/7 Roe Street, Griffith[33]

This proposal was to consolidate 2 blocks and build 4 supportive housing units. Neighbours and the local community association objected on a number of grounds, including failure to comply with technical requirements for driveway gradient, path blockage, open space, internal circulation, overshadowing and proximity of parking to bedrooms. ACAT found in these instances that the development was compliant, although in a number of cases failed to meet numeric rules but did meet the more qualitative criteria. The objectors also had a number of objections related to qualitative issues such as desired character and appropriate building materials. Again, ACAT found the proposal compliant on these aspects.

The proponents and the Commission agreed that the lease should restrict future use to supportive housing only, and this was included in a condition of the ACAT approval.

[33] ACAT decision AT 73/2023, AT 81/2023, These two cases were heard together as they related to the same development.
www.acat.act.gov.au/__data/assets/pdf_file/0005/2573420/SILVEY-GRIFFITH-NARRABUNDAH-COMMUNITY-ASSOCIATION-v-ACT-PLANNING-AND-LAND-AUTHORITY-Administrative-Review-2024-ACAT-74.pdf.

Supportive housing allows for higher density development, so ensuring it remained for this use in future ensures the rules are not later breached.

While the general support of ACAT for the government's decision may appear to support a claim that this appeal was not well-founded, this really can't be justified. First, the condition on lease use was important. Second, ACAT's consideration of compliance was based on a set of amended plans submitted by the government after the appeals were made.

The first hearing was held 26-27 March 2024. The Commissioner for Social Housing then filed amended plans on 13 May 2024. It was these amended plans that were assessed to determine compliance, not the original plans. In some cases, the amended plan provided further information to allow assessment, and in some cases there were changes from the original plans that brought the proposal into compliance (e.g. adjustment of garage sizes, car parking, and size of courtyard walls). In the former case, this implies that the original plans did not contain enough information to assess compliance; in the latter, that they did not actually comply. In both cases, it seems the original approval was not well justified. ACAT agreed for the approval to stand on the condition that it be based on the amended plans.

4.0 Public housing appeals are not the problem

The government's joint media release states that since 2019 there have been a total of 20 ACAT appeals on public housing developments, accounting for 13% of all ACAT appeals. The argument seems to be that this is an expensive and widespread problem that is causing major delays to public housing development.

Again, the facts do not support this contention.

The government's joint media release suggests 13% of all ACAT appeals being public housing related is too high. The most recent public information on the total number of DAs filed as part of the *Growing and Renewing Public Housing* Program is the Auditor-General's report, which says there were 184 DAs from July 2019 to June 2023. Over the same period, the total number of residential DAs filed in the ACT was 2810, of which 749 were for multi-unit residential.[34]

So, the 184 DAs for public housing represent 7% of residential DAs and 25% of multi-unit residential DAs. Since most public housing developments over that period were multi-unit, and since multi-unit development seem more prone to third-party appeals, it seems that on a pro rata basis, we would expect public housing to make up somewhere between 7% and 25% of all appeals, and possibly closer to 25%.

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[34] Development Statistics, https://www.planning.act.gov.au/applications-and-assessments/development-applications/development-statistics

Table 4 Public housing relative to all other residential DAs

	2019-24	Public Housing DAs as a % of total
All DAs	2810	7%
DAs for multi-unit residential	749	25%[35]

Therefore, the fact that 13% of ACAT appeals are public housing seems broadly consistent with the percentage of developments that are public housing. In fact, the appeals rate for public housing may actually be lower than for comparable private housing developments.

It is also not clear that these appeals are a significant source of delay in meeting public housing targets.

In response to a question on notice, Minister Steel listed the 20 ACAT appeals that he referred to[36]. While there are 20 ACAT appeals, these relate to only 16 development applications (DAs). Two DAs went to ACAT twice, and one went three times, suggesting that deficient applications continued to be put forward even after an appeal process.

Therefore, despite the implication that there are 20 cases affecting 133 dwellings, there are actually only 16 DAs affected comprising 115 dwellings. As of Dec 2024, the government has constructed 764 new dwellings as part of its Growing and Renewing Public Housing program[37]. So, the appealed developments represent only 15% of public housing dwellings to date[38]. And more than half of appealed cases were found to have deficiencies through the appeal process. As discussed in Section 1, the government missed its original 1994 target by 446 dwellings, nearly 4 times the number subject to appeals.

So, public housing appeals do not appear to be a major source of delays to public housing, even while assuring better quality construction. We also note that the 2023-24 Community

[35] If all public housing DAs are multi-unit

[36] Assembly Question 121 by Shane Rattenbury, https://questions.parliament.act.gov.au/details/d5a6b13be5b74172a118fa4052f664e7

[37] Public housing stock snapshot, www.act.gov.au/__data/assets/pdf_file/0005/2795468/Public-housing-stock-snapshot-December-2024.pdf

[38] And only 9% if we remove the 45 dwellings from developments that the government delayed significantly – see below.

Service Directorate's Annual Report states that the government is "on track" to meet its targets for 2027 under the Growing and Renewing Public Housing Program. [39]

If the government were really concerned with delays, they might look to some other areas. For example, the government has legislated timelines for making decisions on DAs. However, these timelines are missed about one-third of the time.

Also, the final two DAs listed in Minister Steel's response to a Question on Notice account for 45 of the total of 115 dwellings claimed to be delayed by appeals. One of these, the development in Yarralumla, accounts for 33 dwellings and is the largest development on the list. This development will demolish existing public housing and replace it with a higher number of dwellings. The former public housing tenants were notified to vacate more than 4 years ago, but the government has only recently lodged a DA to replace this facility. Apparently, the property has been used for law enforcement training exercises.

Similarly, the 15 dwellings in O'Connor are also replacements for existing public housing. This facility had a fire in 2021 but the DA for rebuilding was only lodged nearly 2 years later. Again, this seems to show no focus on getting public housing built quickly.

Minister Berry has stated that the government is "pull[ing] out all the stops to get homes built as quickly as possible". This is clearly not correct as the Government has:

- adopted weak targets;
- proposed non-compliant developments;
- significantly delayed getting new developments up and running;
- failed to meet their own timelines for approvals; and
- been a source of major delays in appeals processes.

Rather than pulling out all stops, the government seems to be addressing only one relatively minor issue while not resolving more significant concerns. And they have chosen the most undemocratic approach available. In essence, it appears the government wants to blame the community for expecting planning rules be followed, rather than work to improve the timeliness and ambition of their own actions.

5.0 Alternative approaches

For all the reasons above, extinguishing third party appeal rights for public housing is an ill-informed, overly-aggressive, anti-democratic approach that will not solve what is a real crisis in public housing, and a misdirection of focus. There are alternative approaches to achieve an actual increase in public housing. Some seem like "no-brainers". Others raise complex issues that require further consideration. NCCC does not have the resources or all

[39] Community Service Directorate's Annual Report 2023-24, Page 7
https://www.act.gov.au/__data/assets/pdf_file/0007/2618179/CSD-Annual-Report-2024.pdf

of the expertise to fully develop such approaches. They are included here for further consideration by government.

Both types of alternatives are discussed separately below.

Obvious solutions

a. ***Propose housing developments that meet all relevant legislative and regulatory requirements***. ACAT is essentially a legal review process, and assesses whether relevant proposals meet all rules and requirements. While there have only been a relatively small number of appeals of public housing proposals, more than half of these "failed" when they were effectively put to a compliance check. We do not know how many of those applications that were not appealed also failed to meet requirements but were never found out. It is very unlikely that this number is zero.

   Appeals against ACT Government decisions are likely to be lower when the public has trust that the government is making legal, just decisions. With a more than 50% failure rate on appeals, the government needs to do more to earn the trust of the ACT electorate. Designing compliant public housing proposals would be a good first step.

b. ***Speed up the government's internal processes***. We do not have detailed information on all public housing developments. Even of the 16 DAs that were appealed to ACAT, publicly available information is only available on a handful. But we can see that 2 developments, accounting for 45 of the 115 dwellings that the government is blaming the community for delaying, were delayed by government inaction for 2-4 years before DAs were lodged. With more expeditious progress on these houses, they could have been progressed much faster, even with an appeal.

c. ***Speed up the approval process***. The government has continued for more than 5 years to fail to meet approval timeline deadlines for 30% or more of approvals. Fixing this would have benefits for all developments, not just public housing.

d. ***Increase the ambition of providing public housing and provide the resourcing to meet these targets***. At the least, the government should ensure that the availability of public housing keeps pace with population growth. This will require a significant increase in the public housing portfolio stock, which will have significant budgetary impacts. This will require hard decisions on priority-setting and consideration of new approaches – see point g below. But this is the function of government.

e. ***Ensure appropriate penalties for providing incorrect information***. When lodging a development application, proponents are required to verify that "*I/we declare that all the information given on this form and its attachments is true and complete*." Yet, as indicated in the discussion of case AT41/2022 in Box 1, proponents can and often do provide revised documentation after the appeals process is underway, when it is pointed out that information is incorrect or missing. This indicates that ACTPLA approves applications that

are incomplete and/or contain incorrect data. Yet there seems no mechanism to ensure that proponents are actually providing true and accurate information.

If anything, the current system almost encourages incorrect information. If proponents know that they can get an approval based on incorrect information, they can get away with extra benefits or lesser quality. And if they are discovered during the appeals process, they can just correct the information then.

The government should introduce legislation or regulations that would provide appropriate incentives to ensure information is correct. This could include financial penalties, public shaming and/or a sort of "three strikes" policy where proponents found to repeatedly provide incorrect information are de-licensed. Of course, there would need to be protections for honest and negligible errors. But under the current system, there seems to be no enforcement whatsoever.

More complex approaches

f. ***Streamline the appeals process****.* Appealing decisions in ACAT is complex, time-consuming and expensive. It generally pits individual citizens and volunteer community groups against the resources of its own government. The government will often contract the services of barristers and always have the benefits of significant departmental resources and staff who are being paid to contest with their own citizens. This is in large part due to the legalistic nature of the ACAT process. This may also be one reason why appeals tend to take place in higher socioeconomic settings; it is relatively rare that people can afford to ensure scrutiny over government decisions in such a legalistic, time-consuming and expensive context.

While there is a mediation process as part of the ACAT process, this is still somewhat formal and still leads to a mismatch in resourcing.

If there were a more informal process that had the confidence of the community, there would be options for faster, cheaper and more harmonious resolution. This might include, for example, independent panels consisting of members of the general community (or perhaps Community Councils), government and independent planning experts (all paid to ensure balance). These could bring together Housing ACT and objectors in a cooperative setting, without focusing on a defence of a decision made by the Territory Planning Authority.

In some cases, the resolution of appeals seems to result in measures such as increased fence height or alternative landscaping or slight realignments of windows to avoid overlooking. These do not seem to be matters that require an adversarial system. We understand the complexities of bringing a more cooperative approach to these issues, but a system where citizens feel they are working in cooperation with their neighbours and their government might help to reach quick, mutually acceptable solutions. This would

have the added benefit of making the appeals process less expensive, so it will not be reserved only for the relatively well-off.

One of the complexities of moving to a less adversarial approach is the legally expert review that ACAT provides. It is not unknown for ACAT to essentially reject the basis for a citizen appeal but impose other conditions for approval (or insist on rejecting a DA) based on their own detailed review "standing in the shoes of ACTPLA". It would be a loss if this type of meticulous review were entirely lost.

One solution might be to introduce a new system in a transition period where objectors can choose which system to participate in. ACAT or a similar body might also be asked to undertake random "audits" of approvals to identify any inconsistencies with regulations, and ACTPLA would need a procedure to effectively integrate all findings from such "audits" into its procedures.

g. ***Require all new multi-unit developments (above a certain size) to include public housing***. Granting an approval is effectively providing value to the proponent to use government owned land. It seems entirely consistent to require any resulting development to deliver on government priorities. This is in part a cost allocation exercise recognising the difficult state of the ACT budget. Moving costs of public housing to new developments would shift some costs from all citizens to those purchasing new units and to developers. But such an approach could also lead to cost reductions through economies of scale and the need for fewer bespoke public housing developments. The full economic and equity impacts of such a change would require further consideration.

   This approach could better ensure scattering of public housing throughout all new developments. There currently appears to be some polarisation of housing between the public and the private sector.

h. ***Support more tradespeople entering the Canberra market***. It appears that costs of construction remain high, and that a shortage of qualified tradespeople is in part to blame. We understand there are various measures already underway to address this shortage. But further action may be needed to achieve reduced housing costs for all, including public housing.

i. ***Consider options to reduce costs and timeframes for construction***. We note that the apparently very high cost of building or buying public housing will make it very difficult financially for the government to meet appropriately ambitious public housing goals. Steps to reduce the cost of building could be a cost-effective approach.

   The Productivity Commission recently reported on the construction industry, finding that productivity in this industry had stalled or even declined over a number of decades[40]. The

[40] Housing Construction Productivity: Can we Fix It?, https://www.pc.gov.au/research/completed/housing-construction/housing-construction.pdf

report suggests a number of steps to promote innovation including supporting greater use of prefabricated and modular components and houses. This could be beneficial in reducing costs and timeframes, especially in an environment where skilled labour is in short supply.

It may also be useful for Housing ACT to develop more standardised plans for social housing to reduce costs and timeframes. There will be some site-specific issues that require individual attention, but more standardisation could be beneficial.

Of course, in all of these steps it will be vital to ensure that constructed dwellings continue to meet high standards of quality and amenity.

6.0 Concluding note on health facilities

This submission is focused entirely on issues relating to public housing. But the proposed legislation would also exempt public health facilities from third party appeal processes.

NCCC again agrees that health care is a key priority and given the growing and ageing Canberra population, more health care facilities will be needed.

However, we have not seen any compelling evidence (or any real evidence at all) that there is a problem with appeals for health facilities. And we remain nervous about the government removing a democratic right to review government decisions, based on a “trust us” approach.

It does not seem impossible or even difficult for health agencies to plan well in advance, design consistently compliant new facilities, and work with the community to build trust over health facility developments.

Finally, NCCC is concerned at a “creeping” removal of third party appeal rights. Already, projects related to the light rail and developments in all town centres are exempt from third party appeals (as are certifier-approved single dwelling residential developments). It is notable that when the proposed legislation to remove appeal rights for public housing and public health facilities was introduced, both the HIA and the PCA suggested that the exemption should be extended to <u>all</u> residential developments.

Therefore, we do not support removal of third party appeal rights for either public housing or public health facilities.

Attachment A - Government Media Release on Proposed Legislation

Faster builds on public housing and health infrastructure

Released 05/02/2025

The ACT Government is introducing the Planning (Territory Priority Project) Amendment Bill 2025 which will automatically classify public housing and public health facilities as Territory Priority Projects, removing appeal rights to the ACT Civil and Administrative Tribunal (ACAT).

Since 2019 there have been a total of 20 ACAT appeal applications for public housing developments. In the last five years around 13 per cent of total ACAT appeals on development applications related to public housing developments.

More than 75 per cent of these appeals are ultimately resolved through mediation or with ACAT agreeing with the original decision, meaning costly delays could have been avoided.

Any new Territory Priority Projects will still be required to adhere to all planning and design requirements under the Planning Act.

As part of that process community feedback will be considered by the independent Territory Planning Authority.

Attribute to Minister for Planning and Sustainable Development Chris Steel

“This Bill is a practical measure to remove barriers to a home for families on Housing ACT’s waiting lists.

“We’ve seen far too many instances of delays to already approved public housing projects from costly appeals.

“This law means public housing and health facilities that significantly benefit the people of the ACT can be rolled out without unnecessary delays.

“Development applications will be exempt from third-party appeals and provide greater certainty for the delivery of public housing and key health infrastructure.

“Importantly, Canberrans will still be able to have their say on all development applications through the independent planning process.”

Attribute to Minister for Homes and New Suburbs Yvette Berry

“This new legislation will support the delivery of the ACT Government’s plans for 1000 new public homes by 2030.

“In the last five years, ACAT applications have delayed more than 100 public homes for those who need them most.

“With so many Canberrans on the waitlist for public housing, many of whom are experiencing a range of vulnerabilities, we must pull out all the stops to get homes built as quickly as possible.

“The Territory Priority Projects process provides a pathway to achieve this goal, while maintaining the normal development application process that enables neighbours and other parties to be consulted.”

Attribute to Minister for Health Rachel Stephen-Smith

“Whether it is the new northside hospital or a community health centre, public health infrastructure plays a vital role in supporting our growing city and region.

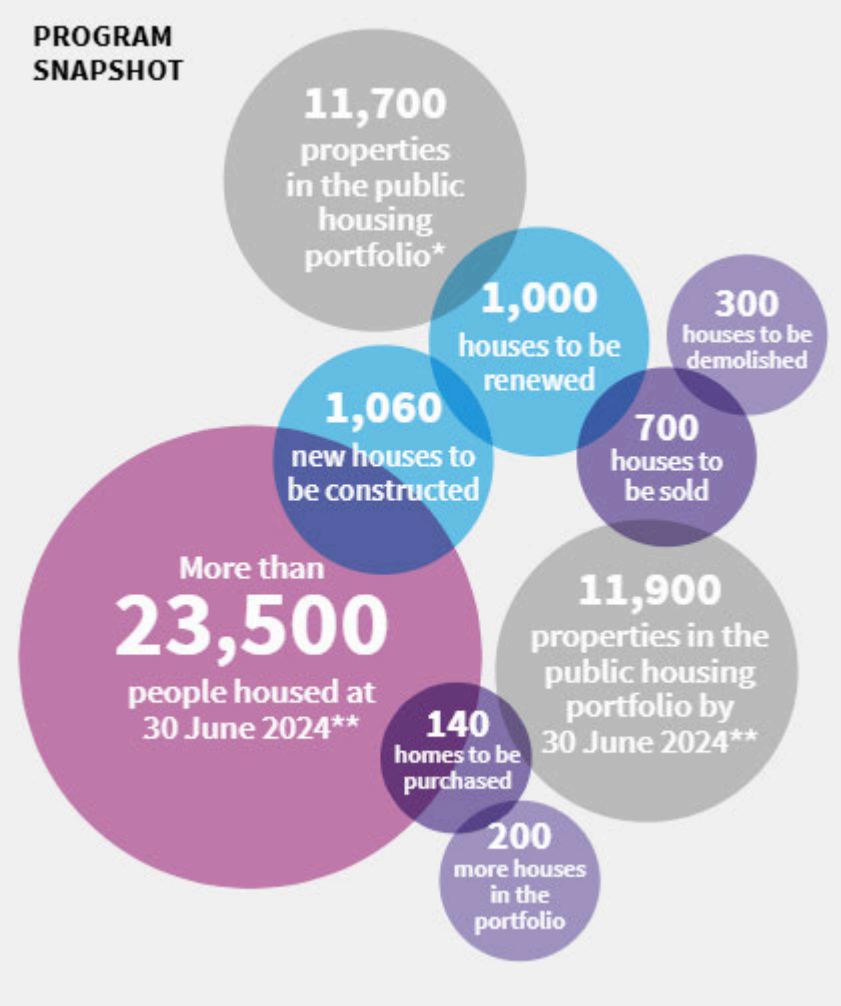
“The ACT Government is committed to delivering better health care closer to home and that means continuing to expand health services across Canberra.

“Prioritising public health infrastructure through the Territory Priority Projects process will ensure our health services can deliver the care Canberrans need, when and where they need it.”

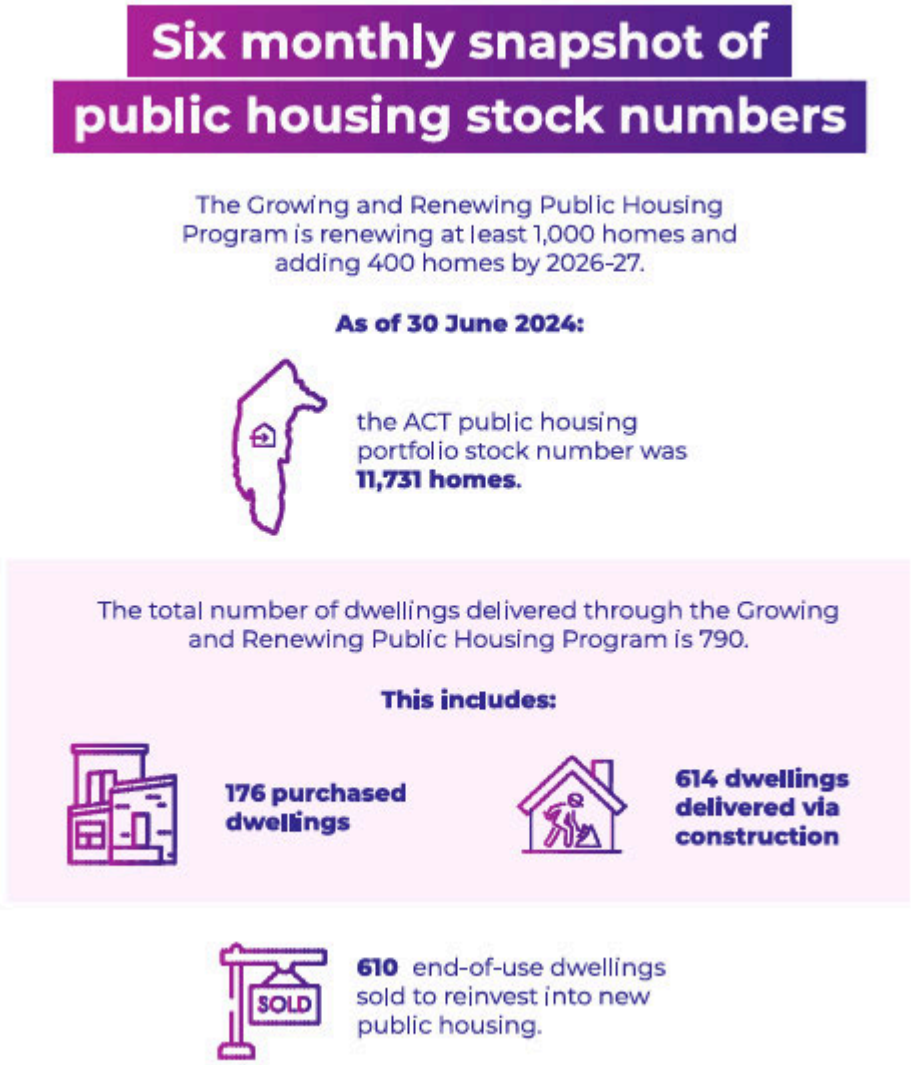
- Statement ends -

Attachment B – Summary of Growing and Renewing Public Housing Targets and Progress Over Time

From original *Growing and Renewing Public Housing Strategy* in 2019:



Public Housing Portfolio Snapshot, June 2024:



Public Housing Portfolio Snapshot, Dec 2024:

Six monthly snapshot of public housing stock numbers

The Growing and Renewing Public Housing Program is renewing at least 1,000 homes and adding 400 homes by 2026-27.

As of 31 December 2024:

the ACT public housing portfolio stock number was **11,845 homes.**

The total number of dwellings delivered through the Growing and Renewing Public Housing Program to 31 December 2024 is 972 dwellings.

This includes:

208 purchased dwellings

764 dwellings delivered via construction

643 end-of-use dwellings sold to reinvest into new public housing

Missing Middle Housing Reforms

The following are Consultation Comments on the Territory Plan 2023 major plan amendment 04 pursuant to the Planning Act 2023 section 63 (1) (c) (i).

To: EPSDDcomms@act.gov.au

From: [redacted] Skyline Town Planning

1. Housing Affordability

Less than two years ago, recent enough that housing affordability or supply has not deteriorated significantly, unit titling dual occupancies in RZ1 where one dwelling is less than 120m^2 was introduced. The size limit was presented by the government and EPSDD as necessary to improve housing affordability. Either this was untrue or the proposed removal of the 120m^2 limit will reduce housing affordability.

2. Backflip on 120m^2 RZ1 Limit

Less than two years ago, a substantial policy change was introduced through the Territory Plan 2023 allowing unit titling dual occupancies in RZ1 where one dwelling is less than 120m^2. This was arguably the most substantial policy change introduced in the Territory Plan 2023.

When such a substantial policy change is introduced, there is an expectation from the industry and general population that it is a properly considered and well informed decision that they are not going to abandon in the short term. Such confidence is essential to a workable planning system such that industry can invest time and money without having to speculate on short term backflips on substantial policy changes.

To provide a concrete example, a recent project on a RZ1 zoned block of approximately 1500m^2 has invested over $100,000 on design, consultation and approval costs for a dual occupancy with one dwelling designed to be under the 120m^2 limit to permit unit titling. The proposed changes now mean a potential buyer will soon have more choice and may elect for a dwelling larger than 120m^2. This jeopardises the viability of the project and the proponent may be forced to abandon the existing design despite having invested over $100,000. The additional housing choice may seem like a better outcome but the wasted $100,000 is ultimately passed on to the buyer or threatens viability of the developer continuing to provide housing in the Canberra region.

Further, the project involved a lease variation component to specify the number of dwellings to permit unit titling. This requires amending the '*residential purposes only*' clause to specify '*two dwellings*' under a Schedule 1 charge. This requires payment of a lease variation charge of 2x$46,000 = $92,000 with execution before the lease variation component of the approval expires. However, under the proposed changes, the block would be permitted four dwellings. To vary the lease from the now limited 'two dwellings' to permit an increase to 'four dwellings' now requires a Schedule 2 charge of 2x $153,750=$ 307,500. The combined Schedule 1 charge and Schedule 2 charge totals $399,500.

If the newly announced unit titled dual occupancy was never pursued and instead the lease varied directly to specify '*four dwellings*', only a Schedule 1 charge of 4x$46,000 = $184,000 is required. Therefore the increased lease variation cost due to the change of policy is $92,000+$307,500-$184,000 = $215,500.

In summary, the back flip on what is permitted in RZ1 has cost them well over $300,000 without any productivity.

3. Inflating Price of Government Assets prior to Disposal

The ACT Housing Commissioner has recently disposed of several properties on 'non-standard blocks' which have special planning rights permitting unit titling of two dwellings without being limited to 120m^2. These blocks have very similar planning rights to 'Mr Fluffy' blocks and have been purchased for a very similar premium to 'Mr Fluffy' blocks. It is well established that this premium is large enough to make a tangible difference to the financial implications of the 'Mr Fluffy' buyback scheme.

The granting these rights was re-instated just 10 months ago in Notifiable instrument NI2024-635 with several properties purchased from the ACT Housing Commissioner since and at a premium price. Several purchasers are now working towards development applications on these blocks. The proposed reforms grant the same planning rights on any block thereby eroding the premium that purchasers have recently paid to an ACT Government entity.

While such blocks don't require a Schedule 1 lease variation charge for unit titling two dwellings, allowing subdivision under the Planning Act 2023, as is being proposed, largely negates this. The premium is further negated by the higher Schedule 2 lease variation charge to permit more than two dwellings such that it is a reasonable conclusion that the entirely of the premium that has been paid to a government entity is now being negated.

While it is appreciated that planning rules evolve over time, for a government to inflate its own sale prices and 10 months later backflip on the substantial policy decision of the 120m^2 size limit is amoral. Further, it undermines confidence in the planning system and deters proponents from providing housing in the region.

4. Reduced Incentive for Adaptable and Supportive Housing

Existing planning controls incentivise adaptable and supportive housing through:

-more than 2 dwellings permitted on standard RZ1 block only if used for supportive housing

-increased number of dwellings permitted in RZ2 if dwellings are adaptable

Although the proposed changes aim to improve housing supply, these incentives are being removed and will presumably result in less supportive housing and less adaptable housing.

5. Character

The proposed changes would allow a single residence in the RZ1 zone to become surrounded by multi-unit housing. As stated by the Minister during the inquiry into V350, "*they purchased there with the view that this residential amenity would stay there, as RZ1. That is why I made my purchase. I may have changed my mind if I thought that a multi-unit development could go up".* This statement was regarding a handful of dispersed multi-developments with required setbacks of 3m and 6m. The proposed changes would allow someone who bought a single home among other single homes to have multi-unit housing with zero setback built on all boundaries except the front boundary.

The magnitude of the change is also highlighted through statements made in Variation to the Territory Plan 387 which was incorporated approximately two years ago. This claimed there had been "*concerns raised about development proposals where multiple dwellings are proposed on blocks in RZ1 zones*". While there may have been more, it appears a single proposal was publicly

notified. It also appears, although subjective, the proposal is an exemplar of the proposed Missing Middle Design Guide.

Approximately two years ago it was published "*There are currently no explicit prohibitions in the Territory Plan to prevent this … even though it would result in a form of development inappropriate for the RZ1 zone*".

Notably, it doesn't claim such a proposal is inconsistent with the zone objectives or the intended policy which may evolve over time but rather that such a development is "*inappropriate for the RZ1 zone"*. What has changed about the RZ1 zone that now makes it appropriate to build proposals like this but with setbacks reduced to zero to all but one boundary of an existing resident's block?

Battleaxe Blocks

The substantial difference in treatment between side boundaries vs rear boundaries makes categorisation important. The boundary separating a battle axe block from the block in front of it will be deemed a rear boundary for both blocks. Is this the intended outcome?

Perverse Outcome of 20% Canopy Cover:

The increase in canopy cover to 20% becomes difficult to achieve without counting existing trees. Before an existing tree can be counted as healthy, a suitably qualified person must write a report about it, at a cost to the property owner. This also applies for non-protected trees. Yet, the property owner can cut down a non-protected tree themselves and propose a new tree of the same species in the same location without incurring any cost. This could be avoided by limiting the requirement to protected trees.

No 'Block Subdivision' in RZ1 to Avoid Land Speculation

Requiring blocks in RZ1 to have a dwelling constructed prior to subdivision is a substantial policy decision. This prevents your average person buying a block of land, building a home for themselves and selling part of the land to someone else. Instead, only someone with finances and risk appetite for building more than one house and a house for someone else will be permitted to subdivide land in RZ1. This is essentially saying only property developers may subdivide land.

The brief justification provided is to avoid land speculation. The likelihood and impact of such speculation has not been substantiated.

Further, speculation is already protected by only permitting a newly created subdivided block to be sold if the Minister's consent is obtained. In contrast, subdivision prior to building is permitted in other zones. No justification has been provided why land speculation is acceptable in RZ2+ but not RZ1.

Requiring only one dwelling to be built could be a potential middle ground.

Consolidation in RZ1 Limited to Multi-Unit Housing

The proposed rules permit block consolidation in RZ1 for multi-unit housing but it remains prohibited for other uses. Given the original subdivision pattern is no longer going to be protected, there may be merit in allowing it for other well-meaning uses, for example child care centres.

Recommendation

Dear Sir/Madam,

I am writing to respectfully submit a series of recommendations for your consideration regarding residential zoning and housing development policies in the ACT.

The following proposals aim to support responsible urban growth, improve housing flexibility, and empower homeowners to make better use of their land:

1. **Rezoning Eligibility from RZ1 to RZ2**
   I propose that blocks currently zoned RZ1 be eligible for rezoning to RZ2 if they meet the following criteria:
   - Minimum land size of **800m^2**
   - Minimum street frontage of **20 metres**
     This would allow subdivision into two parcels of at least **400m^2** each with a **10-metre frontage**, enabling more efficient land use while maintaining neighborhood character.
2. **Increase in Second Dwelling Size Allowance**
   I recommend increasing the allowable size for second dwellings on larger blocks. For example, on a **700m^2 block**, the second dwelling should be permitted to be up to **500m^2**, subject to compliance with site coverage and amenity standards. This change would allow families to build homes that meet their evolving needs.
3. **Permission to Subdivide and Sell Prior to Construction**
   I request that landowners be allowed to **subdivide and sell** portions of their land **before building**. This would reduce financial barriers and allow new owners to develop according to their own plans, thereby increasing housing supply and diversity.
4. **Townhouse Development on Larger Blocks**
   I propose permitting the construction of **two to three townhouses** on blocks with a minimum size of **600m^2**, provided they meet design and amenity requirements. This would support medium-density housing and address the growing demand for affordable and flexible living arrangements.

Thank you for your consideration.

Yours sincerely,

[redacted]

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SUBMISSION ON THE PROPOSED "MISSING MIDDLE" PLANNING CHANGES

Dear Planners

I would be grateful if the following issues could be considered in the "missing middle" review, because they add an additional perspective to more technical concerns about changes such as the extent of reduced setbacks, changes in RZ1 status, or the height of building envelopes.

Unfairness of uncompensated loss in value or amenity of existing homes

Residents with existing houses in will be affected under the new rules by the construction of flats or two or more storey dwellings, potentially with significant overshadowing and lack of privacy.

For example, a two-storey house has just been constructed next door to my single-storey one. My north facing windows will incur more shadow in winter, and it will be possible to look into our bathroom and other rooms from a higher level. Such effects can be expected to be worse under the new rules.

Where an existing resident loses amenity (and possible loss in value) due to a more recent construction under new rules, they suffer from what economists term a "negative externality". Basic fairness requires that the owner of the new construction should compensate the suffering party, either by ameliorating the "bad" that they impose, or through monetary or other compensation. That would be the situation in other spheres of social interaction where harm is caused by one party to another.

Please consider introducing a mechanism to ensure amelioration or compensation where existing residences are affected by factors such as loss of privacy or overshadowing. Such a mechanism would reinforce the stated aim of ACT planning authorities that developments should be consistent with existing streetscapes.

If appeal rights are eliminated, consider an "alert" system to assist approvers

From a social perspective, it is not clear why appeal rights should be eliminated, leaving construction rights solely to one party, when more than one party is involved. This imbalance is likely to lead to lack of equity, especially in circumstances that may not fit neatly into a "tick the box" planning framework.

Human nature is such that planners, DA approvers, builders and certifiers can make errors. For example, a recent DA Exempt construction at [redacted], resulted in a deep (approx. 2 metre) excavation up to the fence line of [redacted]. The excavation had been approved by the certifier, who missed the fact that it encroached well within the tree protection zone of large protected trees in [redacted].

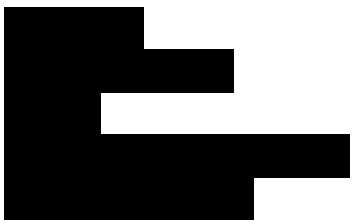
Even if appeal rights are eliminated, it would make sense to have some form of "alert" system, where the public can alert ACT planners to likely problems before final approvals are given for construction.

Likely losses in Canberra's tree canopy

Given the ACT Government's commitment to adapting to climate change, it is not clear why planting areas should be reduced for multi-unit housing. The urban tree canopy is also likely to suffer if on-site parking spaces for dwellings are to be reduced – cars will be increasingly parked on verges, with negative effects on street trees through soil compaction, direct damage, etc.

It is therefore highly desirable that a specific review of potential unintended consequences be undertaken before finalisation of any change in planning rules.

Yours sincerely,



Submission to Missing Middle Housing Reform, August 2025

1) It is stated in the "Missing Middle Housing Reform documents" that Canberra's unique landscape character will remain, however 67.6% of the ACT (zoned RZ1) and 9.5% (zoned RZ2) will be impacted by opening up unknown quantities of denser development across Canberra.

   As residents of a planned city, Canberrans should welcome well designed and considered proposals that improve the architecture, transport and green credentials of this city. Unfortunately, it is likely that this piecemeal and scattered approach to development proposed in the Missing Middle Housing Reforms will result in property developers having much less scrutiny to cram in unspecified amounts of dwellings on individual blocks. Canberra urban planning should model and propose changes that help mitigate the effects of, climate change, particularly urban heating, not just incentivise greater development and new, larger housing that require a lot of energy to heat and cool.

   The proposed reforms will also lead to:
   - a significant loss of trees, privacy, greenspace, solar envelopes;
   - increases in on-street parking and congestion of roads not designed for denser development;
   - no added services, infrastructure, or residential amenity.
   This will have a negative impact on the current quality of life and capital investment of Canberrans and the original development principles of this planned city.

2) The proposed changes in the missing middle housing reform is a sudden disruption to the majority of housing investments in Canberra.

   Canberran residents invest a significant proportion of their income over many years (for example 20-30 years) in their housing, after identifying the type of dwelling, property size, neighbourhood characteristics, green space and treescapes, amenities, transport and infrastructure available.

   Buying into an established suburb of Canberra, I have invested in the traits and liveability of that planned suburb. This includes the understanding and compliance with strict limitations on renovations to existing houses (what is the minimum block area for 2 dwellings or secondary residence, maximum dwelling numbers on a block, setbacks and building envelope, allowable subdivision and block consolidation, treescaping etc). As with a number of other residents, I am highly concerned about the proposed negative impacts to capital investments in

Canberra (housing and solar cells) and the changes to the liveability, landscape and character of the ACT. Areas that are deemed heritage housing precincts, such as the Radburn area, should be explicitly recognised.

The proposed changes in RZ1 zones will allow for developers to build much more densely (4-5 times the present dwelling levels), closer to boundaries, have impact on solar envelopes (affecting current solar cell investments of residents), take out trees and encroach on privacy without facing the current levels of scrutiny and limitations.

Specifically, I am concerned that the proposed changes will:

- Reduce the minimum private open space specifications for multi-unit developments in RZ1 and RZ2 from 40% to 30%.
- Reduce side setbacks and increasing rear setbacks for multi-unit housing in RZ1 and RZ2.
- Increase the angle in which solar building envelopes are calculated for multi-unit housing from 31 degrees to 45 degrees.
- Decrease minimum planting area requirements from multi-unit housing in RZ1 and RZ2 (from 35% to 30%).
- Decrease on-site car parking requirements for developments, likely to result in increases in on-street parking.

3) It is stated in the Missing Middle Housing Reform documents by 2050 “we expect nearly 700,000 people to call our city home, and because of this growth, it’s estimated that there will be a need for 30,000 new homes in the next five years.”

With the number of dwellings recently established in the growing apartment buildings and townhouses in areas across the Woden Valley, Belconnen, City, Gungahlin and Molongo, the ACT Government should confirm how many have already been completed, and how many of these dwellings sit unoccupied? Will the ACT and Commonwealth Governments change the policy and taxation settings to encourage those dwellings to be put into the housing market to help housing affordability for renters and buyers? 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.

While the ABS provides a range with its projections to address future uncertainty, I am concerned the ACT Government has taken an overly high number in its population projections, to suggest a higher number of dwellings are needed in the future and inflate its estimated future budgets.

Given the importance of migration to ACT population growth, whether assumptions around behaviours of migrating cohorts, both internationally and interstate, are realised can have a significant impact on the accuracy of these population projections.

The upside scenario provided by the ACT Government assumes a high level of job vacancies is expected to continue, attracting skilled migrants to the ACT from both overseas and interstate.

In the year ending 31 December 2024, the ABS has shown there was net negative interstate migration for the ACT. This would be consistent with the Australian Public Service and other sectors changing their workplace practices and employing experienced staff to work remotely from the regions or in other cities, where in the past, people would have moved to the ACT for these jobs.

I am also concerned that the future projections for Canberra have not considered the impact of Artificial Intelligence on the workforce of the ACT and Australia. As job changes occur and many employment opportunities decrease in Australia, it may not be reasonable to maintain the net migration of workers from overseas that the ACT Government has expected to be the main contributor to its estimated average annual growth rate of around 1.4 per cent over the 39-year period. The ABS has already predicted the current ten year average annual growth rate (1.4%) for Australia's population is projected to decline to between 0.2% and 0.9%. In order to realistically meet their budget obligations in particular for health, education and other issues affecting the standard of living of their citizens, the ACT and Commonwealth Governments should holistically review and reconsider their population projections.

MASTER BUILDERS
AUSTRALIAN CAPITAL TERRITORY

MASTER BUILDERS ACT

Submission on the ACT Government's Missing Middle Housing Reforms

1. Introduction

The Master Builders Association of the ACT (Master Builders ACT) welcomes the opportunity to provide a comprehensive response to the ACT Government's proposed Missing Middle housing reforms.[1]

We commend the ACT Government for adopting a consultative approach and demonstrating a clear commitment to improving housing diversity, supply, and affordability in the Territory. We also appreciate the opportunity to contribute through the Technical Advisory Group.

1.1 About Master Builders ACT

Master Builders ACT is the peak industry body representing approximately 1000 members within Canberra's building and construction sector. Our membership largely comprises small to medium-sized, family-owned residential builders who are key drivers in delivering Missing Middle housing. These businesses are deeply rooted in local communities, employ local workers, and play an essential role in addressing the Territory's housing needs.

Shaw Building Group

Better Building, DNA Architects and Sugar Designs

1.2 Industry context

The Missing Middle reforms are introduced against a backdrop of significant contraction in the ACT's construction industry. Notably, in the March 2025 quarter, dwelling commencements fell by 67% compared to the previous year, with medium- and high-density housing starts decreasing by over 74%, and completions down by more than 33%.[2] This substantial downturn has led to projections indicating the ACT will fall short of National Housing Accord targets by approximately 11,200 homes.[3] For the reforms to be effective, they must be ambitious, enabling, and practical, underpinned by complementary measures designed to address systemic barriers, accelerate housing delivery, increase supply, and restore industry confidence.

1.3 Submission focus

This submission reaffirms Master Builders ACT's support for the Missing Middle reforms and their potential to expand housing diversity and revitalise the residential construction sector. However, unless accompanied by a coordinated program of complementary reforms, including faster development approvals, infrastructure readiness, fairer statutory charges, targeted workforce investment, and reduced compliance barriers, the full potential of the initiative will not be realised. Each of these structural obstacles currently undermines project feasibility, deters investment, and limits the supply response the ACT urgently needs.

2. Opportunities for the ACT and region

Master Builders ACT supports the proposed Missing Middle reforms due to their capacity to diversify housing options and sustain construction industry activity in the ACT.

We particularly commend the following aspects of the reforms:

- The expansion of permissible housing typologies to include dual and triple occupancies, townhouses, and apartments within RZ1 and RZ2 zones, which reflects contemporary housing demand.
- The shift from rigid dwelling caps to density targets, which encourages more flexible, design-led development approaches.
- The removal of minimum block size requirements, unlocking redevelopment potential consistent with Missing Middle housing objectives.
- The simplification of development standards related to car parking, landscaping, site coverage, setbacks, and building height, providing greater regulatory clarity and predictability.
- The endorsement and promotion of quality design principles through the Missing Middle Housing Design Guide, ensuring contextually appropriate and high-standard developments.
- The introduction of block consolidation provisions that enhance the feasibility of projects and support a broader range of housing delivery models.

3. Concurrent reforms

To fully realise the benefits of the Missing Middle reforms and ensure meaningful progress in housing supply and industry recovery, it is essential to implement complementary and coordinated reforms across several critical areas.

These include:

- Streamlining the development approvals process to reduce delays, complexity, and costs.
- Resolving infrastructure and utility servicing challenges to prevent project hold-ups.
- Reforming statutory charges and other cost structures to improve financial feasibility.
- Aligning workforce development initiatives with the specific skills and capacity requirements of infill housing delivery.
- Addressing the increasing compliance burdens stemming from recent National Construction Code amendments.
- Establishing transparent and effective mechanisms for implementation, ongoing monitoring, and evaluation.

3.1 Planning reform and development approvals

The current fragmented and protracted development approvals process in the ACT significantly impedes the timely delivery of Missing Middle housing. The necessity for multiple agency referrals, the frequency of resubmissions for minor design changes, the risk of lengthy appeals processes, and the absence of clear statutory timeframes contribute to delays that increase costs and deter private investment.[4]

Without pursued reform, the ACT is unlikely to meet its housing supply targets due to these procedural inefficiencies and the resulting uncertainty for developers.

3.1.1 Lessons from Auckland, New Zealand

The changes to planning and zoning in Auckland, New Zealand have been so successful in improving housing affordability and speeding up construction that they have now been replicated in other parts of New Zealand. New Zealand's Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 provides a relevant precedent.[5] The introduction of Medium Density Residential Standards (MDRS) through this amendment permits up to three dwellings on most residential sites without requiring resource consent, provided design criteria are met.[6] This regulatory change has streamlined small-scale infill approvals, increasing housing supply. Additionally, the New Zealand Fast-track Approvals Act 2024[7] established a centralised, expert-panel system with statutory timeframes for major project approvals, significantly reducing consent delays. Complementing these legislative reforms, the 'Going for Housing Growth'[8] policy ensures that councils zone sufficient land to meet 30 years of projected housing demand and discourages restrictive planning practices such as urban growth boundaries.

3.1.2 Recommendations to streamline development approvals

Master Builders ACT recommends that the ACT Government consider adopting key principles from the New Zealand reforms to enhance approval efficiency, including:

- Creating a streamlined approval pathway for developments demonstrably compliant with planning controls to minimise procedural delays and reduce the cost and time associated with appeals to the ACT Civil and Administrative Tribunal
- Introducing clear statutory timeframes for development application assessments, supported by escalation mechanisms and deemed approval provisions to ensure accountability and timeliness.
- Simplifying and harmonising zoning regulations within medium-density precincts to improve regulatory clarity and consistency.
- Undertaking a comprehensive review of planning provisions that may unnecessarily restrict well-designed infill housing.
- Developing a transparent, long-term land supply and infrastructure coordination strategy to foster market certainty.
- Enhancing coordination between planning bodies and infrastructure providers to reduce avoidable delays.

3.2 Infrastructure and utility constraints

Building on the need for streamlined approvals, it is equally critical that development is not delayed further by infrastructure and servicing constraints. Even where planning approval is secured, builders frequently encounter delays, uncertainty, and inconsistent requirements relating to utility and infrastructure regulation.[9]

These issues introduce significant cost and timeline uncertainty, often rendering otherwise viable projects unfeasible.

3.2.1 Examples of technical challenges

These challenges are symptomatic of a broader lack of alignment between planning objectives and infrastructure governance. For instance, recent increases to developer charges under the Capital Contributions Code were introduced without adequate consultation, despite the Code itself being under ongoing review.[10] Similarly, new canopy cover requirements, raised from 15% to 20%, further restrict development potential on smaller RZ1 lots, often rendering compliant design outcomes unachievable.[11] Furthermore, inconsistent stormwater and drainage requirements across suburbs add further complexity, increasing consultancy costs and reducing design efficiency.[12]

Collectively, these examples reveal a regulatory environment that lacks the consistency and coordination needed to support timely, cost-effective infill housing delivery. These issues would also make the implementation of a 'Pattern Book' or similar design guidance virtually unworkable due to the significant number of site-specific issues.

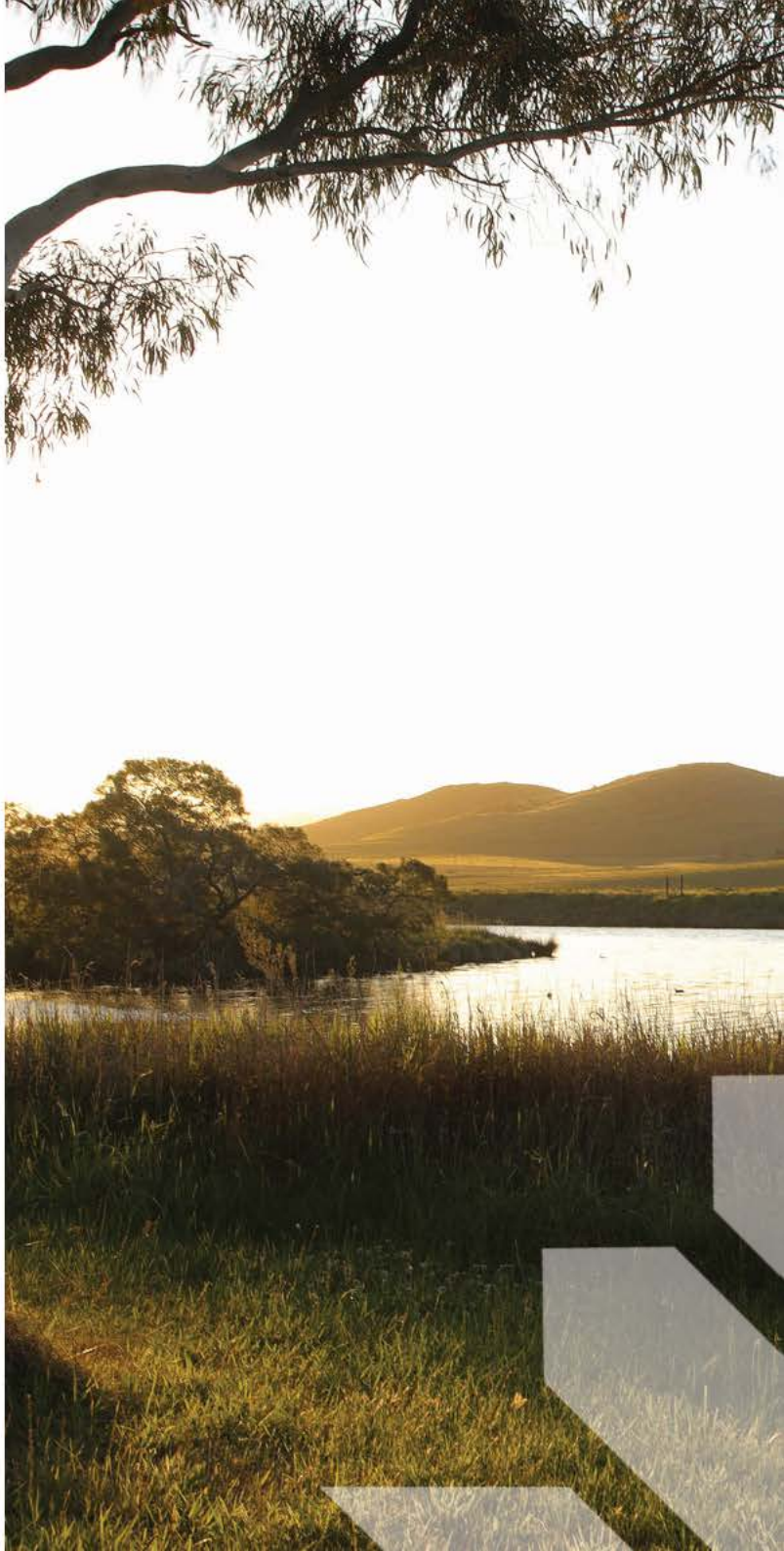
3.2.2 Recommendations to address technical challenges

Master Builders ACT urges the ACT Government to prioritise a comprehensive review of infrastructure and servicing processes (including any necessary improvement recommendations) to ensure they effectively support housing delivery and do not create unnecessary barriers.

This review needs to extend beyond the ACT Government's own agencies and business units, and account for external agencies including utilities providers and the National Capital Authority.

While the responsibility for regulation and reform rests with the ACT Government, Master Builders ACT highlights the following example areas where targeted action could significantly reduce delays and uncertainty:

- Reviewing developer charges to ensure they remain reasonable and do not unduly burden infill projects.
- Implement statutory timeframes including enforceable deadlines for utility providers and referral agencies involved in development approval process to ensure decisions are timely and reduce unnecessary delays.
- Ensure streamlined coordination protocols between agencies and departments responsible, including clear escalation pathways and accountability measures for delayed responses.
- Introduce a transparent exemption mechanism for the increased canopy cover requirements, 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) where meeting the full obligation is impractical, ensuring that environmental objectives remain balanced with development feasibility.
- Standardise stormwater and drainage assessment requirements across the Territory to reduce variability, streamline design processes, and lower consultancy costs, thereby improving predictability for developers.
- Undertake continued review to identify and address any additional barriers or burdens presented by structural inefficiencies impeding housing delivery.



Pier Projects

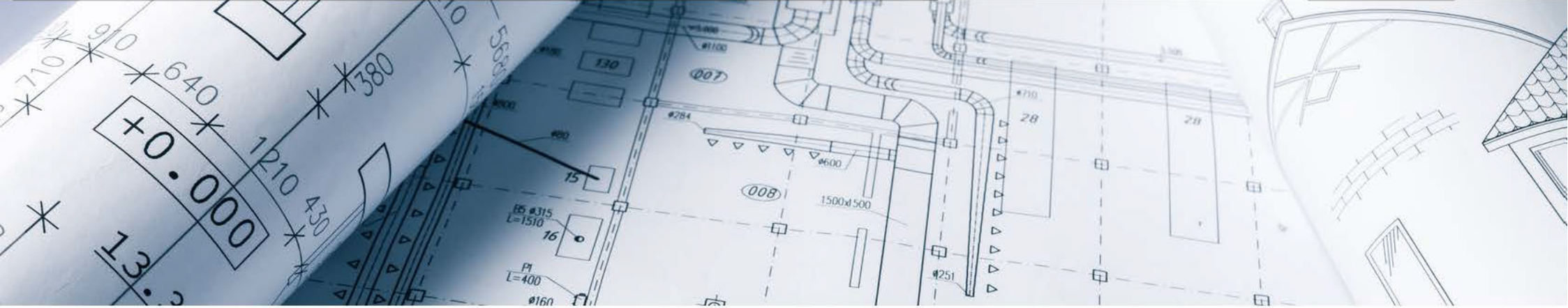
3.3 Lease Variation Charges and project viability

The cumulative cost burden of statutory charges borne by builders continues to significantly undermine the feasibility of Missing Middle housing delivery in the ACT.

The Lease Variation Charge (LVC), established to capture the increase in land value arising from rezoning or redevelopment, has become an increasingly contentious element of the development cost framework, a situation intensified by the recent increase effective from 1 July 2025.[13] Although designed to operate as a revenue-neutral mechanism, the 2019 ACT Government Consultation Report on the Lease Variation Charge documented widespread stakeholder concerns, including from the Master Builders Association, that the current LVC framework systematically overestimates the actual value uplift realised by small-scale infill projects.[14]

The current LVC methodology has been criticised for insufficiently accounting for site-specific constraints such as limited or irregularly shaped lots, infrastructure capacity limitations, and obligations to comply with streetscape and design controls.[15] Feedback from industry sources further underscores the disproportionate financial impact of the July 2025 LVC increase on small- to medium-scale infill developments.[16]

These scenarios exemplify broader industry concerns that the LVC no longer functions as a proportionate or revenue-neutral tool, but rather imposes prohibitive upfront costs that render many infill projects financially unviable, including those aligned with the ACT Government's own Missing Middle housing objectives.



3.3.2 Recommendations to lessen LVC impact

Master Builders ACT urges the ACT Government to prioritise an immediate and comprehensive reform of the Lease Variation Charge framework to ensure it supports rather than impedes Missing Middle housing delivery.

Specifically, we recommend:

- Pausing or reversing the 1 July 2025 LVC increase to prevent further erosion of project viability while a detailed review is conducted and to support the achievement of the ACT's and national housing targets.
- Introducing tiered or scaled LVC rates that reflect development type and scale, ensuring small- and medium-scale infill projects are not disproportionately penalised.
- Implementing exemptions, discounts, or deferral options for Missing Middle developments, such as dual occupancies and townhouses, that align with the Government's strategic housing goals.
- Enhancing transparency and predictability by developing clear valuation benchmarks and providing upfront LVC cost estimates during the early stages of a project.
- Conducting a comprehensive review of the LVC calculation methodology to better reflect actual market conditions, incorporate site-specific constraints, and promote diverse housing supply while maintaining long-term affordability objectives.

Projex Building

Without targeted investment in workforce development, the Territory's capacity to meet its housing targets will remain severely constrained.

3.4 Workforce shortages

The success of the Missing Middle agenda hinges on the availability of a skilled, adaptable construction workforce.

Yet the ACT faces acute shortages in critical roles, including trades, supervision, and estimation, which are essential to timely and cost-effective infill housing delivery. [17] Jobs and Skills Australia reflects that all 26 construction trades are in shortage in the ACT.

These workforce shortages are compounded by systemic underinvestment in local training pathways, particularly following recent reductions to Training Fund Authority (TFA) resourcing. Exempting government-funded construction projects from the TFA levy further weakens the training pipeline, even as these projects clearly dominate the local construction activity. [18] Without targeted investment in workforce development, the Territory's capacity to meet its housing targets will remain severely constrained.

3.4.1 Recommendations to address workforce shortages

To address these workforce capacity constraints, it is recommended that the ACT Government implement a series of targeted interventions:

- Remove the levy exemption for government-funded projects to ensure all developments contribute fairly to workforce training.
- 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.

3.5 National Construction Code compliance burden

The National Construction Code (NCC) 2025 Public Comment Draft introduces reforms aimed at improving building performance, occupant safety, and environmental sustainability.[19] While these objectives are supported in principle, the evolving regulatory landscape continues to present compliance challenges, particularly for small to medium scale infill projects. The breadth and complexity of proposed changes, including new provisions relating to energy efficiency, electrification, condensation management, waterproofing, and carpark fire safety, will require significant industry adaptation.

Master Builders ACT acknowledges the broader public interest intent of these reforms.[20] However, without adequate transition support and targeted guidance, the cumulative impact of these amendments may inadvertently stall delivery and inflate costs for Missing Middle housing projects.

3.5.1 Key areas of industry concern[21]

- The NCC 2025 draft includes additional residential requirements, such as mandatory thermal breaks in steel-framed housing and provisions for centralised heated water systems in apartments. While these measures are designed to improve thermal performance, they may require redesign of common construction practices and add to material and installation costs.
- New provisions will require residential developments to ensure adequate switchboard capacity for future electrification and incorporate infrastructure to support electric vehicle charging. The need for early-stage integration of these requirements adds technical and financial pressures, especially on constrained infill sites.
- Expanded requirements for roof ventilation and vapour permeance aim to reduce condensation risk in cooler climates. While the intent is to improve health and structural outcomes, these provisions introduce additional detailing and specification obligations that require new technical expertise.

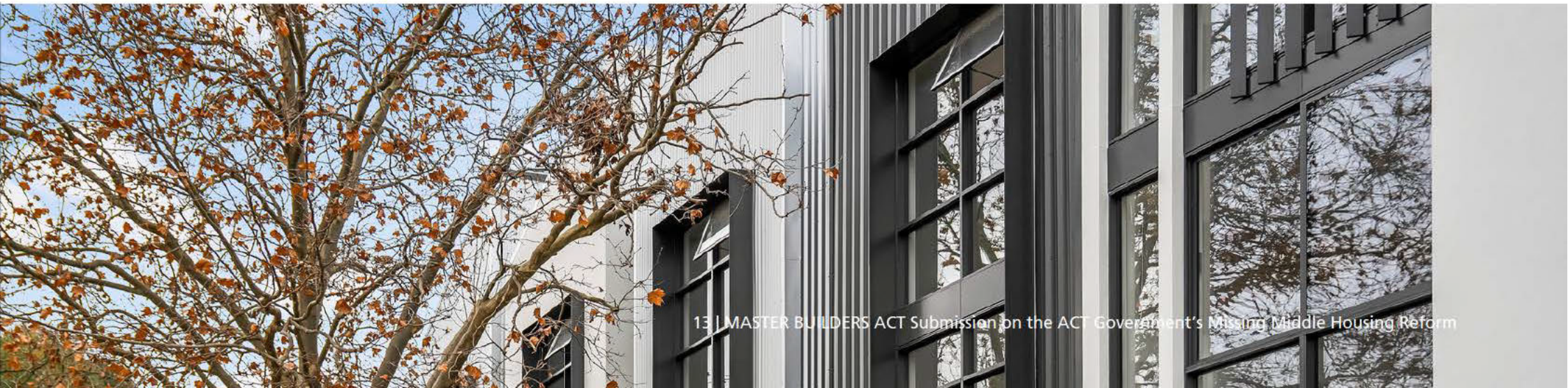
- Clarified standards for waterproofing details and updated specifications for wet area materials will improve long-term durability. However, these changes may increase procurement costs and necessitate further training to ensure compliant implementation.
- New requirements for additional women's sanitary facilities and sanitary item dispensers in public buildings reflect important social equity outcomes but may affect commercial development costs and internal layouts.
- Enhanced fire safety provisions for structured carparks, while warranted, introduce further compliance complexity in multi-unit residential and mixed-use developments.

Crucially, the full extent of these proposed changes remains subject to refinement, with formal adoption timelines not yet confirmed by the Australian Building Codes Board. Nonetheless, early industry consultation proves that these changes bring with them additional compliance and cost pressures. This may substantially affect feasibility, timing, and workforce readiness for infill housing delivery in the ACT.

3.5.2 Recommendations to mitigate NCC compliance burden

To ensure that NCC reforms support, rather than hinder, infill housing supply in the Territory, Master Builders ACT recommends:

- Undertaking a formal cost impact assessment of cumulative NCC amendments on small-lot infill developments, through a co-designed process with industry and the ABCB.
- Developing ACT-specific, plain-language compliance guidance, tailored to the typical design and construction formats used in Missing Middle housing.
- Introducing transitional or phased implementation periods for selected NCC 2025 provisions in established suburbs, to allow industry time to adapt without interrupting housing delivery pipelines.



Projex Building

3.6 Social licence

Previous attempts in the ACT to develop more infill housing led to considerable backlash and two decades of limitations on dual occupancies through the introduction of the 'Garden City' Territory Plan reforms in 2004. The continued success of the Missing Middle depends on the ACT Government ensuring it has anticipated and planned for the consequences of increased density in our existing suburbs. This includes:

- Ensuring sufficient public spaces that reflect the needs of the community, such as parks, playgrounds and footpaths
- Reviewing and updating public transport routes
- Monitoring demographic shifts and ensuring schools are equipped for increases in student enrolments
- Identifying any challenges for utilities and similar infrastructure and working with providers on necessary upgrades ahead of time

Shaw Building Group

The continued success of the Missing Middle depends on the ACT Government ensuring it has anticipated and planned for the consequences of increased density in our existing suburbs.

3.7 Implementation, monitoring and adjustment

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 ACT recommends:

- The establishment of a dedicated Infill Housing Implementation Unit within the Environment, Planning and Sustainable Development Directorate (EPSDD) to coordinate reform delivery and liaise with industry. This should be supported by the regular publication of housing supply metrics, such as approvals, commencements, and completions. Including a formal, independent review of reform impacts within two years.
- Proactive identification of any pain points holding up the desired changes through the Infill Housing Implementation Unit and a plan to address those pain points
- Together, these measures will ensure the reforms remain responsive to market conditions and community needs, while providing government and industry with a clear feedback loop to guide ongoing improvement.

4. Conclusion

Master Builders ACT supports the ACT Government's ambition to enhance housing diversity, affordability, and supply through the Missing Middle reforms.

The proposed changes represent a critical shift toward a more flexible and responsive planning system capable of addressing the Territory's evolving housing needs.

However, effective implementation alone is not enough. Without urgent and coordinated action across development approvals, infrastructure provision, statutory charges, workforce capacity, and regulatory compliance, the full potential of the reforms will not be realised. Canberra's construction industry is ready to meet the challenge but requires a supportive policy and regulatory environment to unlock practical infill development at scale.

The recommendations outlined in this submission aim to support a more efficient, equitable, and outcomes-driven implementation of the reforms from the perspective of the building and construction sector.

Sunny Homes

We urge the Government to work closely with industry stakeholders to ensure these planning changes are not only considered, but result in real, buildable projects that meet the needs of a growing and diverse population. Master Builders ACT welcomes continued collaboration and remains committed to supporting the successful delivery of the Territory's housing strategy.

Sunny Homes

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Appendix A: Recommendation Summary Table

Theme	Recommendation	Objective
1. Development Approvals	Introduce statutory timeframes and deemed approvals for DAs	Reduce delays and improve certainty
	Streamline approval pathways for compliant developments	Encourage faster processing of low-risk applications
	Harmonise zoning rules in medium-density areas	Increase clarity and flexibility
	Review and remove unnecessarily restrictive planning provisions	Enable more infill opportunities
	Publish a transparent long-term land supply and infrastructure coordination strategy	Provide development certainty and strategic clarity
	Enhance coordination between planning and infrastructure agencies	Prevent delays from fragmented oversight
2. Infrastructure & Utilities	Review and adjust developer charges	Improve project viability
	Enforce statutory timeframes for utility responses	Minimise servicing delays
	Introduce escalation and accountability pathways across agencies	Resolve inter-agency hold-ups efficiently
	Implement exemptions from increased canopy cover for constrained infill lots	Prevent impractical environmental obligations
	Standardise stormwater and drainage requirements	Reduce design complexity and consultancy costs

Theme	Recommendation	Objective
3. Lease Variation Charges (LVC)	Pause or reverse the July 2025 LVC increase	Restore feasibility for infill projects
	Introduce scaled or tiered LVC rates based on project size	Ensure fairness for smaller developments
	Implement exemptions, discounts or deferrals for Missing Middle projects	Encourage strategic infill aligned with housing goals
	Provide early-stage LVC estimates with clear benchmarks	Improve cost predictability
	Review the LVC valuation methodology to reflect site constraints and market conditions	Ensure LVC operates equitably and supports diverse housing supply
4. Workforce Development	Remove the TFA levy exemption for government projects	Reinforce industry-wide contribution to training
	Fund targeted training pathways and pre-apprenticeship programs in key construction trades	Address local skills shortages
5. NCC Compliance Burden	Review cumulative cost impacts of NCC amendments	Mitigate regulatory cost pressure on small builders
	Develop plain-language, ACT-specific compliance guidance	Support industry adaptation and reduce errors
	Introduce transitional/grace periods for established infill areas	Ensure staged, manageable implementation

Theme	Recommendation	Objective
6. Implementation & Oversight	Establish a dedicated Infill Housing Implementation Unit within EPSDD	Coordinate reform delivery and industry liaison
	Publish regular housing delivery data (approvals, commencements, completions)	Promote transparency and track reform impact
	Conduct formal independent review of the reforms within two years	Enable evidence-based adjustments and continuous improvement

We approve our submission being made public for Canberrans to read.

Authorised by [redacted] on behalf of Master Builders Association of the ACT.

Contact information

[redacted]

MASTER BUILDERS
AUSTRALIAN CAPITAL TERRITORY

100 YEARS
OF BUILDING
CANBERRA

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Date 05th August 2025

RE: AMC Statement on Missing Middle Housing Reforms

AMC welcomes the proposed Missing Middle Housing Reforms, which present exciting opportunities to deliver more diverse housing within the existing urban fabric of our city.

We commend the sustained efforts of the relevant government agencies and others whose advocacy has been instrumental in driving these meaningful planning changes.

AMC is excited by the opportunities these reforms present. We have actively engaged in the review process; participating in government-led roundtables and public engagement activities, including the consultation held at Belconnen Fresh Food Markets. In addition, we have undertaken a feasibility study applying the reforms to a real-world site in Lyneham that exemplifies the intent of the Missing Middle typology. The findings of that study are attached to this submission.

From this process, we believe that the reforms are well considered at both a strategic and technical level. As with any major policy shift, we expect that the maturity of application over time will resolve many of the smaller practical matters.

Feedback on Key Aspects of the Reforms

Sustainability and Environmental Outcomes

The reduction of required planting areas in RZ1 and RZ2 zones is logical to enable larger homes on smaller blocks. However, it seems inconsistent that minimum tree canopy coverage is increasing in the same zones; potentially reducing usable, sunlit outdoor areas.

Parking, Services and Utilities

The removal of a requirement for a covered parking space is welcome, offering more site flexibility. However, in practice, the market may still expect one covered space, so this change may have limited uptake unless consumer preferences shift.

Allowing basement carpark entrances on RZ1 and RZ2 sites is a very positive reform. This enables more efficient, concealed parking solutions while freeing up ground-level open space.

Regarding co-housing, AMC has firsthand experience from our Watson co-housing project, where future residents expressed little need for the standard 0.5 spaces per bedroom. We believe a reconsideration of co-housing parking minimums is warranted.

Missing Middle Housing Design Guide

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.

Insights from AMC's "Test" Project

In testing the reforms on a Lyneham site, we identified the following key opportunities and considerations:

Setback Flexibility
Greater clarity and flexibility in defining primary vs secondary frontages can unlock site potential. In our example, applying a reduced setback to a lower-order street frontage (with a shorter boundary) offered significantly more development opportunity.

Parking Forward of the Building Line
This remains a challenge on narrow, multi-frontage blocks. With thoughtful architectural integration and screening, more flexible treatment could be appropriate in some contexts.

Storage Provision
With external storage now being internalised, space efficiency becomes critical. In some cases, 3-4-bedroom homes may require an entire additional room for storage; something that feels counterintuitive. Further consideration of bike storage is also required, as traditional external storage solutions are no longer applicable.

Solar Fencing Adjustment
Increasing the solar access angle from 31 to 45 degrees is a positive change that responds to desired density, offers more flexibility and may avoid issues previously experienced (e.g., at our O'Connor project).

Privacy and Screening Rules
The revisions to unscreened and screened distance requirements make a significant difference, enabling more functional arrangements of dwellings.

Room Dimensions
At a conceptual level, the impact of changes to minimum room dimensions is less apparent. Design tolerances still require bedrooms to function effectively, so arrangements like 3m x 3m remain standard practice.

Tree Impact

The canopy area of a large tree (upwards of 400m^2) can significantly constrain feasibility on a typical 1,200m^2 site. Further guidance on managing this impact would be beneficial.

Additional Observations

We see substantial potential to amplify the success of these reforms through complementary changes to taxation, rates, and leasehold arrangements. Such adjustments could broaden market participation and empower a more diverse range of proponents to support the government's goals for inclusive and sustainable urban development.

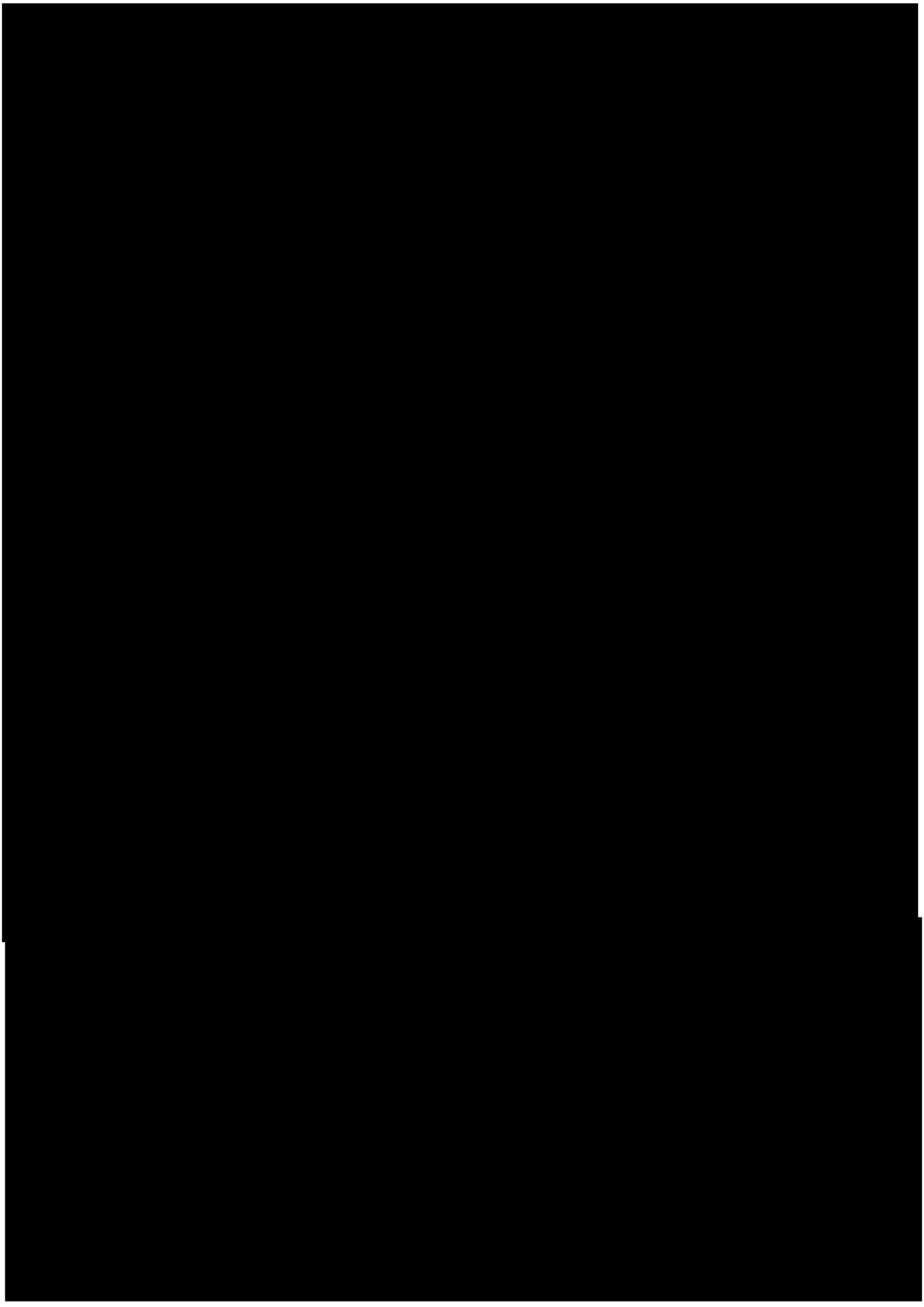
While AMC is broadly supportive of the planning reforms, we note that construction costs remain a significant impediment to uptake. While we do not claim financial expertise, our experience in

procurement and single-dwelling development suggests that uptake will be constrained unless cost barriers are addressed. Anecdotally, up to 40% of the cost of a secondary dwelling can be attributed to fees, charges, and taxes.

We also encourage the development of an **exempt development pathway**, similar to that available for single dwellings, to support faster approvals and reduce financing holding costs for Missing Middle projects.

AMC is optimistic about the potential of the Missing Middle Housing Reforms to reshape Canberra's urban future in a more inclusive and sustainable direction. We look forward to continuing our contribution to this initiative, in collaboration with government, Community Housing Providers, private developers, and other key stakeholders.

Attachment: Test Project Pack (commercial in confidence)



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Comments on the Missing Middle Housing Reforms
I am a home-owner-occupier in Curtin in RZ1 zoning area.

The Missing Middle reforms claim to increase housing density at in a location-agnostic way, implying that they expect redevelopment to be at random acros the suburbs, and at a low level of uptake.
Denser development is expected to follow from easing planning restrictions to allow more dwellings on blocks currently with a single dwelling. This is expected to be **without affecting the character** of the street.
The artists' impressions in the Missing Middle documents in fact show **major modifications** to existing street character:

- An increase in the number of multi-storey buildings in suburban streets.
  This is a reasonable expectation in any redevelopment: but it immediately affects the character of the street. It is dishonest to claim otherwise.
- The number of such buildings in a street should be managed to be no more than a pepper-and-salting, with clustering of redevelopment actively discouraged (apart from consolidation of multiple blocks). I suggest limiting to less than 30% of blocks in any one street.
  Allocating the right to redevelop in this way by first come first served might encourage earlier uptake (from fear of missing out). Managing the distribution of redevelopment will reduce the detrimental effects on local infrastructure and local parking and traffic street by street.
- Reducing setbacks, allowing a reduction of front garden space and low requirements for number of trees per block is detrimental to urban street character. Allowing one dwelling per 200 square metres does not work, with even a minimal tree cover. Canopy cover approaching 40%, not 20%, must be required.
  As well as failing to meet urban climate management goals for canopy cover and permeable area, the suggested densities and types badly affect the visual streetscape. Such packing of buildings within the block will damage the visual character and reduce visual quality of the street.

Parking !!

- You cannot turn a suburban setting into an urban setting by reducing the amount of required parking spaces.
- Decreasing the required onsite parking to be determined by the market market is very badl policy. A developer (the primary market determinant) is bound to want to maximise land area for the dwellings, at the cost of public street space being stolen for the occupiers' parking.
- The number of vehicles per dwelling of all types was stable in the ACT from 2016 census to 2021, despite the relative increase in flats and apartments from 15% to 19.4%. This shift in dwelling type hat might optimistically have been expected to reduce occupants' need for vehicles: but this is not so. There is no indication that missing middle housing will require any fewer vehicles than at present, per dwelling, hence increase the number of cars to be accommodated on the same land and streets.
- Allowing developments to provide less onsite parking will only increase street parking and parking on verges. Existing parking controls are very poorly enforced throughout suburban streets, particularly parking on verges. Street parking on narrow suburban streets will become unsafe for other local traffic, service and emergency vehicles. Any densification plan must include provisions for parking planning and management, as parking and traffic approach the tipping point of requiring more active parking controls.
- Many suburban streets lack footpaths: the safety and attractiveness of pedestrian and other active and mobility travel along the street must also be considered in the planning of missing middle developments.
  More street parking will make walking on the street more dangerous and less attractive

(reducing the attraction of active travel). Consideration should be given to ways of allowing parking on verges in preference to parking on street, by requiring developers to provide a permeable parkable surface such as gravel. In this way the public nature strip might be sacrificed to the goals of denser redevelopment.

Demand?

Where is the actual demand for smaller dwellings? The number of houses currently being built with three or four bedrooms on small blocks greenfield, as well as on larger knock-down-rebuild blocks, must surely indicate demand for the large house. The slow rate of replacement of single houses in RZ2 with multiunit developments must also indicate very low levels of actual demand. The sales value of existing semi-detached houses in Curtin (Carruthers St (section 43) and Theodore St (section 39) does not indicate any great market preference for this size over detached houses of similar age and size nearby.

A large supply of housing of missing middle type could be obtained by planning for it in the North Curtin Residential development: at a potential of 1,000 new dwellings, this is as much in one hit as the missing middle housing reforms could ever supply. (My estimate is based on reducing the stated goal of 1,300 new dwellings in North Curtin development to a more realistically acceptable density of 1,000, set against a fantasy scenario of the Missing Middle estimated total of 1% uptake of redevelopment over all 106,433 separate houses in the ACT [Census 2021].

REID RESIDENTS' ASSOCIATION INC.
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Submission from Reid Residents' Association on Proposed Missing Middle Housing Reforms to the Territory Plan.

Thank you for the opportunity to respond to what is referred to as the Missing Middle (MM) housing reforms to the Territory Plan.

Given the MM claim and the proposed ameliorating reforms, it would be appropriate to have actual evidence of a MM as well as projected consequences if the proposed changes to the various zones, particularly RZ1, are implemented. How will these changes contribute in a significant way to the need for Canberra's sustainability and resilience, its character, aesthetics and liveability that distinguish it as the national capital of Australia?

We will respond to the issue from the perspective of the suburb of Reid as obviously that is the one we know best. However, we are aware of the common issues: 'including population growth and demographic changes (urbanisation trends, ageing and migration), land constraints and climate change impacts, and the need to transition to a low-carbon and circular economy' of all cities, not just Canberra, (p.11 www.infrastructure.gov.au/sites/default/files/documents/draft-national-urban-policy.pdf) and thus, multiple wicked problems.

National Urban Policy, Consultation Draft 2024 cites innovations as strong possibilities such as:

> *Both Singapore's and Scotland's national urban policies acknowledge technological changes such as digitalisation and the emergence of artificial intelligence, and both countries have implemented innovative strategies such as green infrastructure and compact urban growth which offer practical models to address sustainability challenges in Australian cities.*

Reid already has a highly significant green infrastructure (Mapping surface urban heat in Canberra 2017). It also has a wide range of housing stock. This includes single dwellings which are mostly within the Heritage-listed Reid Housing Precinct; many duplexes and apartments – Argyle, Monterey, Jerilderie Court, Reid Court and Kanangra Court; and the high rise apartments, Jamison and Metropol. The sum total of these indicate a diversity of house/dwelling types. It is easily observable, too, that other inner north suburbs also have a wide diversity of housing stock. Reid will also include student housing with the development of the former CIT site and is adjacent to large apartment buildings such as the Glebe Park apartments, Founders Lane, Gatsby and Braddon Court.

So, there is already a diversity of housing in Reid. One issue here is that the removal of much of the social housing from Cooyong Street (and the likely removal of more social housing from Ainslie Avenue), has reduced affordable housing stock.

The suburb of Reid has, therefore, not only **extremely** high rates but also **high prices** for the existing housing stock. Land, if available for infill, is therefore **very costly** and therefore unlikely to meet any MM objectives.

The proposed changes to the Territory Plan appear to be in denial that Canberra, a well-planned city, should remain a well-planned, sustainable and resilient city capable of adapting intelligently. Of particular concern is:

1. the removal of requirements that regulate protection in relation to overshadowing, the deep soils needed for trees with relevant canopy spread, appropriate site coverage-rather than boundary to boundary coverage, the loss of private and public open space, and maintenance of high-quality building standards. This will reduce liveability, wellbeing and, most definitely, resilience. A developer-led approach does not augur well for the sustainably and amenity of Canberra and suburbs like Reid. Compliance appears to have become an antiquated legislative function. An open-door approach to planning can so easily result in an outbreak of a lawless opportunism and a multiplicity of 'jerry-build' housing stock.

2. the lack of recognition of the urgency for exceptional planning. Where is the recognition of how climate change parameters need to govern the way ahead?

It would be useful for the residents of Canberra to see how these proposed MM Housing Reforms align with the principles set out in the afore mentioned National Urban Policy Consultation Draft. Please see the following principles (pp. 40–43) as follows:

- City planning and governance must be collaborative and adaptive
- Purposeful place making increases wellbeing and connection
- Urban development should actively improve social, environmental and economic outcomes
- Improving the evidence base will underpin urban innovation
- Fair and inclusive development builds equitable communities
- Fostering innovation and creativity hubs enhance diversity and broadens opportunities.

Further, to reiterate, Canberra needs to be a city that is sustainable and resilient as clearly set out in the National Urban Policy Consultation Draft (pp. 18-19).

> ***Sustainable***
> *Where governments, industry and community work together to appropriately plan for urban growth, reduce emissions, promote a circular economy and adapt to climate change to ensure that our urban areas meet the needs of diverse communities and that our natural environments are rehabilitated for future generations.*
>
> *As our urban areas continue to grow, we need to ensure they are carefully planned and managed to protect our natural environments and promote wellbeing in communities. Moving towards net zero emissions, circular economies and incorporating climate adaptation principles will help ensure a more sustainable future for our cities and suburbs.*
>
> *Factors that can determine our sustainability include:*
> *• the rehabilitation, restoration and protection of natural environments and ecosystems*
> *• urban biodiversity*

• the health of waterways and air quality
• circular economies and how we produce, consume and dispose of materials

Resilient
Where our cities are economically, socially and environmentally resilient to the impacts of change, including changing climate and increasing exposure to climate-related hazards.

Resilient communities have the ability to resist, absorb, accommodate, recover, transform and thrive in a timely, effective manner in response to shocks and stresses that cities can experience. A wide array of acute and incremental climate events are impacting our communities, economies and built and natural environment. These factors affect urban areas especially when impacts combine, such as the effects of storm surges and sea-level rise on our coastal cities. The spatial distribution of population growth can also expose both people and infrastructure to climate-related hazards. Urban resilience has become increasingly important as we deal with these challenges.

Factors that can determine our resilience include:
• climate-resilient infrastructure and planning frameworks
• a circular economy approach to managing supply chains
• diverse ecosystems and appropriate land-use policies
• digital connectivity and infrastructure.

Planning for Canberra's future sustainability and reliance needs exceptional planning that encompasses all these elements. It requires integrated, innovative and comprehensive work. This work should demonstrate, as clearly as possible, how proposed changes to the Missing Middle housing reforms to the Territory Plan fit the urgency of the need to initiate reforms that could go, at least in some way to manage the existential challenges ahead.

These proposed reforms do not rise to these challenges.

We also support both submissions from the North Canberra Community Council and Inner South Community Council on this matter.

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RRA Committee
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[redacted]

"The planning system has a critical role in responding" *to the housing crisis* "by enabling the delivery of new housing supply in a way that **safeguards the character and liveability of the city**" (my emphasis). Page 2 | ACT MISSING MIDDLE HOUSING DESIGN GUIDE

I have lived in an inner Belconnen suburb, which was established in the early 1970s, for 45 years. If the Missing Middle proposals did in fact safeguard the character and liveability of long-established suburbs, I would not be making this submission.

I have experienced personally the negative impacts of densification near me and can attest to the negative effect on my mental health and sense of wellbeing and belonging. The impacts of densification on existing residents are not considered by the Planning Authority in their proposals nor reflected in associated rules and legislation. The Missing Middle is a misnomer as the 'middle' in terms of style/size of dwelling, price and amenity is spread across Canberra already. A more appropriate name would be 'Destroy the Garden City' or 'Goodbye beautiful Canberra Suburbs'.

Infill policy for long-established suburbs has never safeguarded the residential amenity of existing residents. There is no consideration given to the reasons why people purchase a property in a particular location because of its desired attributes, including not only the property purchased, but the character of surrounding properties and streetscapes. I can see nothing in the disseminated information that will protect character or residential amenity for existing residents in older suburbs. Infill is obviously in direct conflict with safeguarding character. I want to continue to live in the long-established suburb in which I have lived for 45 years (having raised a family and now welcoming grandchildren into my home) without the disturbance and changes that proposed densification would bring.

My experience of densification began many years ago under the previous A10 infill provisions – the current proposals open the door to greater negative impacts. A developer purchased the property next to mine and applied to demolish the home and build two, two-storey houses. The application was approved despite our objections. We appealed the decision and were successful in ACAT with the approval reversed. This was ordered on the basis that there were no two-storey residences anywhere near us. Also, the negative impacts of building close to our property, destroying privacy and pleasant garden outlook, were recognised. Unfortunately, that outcome would not occur today and even less likely to do so if the proposed densification policies are adopted.

Under RZ2 zoning provisions our small crescent street of 19 detached residences has had two infill developments covering 3 blocks. It is a tertiary street with no footpaths and two 90-degree bends. These developments have doubled the number of residences and increased car activity in the street. Beautiful gardens, large trees and decent space between dwellings in a small street - the reasons for purchasing our home - have gone. This has led to a loss of a sense of community - we used to know everyone in the street but that is no

longer the case. In the past I have consoled myself that there was always the option to leave our family home and re-locate to RZ1 to avoid densification. If the Missing Middle proposals go ahead, the only option will be to leave Canberra (where my children and grandchildren all live nearby) or move to a retirement villa which we do not need at this stage in our lives.

There is a claim that Missing Middle policy "protects and enhances the qualities that we value about Canberra while managing growth and change across the city. 2 | ACT MISSING MIDDLE HOUSING DESIGN GUIDE

Nothing I read in the extensive information provided supports this statement. Canberra is a planned city and I and many others were attracted to making a home here because there was a commitment to a Garden City. Suburbs with blocks of a size which can accommodate a family-sized home with surrounding garden space are highly valued. Inner Belconnen suburbs provide that high level of residential amenity. A10, RZ2 and now Missing Middle are all policies set to destroy that. There is absolutely no shortage of young families wishing to buy homes in the long-established inner Belconnen suburbs, but they will likely be priced out of the area if they must compete with developers.

The qualities of peace and quiet, privacy, predominantly single storey homes and green environment are not being "protected or enhanced" with densification proposals!

It appears that the Planning Authority is attempting to provide lower-cost housing in relatively affluent suburbs like those in inner Belconnen. Terrace housing, townhouses and duplexes in long-established suburbs that deliver a high level of residential amenity will not achieve that goal as they will sell for over $1m dollars each.

It is appropriate that newer suburbs are built with increased density compared to that of long-established suburbs, but there should be adequate provision of blocks suitable for single storey detached housing with outdoor space large enough for privacy and recreation and large trees (750 sq m blocks). It is appropriate that unit developments are in Town Centres where people who choose (or can only afford) that lifestyle can co-exist. But please leave those who value a quiet suburban life on leafy blocks alone.

Construction activity that could occur in long-established suburbs under densification provisions would be a never-ending nightmare for existing residents. The developments that have already occurred in my street took years to complete with associated noise disturbance (of building activity and the workers' music and foul language). Trade vehicles were parked on nature strips along both sides of two-thirds of the street causing damage and obscuring vision. Massive trucks coming and going were very noisy, shed their loads on to the road and caused damage to the road surface that has yet to be fixed. The disruption was unacceptable.

"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 neighborhoods and provide more affordable housing choices. By adding missing middle housing, communities can enjoy more diverse and vibrant neighborhoods, better access to amenities, and improved overall housing outcomes." 2 | ACT MISSING MIDDLE HOUSING DESIGN GUIDE

"… duplexes, triplexes and townhouses … fit well into existing neighborhoods" – where is the evidence for this assertion? The new residents might love the idea of these kinds of homes infilled into low density suburbs, but those that have purchased in long-established suburbs want to preserve the character of where they live – duplexes, triplexes and townhouses abound in newer suburbs (Denman Prospect comes to mind in addition to other suburbs created over the last 20 years) but they are incompatible with the expectations of existing residents of long-established suburbs.

What my generation is 'missing' is down-size options for members of the senior population in the suburbs in which we have lived for most of our lives. As we age many property owners in long-established suburbs would more easily transition from family-sized homes to smaller properties which have the valued characteristics of family homes. By smaller properties I mean 3 bedrooms, 2 bathrooms, garage, an area of private garden with additional communal garden space, privacy and very importantly **single level and with disability friendly design features**. This kind of home can be found in retirement villages (in short supply) but developers appear to have no interest in building such properties.

The last thing I and many others want is "vibrancy" in their suburb – vibrancy belongs in Town Centres and perhaps some large group centres e.g. Kingston, Manuka.

What I value is peace and quiet, gardens and neighbours who also value the attributes of where we live that contribute to a high level of residential amenity.

Issues for consideration

Site Coverage and the heat island effect

I have observed that one of the biggest problems with densifying long-established suburbs is that the blocks were designed for single detached homes. The provision of vehicle access typically results in a long concrete driveway running from the front to the rear of the block.

I note that the proposed maximum site coverage is to be 45% for RZ1 and RZ2 (*Missing Middle Housing Reform, p10*). Inserting additional homes into existing rear open space results in a long concrete driveway to one side of the block. Typically, there are small private

courtyards (unlikely to have any grass or trees), with a minimum sized nature strip and front garden to the street, and little or no common garden space.

I am strongly of the view that any driveways/ turning areas / parking areas (hard surfaces) to the rear of the front building line should be included in site coverage calculation as 'built on'. This is appropriate to offset the heat island effect, and to permit adequate gardens along the boundary for screening.

Parking

Another major issue is the less than adequate on-site parking that legislation requires (and possibly less will be required in the future?) for multi-unit housing.

Re-developed sites usually have insufficient parking for residents and little or no parking available on-site for visitors. Unlike single dwellings with their own driveways, shared driveways cannot be used for parking.

One of the recent developments close to me involved demolition of a detached home, clearing of the block, and three terraced townhouses constructed (totally out of character with surrounding properties). The whole of the nature strip and open space on one side of the corner block has been covered in red gravel (should be illegal! It is dangerous for pedestrians, causes messy run-off that builds up in gutters and drains, is unattractive and is a hot, hard surface with no cooling greenery). There are regularly three SUV/utility type vehicles parked on it (see photo above). There is no footpath, so pedestrians are forced to walk on the road (which has been damaged by construction activity). This parking behaviour destroys valued streetscapes. (I was very surprised and concerned when, to the best of my memory and understanding, the presenter at the recent Belconnen information evening stated words to the effect that, in future, consideration would be given to increased use of public roads for parking. That approach to parking would not be welcomed in long-established suburbs.)

I am happy to support the provision of public transport, but it does not suit everybody's needs all the time (e.g. holiday travel, multi-purpose trips, late night travel). The ACT Government needs to accept that people, regardless of the size/type of home, want to, and will always want to, own private vehicles. To preserve streetscapes, and to minimise occurrences of theft, adequate on-site parking needs to be provided.

Densification should be restricted to major roads through the suburbs, i.e. those roads that have bus routes along them and major access road into and through the suburb. Small streets and cul-de-sacs should be protected and allowed to retain their character for future generations.

<u>Building Heights</u>

Rules regarding building heights need to be more sensitive to neighbouring properties, especially where the blocks have slope so that one home is much lower than the neighbouring home.

Observing a knock-down rebuild in a small suburban street in RZ1 (currently under construction), I am of the view that permitted building heights are too generous, especially for flat or skillion rooflines. The building totally dominates the site and if neighbours had interfacing windows would be even more unacceptable. The property I refer to includes basement parking so the 'ground floor' is actually above ground level to accommodate the height of vehicles parked underneath. The building appears to have two living levels with very high ceilings and a flat roof – very dominating and not at all in character with

surrounding properties. Building heights in RZ1/RZ2 need to be reviewed to ensure better outcomes for neighbouring property owners.

Minium block size for development in long-established suburbs

I believe that a minimum block size for increased density should be retained and increased from its current minimum of 600/800 sq m. I would suggest 1200 sq m so that blocks of more modest size can be retained for single detached homes and development occur only on larger blocks where the impact is less. There are some anomalously large blocks in older suburbs (>1500 sq m) that are obvious candidates for sub-division, but subdivision to provide more low-density homes in character with the surrounding homes.

I cannot comprehend why the Missing Middle group appears to have the ear of the ACT government while residents of long-established suburbs do not. I perceive the group as young professionals who have no empathy for people such as myself who should be able to enjoy their homes and lifestyle without negative impacts of densification.

I implore the ACT government to consider residents of long-established suburbs and to truly protect our residential amenity and concurrently our mental health and the environment.

[redacted]
4 August 2025

Submission on the Missing Middle housing reform

[redacted]

I have spent some time reading the Missing Middle housing reform proposal's online and printed material, as well as Census and other material, and have found that the more I read the proposal material the less clear the proposal becomes. It is sometimes contradictory, sometimes confused, and often bases 'factual' statements on dubious assumptions. I realise that this sounds harsh, but I really believe that clear thinking, clear and accurate communication, and statements based on available factual evidence would do much to encourage widespread adoption of housing reform ideas and allay fears that these proposals would destroy 'Canberra's unique amenity and suburban character'.

As the proposal stands, it has the capacity to permanently alter Canberra's amenity and character—and not for the better.

Four points immediately spring to mind, with reference to the RZ1 Suburban zone:

1 Increased number of dwellings on a block with the removal of minimum block area

2 Reduced setbacks

3 Increased impermeable areas, with associated reduced garden areas

4 Reduced provision for parking.

Increased number of dwellings on a block with reduced setbacks and the removal of minimum block area, increased impermeable areas and reduced planting area

Allowing apartments to be built on a suburban block and reducing the size of subdivided blocks may increase the population density but would reduce the amount of planting area, green space and personal space belonging to each dwelling. Research in the Netherlands, Melbourne and elsewhere states that private gardens, high-quality street greenery and 'greenery views' are necessary for mental health and wellbeing, particularly for women. Couple this with the likelihood of an increase in working from home (with its accompanying need for a home office or more space for this purpose) and the result would be an individual's need for a larger dwelling, but with probable reduced subjective wellbeing because of the restricted private and green space described in this proposal.

Reduced provision for parking

The proposal to reduce the minimum required car spaces per dwelling is at odds with what is happening in the real world. Census and other data have not shown a reduction in car ownership per dwelling over the last decade. In fact, there seems to be a slight increase in the proportion of dwellings with three or more cars. The reduced number of car parking spaces and the increased number of cars mean an increase in on-street or on-verge parking, with the possibility of a rise in suburban traffic accidents due to reduced visibility for pedestrians, drivers, cyclists and scooter-riders, and school children.

The tram and buses are not necessarily the answer for people wishing to downsize because of age or infirmity. Cars seem to be even more important for this group, who are the largest target market for missing middle housing. Older people need their cars to visit family and social contacts, particularly at night, when walking is perceived to be unsafe, and at weekends, when there is less public transport. People need to be able to safely park their cars, either on their property or in visitor parking when visiting others.

Stockland

ACT Missing Middle Housing Reforms

Introduction

Stockland welcomes the opportunity to make a submission to the ACT Government's *Missing Middle Housing Reforms*. The proposed changes to the Territory Plan and the draft Missing Middle Housing Design Guide present an opportunity to unlock housing affordability and drive more diverse housing supply in the Territory.

With over 73 years of experience creating communities across Australia, including 25 years in the ACT through projects like the Waterfront Apartments at Kingston Foreshore and The Parks at Red Hill, Stockland has deep expertise in delivering high-quality housing and community outcomes. We look forward to continuing our collaboration with the ACT Government to deliver positive outcomes for the Canberra community moving forward.

Across our national portfolio, we are championing Missing Middle Housing as a housing solution that reflects the needs of a range of customers, including Australian families and first-home buyers. This submission outlines our preliminary support for the ACT Government's *Missing Middle Housing Reforms* and affirms our commitment to supporting the Government's goal of delivering 30,000 additional homes by 2030.

We acknowledge and support the submission made by the Property Council of Australia (PCA). The PCA's insights reflect shared concerns across the industry and reinforce the importance of other legislative reform to maximise the benefits of the proposed zoning changes and to enable the successful delivering of medium-density housing in the ACT.

Recommendations

Recommendation 1: Legislate amendments to the Territory Plan

Stockland supports amending the Territory Plan to enable Missing Middle development and unlock the potential for further infill and compact greenfield development in the ACT. We believe the ACT Government's proposed changes will unlock opportunities for greater housing diversity and availability in the Territory. Key proposed changes we support include:

- **Increasing housing choice** by removing the minimum and maximum block size, and maximum number of dwellings requirements in RZ1 and RZ2 zones. These changes enable blocks to be assessed on their own merit, based on size, shape and context, rather than arbitrary dwelling limits.
- **Updating car parking requirements** to better reflect changing demographics, increased uptake of public and active transport along transport corridors and a reduced reliance on private vehicles.
- **Expressing height limits in storeys rather than metres**, which provides greater clarity and design flexibility across all zones.

To support the realisation of this planning reform, Stockland urges for the implementation of the Development Solutions department proposed by the PCA, empowering it with the authority to bypass

delays caused by referral agency approvals, fast-track complying developments and promote a culture of that supports and enables an outcome focused approach to housing development across the territory.

Recommendation 2: Endorsement and implementation of the Missing Middle Housing Design Guide

Stockland supports the implementation of a dedicated Missing Middle Design Guide. The Guide presents a valuable opportunity to serve as a planning tool that can:

- **Facilitate housing diversity and choice** to meet the needs of a growing and changing population, including first-home buyers, downsizers, investors and key worker, social and community housing tenants
- **Promote housing affordability** through increasing supply of missing middle typologies
- **Provide clarity and consistency in design and assessment** of medium-density housing, reducing ambiguity for the development community.
- **Support investor confidence** by establishing a transparent framework for development, encouraging greater private sector participation which will have a flow on effect for increased construction activity and greater investment in the local economy.
- **Promote high-quality design** that respects existing neighbourhood character while enabling gentle density increases that supports additional housing supply.

We value the opportunity to review the Guide and encourage its integration into the planning system to ensure its principles are consistently applied across the Territory.

Recommendation 3: Clarification and consistency in Technical Specifications

In addition to the comments above, we encourage further clarification and refinement of Technical Specifications, a key instrument under the new Territory Planning System established by the Planning Act 2023. The interpretation and consistent application of these specification is critical to the effective delivery of housing outcomes particularly where subdivision design, block creation and dwelling diversity must align with performance-based planning objectives.

Our industry partners have raised important concerns that resonate with our experience including:

- **A risk that District Strategies will be misaligned** with the reforms, which may lead to unintended consequences in areas designated for higher density. A comprehensive review of all District Policies is necessary to ensure the planning framework supports missing middle housing delivery in both established and greenfield contexts.
- **An unclear and potentially inconsistent distinction between “new” and “existing” residential areas**. Under Section 43 of the Planning Act, all subdivisions, regardless of their location, are subject to the same subdivision design application of development approval process. As the Act does not explicitly differentiate between greenfield and established areas, the proposed reforms introduce a distinction that may not be clearly supported by the current legislative framework. This creates uncertainty around how Technical Specifications and related provisions should be interpreted and applied across different development contexts, potentially leading to inconsistent outcomes or implementation challenges. We recommend clearer definitions and guidance within the planning framework to realise greater clarity and ensure a consistent application as well.

- **Concerns regarding the proposed amendments to Technical Specification 3.2**, which introduces a minimum proportion of single dwellings within subdivision design applications across all residential zones. In higher density zones such as RZ4 and RZ5, mandating a partition of single dwellings may limit the capacity to deliver more diverse housing types such as town homes and dual occupancies making for a more efficient allocation of land use. We recommend that this requirement be reconsidered for higher density areas to enable more flexible, efficient and appropriate land use.
- **A need for clearer guidance on how the Missing Middle Housing Design Guide applies** to large-scale subdivisions and block consolidations, especially in greenfield areas, to ensure consistent and practical application aligned with the Planning Act.

Recommendation 4: Review the Lease Variation Charge to support medium-density housing delivery

To support the effective delivery of the Missing Middle Housing Reforms, the Lease Variation Charge framework should be reviewed to align with the broader policy intent of enabling diverse and affordable housing. Without reform, the current LVC settings act as a disincentive to redeveloping RZ1 and RZ2 sites.

As highlighted by the PCA, the imposition of LVC on medium-density housing impacts development feasibility, and, in many cases, reduced yields below levels that are acceptable to secure finance. This creates a significant barrier to investment in the missing middle housing typologies that the reforms are intended to unlock.

To address these challenges and unlock medium density opportunities, we recommend:

- **Introducing 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 such as dual occupancies and townhomes.
- **Reviewing 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.
- **Providing greater transparency and predictability** in how LVC is calculated for medium-density developments, to support feasibility assessments and investment decisions.
- **Aligning LVC policy with housing targets**, ensuring that economic settings do not undermine the Government's goal of delivering 30,000 new homes by 2030.

A more flexible and targeted LVC framework will help unlock medium density opportunities, support housing affordability, and encourage the delivery of well-designed housing in line with the Territory's planning and housing objectives.

We also recommend that the Government undertake modelling to demonstrate how LVC reform could be revenue-neutral or positive, through increased housing supply and land sale rates.

Recommendation 5: Review the third-party appeal rights an ACAT operations to support planning certainty

The ACT Civil and Administrative Tribunal (ACAT) plays a vital role in upholding planning integrity in the ACT. As Canberra embraces a more compact urban form, it is essential that the planning system supports more certainty, clarity and timely decision-making for stakeholders. With the increasing volume and scope of third-party appeals, there is concern that this could introduce delays and uncertainty that affect the feasibility of medium-density housing projects.

To support the successful application of Missing Middle reforms, there is an opportunity to refine the appeals process in a way that maintains community input while improving process efficiency. For example, introducing a merit-based threshold for third-party appeals could ensure that only well-founded concerns proceed to full review, reducing unnecessary delays and supporting more predictable planning outcomes.

Concluding comments

Stockland welcomes the ACT Government's leadership in progressing the Missing Middle Housing Reforms and recognises the significant opportunity these changes present to reshape Canberra's approach to housing delivery. By delivering a clear framework for medium-density housing, the Government can unlock a range of benefits for the Territory.

To fully realise the potential of these reforms, there is also an opportunity to review the Lease Variation Charge to ensure it supports the delivery of diverse housing typologies. A more flexible and transparent approach to LVC could help improve development feasibility and enable the market to respond more effectively to community needs. In addition, we support a review of the third-party appeal process through ACAT, recognising the importance of balancing community input with planning certainty and timely decision making.

Stockland is committed to working with the ACT Government to ensure the successful implementation of these reforms and to help deliver the 30,000 additional homes needed by 2030. We believe that with the right policy settings, the Missing Middle reforms can help to stimulate housing supply across the region and support strong community outcomes in the long term.

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05 August 2025

Missing Middle Housing Reforms Submission

The Belconnen Community Council (BCC) welcomes this opportunity to contribute to the consultation on the Missing Middle Housing Reforms. While we support the effort to improve the quality of medium-density housing in the ACT, this submission focuses not on the specific content of the design guide, but on the conditions that will determine whether it succeeds in practice. In particular, we focus on two areas that require further attention: the transparency of the consultation process and the operational capacity of key government referral entities, like Transport Canberra and City Services (TCCS), to support implementation.[1]

Transparent consultation fosters legitimacy and public trust

Planning reforms that shape neighbourhoods and the built environment must earn public trust. That trust depends not only on the content of reform documents but also on how government agencies consult and respond to community feedback. A transparent, well-documented consultation process signals to the community that their views are valued and that decision-makers take those views seriously.

In the case of the Missing Middle Housing Reforms, transparency will require more than publishing a high-level summary of comments. Instead, the City and Environment Directorate (CED) must provide a listening report that clearly outlines who participated in the consultation, what perspectives they offered, and how those perspectives influenced the final version of the guide. Without this level of clarity, the community may reasonably conclude that the process served as a formality rather than a meaningful engagement exercise.

The absence of a detailed consultation report often leads to confusion about how government decisions emerge. When residents do not see their concerns acknowledged or reflected in policy outcomes, they may interpret this as evidence that decisions have already been made. This perception can be particularly damaging in the planning space, where community members express concerns about the pace and quality of change in their

[1] While TCCS is no longer a directorate from 1 July 2025, it is listed as a referral entity within the new City and Environment Directorate.

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suburbs. Therefore, a thorough consultation summary that maps feedback to decisions would help demonstrate that the process was not only open but also responsive.

Moreover, to assess the quality of the consultation, it is important to examine not only what views were received but also who provided them. To achieve meaningful outcomes, community consultation must represent diverse local voices. This requires deliberate efforts to include people across age groups, cultural and linguistically diverse backgrounds, income levels, and life stages, incorporating renters, young families, established families, and older residents.

In this context, CED should explain what steps it took to include underrepresented groups in the process and whether any specific measures, such as targeted outreach or translated materials, helped broaden participation. Doing so would strengthen the legitimacy of the consultation outcomes and allow the community to understand the diversity of views considered.

Entity capacity determines whether good design translates into good outcomes

Even the best design guide cannot succeed if government agencies lack the ability to apply it well. While the draft guide outlines principles for quality development, its real-world impact depends on how development proposals are assessed and whether local infrastructure can accommodate population growth.

At present, referral entities like TCCS carry significant responsibility in this space. However, they often do so with limited resourcing and insufficient capacity to demand infrastructure upgrades. Although the guide briefly acknowledges the importance of infrastructure (noted on page three), it does not address the underlying systems needed to align development with service delivery. This gap between design intent and implementation risks undermining the guide's effectiveness.

The situation in the Belconnen Town Centre illustrates why this matters. In the Belconnen Markets precinct, for example, density has increased considerably in recent years, yet visible infrastructure improvements have not kept pace. Residents continue to navigate limited public transport options, congested traffic, and public spaces that remain underdeveloped or poorly maintained. Similarly, other parts of the Belconnen Town Centre have experienced densification without commensurate investment in walkability, public realm, or transport connectivity.

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These examples reveal a broader problem: 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.

Addressing this issue requires more than incremental improvements. The ACT Government must strengthen coordination across planning and service delivery functions. In particular, referral agencies like TCCS need funding, staffing, and data systems that allow them to assess local conditions, respond to cumulative impacts, and influence planning decisions accordingly.

This also means changing how infrastructure adequacy is communicated and assessed. Currently, the process lacks transparency. The public rarely sees how infrastructure issues shape decisions about development applications. Greater clarity about how the government evaluates infrastructure, and how it plans and funds upgrades, would improve community confidence and allow for more informed public debate.

Implementation and engagement must go hand in hand

The two issues outlined above, transparent consultation and capable delivery, are not separate challenges. Rather, they work together to shape how the public experiences planning reform. In this sense, the consultation process plays a dual role. It not only informs the final content of the design guide but also sets expectations for how government will engage during implementation. If the consultation lacks clarity, the broader reform effort risks appearing insular or dismissive. Likewise, if agencies fail to manage infrastructure and assessment effectively, the guide's design principles will have little positive visible effect in the neighbourhoods where people live.

To bridge this gap, CED should frame the finalisation of the design guide as part of an ongoing process, one that involves continued public dialogue and collaboration across directorates. This includes acknowledging areas where current systems fall short and outlining how the government plans to address them. By doing so, the ACT Government can show that it sees planning reform not just as a technical task but as a democratic and service-oriented responsibility.

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Conclusion

The BCC supports efforts to improve the design quality of medium-density housing in the ACT. However, we emphasise the importance of a credible consultation process and the capability of agencies to implement it well.

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.

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About the BCC

- The Belconnen Community Council (BCC) is a non-partisan, volunteer-driven organisation that aims to be at the forefront of advocating for our region, making it an even more attractive place to live, work, and enjoy life.
- The BCC represents the interests of its members and the community to the ACT Government and other stakeholders on various matters affecting the people who live, work, and play in the Belconnen District.
- The Belconnen Community Council receives support and funding from the ACT Government.

Missing Middle Housing Reforms

Greater Canberra Inc, August 2025

Greater Canberra

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Overview

We wholeheartedly support the Missing Middle Housing Reforms. Our principal aim in this submission is ensuring that the amendments to the Territory Plan and the associated subordinate documents achieve what they set out to do.

Windows for meaningful reform of our planning system are rare, and we are in such a window now. Right now, there is consensus between the people of Canberra, civil society, and much of the Legislative Assembly on the need for reform. ACT Labor, the ACT Greens, and Thomas Emerson MLA all went to the 2024 election promising substantive reforms of the RZ1 zone to bring it to the RZ2 standard. The Canberra Liberals went to the election also promising substantial reforms in this direction to enable medium-density housing.

The road to this consensus and this moment has not been short. Calls for more medium-density housing from members of the community and the architectural and planning professions date back decades. The Demonstration Housing Project first opened for applications in 2018. It is now some two and a half years since we launched Missing Middle Canberra in February 2023, as consultation for the draft Territory Plan was occurring.

History demonstrates that energy for reform is not inexhaustible, and therefore we encourage the ACT Government to be ambitious with this reform and ensure that it is as effective as possible from the onset, rather than requiring further tweaks down the track to achieve viability.

With this reform, we have the opportunity to influence the trajectory of our city for the better by creating a more liveable, sustainable, and affordable Canberra for centuries to come. The stakes are literally hundreds of billions of dollars in housing, transport, climate, environmental, social, health and economic productivity benefits. We owe our grandchildren and all those who will come to call Canberra home our best and most ambitious efforts to build a city worthy of them.

Points of strength

Much of this submission focuses on areas in which we believe that the reforms could be strengthened or tweaked - however we **entirely support the objectives and principle of the reforms**. Particularly positive features include:

1. The decision to **allow apartments in RZ1**. Allowing apartments in RZ1 enables for multistorey housing where individual units are themselves single level. This is critical for enabling housing density while creating single level homes needed for elderly and mobility impaired residents.

2. The reduction in **parking minimums and further flexibility for underground parking**, which will enable more homes while providing more housing choice for car-light households and encouraging environmentally sustainable transport.
3. The **ambitious RZ1 dwelling density targets** that meet or exceed existing RZ2 standards. Where a development is able to meet design, solar access, green space, and tree preservation outcomes, they should not be constrained to an unambitious density limit.
4. The **relaxation of solar fence provisions in the technical specifications that will enable more housing**. We support both housing and green space, and support these provisions that support taller over wider housing. However, these reforms should go further.
5. The relaxation of **side setback provisions**. We support zero side setbacks, enabling continuous streetwalls and traditional terrace developments and perimeter blocks. The reforms should be strengthened to enable this.
6. The **increase in height limits across RZ2 to RZ5**, which will deliver more homes in existing medium- and high-density areas.

Recommendations

However, as we discuss further in this submission, we believe there are a number of ways in which more could be done to achieve the Missing Middle policy goals. We recommend:

1. The Missing Middle Housing Reforms should be implemented and DPA-04 passed.
2. The RZ1 Policy Outcomes in DPA-04 should be amended to reflect the current or proposed amended RZ2 Policy Outcomes, to ensure that the Policy Outcomes support Missing Middle housing compliant with the Design Guide and Technical Specifications.
3. The Government should consider if any amendments to the Assessment Outcomes in the Residential Policy are necessary to ensure that the Residential Policy is harmonised with the amended Technical Specifications.
4. The government should consider providing further guidance in the Subdivision Policy on what “appropriately located” means so as to ensure consistent interpretation by ACAT and the Authority, and provide greater certainty as to what subdivisions and consolidations are possible.
5. Solar access provisions should be relaxed in order to enable perimeter block typologies, and to empower consumers to make decisions about how much they value sunlight in their living rooms on the winter solstice against other features (price, location, etc.)

6. Side and upper level setbacks should be fully eliminated, and frontal setbacks minimised to maximise usable green space and housing provision while enabling perimeter block typologies.
7. The arbitrary limits on RZ1 block consolidation in the Residential Zones Technical Specifications should be removed.
8. Parking minimums should be fully eliminated across all residential zones.
9. The Government should continuously identify and eliminate barriers to Missing Middle housing development that may arise as a result of the planning system and other policies.

Draft Major Plan Amendment 04 (DPA-04)

The ACT's new outcomes-based planning system is still very recent, only commencing in November 2023. We have consistently raised our concerns with the uncertainty of the new system and how it interacts with third party ACAT review of decisions throughout the development of the new system.

The Missing Middle Housing Reforms consist of three different kinds of instruments to give effect to the intent of the reforms:

1. The changes to the Territory Plan in Draft Major Plan Amendment 04 (DPA-04), including changes to the Residential and Subdivision Policies
2. The changes to the Residential and Subdivision Technical Specifications
3. The Missing Middle Design Guide

The *Planning Act 2023* is clear. While the Technical Specifications and design guides can "support" the actual text of the Territory Plan, the Territory Plan itself is supreme. **It is critical that DPA-04 is aligned to the intended policy outcomes.** Ultimately, the Technical Specifications and Design Guide can be updated as required, while further major plan amendments to fix issues in DPA-04 must go through a much lengthier process.

The importance of ensuring that the actual text of the Territory Plan is consistent with the ambition of the Design Guide and the Technical Specifications was underlined in the recent ACAT case of *Khandelwal v Territory Planning Authority* (Administrative Review) [2025] ACAT 48, where the Tribunal noted:

> *We agree with the respondent that the statements give priority to the Territory Plan and assessment outcomes, in this case the Residential Zones Policy, over the specifications, in this case the Technical Specifications.*

And furthermore that:

> *The respondent suggested that there is a presumption in favour of the development application being considered to satisfy assessment outcomes where the applicable specifications for those outcomes are met and the development application has explained (or it is readily apparent) how it has satisfied those matters. We agree that talking of a presumption may be a useful way to look at this. But we think this statement is otherwise overbroad. As noted meeting conditions means only that further assessment is not required, but we agree with the respondent that this probably in many cases in effect means can be approved.* ***But further, 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.*** [emphasis added]

As a matter of law then, the Technical Specifications and Design Guide are strictly subordinate to the actual Territory Plan. To the extent that there is any inconsistency between the two, the Territory Plan will prevail.

This is relevant because the Government has not yet decided to exempt Missing Middle developments from third party appeal. Long history has demonstrated that Missing Middle housing of all kinds is exposed to substantial litigation risk, as demonstrated in the matter of *Khandelwal*, and in a large number of cases involving Housing ACT and other social housing providers.

In order for these reforms to succeed, the changes in DPA-04 must be unambiguously and clearly be consistent with the ambition expressed in the Design Guide and the Technical Specifications.

In important ways, DPA-04 falls short. Further amendments are required to ensure that this reform is not accidentally sabotaged by failures in legislative drafting that creates meaningful differences in ACAT and the Authority's interpretation of the provisions.

Residential Policy

RZ1 policy outcomes

The Residential Policy currently reads:

> Development proposals in residential zones will be assessed having regard to the policy outcomes to be achieved for the relevant zone/s…
>
> RZ1 – Suburban Zone
>
> 1. Achieve and/or maintain low density residential neighbourhoods in suburban areas.
>
> 2. Provide for a range of housing choices that meet changing household and community needs.
>
> 3. Limit the extent of change that can occur particularly with regard to the residential density and original pattern of subdivision.

> 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.

DPA-04 proposes to change this language as follows:

> RZ1 – Suburban Zone
>
> 1. Provide for a range of housing choices in a suburban setting which is primarily low density and low rise.
>
> 2. Housing development meets changing household and community needs and demonstrates good design outcomes.
>
> 3. Provide opportunities for redevelopment by enabling some change to residential density and subdivision pattern.
>
> 4. Development respects valued features of the neighbourhood and landscape character of the area and does not have unreasonable negative impacts on neighbouring properties.

By contrast, the current RZ2 outcomes read as follows:

> 1. Facilitate development or redevelopment of sites to achieve medium density housing.
>
> 2. Provide for a range of housing choices where the housing contains a mix of single dwelling and multi-unit housing.
>
> 3. Provide opportunities for redevelopment by enabling changes to the residential density and original pattern of subdivision.
>
> 4. Provide opportunities for redevelopment by enabling change.

In our view, the DPA-04 RZ1 outcomes do not clearly support Missing Middle implementation. The outcomes should speak with a clear voice to state that the kind of developments in the Missing Middle Design Guide are universally permissible throughout RZ1, and the draft ones do not. Namely:

a) DPA-04 provides no definition of “low density”. The Missing Middle Design Guide refers to its own typologies as a “middle” - this naturally leads an observer to conclude that they are medium density, and therefore that RZ1 should not “primarily” consist of Missing Middle housing.
    i) This is especially notable as the current RZ2 policy outcomes include “achieve a mix of low to medium density housing”, implying that the RZ2-style typologies these reforms seek to enable in RZ1 are “medium density” and therefore not something which RZ1 should “primarily” consist of.
b) DPA-04 also has no definition of “low rise”, creating similar ambiguities, although the height limits in the assessment outcomes largely mitigate this concern.
c) DPA-04 allows for “some change to residential density and subdivision pattern”, which implies that there is a degree of change which might be regarded as excessive, and that

ACAT may decide that any individual development has breached this threshold. Notably this restriction does not appear in the RZ2 policy outcomes.

d) The proposed RZ1 policy outcomes are substantially less ambitious than what is envisaged by the Technical Specifications and Missing Middle Housing Design Guide. This is confusing and risks the overall goal of the reforms.

This is inconsistent with the election platforms of ACT Labor, the ACT Greens and Thomas Emerson MLA, all of which support moving RZ1 settings to be generally consistent with RZ2. The current RZ1 policy outcomes in DPA-04 do not do this, and instead create an ambiguous and open-ended halfway house between current RZ1 and RZ2 settings.

The RZ1 provisions should be amended to match those of the current RZ2 policy outcomes wholesale. The Missing Middle Housing Reforms generally seek to legalise and enable what is currently permissible in RZ2 (in terms of height, typology, site coverage) into RZ1 - and this is the clear intent of the Missing Middle Design Guide and Technical Specifications.

For this to be successful, the policy outcomes must be aligned with this goal. Should this not be possible however, DPA-04 should:

a) Explicitly define “low density” as including all missing middle design guide typologies and densities as articulated in the Technical Specifications and Design Guide in the text of the Residential Policy.
b) Remove the “some” from paragraph 3 to make it explicit that a policy outcome is enabling changes to residential density and the subdivision pattern.
c) Striking paragraph 4 in its entirety. There is no analogous provision to paragraph 4 in the policy outcomes of any other zone. It is unclear why the “neighbourhood character” of RZ1 should have special protections in a way that all other residential areas do not, or why RZ1 homeowners should have special grounds for protection against “unreasonable impacts” not extended to the residents of any other zone.

Other changes to policy outcomes

DPA-04 also makes corresponding changes to the policy outcomes in the other residential zones (RZ2 through to RZ5). We have fewer concerns with these changes than with the proposed changes to RZ2. However, consistent with above we would recommend:

a) Similarly explicitly defining what is meant by medium and high density in this context so as to provide certainty that developments that are consistent with the relevant design guides and technical specifications aren’t rejected on review for being too dense.

Assessment outcomes

DPA-04 does not make any amendments to the assessment outcomes. The Technical Specifications, however, make a suite of changes to how certain assessment outcomes are to

be assessed, particularly regarding building envelope, setbacks, and solar access, planting area and other matters.

Especially given ACAT's decision in *Khandelwal* (holding that the assessment outcome must be met independently of the Technical Specifications), the Authority should carefully consider if any changes to the assessment outcomes (as read in conjunction with the zone policy outcomes) is required to ensure that ACAT's interpretation of the outcomes are consistent with the Technical Specifications and Design Guide (which ACAT is liable to largely disregard if it forms the view that proper statutory construction of the policy is inconsistent with the technical specifications).

Assessment requirements

DPA-04 makes a series of changes to the assessment requirements under the Residential Policy, such as deleting the ban on apartments in RZ1. We support these changes.

Subdivision Policy

Besides removing barriers to subdivision and consolidation - which we entirely support - DPA-04 makes only one substantial change to the Subdivision Policy, adding the following qualifier to the assessment outcomes:

> 2. 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) *[new language in bold]*

It's not exactly clear what this new clause is intended to do:

- One possible interpretation is that it is intended to enable the soft limits on consolidation expressed in the Technical Specifications for differently situated blocks, such as end of section blocks, which we discuss later in this submission.
- Another is that this is intended to allow the Authority the discretion to reject subdivision or consolidation that it feels is inappropriate more broadly.

The Supporting Report to DPA-04 describes this change as "to ensure blocks which subdivide are suitable for additional development", which is not illuminating. The Policy does not provide any further guidance to the decision maker (and hence, to ACAT) on what the proper construction of "appropriately located" is, and therefore it's unclear if there are circumstances where the decision maker should, or the merits, reject a subdivision or consolidation.

Again, *Khandelwal* is clear that the Technical Specifications are subordinate and do not replace the assessment outcomes in the Territory Plan, and that the decision maker must be satisfied that the assessment outcome is comprehensively met, even when the Technical Specifications are satisfied.

Third party ACAT appeals against consolidation or subdivision DAs will almost certainly mount the argument that consolidations or subdivisions are "inappropriately located". Without clear

guidance in the policy about what this means, the potential variability of interpretations of this phrase may be wide, inserting substantial uncertainty into the system.

Technical Specifications and Design Guide

Having dealt with the DPA-04 provisions above, we will now turn to the substance of the Technical Specifications and Missing Middle Housing Design Guide.

These provisions are near universal improvements on the existing status quo, making positive changes in nearly every direction. We support them in their entirety.

However, on same matters the Government should consider going further, such as by abolishing parking minimums entirely, further reforming setback provisions, and relaxing solar access and overshadowing provisions, for reasons that we articulate below.

Solar access, setbacks and building envelope

There exists a three way trade off in planning policy between housing, green space, and solar access.

1. You can have both solar access and green space, but sacrifice housing.
2. You can have solar access and housing, but sacrifice green space.
3. You can have green space and housing, but sacrifice solar access.

Of the three options, we view the third option as the most desirable. The Canberran public has spoken clearly that the housing crisis is a key priority in this past election. Similarly the *Urban Forest Act 2023* is a statement of our city's continued prioritisation of canopy cover and green space.

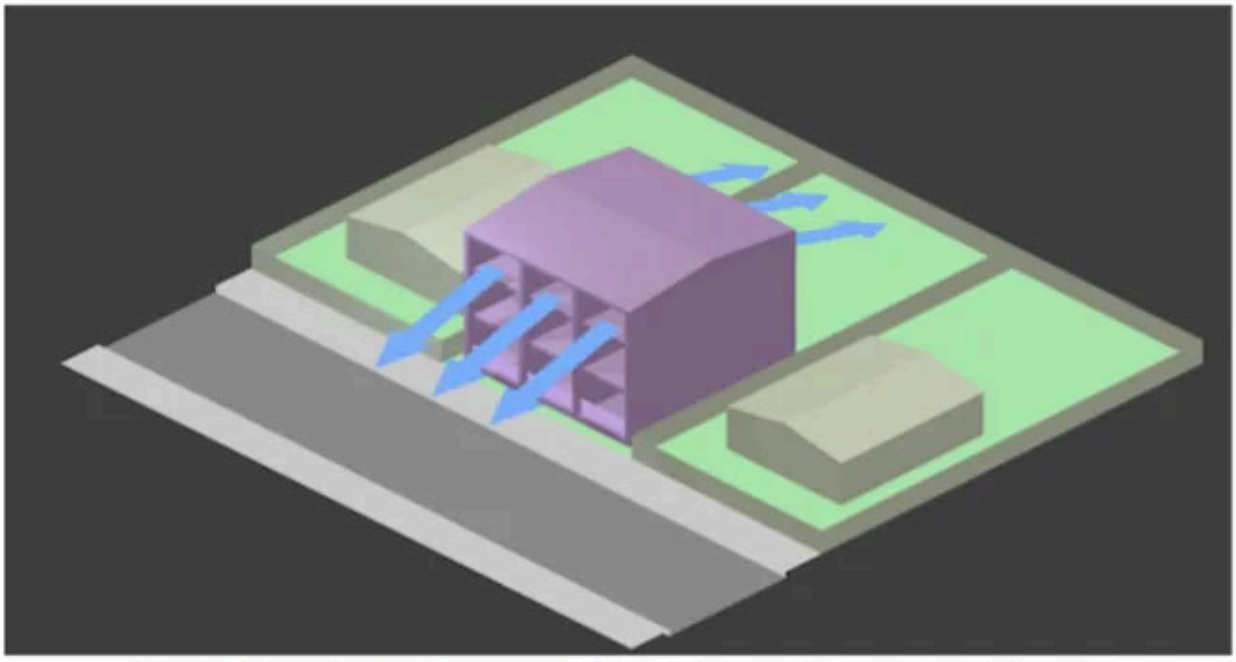
Solar access, setbacks, building envelope controls and other restrictions on the *shape* and mass of buildings (and not their site coverage) are what must give. The arcane set of setbacks, solar fence provisions, solar access requirements and other building envelope regulations are highly obscure, and the vast majority of Canberrans do not know that they exist, or the costs they impose.

These rules should be reformed to enable the development of perimeter blocks - the natural urban form before 20th century urban planning, defined by zero side setbacks (to enable a continuous streetwall), minimal front setbacks (to avoid space wasted in front yards), but significant rear setbacks and buildings lines to enable significant greenspace within the rear of the block, either as individual yards or as a communal block courtyard.

Perimeter blocks in Prague

In our view the perimeter block has several key advantages:

1. It mitigates substantial privacy concerns by orienting all windows either onto the street (the public realm) or into the backyard. The absence of side setbacks ensures that residents do not have windows facing into their adjacent neighbours. (see diagram below)
2. The uplift into a perimeter block development pattern can happen gradually, rather than being contingent on the entire block being developed simultaneously.
3. Over subsequent centuries, appropriate areas may be continuously upzoned to enable higher height limits, densities and commercial mixed use without substantial disruption or changes to the neighbourhood character, street pattern or landscape.



Perimeter block and view orientation

Perimeter blocks come with inherent tradeoffs. Because the orientation of buildings is fundamentally set by reference to the street, not all bedrooms will have good solar access. Because of minimal front setbacks and the absence of upper level setbacks, the built form will shade the street and greenspaces.

The residents of Paris, Amsterdam, Prague, Copenhagen and other European cities where perimeter blocks predominate, make these tradeoffs happily. We suggest that Canberrans would as well, particularly if the benefit is more abundant green space and housing while preserving privacy.

Solar access

Australian planning systems aim to ensure that the living rooms of homes receive a given amount of sunlight on the winter solstice.

It is our view that consumers should ultimately be able to decide how much they value sunlight on midday at the winter solstice compared to other features. For many residents (particularly younger residents who spend little time at home during daylight hours), a home with poor orientation and solar access is a desirable tradeoff for other features (such as location, price and energy efficiency).

Overshadowing and the solar fence

Similarly, there is an element of Australian planning culture which regards it as inherently good to ensure that buildings cast as little shade as possible in any direction.

This element of our planning culture has always been an extremely awkward transplant of northern European cultural norms to the Australian context, where for our climate for the vast majority of the year, shade is beneficial, rather than harmful to the public and private realm.

For Australia, an urban form that provides shade to protect residents from heat and UV rays while outside during the summer and shoulder months is desirable, not harmful. The fact that such a built form would simultaneously ensure more housing while preserving green space is a bonus.

Unfortunately, the upper level setback, “solar fence” and other provisions in the Territory Plan, Missing Middle Design Guide and Technical Specifications (illustrated by the Missing Middle Design Guide below) work in the opposite direction.

Figure 45:Larger block widths and depths enable a greater building envelope while maintaining a consistent neighbourhood feel and character.

As our colleagues in YIMBY Melbourne have noted, upper level setbacks are ruinously bad urban policy. They reduce housing, increase carbon emissions, drive up construction costs, and decrease energy efficiency. In our view, these costs are not worth the price.

We should note that the reform package already takes positive steps in this direction, by increasing the angle of the building envelope from 31 to 45 degrees while increasing the height of the solar fence to 4m from 3.5m. This is a good and welcome step. But we should go further and abolish these controls entirely to fully enable continuous streetwalls and perimeter blocks.

Victoria’s recently reformed *Clause 55 - Townhouse and Low-Rise Code* provides an example of a better approach to built form regulation of low-rise dwellings. Under the code’s standard B2-3.2, buildings can choose from either a sloped building envelope, or an envelope with no building slope. This allows for simpler building designs that preserve more of the block for usable green space.

Setbacks

Large setbacks reduce the flexibility of development of a block and favour the development of large single dwelling homes over diverse housing types. The main objections to reduced setbacks are loss of solar access, privacy and the creation of visual bulk, all of which can be mitigated through smart design.

To fully enable a perimeter block typology and continuous streetwalls, side setbacks should be eliminated and front setbacks minimised. As the site coverage ratio of the block remains constant, this has the effect of increasing the size of backyards, enabling more usable green space able to support more large trees, contributing to canopy coverage targets.

The Residential Zones Technical Specifications take a major and important step in this direction by reducing the side setback to 0m for external walls for multi-unit residential buildings. We should go further and extend this 0m setback for external walls to multi-unit buildings over 4 storeys. The Technical Specifications should ensure that there are minimal requirements for side setbacks in any form to enable a continuous streetwall.

Removing side setbacks will promote more rowhouse/terrace developments, and enable adjacent blocks to share side walls while being developed at different times, which may be advantageous for smaller developers that don't have access to capital for larger developments or neighbours who are separately redeveloping blocks at different times.

Subdivision and consolidation

We strongly support permitting subdivision and consolidation in RZ1.

Subdivision is critical to the viability of smaller low-rise and townhouse developments, providing the flexibility of separate title without the considerable overheads of unit titling. Without these changes, many of these projects would be unviable.

The RZ1 subdivision control will require that each subdivided block contains a lawfully constructed dwelling. To mitigate financial risk for proponents and make this process practically viable, the Authority will need to allow dwelling construction and subdivision as part of the same DA, with the subdivision conditional on the completion of the dwellings. We note the Authority has engaged with this question at public consultation events and expressed a willingness to consider process reforms required to facilitate this.

We support the smaller minimum block sizes in the Subdivision Technical Specification 2.2 as more appropriate to allow Missing Middle development.

On the other hand, consolidation will permit better and more flexible use of larger areas, enabling developments with more dwellings, such as apartments.

However, we do not believe the proposed scale (2,000m^2, 2,500m^2 and 3,000m^2, depending on circumstances) specified in Technical Specification 2.5 is sufficient. While they are a very welcome step forward, they remain overly restrictive. We don't believe they are necessary for

good outcomes, and they limit the potential of consolidation to achieve the core goal of enabling more housing in established suburbs.

While the outcomes-focused approach permits a flexible, contextual assessment of compliance with controls, and thus proposals that exceed these limits may be permitted, the limits in the Tech Spec will guide the application of the policy and are a statement of the Authority's intent.

The dwelling targets already provide sufficient guidance as to the density expected in RZ1. Restricting the maximum block size limits the number of new homes, the flexibility that proponents have to design around the constraints of their context, and the ability to deliver coherent streetscapes. We believe the thresholds should be removed, and if retained, they should be significantly higher.

Parking provision

The proposed changes to parking provision requirements are a welcome step, reflecting the fact that different households have different transport requirements, and that housing policy must adapt to diverse lifestyles, travel modes, and affordability needs.

However, the policy should go further: parking minimums should be eliminated entirely across all residential zones. The current provisions, while improving on the status quo, still limit design flexibility, add significant construction costs, and discourage the delivery of diverse, compact housing typologies, such as townhouses, duplexes, and walk-up apartments, particularly on smaller or irregular sites.

Evidence from other jurisdictions reinforces this position. A 2024 report commissioned by the NSW Productivity Commission and prepared by the Centre for International Economics (CIE) found that car parking accounts for 10.3% of the total development cost of a typical mid-rise apartment building in Sydney.[1] This represents a substantial cost burden, of tens of thousands of dollars per apartment, ultimately imposed on residents who do not require a car space.

Cities around the world are eliminating these requirements - the Parking Reform Network identifies 108 places across 8 countries where all parking minimums have been removed.[2] These cities are not all European public transport paradises as critics may claim, but include many American cities with far greater car dependency than Canberra, as well as all urban areas of New Zealand.

Developers will continue to provide parking in line with market demand, which is often more than the minimum required by regulation. Removing parking requirements would not eliminate parking, it would simply allow the housing market to respond more flexibly to Canberra's

[1] Centre for International Economics (2024), Cost and feasibility estimates for supplying residential dwellings in NSW, prepared for the NSW Productivity Commission, page 3. Available at: https://www.thecie.com.au/publications-archive/cost-and-feasibility-estimates-for-supplying-new-residential-dwellings-in-nsw

[2] Parking Reform Network, Parking Mandates Map, https://parkingreform.org/resources/mandates-map/

evolving needs. As the city grows and densifies, and as more people choose to live in walkable, transit-connected neighbourhoods, rigid parking mandates can prevent the kinds of homes and communities that match those preferences.

Eliminating minimums allows new development to reflect and adapt to a range of changing factors: rising bike ownership and active travel; expanded public and rapid transport options such as light rail; increased rates of working from home, which reduce daily car use; and shifting generational preferences, with younger residents often valuing affordability, proximity to amenities, and sustainable transport over car ownership.

It also allows for greater innovation in site planning and housing design, enabling developers to prioritise shared open space, trees, or additional dwellings where parking would otherwise be mandated but unused. In short, removing parking minimums supports a planning system that is more context-sensitive, future-oriented, and capable of delivering the diverse forms of housing that Canberra needs.

We support the removal of Residential Zone Technical Specification 27.3(b), as this allows greater flexibility in how parking will be provided rather than insisting every development must have a carport or garage. We also support the removal of specification 27.5(a), to provide more flexibility around basement parking.

Why these reforms will work

We believe these reforms are a vital step to building a future Canberra that is more liveable, sustainable and affordable. By saying yes to more homes, these reforms embrace a future where more Canberrans have access to opportunity.

There have been a number of objections to the Missing Middle Housing Reforms, raising various concerns around the effect these changes will have. We don't believe these objections are compelling, and we respond to some of them below.

"One-size-fits-all" infrastructure and the case for universal upzoning

A common objection to broad-based zoning reform is that it applies a "one-size-fits-all" approach across areas with different levels of demand, infrastructure, and amenity. Critics argue that reform should instead be targeted to specific corridors or "high-opportunity" suburbs, usually those closer to jobs, public transport, or shops.

While this logic is superficially appealing, it misunderstands how and where housing is delivered, and ignores the now-substantial body of economic research showing that universal upzoning delivers better results than targeted zoning. Zoning where planners believe housing should go rarely results in much construction, because redevelopment only occurs where it is

financially feasible. If zoning reform is restricted to a narrow set of areas, it risks producing very little housing and driving up land prices in those locations.

Another concern is that more housing will strain infrastructure. This misunderstands the nature of the reform. These changes enable gentle infill, typically two to four dwellings per block, not high-rise towers. Redevelopment will be gradual, occurring over decades.

In fact, 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.

We regard the universality of these reforms to be very positive. Applying these reforms to all residential zones in Canberra maximises the benefits we will see for housing affordability and choice, and it reflects the truth that this is a sensible baseline of low to medium density development that would be appropriate anywhere in the city. If we carve out exemptions for some suburbs then we risk losing some of the benefits that come from these reforms, particularly in high-demand areas near the centre of the city. Arguments about local character should consider what it is that we really value in these areas. With the reforms as they are, we can preserve the existing high quality public spaces, access to nature, tree coverage, and other valuable characteristics of our neighbourhoods while allowing for modest increases in the number of dwellings per block.

Affordability: the economic evidence

One of the major goals of these reforms is to improve the affordability of housing in Canberra. We have argued many times in previous submissions that these changes will help to address housing affordability, and it is worth emphasising again why this is the case.

A common misunderstanding is that an increase in newly constructed dwellings, such as new townhouses in RZ1 areas, won't improve housing affordability because these new dwellings will be fairly expensive to live in. It may be the case that living in these new dwellings in high-demand suburbs will still be expensive, but the real benefit comes from the chain of movements that frees up housing in the local housing market. These movement chains are a well-established mechanism by which new market-rate housing supply improves overall affordability.

One study from Helsinki[3] shows this effect by directly observing the movement chains originating from newly built dwellings. To put this idea into the Canberra context: if four dwellings replaced one on a block in O'Connor, then the four families moving into those new dwellings

[3] Bratu, Cristina and Harjunen, Oskari and Saarimaa, Tuukka, City-wide Effects of New Housing Supply: Evidence from Moving Chains (August 31, 2021). VATT Institute for Economic Research Working Papers 146, Available at SSRN: https://ssrn.com/abstract=3929243 or http://dx.doi.org/10.2139/ssrn.3929243

may have a relatively high income and can afford to pay a higher amount for a newer home, but the places they previously lived are now available to rent or buy, and so on down the chain.

The people who can afford to rent or buy the higher-priced new dwellings are already paying for existing homes. If the new dwellings aren't built, they will simply outbid other people for existing housing, and those of lesser means are the ones who lose the game of musical chairs.

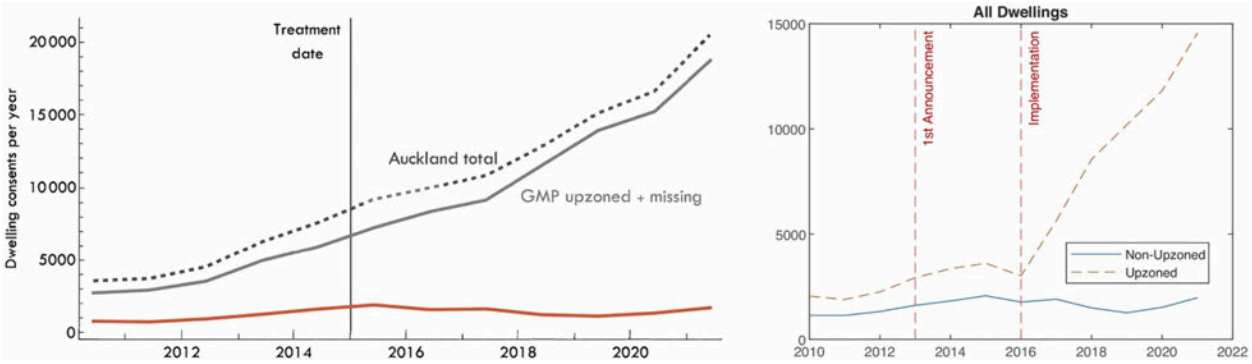
There is concrete evidence of the effects of zoning reform on housing supply and affordability. Recent studies evaluating Auckland's 2016 Unitary Plan - one of the most comprehensive citywide zoning reforms globally - demonstrate the real-world benefits of broad-based upzoning:

- Over five years, upzoned areas saw 21,808 additional dwelling consents, a 5 percent increase in Auckland's housing stock compared to non-upzoned areas.[4]
- Compared to similar New Zealand cities that did not upzone, Auckland issued 43,500 additional consents over six years, equivalent to 9 percent of its housing stock.[5]
- Rents were 28 percent lower than they would have been in the absence of reform, relative to a synthetic counterfactual of comparable cities.[6]

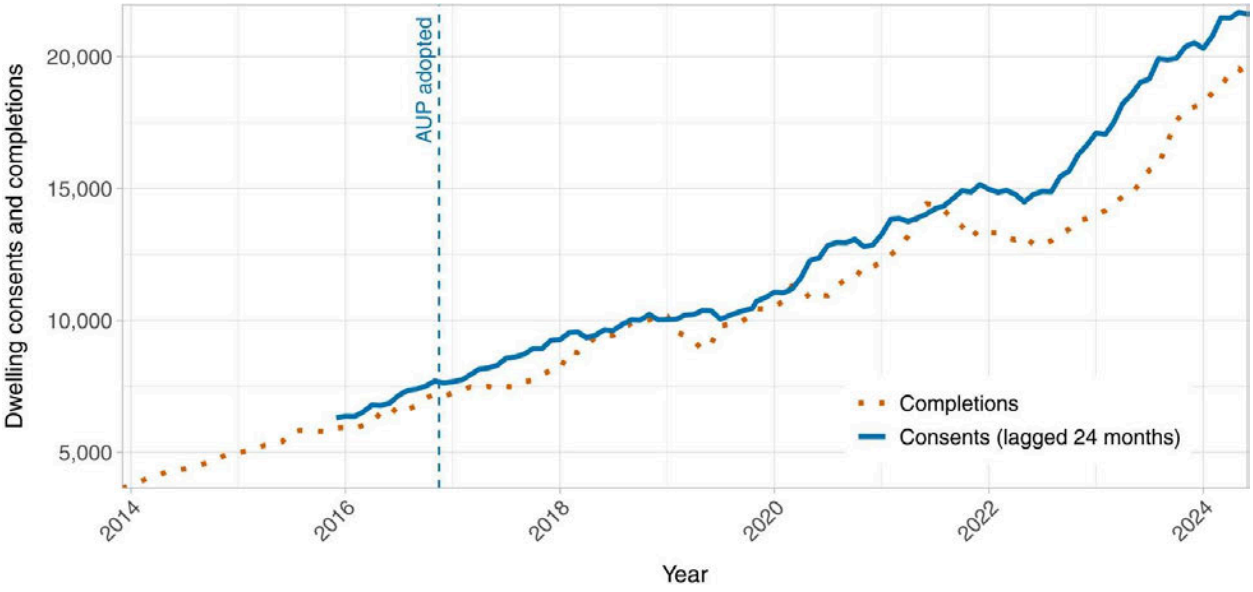
There has been some criticism of these findings. In particular, Cameron Murray and Tim Helm expressed their concerns about the methodology in a blog post titled *"The Auckland Myth: There is no evidence that upzoning increased housing construction"*. These concerns are well addressed in a 2025 paper from Donovan and Maltman.[7] It is not easy to dive into academic arguments about the validity of econometric research, so we have tried to summarise two points here:

- The original Greenaway-McGrevy and Phillips paper excludes data from some areas to produce a comparison of dwelling consents in upzoned versus non-upzoned areas. Murray and Helm show that including the missing data into the upzoned group appears to weaken the impacts of upzoning (see the below graph on the left). Donovan and Maltman explain that this data is intentionally removed so that areas affected by the AUP could be contrasted with similar but unaffected residential areas. For example, some areas were removed from consideration because they had already undergone a similar upzoning in 2013, which meant the 2016 changes appear less significant because these areas already had an increase in dwelling consents.

[4] Greenaway-McGrevy, R., Phillips, P.C., 2023. The impact of upzoning on housing construction in Auckland. *Journal of Urban Economics*. 136.
[5] Greenaway-McGrevy, Ryan. "Can zoning reform increase housing construction? Evidence from Auckland." *Economic Policy Centre Working Paper* 17.2 (2023): 6.
[6] Greenaway-McGrevy, R., So, Y., 2024. Can Zoning Reform Reduce Housing Costs? Evidence from Rents in Auckland. Working Paper 016. *Economic Policy Centre*, University of Auckland.
[7] Donovan, S. and Maltman, M., 2025. Dispelling myths: Reviewing the evidence on zoning reforms in Auckland. *Land Use Policy*, *151*, p.107498.



- Secondly, Murray and Helm note the difference between dwelling consents and actual construction of new dwellings, estimating that only 69% of dwelling consents had resulted in a new dwelling, suggesting that the actual effects on housing supply are overstated. Donovan and Maltman dispute this, using 2023 Census data to show that the number of dwellings added in Auckland from 2018 to 2023 represented approximately 90% of dwelling consents in that time period. These differences may be due to the lag between a dwelling consent being approved and the construction finally finishing, as shown in the below graph.



The evidence from Auckland's Unitary Plan remains strongly in favour of the positive effects of upzoning on housing supply and affordability.

Parking

Some opponents of the proposed reforms argue that reducing parking requirements will worsen street congestion and make life harder for existing residents.

The current proposal still requires consideration of parking and provides standard parking provision rates in the Technical Specifications. The reduction or removal of visitor and excess parking requirements helps make more compact housing viable on small or irregular blocks. Existing parking spots will of course continue to exist.

As outlined earlier in this submission, we believe complete removal of parking requirements would help achieve both our housing goals and our environmental sustainability goals. The proposed changes in the draft Tech Specs are a modest step in this direction, reflecting the fact that not all households have the same car needs. Developers will continue to provide parking in line with demand. In fact, they often provide more than the regulatory minimum where the market expects it. By relaxing these rules, these reforms allow greater flexibility and help reduce unnecessary construction costs.

Importantly, the types of homes these reforms enable - townhouses, duplexes, and walk-ups - do not generate the same traffic impact as high-rise developments. They will be distributed gradually across the city, avoiding concentrated pressure on any single street. Over time, this gentle growth will help support more sustainable transport choices, including walking, cycling, and public transport, including by enabling more people to live in the inner-ring suburbs which have better access to bike paths and rapid bus routes.

Land value and rates

Some residents worry that upzoning will increase land values and rates. In Canberra's leasehold system, land value uplift typically occurs only when a lease is varied, at which point much of the uplift is captured through the Lease Variation Charge.

If a homeowner does not want to redevelop, they will not face higher LVC or rates. If they do, the value of additional dwellings will typically far outweigh the marginal costs involved. This ensures that the community benefits from growth without penalising those who choose to stay.

We do have serious concerns around the current methodology for calculating LVC for residential land, and we believe it will pose a significant barrier for Missing Middle developments. We intend to make our views on this issue known at a later point.

Local character

Some submissions raise concerns about preserving "neighbourhood character." But we ask: what exactly is it that we want to preserve?

If it's trees, green space, sunlight, and access to nature, those things are preserved. What's changing is that a single detached dwelling might become a duplex or a row of terraces. These forms already exist in some of Canberra's most valued neighbourhoods, and the proposed reforms are designed to support this type of incremental, human-scale development.

Preserving character should not become code for preserving exclusion. Our city's identity should reflect people and diversity, not a fixed architectural style or housing typology. These reforms allow our suburbs to adapt to the needs of future generations, so that people can continue to live close to friends, jobs, transport, and parks, regardless of whether they can afford a detached house on an 800m² block.

SUBMISSION ON "MISSING MIDDLE"

DRAFT MAJOR PLAN AMENDMENT DPA-04

I have focused my submission on the extent to which the proposed Missing Middle amendments to the Territory Plan and supporting documents will help to achieve the objects of the Planning Act, in particular those relating to sustainability and a climate-resilient environment.

My overall conclusion is that the draft Major Plan Amendment and the Missing Middle Design Guide have many positive aspects in terms of creating greater scope for creative and design-led approaches to missing middle housing in existing suburbs. However, the Technical Specifications need to be more consistent with the Objects and Good Planning Principles of the Planning Act 2023.

In proposing these further significant changes to the planning system, it is important also for the ACT Government to fulfil its commitment to conduct a process evaluation of the new "outcomes based" planning system within two years of its introduction in late 2023.

Below are my recommendations and related background in response to the "Missing Middle" Draft Major Plan Amendment DPA-04 and the supporting Missing Middle Design Guide and Technical Specifications.

I am lodging this submission in my own personal capacity rather than as a representative of any organisation.

RECOMMENDATIONS

1. That the ACT Government fulfil its commitment to undertake a process evaluation within two years of the new "outcomes based" Planning System it introduced in 2023 "to assess the planning system's usability, accessibility, timeliness and certainty".[1] Such an evaluation will ensure that the proposed Territory Plan Amendment, Missing Middle Design Guide, supporting technical specifications and other material, take into account learnings to improve future outcomes:

    A. As part of this process evaluation, it would be valuable to take a sample of DAs decided since the new planning system was introduced on 27 November 2023 and see what, if any lessons can be learnt, and feed those lessons into the current proposed additional reforms.

2. Ensure that provisions of the new Missing Middle Design Guide and the Technical Specifications are more consistent with the Objects and Planning Principles of the Planning Act and the Assessment Outcomes of the Territory Plan, especially those relating to sustainability and a climate-resilient environment. In particular, provisions relating to solar access in the Technical Specifications and Design guide should be amended to refer to "good solar access".

3. The ACT should not endorse apartment living rooms smaller than those in NSW, as proposed by the Residential Zone Technical Specifications.

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[1] https://www.planning.act.gov.au/professionals/our-planning-system/act-planning-system-evaluation-framework, accessed 4 August 2025.

4. There needs to be an update in summer 2025/26 of ACT-wide heat island mapping, last conducted in 2017, to determine which areas are most vulnerable to the heat island effect and hence need more active planning of planting area on dwelling sites and in the public realm to address this challenge.

5. The proposed parking arrangements should be reviewed, including the reduced parking provision on-site and the lack of visitor parking, especially in suburbs with no/minimal shared paths and narrow streets. We should avoid unintended consequences that may arise if we make active travel more difficult in such suburbs where people have to walk/cycle on the road and dodge parked and moving cars.

6. Provide a description of 'site context' in the proposed Plan Amendment, and 'Design Guidance' about this in the Draft Missing Middle Housing Design Guide.

7. As proposed by the ISCCC submission, support greater block consolidation than provided for in the proposed Missing Middle provisions, for example, consolidation of a minimum of four adjoining existing house blocks, with a development plan to be negotiated with stakeholders, and only if the plan will deliver good solar access, more than 30 percent planting area and 30 percent canopy cover.

8. Also as proposed by the ISCCC submission, new single detached dwellings should be discouraged in RZ2, a zone which should be transitioning to more medium density housing.

BACKGROUND

1. What has been achieved already under the new outcomes-based planning system since November 2023?

The ACT Government introduced the new Planning Act in November 2023. It was supposed to be a simpler, and more easy to use planning system, but the reality has not lived up to the promise.

In implementing the new "outcomes based" planning system, the Government developed an ACT Planning System Evaluation Framework, and committed to undertake a Process Evaluation in Year 1 or 2 to evaluate short-term outcomes and the initial implementation. The purpose was to "allow decision-makers to assess the effectiveness of the new system and to identify early issues to support corrective action, where necessary."[2]

The specific issues that the ACT Government committed to consider as part of this process evaluation were:

- Planning system is efficient, accessible, transparent and provides certainty for industry, community and government
- Planning system provides mechanisms for related government policies and priorities to be pursued
- DA process allows for innovative applications to be considered
- DAs are high quality and focus on achieving outcomes
- Guidance and resources are available to support the development process and improve community awareness[3]

In proposing further far-reaching changes to the planning system, the Government should adhere to this commitment.

A. As part of this process evaluation, it would be valuable to consider Development Applications decided since the new planning system was introduced on 27 November 2023 and see what, if any lessons can be learnt, and feed those lessons into the current proposed additional reforms.

B. For example, why were 62 DAs lodged for Dual Occupancy development between 27 November 2023 and 21 January 2025 62, but only 30 were approved? What learnings can be gleaned from this?[4]

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[2] https://www.planning.act.gov.au/__data/assets/pdf_file/0003/2516943/act-planning-system-evaluation-framework.pdf, *ACT Planning System Evaluation Framework*, p.14.

[3] Ibid

[4] Mr Chris Steel MLA, Answer to QON 67: development applications (Dual Occupancies), 19 February 2025, https://www.parliament.act.gov.au/__data/assets/pdf_file/0005/2820326/EPTCS-QON-067-ANSWER-EPSDD-development-applications-Dual-Occupancies-CAIN.pdf, accessed 5 August 2025

2. Ensure that the proposed Territory Plan Amendment, design guide and supporting documents align better with objects and principles of good planning of the Planning Act 2023

In particular, provisions in the draft Missing Middle design guide and technical specifications relating to access to sunlight (solar access) and planting area should better ensure climate change mitigation and adaptation best practices, as provided for under Object 3 (e) in the Planning Act:

"(e) a sustainable and climate-resilient environment that is planned, designed and developed to adapt to climate change, reduce greenhouse gas emissions and achieve a net-zero greenhouse gas future using integrated mitigation and adaptation best practices and considers food and water security.

Note 1 The territory planning authority must exercise its functions, if relevant, in accordance with the object of this Act (see s 18 (3) (a)).

Note 2 The object of this Act must be considered in developing planning strategies, plans and policies (see s 10 (1)) and the planning strategy must be consistent with the object of this Act (see s 36 (1)). The territory plan must give effect to the planning strategy (see s 47 (b)) and the Territory, the Executive, a Minister or a territory authority must not do any act, or approve the doing of an act, that is inconsistent with the territory plan (see s 52)."

The proposed change in the solar envelope from 31 degrees to 45 degrees for multi-unit dwellings could lead to reduced solar access in neighbouring homes and increase heating costs for people in winter. (See the section below on Technical Specifications for more details)

There are issues with the consistency of the design guide and technical specifications with the Planning Act's Principles of Good Planning. For example:

(1)(c) High quality design principles

(iv) provide appropriate solar access

The proposed amendments do not appear to provide for appropriate solar access, so are not consistent with the good planning principles.

(2)(c) urban areas should be designed to promote active travel and convenient and efficient use of public transport; many existing suburbs do not have footpaths, and so there are issues of access for pedestrians and cyclists if new dwellings on narrow streets do not provide adequate parking and cars end up being parked on both sides of the street.

3. Ensure that the proposed changes in the Territory Plan Amendment are consistent with Territory Plan's Policy Outcomes

The existing Territory Plan Policy Outcomes for All Residential Zones require:

"3. 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"[5]

The draft Territory Plan Amendment does not change this policy outcome for all residential zones. Given that it still applies, then the draft Amended Territory Plan, Missing Middle Design Guide and Technical Specifications should all refer to "good solar access".

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[5] Policy Outcomes, Zone Policies, E1 Residential Zone Policies, in Part E of Territory Plan, p2.

- Missing Middle Design Guide - Section 3.4C should be strengthened by changing the words "adequate solar access" to "good solar access"
- Residential Technical specifications - the reference to solar envelope on page 21, where the angle has increased from 31 degrees to 45 degrees for multi-unit housing, would not appear to ensure "good solar access". Therefore, it should be amended to bring it into line with the Territory Plan outcome for all residential zones.

4. Ensure proposed changes are consistent with the Assessment Outcomes in the existing Residential Zone Policies, pages 4-5, of the Territory Plan.

The Assessment Outcomes are not changing in the draft Territory Plan Amendment and so still apply. They are mandatory and include the following:

"6. 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"

"7. The functionality and layout of the development is accessible and adaptable, while achieving good connections with the surrounding area. This includes consideration of traffic flow and passive surveillance.

8. The development encourages active travel through safe and convenient access to the active travel network."

"14. The height, bulk and scale of the development is appropriate, noting the desired zone policy outcomes and the streetscape. This includes consideration of building envelope and setbacks."

"15.Reasonable solar access to dwellings and private open space within a block and on adjoining residential blocks is achieved. This includes solar access into main living spaces within a dwelling."

There is an inconsistency here between the reference to "reasonable solar access" in Assessment Outcome 15 and "good solar access" in the Territory Plan Policy Outcomes for all residential zones. This needs to be addressed.

6. Suggested Amendments to the Missing Middle Design Guide

Better Guidance on **Development Context and Site Analysis**

The Inner South Canberra Community Council's submission[6] points out that the Missing Middle Design Guide focuses on what can fit on a residential block, and highlights the importance of determining also what is appropriate in the "development context". As suggested by the ISCCC, a possible useful guide on this is "The Australian Model Code for Residential Development (AMCORD) - 2.4 Development Context and Site Analysis' (pages 63,64), which says that 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, streetscape, and relationship to local movement and social networks]

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[6] https://www.isccc.org.au/isccc-submission-on-the-act-governments-missing-middle-housing-reform-proposals, accessed on 4 August 2025.

- the relationship of the site to adjoining properties;
- physical characteristics of the site.

More emphasis on “communal open space” requirements

As the ISCCC also suggests, there should be more emphasis on “communal open space” requirements 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 [see: ‘Healthy Higher Density Living for Families with Children’ Western Sydney Local Health District 2024].

Better solar access for both occupants of new dwellings and their neighbours

On page 56 of the Missing Middle Design Guide, the diagram showing three adjacent dwellings suggests that the angle of the sun would result in minimal sunlight entering a habitable room on the northern side of the single storey home.

On page 57, the diagram suggests the new development will have a major impact on the solar access of the dwelling on its southern side. Is this consistent with Territory Plan Policy Outcome 3. “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”?

To be consistent with this Territory Plan policy outcome, Section 3.4C of the Design Guide should be strengthened by changing the words “adequate solar access” to “good solar access”.

Building Setbacks

It is not clear why section 6.2A talks about the desirability of an upper storey setback, when this has been deleted as a requirement in the Technical Specifications:

“iv. Consider upper storey setbacks to ensure appropriate frontage to the street and to reduce the visual intensity of taller buildings”

There is also a reference to “i. Upper floor built form should be setback from the side boundary of adjacent neighbouring properties” - yet figures 72 and 73 do not appear to show the upper floor setback.

Building separation, p 84

The following is a very weak statement that is inconsistent with the Territory Plan policy outcome of providing “good solar access”:

“Ii. Where appropriate and possible, building separation and setbacks may need to be increased to maximise solar access, avoid unreasonable overshadowing of private open space and overlooking of neighbouring properties.”

How do the following provisions ensure “good solar access” for both the new dwelling occupants and the neighbours?

“iii. Where sufficient separation between dwellings as demonstrated below cannot be achieved, additional privacy mitigating devices such as deep window reveals, louvres, fences or dense planting should be considered. Alternatively, consider offsetting window locations between neighbouring buildings to avoid direct sight lines into primary or private living spaces.

iv. Building separation distances should ensure solar access and views to the sky."

7. Suggested amendments to proposed Technical Specifications

The Residential Technical Specifications say:

"The primary assessment consideration for a development application is the assessment outcomes in the Territory Plan. In demonstrating compliance with the assessment outcomes, consideration may be given to the relevant planning technical specifications which may serve as a benchmark."

"Where a proposed development complies with a relevant provision in the planning technical specifications and the development comprehensively addresses the assessment outcome, further assessment regarding those specific provisions will not be required."

Note the use of the word "May" in the first paragraph above. It indicates that the use of Technical Specifications is optional.

The provisions of particular concern are:

Section 11: Minimum dimensions for private and communal open space

The proposed technical specifications reduce the required private open space from 40% to 30% for Multi-unit Housing, and seem to delete any minimum dimensions for private open space for single dwellings. On the other hand, it appears that the minimum requirements have been transferred to tables at sections 11.5 and 11.6. A planning agency official, James Bennett, told MLAs at Budget Estimates hearings on 1 August 2025 that while private open space had been reduced, its quality would be improved eg by requiring a larger, more usable courtyard area and less narrow, unusable space, down the side of house. It will be important to monitor how this works out in practice.

Section 14.2: Building Envelope

The revised technical specifications increase the building envelope: the building envelope formed by planes projected over the subject block at 45° to the horizontal has increased from a height of 3.5 to a height of 4m above each side and rear boundary, except for side or rear boundaries where solar building envelope requirements apply. With the changes to both the height of the solar fence, and the angle of the building envelope increasing from 31 degrees to 45 degrees, there is a strong risk that many new dwellings will block their neighbour's access to sunlight.

Table 4, page 17: Multi-unit housing front boundary setbacks – all residential zones

It appears that the requirement for a setback for upper floors of a home have been deleted, even though the Missing Middle Design Guide refers to the desirability of a setback for upper floors. This change to upper floor setback requirements may affect the streetscape significantly, and so there is a need to bring greater consistency between the Technical Specifications and the Missing Middle Design Guide.

Table 9, page 20: Multi-unit housing side and rear setbacks – RZ1 and RZ2

There is now a zero side setback for the Lower floor level – external wall and basement. This means that builders can now excavate to the boundary, and there can be boundary-to-boundary development. How can access be obtained in future if works need to be undertaken at the side or rear of the property? What protections are provided that the neighbour's boundary walls or fences won't be damaged? I am aware of a case where excavation to the boundary caused instability under

a neighbour's boundary walls, halting work on the site. This zero side setback for the Lower floor level – external wall and basement needs to be reviewed.

Section 15.1, page 21: Solar building envelope

The increase in the solar building envelope - the angle has been retained at 31 degrees for single dwellings. However, it has been increased from 31 degrees to 45 degrees for multi-unit housing - this may have adverse implications in terms of reducing solar access in neighbouring dwellings, and should be reviewed to ensure that "good solar access" is delivered.

Section 15.2, page 21: Solar access – multi-unit housing

This section provides that minimum solar access to a multi unit dwelling, in an apartment, between the hours of 9am and 3pm on the winter solstice (21 June), is:

a) The floor or internal wall of a daytime living area of not fewer than 70% of apartments on a site is exposed to not less than 3 hours of direct sunlight.

b) No more than 15% of apartments on a site receive no direct sunlight. Daytime living area means a habitable room other than a bedroom.

This means about one in 6 or 7 households will receive no direct sunlight in their living area in the middle of winter, and it is likely that only a proportion of the internal wall of a daytime living area may receive direct sunlight. Surely this can be improved!

Section 17.3, page 23: Minimum Dwelling Size & Living Area Size: Multi-unit Housing

Minimum dwelling floor areas have been changed as follows:

a) Studio dwellings - minimum reduced from 40 to 35m2

d) Dwellings with 3 or more bedrooms - minimum reduced from 95 to 90m2

It is unfortunate the dwelling size for apartments will be reduced in the ACT, but I note that it will bring the minimums in line with NSW and Victorian requirements.

Section 17.4, page 23: Minimum widths and area – multi-unit housing

Worse is the proposed reduction in the minimum width of living rooms or combined living/dining rooms:

i) From 3.6m to 3m for studio and 1-bedroom dwellings.

ii) From 4m to 3.6m for 2 and 3-bedroom dwellings.

This reduction moves the ACT away from the NSW standard of 3.6m for living/dining rooms in studio and 1 bedroom dwellings, and 4 m for 2 and 3 bedroom dwellings. The ACT should not be endorsing apartment living areas smaller than those in NSW.

Section 19.1, page 26, Planting Area: Sustainability and Environment

For multi-unit housing, the required permeable/planting area will be reduced from 35% to 30%. This will bring it in line with required planting area for single dwelling housing on a large block. There needs to be an evidence-based approach to decide whether this is sufficient, including an update in summer of ACT-wide heat island mapping. This could determine which areas are most vulnerable to

the heat island effect and hence need more active planning of dwellings and public realm to address this challenge.

Section 19.3, page 27: Tree canopy cover, multi-unit housing in RZ1 and RZ2

The minimum required canopy cover at maturity is required to increase from 15 to 20 percent. This is positive, but the long timeframe needed for this canopy cover to mature creates a risk that it won't actually eventuate.

Section 27.3, Page 33: Location of car parking spaces

The Technical Specifications no longer require one car parking space to be roofed, so in effect, garages and covered parking spaces are no longer required. Taken together with the reduction in the parking provision rates, the likely impact is much greater visibility of motor vehicles in the street, with adverse implications for neighbourhood character. In my view, there should still be at least one roofed car parking space per dwelling.

Table 13: Parking provision rates for residential zones, page 36

The proposed technical specifications have decreased significantly the amount of required parking for residents and seem to have deleted any requirement for visitor parking in RZ1 and RZ2. This needs to be reviewed. It is a recipe for street congestion, and for barriers to active travel such as walking and cycling, especially in many existing suburbs that have narrow streets and have no shared paths.

The former Estate Development Code had provisions to avoid this outcome. The Code's Rule 64 required that undesignated on-street car parking comply with the following:

a) where the carriageway width is less than 5.5m, on-street car parking is not permitted

b) where the carriageway width is 5.5m or greater and less than 6m, on-street car parking can only be permitted on one side of the street

c) where the carriageway width is greater than 6m and 7.5m or less, on-street car parking is allowed on both sides of the street where car parking spaces are staggered down the street

d) where the carriageway width is greater than 7.5m, on-street car parking spaces can be

provided on both sides of the street.[7]

I have relatives residing in an apartment complex in a medium density area in Sydney, with buses passing right out the front every 10-15 minutes. Yet, all available street parking is taken, because a lot of households in two bedroom apartments and semi-detached dwellings have two cars, so one of them is on their dwelling site and the other is on the street. If there is such street congestion even in areas in Sydney very well-served by public transport, then we can expect a similar outcome in a city like Canberra which is much less well-served by public transport. We should avoid unintended consequences that may arise if we make active travel more difficult in suburbs where there are no shared paths and where people have to walk/cycle on the road and dodge parked and moving cars.

[redacted]

5 August 2025

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[7]Estate Development Code, NI2008-27, effective 28 August 2020.

From: [redacted]
To: EPSDD Communications
Subject: Missing Middle Housing Reforms Submission
Date: Tuesday, 5 August 2025 11:56:30 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.

Dear CED

I make this submission to the Missing Middle Housing Reforms in my personal capacity.

I strongly support the Missing Middle Housing Reforms proposal, and I particularly note that as an Inner South resident for over a decade, these reforms will have a positive impact on providing more housing choice in the Inner South. The Inner South is now a highly valuable inner-ring area of a major city, and it is therefore appropriate for medium density to be the baseline expectation across all suburbs, rather than the current bifurcation we have between high-density areas such as Kingston and low-density RZ1 areas in Griffith, Red Hill or Yarralumla.

As a public transport and bike user who doesn't own a car, I strongly support the reduction in parking provision rates as a step towards complete removal of parking mandates. The parking space I am forced to rent in my building provides me with no value, only additional cost. Parking mandates make housing more expensive. The ACT Legislative Assembly has declared a climate emergency: let's act like it by removing the assumption, entrenched in legislation, that cars must forever be at the core of our built environment.

I am a member of Greater Canberra and endorse their organisational submission, which I assisted in drafting.

Regards

[redacted]

[redacted]
05/08/2025

Submission to Missing Middle Housing Reform Consultation

Thank you for the opportunity to provide comment. I strongly support the intent of the reform and most of the detail. I also generally support most of the Australian Institute of Architects response. I highly commend the ambition in making these substantial changes and believe that they do go someway toward meeting the urgency of the of the housing crisis and allowing for an equitable city with access to diverse housing types while preserving amenity and bush/landscape character. These are all fundamental matters which the proposed changes seem to broadly balance for the future.

However there are a few items I urge amendment / further consideration of:

1. Rezoning

I encourage future, substantial rezoning – there are large areas that I believe should be rezoned to RZ2, RZ3 and even RZ4. For example the existing RZ2 zones are often tiny and appear arbitrarily drawn only partly around local shops. Many local shops and schools that were designed in the NCDC era with suburbs / population that worked then, but are not viable with current (aged / smaller household) population catchments. Higher zoning adjacent local shops can be of suitable character – I think Bluebell Place (City Edge) at O'Conner Shops is a great exemplar (RZ4)

2. Differentiation between zoning

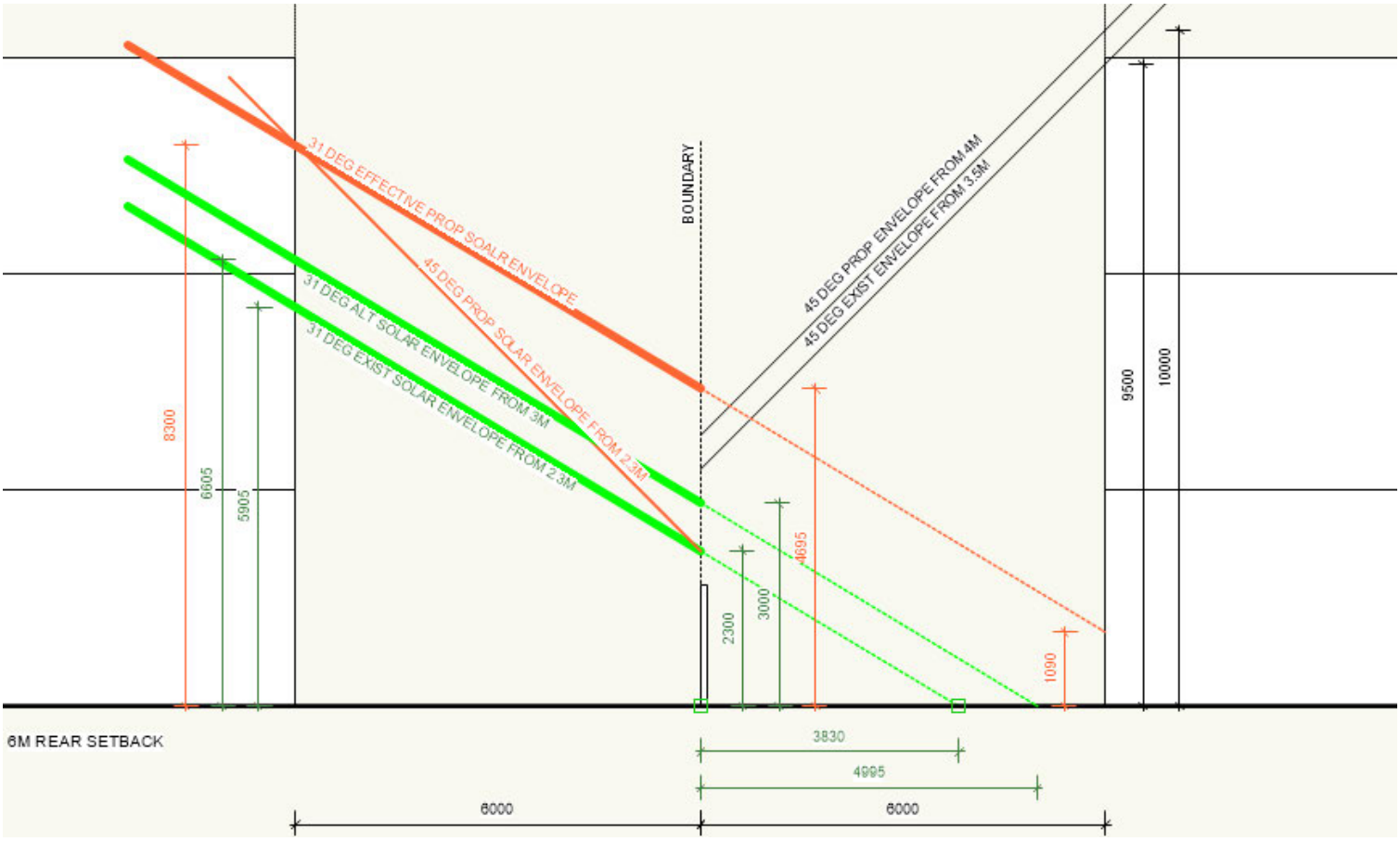
I suggest more difference between some zones that now appear similar could be desirable (it is better to rezone than make them all similar) and that the higher density zones could be more flexible eg:

- mandatory site coverage could be made flexible in RZ4 & RZ5, possibly RZ3 too - particularly I suggest this could be achieved with the definition being varied for these zones to exclude basements and podiums as long as other desired outcomes are met (eg bulk/massing, deep root planting / canopy, potentially views through and permeability in some locations etc) ie greater flexibility for parking provision without excessive levels of basement excavation will support greater dwelling density;
- RZ5 the 7 storey could be made flexible, ie put it in the tech specs but not as a mandatory limit (I note that at the moment RZ5 has hardly been used – only flanking Woden Town Centre, John Gorton Drive / Holborow Ave in Molonglo and a couple of blocks in Belconnen and Lawson and I presume actual heights are varied by District Policies)
- I support RZ1 as 9m height or 2 storey plus attic and basement, and keeping this lower rise than RZ2 as differentiation - as above, in future we should rezone more RZ1 to RZ2
- I support flexibility in subdivision, eg I don't see any difference between the common existing dual occupancy with a rear dwelling / battle-axe configuration without direct frontage to a street or urban open space and a similar configuration on subdivided separate blocks – this allows for retention of existing dwellings where appropriate, which contributes to diverse housing and sense of place/character (there is a great legacy of suburban architecture in Canberra most of which is not heritage listed and would be sad to lose)
- also it looks like the Residential Zone Tech Specs 14.1(e) is stricter than (d), I presume this is a drafting error - ie as written RZ4 can be 21m adjacent RZ3 and PRZ but RZ5 must be 14m

3. Solar envelope / fence and solar access for neighbouring blocks

I strongly support the concept of a solar envelope / solar fence and think it should be maintained, the proposed changes seem to substantially undermine it relying instead on other controls for neighbours amenity

- the solar envelope should actually relate to real sun angles – the proposed 45deg or any other angle is arbitrary and confusing, it should remain at 31deg and the fence height be adjusted to get the desired outcome
- however I disagree with the proposed setting - 45deg from a 2.3m fence allows 8.3m height at a 6m setback from the rear which equates to 31deg from a fence of 4.7m, which would appear to allow solar access into the top of a ground floor window (assuming no misplaced eave!) at a 6m setback on the neighbouring block but no sun to a private open space in that setback zone
- the existing 31deg at a fence of 2.3m allows 5.9m height at a 6m setback and already shadows 3.8m into the 6m setback of the neighbouring block, which seemed reasonable
- **a compromise position I could support would be 31deg from a 2.7m or 3m fence in rear zone, which would respectively allow 6.3m or 6.6m height at a 6m setback**



- I'm less worried about the setting for the solar envelope to the side boundary in the primary building zone - I think the primary building zone needs to be flexible, but whatever setting is chosen it should still be written at 31deg so that neighbours / the community have a clear expectation of planning outcomes
- the summary Missing Middle Comparison table states that solar access requirements for neighbours continue to apply but I cannot see clearly where this control is located – is this referring to Assessment Outcome 6 (no specification) or Specification 15.2 (I was in an ACAT case a few years ago where a developer argued the 70% rule should be applied to neighbouring blocks but as far as I could tell there was no clear established precedent and the case was settled before it could be established) or is it the Housing Design Guide that gives such a requirement?

- I note that shadow diagrams including elevations of impacted adjacent blocks are required by the Minimum Documentation Guidelines and that a solar access plan is listed as required if relevant in the table but for multi-unit housing but in the description is stated as required, and that the description doesn't actually have much guidance including as to if a solar access plan is for one or both of the proposed development and the impacted adjacent block/s
- **I humbly suggest that the Technical Specifications should include a clear expectation as a benchmark along the lines "not reducing solar access for any neighbouring dwelling to less than 3 hours between 9am to 3pm", particularly if the solar envelope becomes less strict (and then flexibility can still be achieved beyond this via the Guides)**
- However the solar envelope, in the Technical Specifications, gives clear and easy guidance both to the community and proponents in early stages of design (before more thorough impact analysis) and protects future development potential of neighbouring blocks not just existing dwellings

4. Quality of outcome / speed and consistency of assessment

I am somewhat concerned about ensuring that quality outcomes are achieved and note that these are the biggest changes to the city's residential planning since the 1993 rezoning of the Northbourne Ave corridor or the earlier rezoning of Kingston. I support these changes proceeding. I note that the outcomes system is qualitative and that speed and consistency of assessment have a direct impact on affordability. I urge that assessment is hastened with caution:

- I urge substantially increased resources to planning assessment to ensure considered and speedy approvals within the now qualitative / outcome based system
- I don't support DA Exempt / private Certifier approved multi-unit housing, unless

  a) the Technical Specifications are substantially reviewed / expanded where Outcomes are not currently covered and architects are mandatory as per NSW; or

  b) consideration is given to a pattern book as per NSW
- I would like to see a committed to publicly transparent review / reporting on approved developments after some appropriate period eg 12/18/24 months to test if desired outcomes are being achieved or if the controls need refining
- I request continued publication of exemplars, particularly/including local that have been approved through the reform, to build up a reference library that continues to upskill the community and promote best practice

I look forward to the finalisation and implementation of this reform, and further intimated reforms.

Many thanks

[redacted]

[redacted]

Architect (ACT 2666)

PROPERTY COUNCIL of Australia

Submission on the Missing Middle Housing Reforms

August 2025

Summary

The Property Council of Australia (ACT & Capital Region Division) commends the ACT Government on progressing this "Missing Middle" zoning reform, which has involved extensive consultation with industry. We consider this to be a once-in-a-generation opportunity to bring zoning in line with expectations and requirements for a modern and prosperous capital city.

The zoning reform is a step towards unlocking thousands of homes across Canberra, allowing for diversity of choice, and ultimately improving access and affordability for current and future generations. In addition to supporting this proposed reform, the Property Council has made recommendations to the ACT Government on what other legislative reform we consider is required to maximise the benefit of these zoning changes, and bring about real results and delivery of more homes.

About us

The Property Council of Australia is the leading advocate and biggest employer for the nation's largest industry. In the ACT, the property sector continues to account directly for more than $4.5 billion in economic activity, a further $2.1 billion indirectly, and one in seven jobs.

Property is the beating heart of the ACT's success across all measures – with almost 45 per cent of tax and royalty revenue being contributed by the sector. The continued success of Canberra depends on the success of property, development, and the built environment.

Members of the ACT & Capital Region Division of the Property Council include the people and companies who plan, design, invest, own, manage, support, and build, the homes for Canberrans. We are committed to great cities, strong economies, and sustainable communities.

[redacted]
Property Council of Australia

Overview

The need for housing choice and diversity is fundamentally clear. Living in the ACT should provide a prospective purchaser with the choice between single-family homes, multi-occupancy, duplexes, townhouses, terraces, small apartment buildings, and high-rise apartments.

There is no question that we are facing a housing affordability and choice crisis. Our population for the ACT and Capital Region continues to increase – so we must have the right economic parameters in place to support the housing supply we need. To achieve the target of 30,000 homes by 2030, it remains critical to improve planning processes and systems, attract investment, and deliver the appropriate infrastructure to meet this target.

These changes impact over 92% of the city's residential land, the majority of which is owned privately by everyday Canberrans. Creating additional development rights will not automatically translate to additional dwellings. 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.

It is also the case that while the development rights do not differentiate nor discriminate between suburbs, there is no doubt the market certainly does. Demand in existing suburbs will largely depend on whether the social infrastructure is fit for purpose. The ACT Government has the power and ability to ensure the social infrastructure exists or is being upgraded in the areas where growth will be encouraged.

Interestingly, analysis from our members indicates that approximately 12,000 out of 14,500 RZ2 blocks in Canberra only have one dwelling. Of these single dwelling RZ2 blocks, about 5,000 are larger than 800m2 in area, suggesting that there has been a material opportunity for missing middle housing available for the past 20 years, that has not been taken up. This further shows that zoning changes alone while vital, are not enough to result in significant delivery of homes across Canberra.

In terms of success, it would be valuable information, to the Territory, Canberra residents, and the property industry, for the ACT Government to establish and publicly report on a monitoring framework that demonstrates actual additional developments approved, commenced, and completed, because of these zoning changes. While based on a similar concept of creating additional development rights with slightly different methodologies, modelling conducted by Purdon for the Property Council in 2024 suggested that creating additional rights across residential zones would conservatively result in the creation of 59,924 new dwellings in the ACT by 2060. Time will tell whether that figure is achievable.

It is further recommended that a greater level of development data be recorded and reported by the Territory, such as dwelling size, number of bedrooms per dwelling, housing typology, to better understand the mix of dwellings being approved and built in the Territory. It is noted that baseline data like this is not readily available. Conducting this analysis, together with ensuring there is baseline data available, will enable the ACT Government, industry, and community, to track the progress of this reform and identify where improvements are required.

The positive impacts

The discussion papers provided referred to potential positive impacts of the amendments. We address those below, in addition to others that have been identified.

Increased housing choice

This is vitally important for the sustainability, growth, and longevity of our nation's capital. Residents need to have the ability to grow and age in place, having the ability to remain in the same neighbourhood, but change homes as they need. The reforms are virtually silent on opportunities in this space to incentivise the delivery of missing middle seniors and affordable housing. Opportunities to incentivise could include relaxation of standards (i.e. heights) where certain conditions are met, such as proximity to services and facilities, adequate amenity retained despite additional heigh, affordable housing component to be managed by a registered community housing provider, requirement to attend NCDRP.

Housing availability and affordability

Again, this is vitally important. If homes are not available for current and future generations, we will lose people and talent to other jurisdictions. This policy will increase supply which will in turn, improve affordability across all dwelling types.

Urban vitality

Urban vitality leads to greater economic benefits, more amenities, and can improve the wellbeing of residents. This is a direct result of sustainable urban development and should be encouraged.

Environmental sustainability

The ACT Government has been clear on the desire for 70% of new dwellings to be urban infill, thereby reducing urban sprawl. A denser and more compact city promotes effective public transport networks, reduces commute times, and results in more sustainable infrastructure. These changes to the Territory Plan have provided an opportunity to amend the tree requirements (site coverage and canopy) which may in turn have environmental benefits.

Economic development

While everyone will receive the rights at the same time, not every landowner will be in a position (or have the desire) to act immediately. Previous research commissioned by the Property Council suggested that increased construction activity, due to Missing-Middle-like reform, would add up to $48.5 billion to the economy by 2060.

Infrastructure and operational efficiencies

We have existing infrastructure in existing suburbs that is not being utilised to its full capacity, whereas other newly constructed and developed suburbs are under pressure. This reform may incentivise development in existing, older suburbs where, for example, the schools are not at capacity. Upgrades will be required to utility infrastructure which may be complicated but not impossible to manage.

Additional comments

At least from the perspective of the ACT Government, should be the potential additional revenue available for collection due to the construction of additional dwellings and ultimately subdivisions. This may also be seen as a negative though, for property owners throughout the Territory who do not intend to utilise the increased development rights but may see an increase in their unimproved land values. Whether unimproved land values will artificially increase remains to be seen, noting that it is likely to happen regardless due to lack of supply.

The not-so-positive impacts (rebutted)

Increased infrastructure demand

This should not be seen purely as a consequence of the Missing Middle reform. As outlined above, increased and disproportionate demand on infrastructure is already occurring across the Territory, in particular on our roads, healthcare, and our schools. Given that population growth is occurring, upgrades to infrastructure are inevitable, and there is clear evidence that infill infrastructure is between 25-50% cheaper than in greenfield developments, on a cost per dwelling basis.

The ACT Government will need to take a lead in ensuring the cumulative effectives of added infrastructure demand, traffic, and parking are addressed at a Territory Plan level, rather than leaving it to the responsibility of individual developers. A fair approach would see equitable contributions to build and maintain the infrastructure we need.

Increased parking demand

This is predominantly addressed in the car parking requirements that are included in the Territory Plan amendments. This is also a rudimentary issue; with the promotion of active travel, commitment to effective and efficient public transport, reliance on vehicles will become less necessary in future years. To maximise development potential and yield, it is anticipated that the initial Missing Middle projects will focus on areas that are on public transport routes or close to them.

Potential for unintended gentrification

There is a low risk of this occurring, given that the development will primarily occur as a result of individual owners choosing to sell or develop. The ACT Government has social and affordable housing targets and can provide remissions or incentives to the private market for the delivery of social and affordable housing.

Impacts on local character and amenity

The Missing Middle zoning changes will impact local character and amenity - for the better. Canberra's existing suburbs are ageing and we must adapt. Our suburbs have evolved significantly since Canberra was named our nation's capital, and rightly so, as our understanding of good urban design, sustainability, and community needs, has improved.

To meet the needs of future generations, we must embrace thoughtful change and move beyond outdated, exclusionary attitudes that prioritise preservation over progress at any cost.

The documents

We have provided specific comments below on the documents that have been made publicly available as part of this consultation process. We note that Property Council members also participated in industry workshops and provided feedback directly to the facilitators on some of the details in the Missing Middle Housing Design Guide, Territory Plan Amendments, and the Technical Specifications. We also note that many of our members, who are deeply passionate about Canberra, are making their own submission to the Missing Middle Consultation which are likely to address many of the technical components of the proposed reform.

Missing Middle Housing Design Guide

We support the development of the Missing Middle Housing Design Guide (MMHDG) and note that our members and representatives of the Property Council have had an opportunity to provide feedback directly on this Guide with industry consultation. This document will be immensely helpful to members of the community who are current or future owners of RZ1 or RZ2 zoned blocks, who are in a position and willing to re-develop that block with Missing Middle dwellings.

Our specific comments are:

- Noting the operation of several Design Guides, clear guidance is recommended for industry where a situation of tension or conflict arises between the MMHDG and the Urban Design Guide. The Territory Plan provides an order of precedence between policies, design guides (as a whole) and specifications (Part A, Administration and Governance, page 9). Curiously, no order of precedence seems to have been provided to address inconsistencies between design guides.

- The language clearly indicates the MMHDG is not intended to be used as a Pattern Book, and delivering the plans will not necessarily guarantee a development approval. Further consideration should be given to whether a Pattern Book should be developed, with industry consultation, and introduced to facilitate more efficient approvals of the Missing Middle typologies throughout the Territory.

- This would need to include streamlined planning applications and approvals, even exempt requirements, and removal of third-party appeal rights.

- As outlined above when addressing the "impacts on local character and amenity" - there is no doubt that these reforms will alter, albeit only slightly in some areas, the appearance of existing suburbs. This should not be seen as fundamentally bad. Noting that the MMHDG is intended to be used as an educational resource for both the developer and community alike, caution should be exercised when using language such as "new developments integrate seamlessly". That may be entirely possible in some aged care suburbs, or where there are only large single dwellings on large blocks. 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.

Territory Plan Amendments

We support the removal of minimum and maximum block sizes, and maximum number of dwellings in the RZ1 and RZ2 zones. The inclusion of density targets in the Residential Zones Specifications ensures that each block can be assessed independently by the owner, based on its own size and characteristics rather than an arbitrary number. We commend the ACT Government for this as it will undoubtedly result in a diverse housing mix across the Territory, reflecting the diverse block size and shape that already exists. Similarly, the changes across all zones to have maximum height limits in storeys, rather than metres, is a welcome change and supported by industry.

As outlined above, we support the changes to car parking requirements, which reflect the changing demographics across the city, the decreased reliance on cars, and an increase in participation in active travel and public transport.

The documents continued

However, this has been a missed opportunity to strongly consider the consolidation of zones, noting that the Territory has five residential zones - all other states and territories except for Western Australia and New South Wales have less. Five residential zones seems excessive given the size of our jurisdiction and the fact we have one single planning authority and government.

While the majority of the reforms focus on RZ1 and RZ2 amendments, the minor amendments to the heights in RZ3 and above could be improved. We support the amendments to move to storeys rather than height but consider there should be consideration of greater heights if certain other requirements are met.

More height can provide better opportunities for ground plane landscaping or deep soil planting. Presumably at four storeys you need a lift which substantially adds to cost. To offset, why not provide scope for additional height in circumstances where it can be demonstrated that there is an appropriate solar / privacy / amenity outcome in the site and adjacent residential sites, the streetscape is not out of character with the desired future character, and where additional landscaped area provision and canopy cover is required. There needs to be more flexibility built in to deliver the outcomes that this policy is striving for. Consideration should be given that the changes to RZ4 height limits, as they currently stand, may cause projects to require NCDRP review.

On the stated policy outcomes, members have suggested amendments (especially in respect of RZ2) where objective 1 is removed, and objectives 2 and 3 are merged to read "*provide for a range of well-designed low and medium density housing options including low-rise multi-unit housing or more compact single dwelling housing.*" Given the requirements to comply with the policy outcomes it is important that they are clear and measurable.

Technical Specifications

In addition to the comments raised above:

- The maximum site coverage has remained at 45%. Members have raised questions as to why this needs to be retained when there are other planning guides that exist, such as setbacks, envelopes, canopy cover requirements that achieve a similar outcome. Site coverage includes non-bulky elements such as decks, terraces, patios that contribute to outdoor amenity but not necessarily to bulk and scale. This applies to both RZ1 and RZ2.

- Concerns have been raised about the appropriateness of the change in solar controls 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 envelope provides flexibility to enable a good planning outcome. We do not consider any change should be made to the existing 31 degrees requirement.

- There are no changes proposed to the District Policies because of these reforms, which may result in conflicts and unintended consequences. It is recommended that the Territory Planning Authority undertakes a comprehensive review of all District Policies to ensure these Reforms are as effective as possible to deliver missing middle housing on areas intended for higher density.

The documents continued

- The reforms create a distinction between new and existing residential areas, which appear to be inconsistent with the legislative framework. There is a lack of definitions and lack of distinction between subdivision and subdivision design application, means any 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 subdivisions are a subdivision design application/subdivision development proposal under s 43 of the Act which is considered a 'Significant Development' with all the requirements and timeframes associated.

- We have concern on the proposed amendment to Technical Specification 3.2 regarding the proportion of single dwelling housing within a subdivision design application for all residential areas. This should not apply to RZ4 and RZ5, as single dwellings on these sites is an inefficient use of higher density zones.

- Adjustments to the study and bedroom dimensions is welcomed as it provides greater flexibility in design.

- In relation to block consolidation, there is a technical specification that restricts it arbitrarily to between 2,000 and 3,000 m2. If the specifications are continued to be used as they are currently (i.e. as if they were legislation), then these 'rules' will restrict the consolidation of large scale change, even where a landowner could prove the road network and waste management can be serviced.

Barriers to success

Ultimate success of this reform, of delivering more housing choice and affordability to Canberrans (which we strongly recommend be reported regularly by the ACT Government), will depend on several factors above and beyond the Territory Plan amendments passing through the Legislative Assembly. Those barriers to success, and our proposed solutions, are outlined below.

Planning system and referral entities

The ACT Government must continue to prioritise and implement reforms in the newly formed City and Environment Directorate (CED). We note the merging of EPSDD, TCCS, and Access Canberra from 1 July 2025, and commend the ACT Government for responding to industry feedback and working towards reducing complexity and bureaucracy in the ACT Public Service. Moving forward, industry urges the Government to implement the Development Solutions department and empower them with the ability to cut through referral agency approvals, fast-track complying developments, and promote a development facilitation mindset and a culture of yes to housing development across the Territory.

Changes to the existing six-stage Development Assessment process must be placed on the agenda. The current staged process is cumbersome, opaque and can lead to inefficient and inconsistent decision making across entities. Having moved to an outcomes-based system, with the addition of Missing Middle changes, it is fundamental that the assessment teams and referral entities are given greater agency to confidently make decisions, rather than the "too many cooks" approach that is currently in place.

Lease variation charge

In its current form, without reform, the LVC will be a strong disincentive to redeveloping RZ1 and RZ2 sites across Canberra. Noting the level of dwelling approvals in the 24/25 financial year was the lowest in almost two decades, the property and construction industry, and investors, are suffering from a lack of confidence and a lack of certainty, and that will flow through to the Missing Middle. As per previous correspondence to the then EPSDD, the imposition of LVC on development impacts feasibility and reduces yield below an acceptable threshold to obtain institutional finance.

From 1 July 2025, a single additional dwelling in Forrest may cost $343,750 (per unit). This amount is $277,500 in Barton, $257,500 in Deakin, and $181,250 in Ainslie (per dwelling). The lowest amount payable, across any suburb, per single additional dwelling, is currently $49,375. Greenway attracts a charge of $52,500 per unit for 2 dwellings, and $48,750 per unit for 3 dwellings. Even at the standard rate of $46,000 per dwelling, this is far too high and will ultimately contribute to the failure of the Missing Middle reforms.

Missing Middle development will not be feasible unless there is a change to the way LVC is applied. Regardless of any uplift in land value that may eventuate (which is paper based anyway so does not positively contribute to cash flow), paying a charge per dwelling like the LVC exacerbates the housing affordability crisis as this amount is directly added to the cost of the completed dwelling.

The current application of LVC exists as a blunt instrument which unnaturally influences what size and shape dwellings can be produced. It influences development towards larger dwellings, and even in the case of townhouses and other missing middle typologies, will continue to lead to the delivery of three-to-four-bedroom stock, as the returns on one- and two-bedroom stock are diminished.

Barriers to success

LVC is holding back housing supply in the Territory, disproportionately impacting housing affordability and thwarting the revenue available for collection by the ACT Government by way of land rates. We expect any modelling carried out to show that reform to the LVC would create clarity, confidence, and certainty for developers and would encourage Missing Middle typologies to be developed across all suburbs in Canberra, with a revenue neutral or positive position for the Territory due to an increase in supply and a proportionate increase in residential rates.

As noted in the overview of this submission, the majority of residential land impacted by the missing middle reforms is owned privately by everyday Canberrans. The requirement to pay LVC may disincentivise many of these owners, who may not have the financial capacity to absorb the cost of LVC, from exploring subdivision and redevelopment opportunities and thereby limit the positive contributions the Missing Middle reforms are intended to have.

To address this issue, we recommend:

Implement a moratorium on LVC for all Missing Middle housing typologies.

Review the codified charges for residential dwellings, rebalancing the equation between tax and rewarding investment and enterprise, simplifying the codified system by consolidating the number of areas that a codified value applies to (i.e. moving away from a single suburb codified value) and implementing a sliding scale for the size of the dwelling(s) that are being created rather than the number of dwellings.

Third party appeals

The uncertainty that the ACAT process and third-party appeals adds to development feasibility is increasing. Appeals to the ACAT are likely to increase with a corresponding increase in urban infill development, with every RZ1 block that is being developed potentially subject to an ACAT third-party appeal. Further consideration should be given to reviewing the scope of third party appeals as part of this process. This has been an extensive consultation process with the community, where community groups, individuals, and organisations, have had an opportunity to have their say about the future of housing development in Canberra. On this basis, it would be appropriate for third-party appeal rights to be limited and require a merit assessment themselves before the appeal progresses.

As we have stated previously, the move towards performance-based planning in the ACT is commended and supported by the Property Council. In practice, the Technical Specifications are being used by the ACAT as an example of the only safe and compliant way to demonstrate compliance with the Assessment Outcomes (see *Khandelwal v Territory Planning Authority (Administrative Review)* [2025] ACAT 48). This means that the Technical Specifications are elevated to de-facto 'rules' / enforceable requirements that often don't deliver the best outcomes for a site. Given the promotion of the Outcomes and Technical Specifications as part of this Missing Middle reform, it is imperative that the review be extended to include the operations of the ACAT, provide guidance to the ACAT and Tribunal Members on the hierarchy of planning authority and documents, in addition to the reform of third-party appeal rights.

To address this issue, we recommend:

Commit to a review of third-party appeal rights in respect of Missing Middle housing typologies.

Barriers to success

Urban Forest Act

We welcome the earlier announcement from the ACT Government that the review of the Urban Forest Act will take place sooner than first anticipated. The current requirements, including the regulation of trees and the requirements for removal, will inhibit the success of the delivery of Missing Middle.

Developer licensing

Our position on developer licensing has been made clear in previous submissions to the ACT Government. We reiterate that in its current form, the imposition of personal liability on a developer for things over which the developer does not directly control, is problematic.

Given that projects over 3 dwellings will be required to obtain a licence, it remains to be seen whether that will be a barrier to everyday Canberrans choosing to undertake a development on their parcel of land. The barriers, the lack of knowledge, and the considerable expense they will need to go to in order to obtain their licence, may be a barrier to entry.

Missing Middle Housing in the ACT: Feedback Submission

Executive Summary

The Australian Capital Territory (ACT) is experiencing considerable housing affordability pressures, exacerbated by limited housing supply and insufficient diversity in available housing types. Missing middle housing —including duplexes, townhouses, and small-scale multi-unit developments —is pivotal to addressing these challenges. However, current planning regulations and associated costs overseen by the ACT Planning and Land Authority (ACTPLA) significantly restrict the delivery of this crucial housing category.

Identified Barriers:

- Overly restrictive height and setback requirements in established suburbs. [1]
- High upfront development application fees disproportionately impacting homeowners and small developers. [3]
- Procedural requirements mandating full completion before block subdivision, heightening financial risk and limiting cash flow. [7]

Strategic Recommendations:

- **Policy Reforms:**
  - Allow three-storey developments, especially in RZ1, RZ2, and RZ3 zones[1].
  - Implement flexible, performance-based setback regulations. [9]
  - Increase density allowances in strategic infill areas, particularly RZ2 zones.
  - Proactively rezone key areas near shopping centers and public transport, and implement automatic rezoning to remove individual application charges for multiple units.
- **Staged Subdivision Approvals:**
  - Introduce staged subdivision processes, secured by financial guarantees, allowing early capital realization and reducing financial barriers. [11]
- **Financial Incentives:**
  - Provide targeted government loans, grants, shared equity schemes, and deferred payment options to improve project viability for non-developer entities. [14]
- **Technological and Design Innovations:**
  - Deploy AI-powered assessment tools and offer government-owned pre-approved housing designs to streamline processes and substantially reduce

upfront costs. [18]

- **Community Partnerships:**
  - Promote partnerships with homeowners and neighbours through Community Land Trusts (CLTs) and co-housing initiatives to foster sustainable, integrated, and affordable communities. [21]

Benefits of the Proposed Solutions:

- **Simplified Processes:** Streamlining planning and approval processes through measures like AI-powered assessment tools and government-owned pre-approved designs will significantly enhance accessibility for individual homeowners and small-scale developers. This reduces the complexity and time burden, encouraging more diverse participants to enter the housing market, leading to a diversified and increased housing supply, and ultimately, a reduction in overall housing costs.
- **Reduced Upfront Costs:** Lowering financial risk through targeted government loans, grants, and deferred payment schemes for statutory fees and infrastructure charges enables greater participation from homeowners and small developers, improving project feasibility and making missing middle housing more financially accessible.
- **Community Partnerships:** Promoting partnerships with homeowners and neighbours through models like Community Land Trusts (CLTs) and co-housing initiatives fosters stronger community cohesion, ensures long-term affordability by removing land from the speculative market, and enhances local acceptance of increased residential density by involving residents in the design and governance.

Immediate Implementation Actions:

- Conduct pilot projects with flexible planning rules in selected suburbs.
- Initiate government-backed financial pilot programs (loans, deferred payments).
- Launch an AI assessment pilot project to demonstrate efficiency and cost reduction.

Adopting these recommendations will significantly contribute to the ACT's goal of creating a more accessible, equitable, and sustainable housing market.

1. Introduction: The Imperative for Missing Middle Housing in the ACT

Defining "Missing Middle Housing" and its Relevance

"Missing middle housing" refers to a diverse range of housing types that bridge the gap between detached single-family homes and large, multi-storey apartment buildings. This category typically includes duplexes, townhouses, triplexes, courtyard clusters, and small-scale multi-unit dwellings.[24] These housing forms are increasingly recognized as essential components of a healthy urban housing ecosystem. They offer a crucial middle ground that provides affordability, flexibility, and a broader range of choices for residents.[24] By gently increasing residential density within existing suburbs, missing middle housing can contribute to the creation of vibrant, sustainable, and future-proofed communities without compromising their established character.[24] This approach optimizes land use in a manner that feels organic and integrated, rather than forced.[24]

Context of the ACT's Housing Affordability and Supply Challenges

Australia is currently facing a significant housing crisis, with an urgent need for approximately 1.2 million new homes within the next five years to meet projected population growth.[24] The prevailing zoning laws in many Australian cities often present a binary choice: either a large detached house on the urban fringe or a compact apartment in a city tower.[24] This limited spectrum of housing options has led to underutilized land in well-located suburbs, restricted housing supply, and consequently, inflated property prices.[24]

The ACT is not immune to these pressures. Its housing market exhibits similar characteristics, with a critical demand for more diverse housing options. This demand is driven by evolving demographic trends, including a growing number of downsizing Baby Boomers, young professionals, and single-person households who seek alternatives that are more affordable and better suited to their lifestyle needs than traditional detached homes or high-rise apartments.[24] Addressing this "missing middle" gap is therefore paramount for enhancing liveability and ensuring equitable access to housing in the ACT.

Purpose of this Feedback Submission to ACTPLA

This submission aims to provide constructive and evidence-based feedback on the proposed missing middle housing reforms in the ACT. Its primary purpose is to

articulate the existing regulatory and procedural barriers within the current planning system that hinder the development of missing middle housing. By drawing upon specific ACTPLA legislation and regulations, this report will highlight the practical implications of these barriers. Furthermore, it will propose a series of innovative, multi-faceted solutions, supported by comparative analysis of successful models and development cost data from other jurisdictions, both within Australia and internationally. The ultimate objective is to advocate for a more enabling and responsive planning framework that can foster a greater diversity of housing options, improve affordability, and enhance the overall liveability of ACT communities.

2. Current Regulatory and Procedural Barriers in the ACT

The current planning framework in the ACT, particularly as administered by ACTPLA, presents several significant regulatory and procedural impediments to the widespread adoption and development of missing middle housing. These barriers manifest in restricti ve planning rules, high application costs, and cumbersome procedural requirements, collectively hindering the efficient delivery of diverse housing types.

2.1 Restrictive Planning Rules in Older Suburbs (ACTPLA Development Rules/Legislation)

Height and Storey Limitations

One of the most direct constraints on missing middle housing in the ACT's older suburbs stems from stringent height and storey limitations. The RZ1 (Suburban Zone), which encompasses a substantial portion of the established residential fabric, strictly mandates that buildings do not exceed two storeys. [1] This rule is absolute, explicitly prohibiting attics or basement car parking if they are located directly above or below any two-storey element of the dwelling. [1] While RZ2 (Suburban Core Zone) and RZ3 (Urban Residential Zone) also maintain a two-storey limit, they offer a slight concession by permitting attics and/or basements in addition to the two storeys. [1] Only the RZ4 (Medium Density Residential Zone) allows for three-storey buildings, with attics and/or basements permitted in addition. [1] The RZ5 (High Density Residential Zone) permits buildings up to six storeys, though specific height restrictions apply when adjacent to RZ1, RZ2, and RZ3 zones[1].

The strict two-storey limit in RZ1, where much of the older suburban housing stock is located, directly limits the potential for increased density and diverse housing types characteristic of missing middle housing. Types such as three-storey townhouses,

triplexes, or small apartment buildings, which are crucial for filling the housing gap between detached homes and high-rise towers, are effectively precluded in these zones. This regulatory constraint inadvertently funnels development towards either low-density single-family homes or high-rise structures, thereby perpetuating the "missing middle" housing deficit. The current rules, while perhaps intended to preserve neighborhood character, inadvertently restrict the very housing types that could gently increase density and provide much-needed options.

Strict Setback Requirements

Compounding the impact of height restrictions are the complex and often stringent setback requirements outlined in the ACT Residential Zones Multi Unit Housing Development Code. These regulations dictate precise distances buildings must maintain from property boundaries. For instance, in RZ1, RZ2, and RZ3 zones, side setbacks for upper floors can range from 3 meters to 9 meters, depending on the type of wall (e.g., blank walls versus those with windows or balconies) and whether the boundary falls within the Primary Building Zone (PBZ) or Rear Zone (RZ).[1] Rear setbacks are similarly substantial, ranging from 3 meters for lower floors to 9 meters for upper floors with non-blank walls.[1] These setbacks are often defined by projected planes, such as 45 degrees from 2 meters or 3.5 meters above natural ground level.[1] The stated intent behind these controls is to ensure sufficient spatial separation, privacy, and solar access for adjoining properties.[1]

The combination of strict height limits and these complex, often increasing, setback requirements for upper floors significantly constrains the actual buildable area on a block. For example, a 6-meter setback for an upper floor side boundary in the PBZ, or a 9-meter setback in the RZ for non-blank walls, can render a substantial portion of a standard block unusable for multi-unit housing. While the objective of protecting amenity is valid, the prescriptive nature of these rules can make it nearly impossible to design multi-unit dwellings that are both compliant and economically viable, particularly on smaller or irregularly shaped infill lots. This rigidity in planning regulations inadvertently stifles the very gentle density that missing middle housing aims to achieve, leading to underutilized land and inflated per-unit development costs.

2.2 High Costs Associated with Development Applications

The financial burden associated with navigating the ACT's development application (DA) process presents another significant barrier, particularly for individual

homeowners or small-scale developers.

Breakdown of ACTPLA Application Fees

ACTPLA fees are multifaceted and vary considerably based on the nature and estimated cost of the development. For instance, "Deemed-to-Satisfy" applications incur fees ranging from $146 to $242. "Performance Assessed" applications are charged at $289 or 0. 125% of the development cost, up to a maximum of $200,000, whichever is greater. For "Impact Assessed" projects, fees can be 0.25% of the total development cost, capped at $300,000 or $500,000, with Environmental Impact Statement (EIS) declarations incurri ng an initial $2,024 plus 0.25% of the total development cost. [3] Land division fees are $203, with an additional $18.50 per allotment for subdivisions creating five or more lots. [3] Building assessment fees for multi-unit dwellings (Classes 2-9) range from $775 for projects up to $20,000 in cost, escalating to $3,921 plus 0.15% for projects exceeding $1 million. [3] Beyond initial submissions, fees for processing residential developments (such as estate development plans and design/operational acceptance) demonstrate a significant escalation: while the first and second submissions are free, a third submission costs $1,647.85, and a fourth or more submission is $3,437.65.[4] Inspections also incur fees after the initial one. [4] Additionally, an Urban Tree Fund fee of $516 is levied for each replacement tree not planted on site. [3]

The cumulative nature of these various application, assessment, referral, inspection, and re-submission fees creates an extremely high cost for simply getting applications processed. This financial burden disproportionately impacts individual homeowners or small-scale developers who typically lack the extensive capital reserves or economies of scale enjoyed by larger development corporations. The escalating fees for multiple submissions, in particular, can quickly render a project unviable if initial applic ations are not perfectly aligned with complex requirements, effectively acting as a significant barrier to entry for non-developer entities.

Professional Fees

Beyond the direct government charges, applicants face substantial costs for professional services. Architects typically charge between 5% and 20% of the total construction costs, or hourly rates ranging from $100 to $250. [5] For basic architectural plans, costs can range from $2,000 to $20,000, while comprehensive design services, including full construction documents and project management, can amount to $15,000 to over $80,000. [5] A real-world example cited a cost of $12,000

for design development and planning consultation, with an additional $3,500 for other consultancy fees covering engineers, surveyors, and land assessment.[6] These professional fees are standard and essential components of any development application.[27]

The combination of these substantial professional fees for design, engineering, and surveying, coupled with the high and often unpredictable government application fees (especially when multiple re-submissions or additional inspections are required), creates a significant upfront financial risk. This financial exposure is incurred regardless of whether the development application is ultimately approved. Such a high-risk, non-recoverable cost structure deters potential missing middle projects, particularly those initiated by non-traditional developers such as individual homeowners seeking to add a duplex or small multi-unit dwelling to their property. These entities often lack access to large capital pools or the willingness to absorb such considerable financial risks before construction even commences.

2.3 Requirement for Development Completion Before Block Subdivision

A critical procedural hurdle in the ACT is the requirement for substantial development completion before formal block subdivision can occur. In the ACT, a "subdivision certificate" is issued at the *end* of the development and construction process, serving as the authorization for the registration of a plan of subdivision. [29] Similarly, for most new building work, a "certificate of occupancy or use" is required before a building can be occupied, typically issued when the work is complete or substantially complete. [7] Unit developments also necessitate a "certificate of compliance" once all development provisions have been met. [7] Furthermore, subdivision design applications are categorized as "significant development," implying a more rigorous assessment process. [8]

This sequential requirement means that individual units within a multi-unit development cannot be legally separated and sold until the entire project is substantially complete and all necessary certifications have been obtained. This places a significant cash flow burden and amplifies financial risk for developers, particularly smaller entities or individual homeowners. They are compelled to finance the entire construction project upfront, including all associated costs, before they can realize any revenue from the sale of individual units. This contrasts sharply with models in other jurisdictions where preliminary subdivision plans can be approved earlier, often secured by performance bonds or covenants, thereby allowing for staged sales and reduced financial exposure throughout the development lifecycle. [11]

The ACT's current approach limits access to capital and increases holding costs, making missing middle projects less financially accessible and viable for a broader range of participants.

3. Proposed Solutions and Innovative Approaches

Addressing the identified barriers requires a multi-pronged strategy that encompasses policy and legislative reforms, innovative financial and partnership models, and the strategic adoption of technology and design innovations.

3.1 Policy and Legislative Reforms

Allowing Three-Storey Developments and Removing Height Restrictions

To effectively address the "missing middle" housing gap, a critical policy reform involves amending planning regulations to permit three-storey developments for missing middle housing types, such as townhouses, triplexes, and small apartment buildings. This expansion should particularly target RZ1 (Suburban Zone), RZ2 (Suburban Core Zone), and RZ3 (Urban Residential Zone) areas, aligning their allowances more closely with the existing RZ4 (Medium Density Residential Zone) provisions.[1] The current strict two-storey limit in RZ1, RZ2, and RZ3 zones severely restricts the potential for increased density and diverse housing types. Removing these rigid height restrictions would enable more flexible and efficient use of land, allowing for the construction of housing types that better meet the evolving needs of the ACT's population, such as multi-generational households and downsizers seeking alternatives to large detached homes or high-rise apartments.[34] Such a change is especially pertinent in locations well-serviced by public transport, existing amenities, or areas specifically designated for infill growth.

Increasing Dwelling Density in RZ2 Zones

Coupled with increased height allowances, there is a need to explicitly increase the number of dwellings permitted on RZ2 (Suburban Core Zone) residential blocks. Currently, RZ2 allows for single dwellings, dual occupancies on blocks 800 square metres or larger, and multi-unit developments, with dual occupancies able to be unit-titled for separate sale.[35] Some "Mr Fluffy" affected blocks have a reduced minimum size of 700 square metres for dual occupancy.[36] Expanding the permissible number of units in RZ2 zones, beyond just dual occupancy, would significantly contribute to housing supply in established areas, particularly when combined with the proposed

increase to three storeys. This would allow for more diverse housing configurations like triplexes or small apartment buildings, maximizing the utility of well-located land.

Flexible Setback Regulations

A move away from rigid, prescriptive setback rules towards a more flexible, performance-based planning framework is essential. Instead of mandating fixed distances from boundaries, the regulations should establish clear amenity outcomes that designs must achieve. These outcomes would typically include ensuring adequate solar access, maintaining reasonable privacy for adjoining properties, and providing sufficient spatial separation. [1] This shift would grant greater design flexibility and encourage innovation, allowing architects and developers to make more efficient use of land while still safeguarding the amenity of neighboring properties.

Transitioning from prescriptive setback rules to performance-based codes would empower designers to create innovative missing middle housing solutions that optimize land utilization while consistently protecting neighbor amenity. This approach, successfully implemented in some international contexts, allows for site-specific adaptations rather than imposing blanket restrictions that currently stifle creative infill development. [9] For instance, form-based codes regulate the physical design and footprint of new developments rather than solely focusing on residential density or unit count, which can effectively address concerns about neighborhood character. [9] Such flexibility would enable context-sensitive solutions, where setbacks could vary based on specific site conditions, building articulation, or the incorporation of screening elements, thereby preventing the rigid application of rules that can render infill development unfeasible.

Rezoning in Key Areas and Automatic Rezoning

The ACT Government should proactively identify and rezone key areas, particularly those in close proximity to existing shopping centers, public transport hubs, and other amenities. The Territory Plan already guides zoning and development, and is updated to allow for more diverse housing types in areas like RZ2 zones, which are typically found near shops and public transport routes.

Furthermore, legislation should be changed to allow for *automatic rezoning* in these designated growth areas, removing the need for individual property owners to apply for rezoning to put multiple units on their land. This would significantly reduce the administrative burden, time, and cost associated with increasing density. For example, some US cities allow duplexes and triplexes "by right" in all residential zones, streamlining development.[9] Massachusetts has a law that enables the state to directly "zone" or exempt certain structures from municipal zoning altogether, encouraging multi-family housing near public transit.[37] This approach would remove existing charges and complexities associated with individual rezoning applications, making it easier and more financially viable for homeowners and small developers to contribute to the housing supply.

Staged Subdivision Approvals

To alleviate the significant financial burden on developers, particularly smaller entities and homeowners, the ACT should introduce a multi-stage subdivision approval process. This process would allow for the approval of preliminary subdivision plans, for instance, at the Development Application (DA) stage, prior to the completion of all building works. Final subdivision certification and titling could then be secured by financial instruments such as performance bonds or covenants, which would guarantee the satisfactory completion of all required infrastructure and dwellings. [11]

Implementing a staged subdivision approval process would significantly de-risk projects for smaller developers and homeowners. By allowing preliminary plans to be approved earlier, and by securing the completion of infrastructure with financial guarantees, developers would be able to access finance for individual units or even sell off subdivided lots at earlier stages of the project. This would dramatically improve cash flow, reduce the need for extensive upfront capital, and lower overall holding costs. The current requirement to finance an entire multi-unit development before any revenue can be realized is a major financial barrier. A staged approval process would make missing middle projects more financially accessible and viable for a broader range of participants, thereby stimulating supply from non-traditional development entities.

3.2 Financial and Partnership Models

Partnering with Owners and Neighbours

To foster genuinely affordable and socially integrated missing middle housing, the ACT should actively support and incentivize community-led housing models, such as Community Land Trusts (CLTs) and co-housing initiatives. Community Land Trusts are non-profit organizations that acquire and hold land in trust to ensure long-term affordability of housing built upon it, effectively removing the land from the speculative market.[41] These models feature robust and transparent governance structures that prioritize community benefit and deliver better housing outcomes.[21] Co-housing initiatives, on the other hand, involve future residents in the design, delivery, and post-occupancy management of their communities, fostering a strong sense of collective responsibility and shared resources.[43]

By actively supporting these models, for example, through seed funding, technical assistance, or preferential planning pathways, the ACT could leverage community agency to overcome common resistance to density and ensure long-term affordability and liveability. Mechanisms like Voluntary Planning Agreements (VPAs) could also be explored, where private developers contribute land or funds to CLTs in exchange for planning concessions.[21] This approach not only increases housing supply but also cultivates stronger, more inclusive, and resilient communities, providing diverse housing options that cater to changing demographics and promoting social interaction. This directly addresses concerns about preserving the "character and soul of existing suburbs" while enabling growth, contrasting with poor quality infill development that can alienate communities.[44]

Government Loans and Financial Incentives

To stimulate missing middle housing development from owner-occupiers and small-scale developers, the ACT Government should establish or expand targeted loan and

grant programs. This could involve offering concessional loans, implementing shared equity schemes similar to the federal "Help to Buy" initiative [14], or extending guarantees akin to the "Home Guarantee Scheme".[16] These financial mechanisms would aim to reduce upfront deposit requirements and potentially waive Lenders Mortgage Insurance (LMI), thereby lowering initial costs and increasing access to capital for individuals and smaller entities.[14]

The current federal "Help to Buy" scheme, for example, allows eligible home buyers to purchase a property with a deposit as low as 2%, with the government contributing up to 40% equity for new homes, and waiving LMI.[14] Similarly, the "Home Guarantee Scheme" supports home buyers with a 2% or 5% deposit by providing a guarantee to the lender, reducing the need for LMI.[16] While these existing schemes primarily target homeownership, the strategic application of similar principles to small-scale development projects (e.g., owner-builder duplexes or small multi-unit projects) would be transformative. Additionally, dedicated funds for infill development, such as Western Australia's Infrastructure Development Fund which assists medium to high-density housing in priority infill locations [54], could be explored. This targeted financial de-risking would stimulate a more diverse range of housing providers beyond large corporate developers, directly addressing the financial barriers for individuals and small groups seeking to undertake missing middle projects.

Deferred Payments

To improve liquidity and ease the upfront financial burden on developers, particularly for smaller-scale missing middle projects where units are intended for sale upon completion, the implementation of deferred payment schemes for certain statutory fees and infrastructure charges is recommended. Payments could be structured to occur at key project milestones or upon the sale of individual units, significantly reducing the initial capital outlay required. The ACT already offers deferred duty for eligible home buyers [17], and other jurisdictions like Queensland provide stamp duty concessions.[55]

Applying this concept to development-related fees, such as Development Application fees or infrastructure charges, would free up crucial capital during the construction phase. For a small developer or homeowner building a duplex with the intent to sell

one or both units, deferring these significant fees until settlement would enhance project viability. This mechanism directly addresses the "extreme high cost to get applications in" by shifting the timing of payment, thereby improving cash flow and making missing middle projects more feasible for a broader spectrum of participants.

Removing Barriers Less Geared Towards Developers

A comprehensive review and revision of existing planning policies and fee structures are necessary to specifically reduce the disproportionate burden on individual homeowners and small-scale entities. This involves simplifying complex application processes, which often require extensive documentation and specialist reports that can be costly and time-consuming for non-developers.[56] The number of required specialist reports for smaller, less complex projects should be re-evaluated and potentially reduced. Furthermore, fee structures should be made more progressive, ensuring they do not inadvertently penalize smaller developments that are crucial for missing middle housing. The aim is to create a more equitable playing field, encouraging a wider array of participants to contribute to housing supply by making the development process more accessible and less financially prohibitive for those without large-scale developer resources.

3.3 Technological and Design Innovations

Leveraging AI for Development Assessment

Investing in and implementing Artificial Intelligence (AI)-powered tools within ACTPLA's development assessment processes offers a transformative opportunity to enhance efficiency and consistency. AI can be deployed for automated compliance checks against planning codes, enabling rapid identification of deviations and ensuring adherence to regulations.[18] It can also facilitate risk-based triage of applications, allowing planners to quickly identify and prioritize complex or non-

compliant elements within submissions. [18] Furthermore, AI can power self-assessment tools for applicants, enabling them to conduct preliminary checks on their proposals before formal submission, thereby reducing common mistakes and the need for multiple re-submissions.[18]

AI's ability to analyze vast amounts of data and simulate urban scenarios can significantly reduce DA processing times, improve consistency in decision-making, and minimize administrative errors.[62] For example, in NSW, AI trials aim to reduce administrative delays, duplications, and mistakes, potentially saving "hundreds of thousands of days" by reducing requests for additional information.[19] This directly translates to lower costs and faster approvals, which are critical for making missing middle projects more viable, especially for smaller players who are particularly sensitive to prolonged timelines and escalating fees. AI can liberate planners from routine tasks, allowing them to focus on strategic initiatives and complex problem-solving.[19]

Pre-Approved Designs (ACT Government Owning IP)

Developing a publicly accessible library of high-quality, adaptable, and sustainable missing middle housing designs (e.g., duplexes, townhouses, small apartment buildings) would significantly streamline the development process. The ACT Government should proactively own the intellectual property (IP) of these designs, making them available for public use, potentially free of charge or for a nominal fee. These designs would come with pre-approved planning pathways, substantially reducing both design costs and approval times for applicants.

This strategy has been successfully implemented in other Australian jurisdictions. Victoria's "Future Homes" initiative provides exemplar designs for small apartment buildings, available for purchase with mandatory design and planning requirements to ensure quality.[71] Similarly, the "NSW Housing Pattern Book" offers pre-approved, architecturally designed, and cost-effective templates for low- and mid-rise housing, accessible for public use and benefiting from a fast-track planning approval process, often through Complying Development Certificates (CDCs). [20] These models demonstrate that government ownership of IP can facilitate widespread access to quality designs, de-risk the initial design phase for applicants, and provide a clear,

fast-track path to compliance. This directly addresses the burden of high professional fees and complex approval processes, thereby democratizing access to missing middle development for a broader range of participants, including homeowners and small builders.

Proactive Land Identification

To ensure that missing middle housing is developed in appropriate and well-serviced locations, the ACT Government should adopt a proactive approach to land identification. This involves leveraging advanced data analytics and AI tools to identify underutilized land parcels within established suburbs that are ideally suited for missing middle development. [63] This analysis would consider critical factors such as existing infrastructure capacity (roads, utilities), proximity to public transport links, and compatibility with surrounding community character. [63]

Once suitable parcels are identified, the ACT Government could then proactively engage with the owners of these properties. This engagement could involve offering targeted incentives, providing dedicated support for navigating the planning process, or even making direct offers for development partnerships. This strategic approach provides market certainty by clearly indicating "development-ready" sites, thereby reducing the speculative risk for potential developers, particularly smaller ones. By shifting the burden from individual applicants trying to find suitable sites to the government providing clear guidance and support, this strategy would accelerate infill development in a planned and integrated manner, ensuring that new housing contributes positively to existing communities.

4. Benefits of a New Approach to Missing Middle Housing

A progressive approach to missing middle housing in the ACT offers a multitude of benefits across social, economic, and environmental dimensions, contributing to a more sustainable and equitable urban future.

4.1 Social Benefits

Increased Housing Affordability and Accessibility

Missing middle housing types are inherently more affordable than traditional single-family homes, primarily due to their smaller size and reduced per-unit construction and land costs.[9] By expanding the supply of these diverse housing options, the ACT can directly alleviate the acute price pressures currently experienced across the housing market.[9] This increased supply also enhances accessibility for a broader range of income levels, making homeownership or appropriate rental options attainable for more residents.[9]

Enhanced Housing Diversity and Choice

The introduction of a greater variety of housing types provides attractive options for diverse demographics. This includes seniors looking to downsize while remaining in their established communities, young professionals seeking entry into the housing market, and small families who may not require or be able to afford a large detached house but also do not wish to live in high-rise apartments.[9] This diversity ensures that the housing stock is responsive to the evolving needs and preferences of the ACT's population.

Strengthened Community Cohesion and Liveability

Missing middle housing, when designed thoughtfully, can seamlessly blend with existing neighborhood character, fostering a sense of continuity rather than disruption.[9] Furthermore, actively supporting community-led models such as co-

housing initiatives and Community Land Trusts can significantly strengthen community cohesion. These models promote shared resources, encourage social interaction, and cultivate a strong sense of belonging among residents.[43] This emphasis on community interaction and shared spaces contributes to a higher quality of life and improved overall liveability within suburbs.

Improved Social Equity and Inclusivity

By providing a greater diversity of housing options at different price points, missing middle housing can facilitate more economically and racially inclusive neighborhoods. Historically, single-family-only zoning has contributed to patterns of residential segregation by pricing out lower-income households and people of color from certain areas.[9] Enabling missing middle housing types is a strategic approach to creating more affordable homes in well-located areas, thereby fostering greater social equity and ensuring that diverse residents can access desirable communities. This contributes to a more equitable urban landscape where housing opportunities are distributed more evenly.

4.2 Economic Benefits

Stimulation of the Construction Sector and Job Creation

An increased focus on missing middle housing directly stimulates activity within the construction sector. Australia's urgent need for new homes underscores the potential for significant construction growth. [24] By streamlining approvals and incentivizing these housing types, the ACT can boost building activity, leading to job creation across various trades and professions within the industry.

Efficient Use of Existing Infrastructure

Infill development, a hallmark of missing middle housing, optimizes land use within existing urban boundaries. This approach leverages existing infrastructure, including roads, utilities, and public transport networks, reducing the need for costly new infrastructure investments in greenfield areas on the city's periphery. [24] This efficient utilization of existing assets translates into significant cost savings for the government and taxpayers.

Increased Property Value and Economic Activity

Well-designed infill developments can enhance the value of properties in desirable urban locations. [34] By offering a diversified range of housing options, these developments support local businesses and services, as increased residential density in established areas makes local retail and community service provision more economically viable. [81] This fosters localized economic activity and vibrancy.

Reduced Urban Sprawl and Associated Infrastructure Costs

Embracing gentle density allows cities to grow "inside-out," minimizing urban sprawl and the associated costs of extending infrastructure networks to new, undeveloped areas.[10] This approach preserves valuable peri-urban land, often agricultural or environmentally sensitive, and reduces long-term public expenditure on infrastructure maintenance and expansion. The economic benefit extends beyond immediate construction, encompassing long-term efficiency gains from more compact and well-planned urban development.

4.3 Environmental Benefits

Reduced Carbon Footprint through Infill Development

Missing middle housing, by promoting compact development patterns, inherently reduces urban sprawl. This leads to shorter commuting distances for residents, which in turn results in lower carbon emissions from transportation. [10] Furthermore, new missing middle housing can be designed to incorporate advanced energy - efficient features, such as passive solar design, high - performance insulation, and renewable energy systems, further reducing their environmental impact. [34]

Preservation of Green Spaces and Natural Habitats

By concentrating development within existing urban boundaries through infill strategies, the pressure to develop greenfield sites and natural habitats on the city's fringes is significantly reduced. [10] This approach helps to preserve biodiversity, protect ecosystems, and maintain the natural amenity of the surrounding landscape.

Promotion of Walkability and Reduced Reliance on Private Vehicles

Increased residential density in well - located areas, particularly near public transport hubs and local amenities, fosters more walkable neighborhoods. [9] This encourages residents to rely less on private vehicles for daily commutes and errands, promoting active transport modes like walking and cycling. The reduction in car dependency contributes to lower traffic congestion, improved air quality, and a heal thier urban environment. Missing middle housing is thus a key component of a broader sustainable urban strategy, aligning with climate goals by promoting compact, efficient, and green urbanism.

5. Comparative Analysis: Successful Models and Costs in Other

Jurisdictions

Examining approaches in other jurisdictions, both within Australia and internationally, provides valuable insights into effective strategies for promoting missing middle housing and highlights areas where the ACT can learn and adapt.

5.1 Onshore Jurisdictions (Australia)

NSW Housing Pattern Book & Complying Development

The New South Wales (NSW) Government is actively developing a "Housing Pattern Book" that features pre-approved, architecturally designed, and cost-effective templates for low- and mid-rise housing.[20] This collection includes designs for terrace houses, duplexes, and low-rise apartments (up to six storeys). [20] These designs are publicly accessible, and their use is intended to come with a fast-track planning approval process, often facilitated through Complying Development Certificates (CDCs) for low-rise housing.[20] CDCs can be approved by local councils or private certifiers typically within 2 to 3 weeks, significantly accelerating the approval timeline compared to traditional Development Applications (DAs). [77]

The NSW Housing Pattern Book demonstrates a scalable model for accelerating missing middle housing by providing pre-approved designs that bypass lengthy individual design and approval processes. This offers a clear, streamlined pathway for diverse stakeholders, including homeowners and small builders, to contribute to housing supply while maintaining design quality and neighborhood character. The government's ownership of the intellectual property (IP) for these designs makes them widely available for public benefit, directly addressing the high professional fees and complex approval times often encountered in traditional development processes.

Victoria's Future Homes Initiative

Victoria's "Future Homes" initiative provides exemplar designs for small apartment buildings, specifically targeting the General Residential Zone for buildings up to three storeys, and a broader "Great Design Fast Track" for projects up to eight storeys. [71] While these designs are available for purchase and can be adapted to various site conditions, they must adhere to 13 mandatory design and planning requirements prescribed under the General Residential Zone. [71] The "Great Design Fast Track" offers a streamlined planning process where the Minister for Planning acts as the ultimate decision-maker, and third-party appeal rights are removed, facilitating faster decisions.[72]

Victoria's Future Homes model highlights the potential for combining pre-approved designs with *mandatory* design and planning requirements to ensure high-quality outcomes even with accelerated approvals. This approach demonstrates that efficiency in housing delivery does not have to come at the expense of design excellence or local amenity, a common concern associated with increased density. By embedding quality standards from the outset, the initiative aims to address community apprehension about rapid development and promote well-integrated missing middle housing.

Community Housing Providers (CHPs) and Community Land Trusts (CLTs)

Across Australia, Community Housing Providers (CHPs) and Community Land Trusts (CLTs) are playing an increasingly vital role in delivering social and affordable missing middle housing. CHPs are not-for-profit entities that provide housing for low-to-moderate income individuals and families, often partnering with all levels of government and the private sector. [42] These organizations manage substantial asset portfolios and leverage various financing mechanisms to deliver housing at scale. [23] CLTs are community-run models that acquire land to ensure long-term housing affordability by removing it from the speculative market. [41] They foster resident participation in planning and governance and can acquire land through mechanisms like Voluntary Planning Agreements. [21]

The growing prominence of CHPs and the emergence of CLTs in Australia demonstrate viable alternative models for delivering social and affordable missing middle housing. These entities, often collaborating with government funding bodies like Housing Australia (through initiatives such as the Housing Australia Future Fund Facility and National Housing Accord Facility [42]), offer a non-speculative pathway to long-term affordability and community-centric development. This addresses a critical gap often left by traditional market-driven approaches, which may prioritize profit over long-term affordability and community integration.

5.2 Offshore Jurisdictions

United States (e.g., Portland, Sacramento)

Several US cities have successfully implemented reforms to encourage missing middle housing. Cities like Portland and Sacramento have shifted from traditional zoning to more flexible approaches, such as form-based codes, which regulate the physical design and footprint of new developments rather than strictly controlling residential density or the number of units. [9] This approach allows missing middle housing types like duplexes and triplexes to be allowable "by right" in all residential zones, significantly streamlining the development process. [9]

This policy shift has demonstrated tangible benefits in expanding the supply of affordable housing. Research indicates that building middle-priced housing increases long-term regional affordability by allowing higher-income residents to move into new market-rate housing, thereby vacating older housing stock that can then become accessible to lower-income households. [25] For example, the City of Portland found that allowing smaller units citywide could reduce average housing costs by 56% over a 20-year period. [25] This model underscores that updating zoning codes and land use regulations to facilitate missing middle housing can lead to more inclusive neighborhoods and alleviate price pressures across the broader housing market.

Sweden (Prefabricated Housing)

Sweden stands out as a leading example in the adoption of prefabricated housing, with 84% of new houses utilizing prefabricated elements, compared to only about 5% in Australia.[82] This widespread adoption is directly relevant to the efficient delivery of missing middle housing. Prefabricated construction can deliver low-rise apartments, townhouses, and duplexes much more quickly than traditional on-site construction methods, often in weeks rather than months. [82]

Beyond speed, prefabricated housing offers consistent high quality due to precise manufacturing in controlled factory conditions, and it contributes to greater sustainability by reducing waste. [82] Off-site production also minimizes construction activities, noise, and traffic disturbances on the housing site, which is particularly beneficial in established urban areas where infill development is needed. [82] The Swedish model demonstrates that leveraging advanced construction methods can significantly enhance the speed, affordability, and quality of missing middle housing delivery, providing a proven approach to scaling supply efficiently.

5.3 Development Cost and Barrier Comparison (Major Australian Cities)

Comparing development costs and regulatory barriers across major Australian cities reveals the varying challenges faced by developers and highlights the ACT's position within this landscape.

Construction Costs

Construction costs vary significantly across Australia's major cities. A recent report indicates that Brisbane leads as the most expensive city to build in Australia, at AU5,009persquaremeter,followedcloselybySydneyatAU4,866 per square meter. [86] Perth ranks third at AU

4,497persquaremeter.[86]Melbourneiscomparativelycheaper,atAU4,242 per square

meter, and Adelaide is the most affordable, averaging AU$4,133 per square meter. [86] Another source provides a slightly different range for average build costs per square meter: NSW ($2,300-$4,200), Victoria ($2,000-$3,800), Queensland ($1,800-$3,400), and South Australia ($1,700+).[87] These figures reflect regional differences in labor costs, material availability, and market demand. While specific data for ACT construction costs were not provided in the research, its position as a capital city suggests costs are likely to be on the higher end of the spectrum, comparable to Sydney or Brisbane.

Application Fees (Duplex/Townhouse/Multi-unit)

Development application fees for multi-unit projects vary considerably across Australian cities, adding to the overall cost burden.

- **ACT:** Fees are complex and tiered based on development cost and assessment type. For instance, "Performance Assessed" applications are $289 or 0.125% of development cost (up to $200,000 max), while "Impact Assessed" can be 0.25% of development cost (up to $300,000 or $500,000 max). [3] Crucially, third and subsequent submissions for residential developments incur escalating fees ($1,647.85 for third, $3,437.65 for fourth or more). [4] Land division fees are $203 plus additional per-allotment charges. [3]
- **Sydney (NSW):** DA fees are also tiered based on estimated development cost. For example, works between $500,001 and $1,000,000 incur a base fee of $2,272 plus $1.64 per $1,000 over $500,000. [88] For works over $10 million, the base fee is $20,667 plus $1.19 per $1,000 over $10 million. [88] Fees for strata subdivision are $430 plus $65 per additional lot. [88] Additional fees apply for integrated or designated developments. [88]
- **Melbourne (VIC):** Planning permit application fees are structured by development cost. For "other development" (which includes multi-unit), costs range from $1,302.80 for projects up to $100,000, to $65,458.10 for projects exceeding $50,000,000. [92] A Metropolitan Planning Levy applies for developments in metropolitan Melbourne exceeding $1 million. [71]
- **Brisbane (QLD):** Fees are calculated using a points system, with one point valued at $143 for 2025-26.[98] For multi-unit residential development, fees range significantly based on the number of dwellings and gross floor area (GFA). For

instance, multi-unit residential development with 11-50 dwellings and 1,001-5,000m² GFA can incur a fee of $7,329.[99] Smaller dual occupancy applications can be around $3,500 for a town planner's services, plus council fees.[100]

- **Adelaide (SA):** Fees are also tiered by development cost. "Performance Assessed" is $289 or 0.125% of development cost (up to $200,000 max). [3] "Building Assessment – Classes 2-9" (multi-unit) ranges from $775 (up to $20,000 cost) to $3,921 plus 0.15% (over $1M cost). [3] Land division fees are $203 plus per-allotment charges. [3]
- **Perth (WA):** Development Assessment Panel (DAP) application fees for projects less than $2 million are $5,341, increasing to $16,680 for projects not less than $50 million. [102]

The comparative analysis of application fees reveals that while all major Australian cities have tiered fee structures based on development cost, the cumulative impact of various fees, especially for re-submissions and additional services, can be substantial in the ACT. This complexity and potential for escalating costs, particularly for smaller projects or those undertaken by non-developers, can place the ACT at a competitive disadvantage, contributing to higher overall development costs.

Processing Times

Development application processing times for multi-unit developments vary significantly, both within Australia and internationally.

- **ACT:** A "standard development DA" typically has a public notification period of 15 working days, with entities providing advice within the same timeframe. [104] For "significant development DAs" (which include subdivision design applications), there's a 2-stage public notification of 20 working days followed by a second 10 working day period, with entities also responding within these timeframes. [104] While specific average total processing times for multi-unit DAs in ACT are not explicitly stated, the multi-stage nature and referral requirements imply a longer process.
- **Sydney (NSW):** North Sydney Council reported an average processing time of 207 days for all development applications in FY2023/24, aiming to reduce it to 115 days.[105] Complying Development Certificates (CDCs) in NSW, however, offer a fast-tracked alternative, typically issued within 2 to 3 weeks. [77]

- **Melbourne (VIC):** Planning permit applications for 1-2 additional dwellings can take 5-9 months, while multi-unit developments (3 or more dwellings) can take upwards of 9 months. [106] Councils are statutorily required to provide a decision within 60 days, but this period is subject to "exclusion periods and pauses" for information requests and public notification, meaning the actual time is much longer. [106]
- **International (US Multifamily Projects):** Research indicates that, on average, it takes 15.3 months from project announcement to construction start, and 12.3 months from construction start to completion, totaling 27.6 months from inception to delivery. [107] Notably, most of this time is spent on planning and permitting (3-4 months longer than construction). [107] For buildings with 20 or more units, the authorization-to-completion time averaged 19.9 months in 2023. [109]

The comparative data suggests that planning and permitting phases are often the most time-consuming aspects of development. While direct comparisons with ACT's multi-unit DA average processing times are limited, the complexity of its rules, coupled with th e need for multiple submissions and extensive referral processes, indicates that the ACT's system likely contributes to prolonged timelines. This contributes to higher holding costs and uncertainty for developers, which can ultimately impact housing supply and affordability.

The comparative analysis reveals that ACT's prescriptive planning rules, high and complex application fees, and delayed subdivision processes place it at a competitive disadvantage compared to other jurisdictions that have streamlined processes, adopted pr e-approved designs, or fostered alternative delivery models. This contributes to higher development costs and longer timelines, directly impacting housing affordability and supply.

6. Conclusion and Recommendations

The analysis presented in this submission underscores the critical need for comprehensive reform of the ACT's planning system to effectively enable missing middle housing. Current regulatory frameworks, characterized by restrictive height and setback rules in older suburbs, a complex and costly development application process, and the requirement for full development completion before subdivision,

create significant barriers. These impediments disproportionately affect individual homeowners and small-scale developers, limiting their capacity to contribute to the housing supply and perpetuating the "missing middle" deficit.

The examination of successful models in other jurisdictions, both within Australia and internationally, demonstrates that alternative approaches can yield positive outcomes in terms of housing diversity, affordability, and streamlined delivery. Jurisdictions like NSW and Victoria have successfully implemented pre-approved design programs with fast-track approval pathways, significantly reducing design costs and approval times. The growing prominence of Community Housing Providers and Community Land Trusts in Australia offers proven models for delivering long-term affordable and community-centric housing. Internationally, shifts to performance-based zoning and the widespread adoption of prefabricated construction highlight opportunities for greater efficiency and quality.

Based on this comprehensive assessment, the following recommendations are put forth to ACTPLA to foster a more enabling environment for missing middle housing:

1. Policy and Legislative Modernization:
* Revise Height and Storey Limits: Amend planning regulations in RZ1, RZ2, and RZ3 zones to permit three-storey missing middle housing types (e.g., townhouses, triplexes, small apartment buildings), particularly in areas well-serviced by public transport and amenities. This would unlock significant infill potential and align with evolving demographic needs.
* Increase Dwelling Density in RZ2 Zones: Explicitly increase the number of dwellings permitted on RZ2 residential blocks, beyond just dual occupancy, to maximize the utility of well-located land, coupled with increased height allowances.
* Implement Performance-Based Setbacks: Transition from rigid, prescriptive setback rules to a performance-based planning framework. This would involve setting clear amenity outcomes (e.g., solar access, privacy) that designs must achieve, allowing for greater design flexibility and innovation while still protecting neighboring amenity.
* Proactive Rezoning and Automatic Rezoning: Proactively identify and rezone key areas, especially those near shopping centers and public transport. Implement legislative changes to allow for automatic rezoning in designated growth areas, removing the need for individual applications and associated charges for putting multiple units on a block.
* Introduce Staged Subdivision Approvals: Establish a multi-stage subdivision approval process that permits the approval of preliminary subdivision plans (e.g., at the DA stage) prior to full building completion. Final subdivision certification could be secured by performance bonds or covenants, thereby de-risking projects and improving capital accessibility for smaller developers and homeowners.
2. Financial and Partnership Empowerment:

* Support Community -Led Housing Models: Actively incentivize and provide technical and financial assistance to Community Land Trusts (CLTs) and co-housing initiatives. This would foster community-led development, ensure long-term affordability, and enhance community acceptance of increased density.
* Expand Targeted Government Financial Support: Establish or expand government-backed loan and grant programs specifically tailored for owner-occupiers and small-scale developers undertaking missing middle projects. This includes concessional loans, shared equity schemes, and guarantees to reduce upfront deposit requirements and waive Lenders Mortgage Insurance (LMI).
* Implement Deferred Payment Schemes: Introduce deferred payment mechanisms for certain statutory fees and infrastructure charges associated with missing middle developments, especially for projects where units are intended for sale upon completion. Payments could be tied to key milestones or property sales to improve liquidity.
* Simplify Processes for Non-Developers: Conduct a comprehensive review of planning policies and fee structures to identify and remove barriers that disproportionately burden individual homeowners and small-scale entities. This should include simplifying application requirements and ensuring fee structures are progressive, and do not inadvertently penalize smaller developments.
3. Embrace Technological and Design Innovation:
* Leverage AI for Development Assessment: Invest in and implement AI-powered tools within ACTPLA's development assessment processes for automated compliance checks, risk-based triage of applications, and self-assessment tools for applicants. This would significantly reduce processing times, improve consistency, and minimize administrative delays and costs.
* Develop Pre-Approved Design Library: Create a publicly accessible library of high-quality, adaptable, and sustainable missing middle housing designs, with the ACT Government owning the intellectual property. These designs should come with pre-approved planning pathways, substantially reducing design costs and accelerating approval times for applicants.
* Proactive Land Identification: Utilize data analytics and AI to strategically identify underutilized land parcels within established suburbs suitable for missing middle development. Proactively engage with property owners, offering incentives, support, or partnership opportunities to stimulate development in these identified areas.
Long-Term Benefits:
Adopting these proposed reforms will yield substantial long-term social and economic benefits for the ACT. It will lead to increased housing affordability and accessibility, offering diverse choices that cater to the evolving needs of the population. Stronger community cohesion and improved social equity will result from well-integrated, community-centric developments. Economically, these changes will stimulate the construction sector, ensure the efficient use of existing infrastructure, and reduce the costly impacts of urban sprawl. Ultimately, a progressive approach to missing middle housing will contribute to a more vibrant, sustainable, and equitable Canberra, enhancing the liveability and prosperity of its communities for generations to come.

Comments and Suggested Improvements to Draft Attachments

This section provides a critical analysis of the attached draft documents (Draft Major Plan Amendment 04 - DPA-04, Draft Missing Middle Housing Design Guide, Draft Planning Residential Zones Technical Specifications, Draft Planning Subdivision Technical Specifications, and Missing Middle Comparison Table) in comparison to the strategic recommendations outlined in this feedback submission.

1. Height and Storey Limitations (DPA -04 vs. Feedback Submission)

- **DPA-04's Proposed Changes:** The Draft Major Plan Amendment 04 [111] and the Missing Middle Comparison Table [111] propose specific changes to maximum heights and storeys across residential zones:
  - **RZ1 (Suburban Zone):** Remains at 2 storeys + attic. [111]
  - **RZ2 (Suburban Core Zone):** Multi-unit housing increases to 3 storeys + attic. [111]
  - **RZ3 (Urban Residential Zone):** Multi-unit housing increases to 4 storeys. [111]
  - **RZ4 (Medium Density Residential Zone):** Multi-unit housing increases to 6 storeys. [111]
  - **RZ5 (High Density Residential Zone):** Multi-unit housing increases to 7 storeys. [111]
- **Feedback Submission's Recommendation:** This submission recommends allowing "three-storey developments, especially in RZ1, RZ2, and RZ3 zones."
- **Comments and Suggested Improvements to Draft Attachments:**
  - **RZ1 Discrepancy:** The DPA-04 does *not* propose allowing 3-storey developments in RZ1, maintaining the current 2 storeys + attic limit. [111] This is a significant divergence from the feedback submission's recommendation. To genuinely unlock the potential for missing middle housing and increase supply in RZ1 (which accounts for 67.6% of urban land [111]), the DPA-04 could be improved by exploring the feasibility of permitting 3-storey missing middle housing types in RZ1. This would be particularly beneficial in well-located areas or those identified for infill growth, aligning RZ1 more closely with the

broader objective of diversifying housing choice and increasing density where appropriate. A genuine commitment from the government to solving the housing problem, rather than a short-term money-making view, would prioritize maximizing housing options in this extensive zone.

- **RZ3 Alignment:** The feedback submission's recommendation for RZ3 is "three-storey," which is *less* than the 4 storeys proposed for multi-unit housing in RZ3 by DPA-04. [111] While the submission could align with the DPA's higher allowance for increased density, the DPA-04 should clearly articulate the rationale for this specific increase in RZ3, ensuring it supports the long-term value of diverse housing without compromising local character.

2. Automatic Rezoning and Removal of Charges (DPA-04 vs. Feedback Submission)

- **DPA-04's Proposed Changes:** The Draft Major Plan Amendment 04 [111] and Missing Middle Comparison Table [111] indicate that the Territory Plan is being updated to allow for more diverse housing types in areas like RZ2 zones, which are typically found near shops and public transport routes. [111] It also removes minimum block area requirements and maximum dwelling numbers in RZ2, implicitly reducing barriers. [111]
  - Specifically, DPA-04 removes minimum block size for secondary residences and co-housing, and permits apartments in RZ1 (limited to 2 storeys). [111]
  - It also permits block subdivision in RZ1 where a dwelling has been lawfully constructed and allows consolidation for all development resulting in more dwellings. [111]
- **Feedback Submission's Recommendation:** This submission explicitly calls for "changing legislation to automatically rezone" key areas and to "remove charge to put multiple units."
- **Comments and Suggested Improvements to Draft Attachments:**
  - While the DPA-04 takes positive steps by removing certain minimums and allowing more housing types [111], it *does not explicitly propose mechanisms for automatic rezoning* or the *removal of specific application charges* through legislative change. This is a critical gap.
  - The current fee structure, as detailed in the initial research report, still

includes various application, assessment, and re-submission fees that can be substantial, particularly for smaller projects or those undertaken by non-developers.[3] For instance, third and subsequent submissions for residential developments incur escalating fees.[4] This means that while density limits might be relaxed, the financial and administrative burden of the application process itself remains a significant barrier for homeowners looking to enter the market.

- Homeowners who have invested years into their property should be incentivized to assist with the housing crisis. Instead, by having huge costs, the market is primarily accessible only to large developers. These developers may not always "play fairly," potentially trying to offer below-market sale prices and targeting vulnerable homeowners who may not have the financial means to update their properties to reap maximum sale prices.
- To demonstrate a genuine commitment from the government to solve the housing problem, rather than simply generating more revenue from development applications, the DPA-04 could be improved by:
  - **Proposing legislative changes for automatic rezoning:** This would streamline the process for properties in identified strategic growth areas (e.g., near shopping centers and public transport) to automatically permit missing middle housing types without requiring individual, costly rezoning applications. This aligns with models in some US cities where certain housing types are allowed "by right" in all residential zones, significantly reducing time and cost. [9]
  - **Explicitly removing or significantly reducing application charges:** A clear legislative change to remove or substantially reduce specific application charges associated with adding multiple units (e.g., duplexes, triplexes) on a single block would further incentivize homeowners and small developers, directly addressing the "extreme high cost to get application in" barrier. This would reflect a "total economic value view" where the long-term benefits of increased housing supply and affordability outweigh short-term revenue generation from fees. Deferred payments and partnerships, as highlighted in the feedback submission, are extremely important mechanisms to support this longer-term value.
  - **Examples where this has worked in other jurisdictions:**
    - **Deferred Payments:** The ACT itself already offers deferred duty for eligible home buyers. [17] Queensland has also introduced stamp duty concessions for first-home buyers. [55]

- **Government Financial Support for Individuals/Small Scale:** Federal initiatives like the "Help to Buy" scheme allow eligible home buyers to purchase with a low deposit (as low as 2%) and receive a government equity contribution (up to 40% for new homes), often waiving Lenders Mortgage Insurance (LMI). [14] The "Home Guarantee Scheme" also supports buyers with small deposits by providing a guarantee to the lender, reducing LMI. Western Australia's Infrastructure Development Fund assists medium to high-density housing in priority infill locations .
- **Partnerships and Community-Led Models:** Community Housing Providers (CHPs) and Community Land Trusts (CLTs) in Australia demonstrate successful models for delivering social and affordable housing, often in partnership with government and private sectors. CLTs, in particular, are community-run and remove land from the speculative market to ensure long-term affordability.
- **Streamlined Processes & Pre-Approved Designs:** The NSW Housing Pattern Book provides pre-approved, architecturally designed templates with fast-track approval pathways (e.g., Complying Development Certificates), significantly reducing design costs and approval times for a broader range of stakeholders , including homeowners and small builders. Victoria's "Future Homes" initiative offers a similar model with exemplar designs and streamlined planning processes. These examples show how governments can actively reduce the financial and procedural burden on individuals.

3. Clarity on Benefits (Feedback Submission vs. Attached Documents)

- **Feedback Submission's Clarity:** The Executive Summary and Section 4 of this feedback submission clearly articulate the benefits of simplified processes, reduced upfront costs, and community partnerships.
- **Comments and Suggested Improvements to Draft Attachments:**
  - The Draft Major Plan Amendment 04 [111] and Supporting Report [111] discuss general positive impacts such as increased housing choice, affordability, urban vitality, environmental sustainability, and economic development. They mention "removing barriers to development"

and supporting a "more flexible and responsive planning system." [111]

- However, these documents could benefit from more explicitly linking specific proposed changes to the direct benefits for *homeowners and small-scale developers*. For instance, while the Missing Middle Comparison Table [111] provides reasons for changes (e.g., "to enable more missing middle housing in RZ1"), it does not explicitly state how these changes lead to *simplified processes* for individual homeowners or *reduced upfront costs* for non-traditional developers.
- The attached drafts do not sufficiently emphasize how the proposed reforms will directly translate into tangible cost and time savings for individual homeowners, beyond general statements about "development viability". [111]
- Furthermore, while the Missing Middle Housing Design Guide [111] emphasizes community benefits and value, the DPA-04 and Supporting Report could more strongly highlight how the proposed policy changes directly enable and support *community-led housing models* and *homeowner participation* beyond just allowing co-housing. The importance of "partnerships" and "deferred payments" as crucial elements for fostering a more accessible market for homeowners, and prioritizing the "longer term value" of a diversified housing supply, is not adequatel y detailed in the official drafts.

By incorporating these suggestions, the attached draft documents could more comprehensively align with the strategic vision and detailed benefits articulated in this feedback submission, making the proposed reforms even more impactful and transparent, and demonstrating a genuine commitment to addressing the housing crisis from a total economic value perspective.

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The Missing Middle Found

"The importance of having a home cannot be underestimated. It provides the foundation for so many aspects of a person's life – for health, education, work, family and so much in between. The Government believes there is a moral and economic imperative to supply more homes and ensure that all Canberrans can afford housing in our city, whether it is to buy or rent." [ILRP Forword p3]

Who could disagree with that? Unfortunately, by any measure the ACT Government's housing policy over the last couple of decades has not worked. It is not working. The Government has a responsibility to ensure a supply of affordable housing for residents. Affordable housing is fundamental to the success and wellbeing of a community.

This problem could be solved quickly by providing a supply of affordable land to homebuyers so that they can build the affordable house of their choice. Instead the Government's policy is not to build houses but restrict the land supply and tweak planning and building controls to support greater density. This approach has not worked. For at least a decade, the ACT Government has exacerbated the affordable housing crisis.

Recommendation 1: Take action on the housing affordability crisis by releasing 500 blocks of land per year to owner/occupiers so that they can build the affordable house of their choice. [land price to be equivalent to the South Australian median greenfield block land price]

Missing Middle Housing Reforms

The objective of the Missing Middle Housing Reforms is to produce 30,000 additional homes in the next 5 years or an average of 6000 per year. This is all types of dwellings standalone, townhouses and high density apartment towers. There is no predicted proportional split between these housing types. The most likely outcome of these Reforms is a continued increase in the number of expensive missing middle dwellings in inner city locations and a greater increase in lower quality infill multi-unit developments in areas that are not well located. A continued reduction in the supply of detached dwellings suitable for larger households.

The MM Reform is not trying to directly address the housing crisis, or more specifically, the housing affordability crisis.

The substance of the Reform is enable a specific type of missing middle dwelling to be built across Canberra including:

- Dual and tri-occupancies (2 or 3 homes per block)
- townhouses and terrace houses, and
- low-rise apartments

Despite the fact that these dwelling types have a similar footprint to units, the Government suggests that these specific dwelling types offer the home buyer greater choice.

An underlying principle of the ACT Government's Indicative Land Release Program is 'delivering housing diversity and affordable housing choices'.
[https://www.planning.act.gov.au/__data/assets/pdf_file/0007/2869117/act-housing-supply-and-land-release-program-2025-26-to-2029-30.pdf].

The Government's Indicative Land Release Program (2025-30) proposed the release of land for 25,948 residences, of which only 2379 will be for single detached dwellings. That's a ratio of 9 units for every detached dwelling.

The Government presumes the gap left will be the private sector contribution to new housing. This ranges between 1,000 to 1,500 homes annually with the Government hoping this will increase to 9,000 additional homes over the coming five years to with most of these being multi-unit properties rather knock-down rebuilds that don't add to additional stock.

These numbers are not based on the release of greenfields sites but the continuation of the policy to restrict the availability of these sites, particularly for standalone dwellings. The Government's plan is that 20,400 dwellings (or 68%) will come from infill developments in existing suburbs. This means releasing a number of large sites and the demolition of existing detached houses (or duplexes).

These targets are not particularly ambitious but the Government intends on greasing the wheels for infill development by significant upzoning of all residential zones and the relaxation of planning controls. It is the proposed MM changes to the Territory Plan and Building Controls where the impact of the Reforms will result. By limiting 90% of construction to unit style developments the building targets are less likely to be achieved. The minimising and removal of building controls will reduce the liveability of dwellings constructed, reduce quality protections for home buyers and impacts on neighbours. There is no evidence that the Reforms will improve the supply and affordability of housing across Canberra.

The Master Builders Association while welcoming the increased land release program commented that previous forward plans have 'fallen short of ambition' and added the reality check that 'the mix between stand-alone and multi-unit housing was ultimately determined by the market and economic viability.'

Is the Missing Middle a Myth?

'Currently, new homes in Canberra are mostly single homes or high-density apartments in our town and city centres. This leaves a 'gap' or 'missing middle' in the housing market'. [https://yoursayconversations.act.gov.au/missing-middle-housing-reforms]

The data might be hard to get from Government, but it would be worth fact checking whether new homes were greenfield new builds or knockdown rebuilds. Also how many multi-unit townhouse developments were built? We might be surprised.

There are a couple of groups who are struggling to find townhouses, terraces and low rise apartments in the Canberra suburbs. They have borrowed the catchy phrase the 'Missing Middle'. The problem is that these housing typologies aren't missing, and in fact, dominate the landscape in a number of suburbs. To name a few that have over 50% apartments and townhouses, Kingston (Flats, Units and Townhouses 96.9%, houses 3%), Bruce (Flats, Units and Townhouses 79.2%, Houses 20.7%), Turner (Flats, Units and Townhouses 87.2% Houses 12.6%), Wright (Flats, Units and Townhouses 60.3% Houses 39.4%) and Denman Prospect (Flats, Units and Townhouses 51.3% Houses 48.6%). Most suburbs seem to have at least 30% apartments and townhouses, even Garran, Deakin and Yarralumla.

When it comes to apartments and townhouses you're spoilt for choice whether the suburbs old or new.

Townhouses, terraces and low-level apartments have all the characteristics of a unit. Is this greater choice?

A key promise of the proposed Missing Middle Reform is to offer Canberra home buyers greater choice. Choice of housing type and in a location where you want to live. This is a great marketing line but falls short of reality. Choice in housing, choice of location and dwelling size has always been determined by the price you can afford to pay. The reality is that many Canberrans struggle to find affordable housing anywhere in Canberra.

The Government has been explicit in its aim to restrict the construction of detached housing and replace it with the 'missing middle' townhouses, terrace houses and low-rise apartments This will be achieved by upzoning and changes to building codes in the RZ1 and RZ2 zones in existing suburbs.

The Government's Missing Middle website [https://yoursayconversations.act.gov.au/missing-middle-housing-reforms] provides examples existing townhouses, low level apartments and row houses from across Canberra that 'are done right' to show what's possible. Although little information is provided beyond façade photos and a real estate blurb. It's worth having a look at these examples of a townhouse or apartments.

For those who have taken the tour on the interactive map the first reaction of many is "I've seen these before, there everywhere". Not sure that the 'missing middle' is hard to find. There are home buyers who prefer this type of housing, but there are many for which this housing is not suitable.

It's worth having a closer look at the examples in more detail. A number of the examples are currently for sale so there is additional information beyond the façade photos on the website. These can be found on the real estate search website of your choice. Attachment A provides expanded information on a couple of these best examples of missing middle housing typologies.

Quick observation is that there are plenty of townhouses available across Canberra, that they are unit-like in their configuration and expensive. When you compare the dwelling footprint, floorplans and pricing it's hard to see how they offer more choice to the homebuyer than units in a high density apartment block. Typically they come with underground car parking. Two or three beds. Two bathrooms. Kitchen, living and dining spaces are open planned. There is some variation regarding how many levels the floor plans are spread over. Similar to any high density unit development location and price determine the amount of internal space and the optional finishes. You can pay more for extra carparks, storage and private space. With increased density space costs more. With increased density there is a premium on space and there is also a need to compromise on outcomes such as light, ventilation, storage, parking, noise and privacy.

Considering the compromises and much less space, it is also surprising how close the prices are for a 3 bedroom detached house, a 3 bedroom unit or a 3 bedroom 'missing middle' typology in the same location. A detached dwelling might have 6 to 8 times the space compared with the unit sized dwelling. This extra space provides additional options for living and for a lot of people this is important.

Operating costs are also very similar. The detached house has rates determined by land size and location. Units also have rates determined by footprint and location but also come with strata fees and special levies. The combination of these costs are often higher for units/townhouses than the rates for detached houses in the same location.

<u>Attachment A1 Berrigan St O'Connor</u>

Berrigan St O'Connor (attachment A1) provides not only examples of 'missing middle' developments 'done right' but also an example of the changes that will come to RZ1 and RZ2 following the upzoning of those areas. Berrigan Street was RZ1 until the rezoning changes that came with the planning changes to establish the Northbourne Gateway Transport Corridor.

The townhouse floorplans are similar in dimensions to units. The before and after photos show the loss of greenspace in. Greater surface area coverage suggests increased heat effect. How is greenspace and canopy protected and enhanced. Increased density of 4 houses to 19 dwellings. Amenity compromised – some dwellings are better than others and priced accordingly. A lot of stairs across levels. No assessment of the impacts of this increased density such as less light, ventilation, storage, parking, greenery and privacy (relative to replaced detached dwellings). These impacts are approved within the existing building specifications. Berrigan St provides a good example of planning done block by block where the cumulative impact of similar developments side by side are not assessed. Berrigan St is an interesting example because it's a street where 'missing middle' infill redevelopment for the whole street after rezoning and provides an indication of what is likely in the RZ1 and RZ2 zones as a result of the Missing Middle Housing Reform. It also provides an example of the impact on streetscape.

Berrigan St provides an opportunity for Urban Planners to study the real world impacts of increasing density in a suburb that followed Garden City Design principals. What have been the costs and benefits of this change? What has been the impact beyond the façade and the cumulative impact on the whole street, neighbours and the streetscape? Is the street more liveable, more affordable? From a climate perspective is the street more sustainable and climate resilient? Has the design made a positive contribution to climate change or is it a heat sink? Is the community stronger as a result of the redevelopment? Does this cumulative development deliver the best practice outcomes sought in the Missing Middle Design Guide? These are outcomes that could and should be assessed. This assessment should be undertaken prior to the rezoning of Canberra's residential areas.

Recommendation 2: There are many real world opportunities to undertake a social and economic impact study of rezoning at the street and suburb level. These studies should be undertaken at a number of sites prior to the rezoning of Canberra's residential areas.to understand and mitigate the impacts of such change.

Recommendation 3: The Government should publish online comprehensive information on the ACT's residential housing market including measures such as total housing stock, dwelling types, land release and pricing, construction approvals, commencements and completions for different dwelling types and there suburban location. Residential sales data.

<u>Attachment A2 Franklin St, Forrest</u>

The townhouse shows what is coming to RZ1 and RZ2. These townhouses in Forrest provide 7 two storey townhouses on a consolidated block of 2,689 m2. The footprint of 260 sqm with above ground double carpark and pool. The internal floorplan is typical of a unit. The location and the finishes are reflected in the price ($2,725,000). This would be beyond the budget of the majority of Canberrans. It is on the website to illustrate how townhouses can be blended into a leafy Forrest streetscape behind a large hedge. Is a hedge canopy? Interestingly, this development was allowed under existing RZ2 zoning. Posing the question why rezoning is required across Canberra.

Forrest has 63% townhouses, flats and units so there is plenty of missing middle choice but the location comes with a high price tag. Rates and strata fees at $11,000+ per annum are comparable with the rates for a detached large block in the same area.

Block by Block Development Approval is not Planning.

Despite all the marketing, the Missing Middle Housing Reforms mark the final shift from a Garden City Design to a Unit City Design. It's ironic that the Garden City Design was a reaction to the dingy adhoc urban design of European industrialised cities. A premium was put on greenspaces, where the outside is bought in and there is internal space and light for wellbeing. Unit City Urban design is taking us back in time with many small units are built - a form of modern cave dwelling. A single light source at the front. Is this transition what people want or what the affordable end of the market offering?

Canberra has gone from being one of the world's greatest planned cities to a city with no planning. Urban planning was a respected profession that combined science, demographic and social studies with spatial information to achieve an urban design that provided the best outcomes for the community. This human activity is data rich and provides enormous opportunity for analysis. Today the outcomes of urban design can be modelled and assessed in real-time. In the recent past there was a process of master planning. Looking forward to the impacts of changing demographics, climate, environment, technology and community needs. The information produced informed how urban design would change to incorporate these changes. The new suburbs in Molonglo show the use of research to incorporate more density, greater density, green spaces and community connection. Similar research and planning is required in existing suburbs considering the Molonglo sized population increases expected.

Unfortunately, the Government has decided it can't afford planning or planners and has progressively downsized the number of professionals. Assessments are now outsourced and are undertaken only if required. Density advocates have recently cobbled together statistics showing that the work of planners is a cause of lower housing supply. So they believe planning is a hindrance and unnecessary.

Without firm delivery plans, the Reforms are more an exercise in wishing and hoping than practical policy implementation.

A weakness of the Reforms is that the Government is going to deliver very few dwellings itself. The Reforms suggests that the Government intends to withdraw and have is little responsibility for urban planning, development assessment and delivery as possible. No cost-benefit or impacts analysis have been provided. There is no demand analysis, timelines, or predictions of how these proposed changes are going to roll out. There is no assessment of housing supply, pricing or affordability that will directly result from these changes. There are none of the planning methodologies used that assess the likely demands on community and physical infrastructure expected population increase. Any additional costs will presumably be picked by the community later. This rejection of social planning and assessment will inevitably lead to lower quality urban design outcomes.

There is no planning as to which blocks will be developed as part of the Reform. The only guidance provided by Government is the rezoning of over 90% of Canberra's existing residential land. Planning, or more accurately building assessment, will be done block by block. The market will determine which block will be developed. The responsibility for delivery of housing supply has been handed to the building industry. The Minister has even suggested exemption from building assessment if a builder uses the magic word 'missing middle'.

Recommendation 4: Ensure that 'missing middle' developments are independently assessed against the outcomes sought in the Missing Middle Design Guidelines.

Recommendation 5: Review the technical specifications proposed against the existing specifications and explain the likely impact of these changes on built form and neighbouring blocks, including if a theoretical maximised dwelling is built.

While showcasing the front of the best missing middle types, there are developments that are pretty ordinary and ignore the design suggestions in the missing middle design guidelines. While there were calls for photos sent in of the best missing middle dwellings there was no similar request showing the worst. The proposed planning reforms and the scale-back assessment processes will allow more poor quality builds to occur. Information was not provided on how poor quality builds would be dealt with.

Ignoring the impacts of construction beyond the block to the street level, section level and suburb level is unsustainable. The cumulative impacts of increasing density on blocks side by side are not assessed. The result is streets that don't work and where liveability is seriously compromised. The compromises of limited space that included outcomes such as less light, ventilation, storage, parking, greenery and privacy are made worse when buildings are placed close together and increased in height. The dark spaces between the buildings are cause for concern and the elimination of canopy trees. The relaxation of technical specifications and assessment processes invites a serious reduction in the design quality and resultant liveability in RZ1 and RZ2 residential zones.

The impacts of rezoning are shown in the residential areas surrounding the Northbourne Transport Corridor. This Corridor was master planned but there has been no subsequent studies to assess whether the outcomes sought were achieved or the impacts of the significant upzoning that occurred. This study is important to inform a similar process that will occur along the Adelaide Avenue Transport Corridor. It would be tragic to waste this intellectual capital.

The Demand for Missing Middle Dwellings?

The implementation of the Missing Middle Housing Reform package is fragile because the Government is leaving delivery to the housing market. This relies on home buyers wanting to buy a missing middle dwelling and the building industry constructing them. The home buyer has a choice of competing dwelling types and will choose what they want and what suits their needs.

Government does have the opportunity to manipulate the market by favouring one dwelling type over another. For a decade or more the ACT Government has preferenced the development of high density apartments over detached houses. The supply of detached housing blocks has been significantly restricted compared to with other jurisdictions. This has produced an oversupply of units and an undersupply of detached houses. This has had a price impact on these dwelling types. The result is that ACT detached houses are amongst the most expensive in Australia. This has an impact on the housing choice in the ACT as detached houses have become relatively unaffordable.

The proposed changes to zoning in RZ1 and RZ2 is likely to further increase the value of existing land this will favour greater density and redevelopment. It will also increase costs for existing residents. The Government is continuing to use land pricing to preference multi-unit developments.

The Government has not undertaken the demand studies that would provide evidence of the type of housing people actually prefer. The information is readily available but the type of housing people want might not be the type the Government wants built. ACT builders have long complained that Government has restricted the supply of land for houses that homebuyers want and this impacts the viability of their business.

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.

The ACT has had a policy for a number of years to produce a high ratio of multi-unit dwellings compared to standalone houses. This supported by the ABS building completion figures and the Urban Development Institute of Australia annual reporting. This is why the Missing Middle is so easily found.

Compared to other jurisdictions the ACT is getting further away from the ability to produce affordable housing. The ACT has the second highest greenfield land costs and the lowest number of greenfield land sales of any jurisdiction. Given the statistical evidence it's hard to understand why there is a need to rezone the whole of Canberra to produce more unaffordable housing.

Reputable commentators on the Australian real estate market report that there is an oversupply in the ACT multi-unit market. Given these market conditions the building industry might be reluctant to invest more in 'missing middle' multi-unit developments.

A weakness in the Government's ability to deliver the supply of housing is that they are relying on the construction industry to deliver the program and the industry responds to buyer demand. The One indication of demand for 'missing middle' type housing is seen in the number of multi-unit developments that have received development approval but have been stalled for a number of years due to lack of sales and viability.

The Government needs to put a lot more resources into understanding the supply and demand side of the housing industry in the ACT before making ineffective and ad hoc changes to the planning and development rules. Lessons of the effort required can be learnt from other jurisdictions that have a vibrant construction industry building a wide choice of affordable housing.

A few statistics because data's important

The ACT has the highest proportion of multi-unit builds to detached housing of any jurisdiction in Australia. New unit completions for 2024 in the ACT were 3031 which was almost equal to the combined new unit completions in Adelaide (1380) and Perth (2066). The ACT result was 20% below the previous year's completions and considering the population differences between the ACT and the other capitals shows how skewed dwelling construction is toward units in the ACT.

It also consistently has the second highest land costs of any jurisdiction (after Sydney). In 2024 land cost in the ACT was $1347sqm compared with Perth $877sqm and Adelaide $751sqm.

Greenfield block releases provide an indication of the detached building supply. In 2024 the ACT recorded a second consecutive year of extremely low level of greenfield block sales with just 272 contracted sales. This reflected a 10% reduction on 2023 volumes and was 75% below the decade average. In contrast Perth released 11,260 blocks and Adelaide 2,970 blocks.

These construction trends have been consistent for ten years. [UDIA State of The Land National Residential Greenfield and Apartment Market Study2025]

These statistics provide an insight and potential solutions for the ACT's lack of housing supply, affordability, choice of dwelling, and relatively expensive real estate.

Building Missing Middle Housing

If the important goals of the Missing Middle Housing Reform is to address the housing crisis by increasing the supply of affordable housing the outsourcing delivery to the housing industry creates a problem. There is a the lack of goal alignment among the people that make up the housing industry. It is clear that the players don't have the same goals or motivations. The owner/occupier simply wants a home that provides for their needs and future. It has to be affordable and not expose them to excessive financial risk. The investor wants a property that provides a competitive return and the potential through rising prices for a significant capital gain. Builders want a business model that provides them with a comfortable profit and increasing house prices lowers their construction risk. The Government has a social obligation to citizens to provide a sufficient supply of quality and affordable housing. Housing is also a significant revenue source for Government and increasing house and land prices provides greater revenue.

Governments' attempts to increase the supply of affordable housing is therefore not compatible with the goals and motivations of the key players in the housing industry. The Governments' latest housing industry proposals to upzone of 90% of Canberra's residential area and relax building controls, while restricting land supply, will support the goals of property industry and investors rather than owner occupiers. Government policies mostly focus on the demand side of housing that puts upward pressure on house prices.

Economic conditions have a much greater impact on the supply of housing than planning and building controls. Unfortunately the data shows that ACT new housing approvals are at their lowest in decades. Building statistics are showing that the construction market is currently contracting and 10% of building contractors are failing. The construction industry has fallen in a hole. This is another problem for the Government relying on the market to deliver housing supply to meet demand.

Builders Have Their Niche

The building industry is made up of different kinds of builders. Builders that specialise in knockdown rebuilds, new housing in greenfields sites, renovations, large unit developments and everything in-between. There is a group of builders whose business model focuses on building townhouse, terraces and low-level apartment buildings. The Missing Middle (MM) housing policy aims to empower those builders.

Like other builders, the MM builders have to make a commercial decision. How and where to build a row of townhouses. It starts with securing a block of land. Experience has shown them that to get the economies of scale to build several townhouses they need a block of a suitable size. This three or more house blocks in an established suburb. The end price of the townhouse or block of apartments is determined by the initial cost of the land, the construction cost, sales costs and the

need to make a commercial return for their product. The builder can make marginal tweaks to the price through choice of location, size of dwelling, quality of materials and inclusions. This can be risky because in the end it's the consumer in the market that determines the price they are prepared to pay.

Individual builders chose their building niche because they believe it produces they return they are looking to achieve. Builders in the townhouse and low rise apartment niche are typically small scale undertaking one or two projects a year.

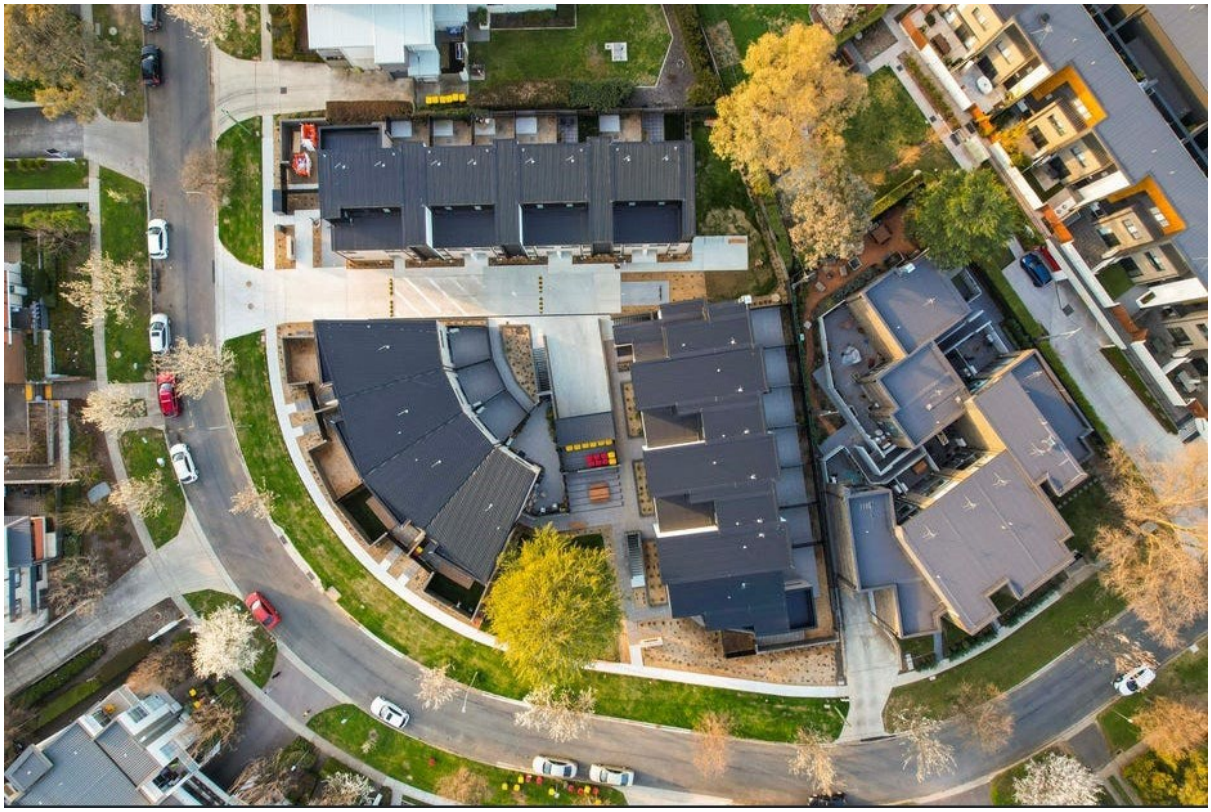
An unintended consequence of the proposed changes might be a significant increase in knockdown rebuilds in existing areas as the constraints on what is possible to build on a given block is relaxed. If implemented the Government will need to undertake ongoing assessment to ensure the proposed changes deliver the outcomes sought. Considering the concerns raised by the community regarding the impacts of the changes it would be appropriate to establish a quarterly reporting tool that provides performance information on the success of the Missing Middle Housing Reform.

Recommendation 6: The Government provide quarterly online performance reporting to gauge to impacts of the Missing Middle Housing Reform

Berrigan St O'Connor

Original Streetscape

Block Consolidation and lift in density. Four houses to 19 Townhouses. Loss of greenspace
Site Sold in 2019 for $3,900,000. Sale value of 19 townhouses approximately $18 million.



Housing Map – an interactive Housing Map shows some of the well-designed Missing Middle housing types that already exist across the ACT
https://yoursayconversations.act.gov.au/missing-middle-housing-reforms EPSD Missing Middle

Terrace/Townhouse Inner North and City

The 'Juno' multi-occupancy development is well-positioned between both the Lyneham and O'Connor shops. The 2,993 m² site, once home to four individual residences, now presents a collection of 19 two-storey units. Offering a selection of 2, 3 and 4-bedroom configurations. Juno is centrally positioned with generous plantings and retention of heritage trees, which integrates the development in nature. It is close to the Macarthur Light Rail stop and the Sullivans Creek travel path, with both Turner and Lynham schools in walking distance.

Architect/Designer DNA Architects **Location** 8-14 Berrigan Crescent, O'Connor

Development details

Zone: RZ4: Medium Density Residential **Number of homes:** 19

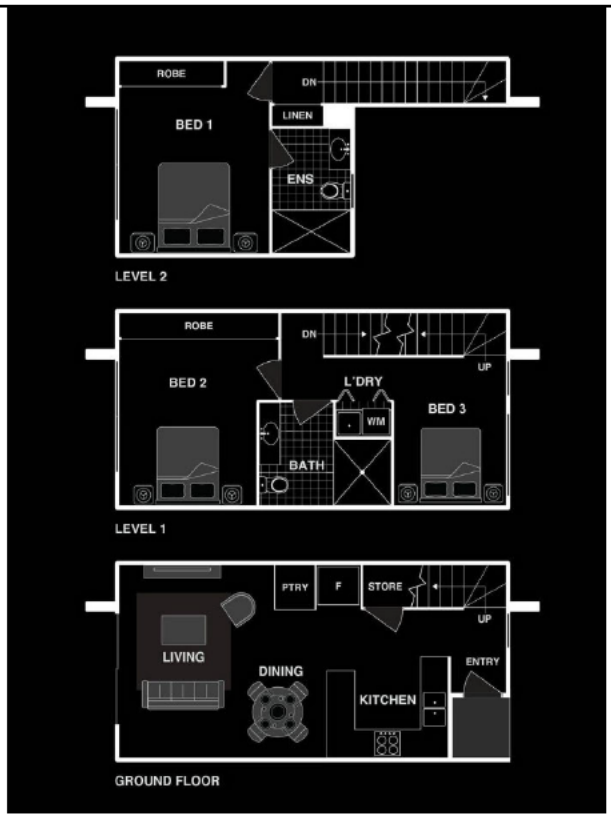
Number of storeys: 2 plus basement **Car parking spaces:** 37 Year completed: 2023

Juno Townhouses Current Information [see Allhomes August 2025]

Note aspect and window openings for available light.

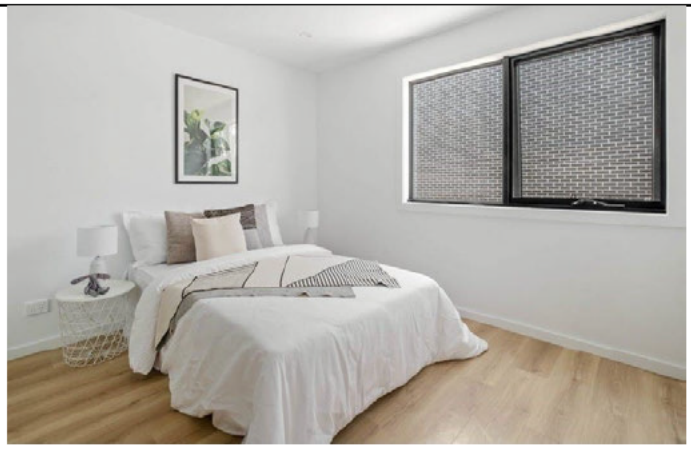
Juno 2 bedroom floorplan [6/8 Berrigan St]

2 bed 2 bath 1 car underground
Internal space: 103m2 Courtyard: 28m2 4.7m wide
Over four levels including carpark
Price: $845,000+
Rates and Body Corporate: $4,450 pa



Juno 3 bedroom floorplan [2/8 Berrigan St]

3 bed 2 bath 2 car underground
Floor size: 131m2
Over four levels including carpark
Price: $910,000+



Room with a view

Medium Density Kingston Terrace/Townhouse

Location: 70 Franklin St, Forrest

These townhouses in Forrest provide 7 double-height homes on a block size of 2,689 m2. These are noted for their appropriate size and scale in the existing street, while still including a double-car garage and pool for each home. The landscaping softens the building edge and integrates the building with the leafy surrounds of Forrest. They are closely located to the Manuka shops, Forrest Primary School, and Manuka Pool and Oval.

Development details

Block and section: Block 22 Section 20 **Zone**: RZ2: Suburban Core
Number of homes: 7 **Number of storeys:** 2
Car parking spaces: 14 **Year completed:** 2016

Location: 6/70 Franklin St, Forrest, ACT 2603

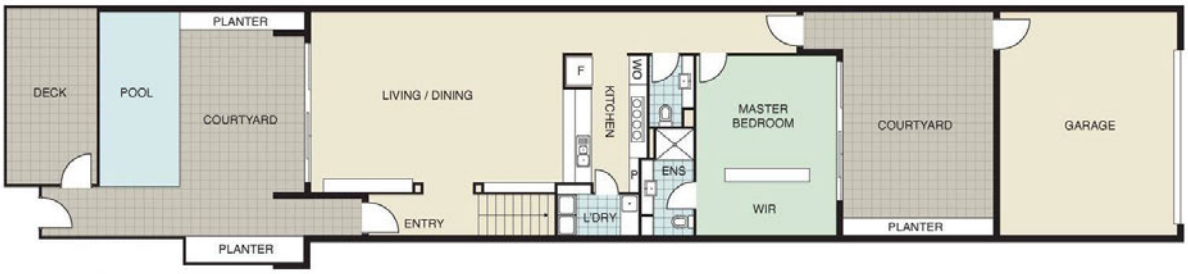
Townhouse 3 bed 2 bath 2 Car

Sold on April 2024 **$2,725,000**

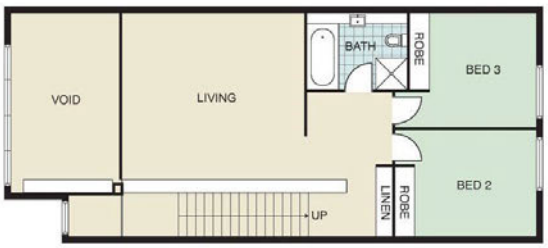
Block Size: 260 m2

Financials (approx): Body Corporate: $6660 pa Rates: 5000 pa

Rent Estimate: $1360 per week Land Tax: (if rented)



GROUND LEVEL



FLOOR PLAN
NOT TO SCALE

6/70 FRANKLIN STREET FORREST

UPPER LEVEL

BLACKSHAW

ACT Missing Middle Housing Reforms

11 August 2025

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[redacted]
[redacted]
Housing Industry Association
4/9 Sydney Avenue, Barton ACT 2600
Phone: [redacted]
Email: [redacted]

About the Housing the Industry Association

The Housing Industry Association (HIA) is Australia's only national industry association exclusively representing the interests of the residential building industry - including new home builders, renovators, trade contractors, land developers, related building professionals, and suppliers and manufacturers of building products.

The residential building industry includes land development, detached home construction, home renovations, low/medium-density housing, high-rise apartment buildings and building product manufacturing. HIA members construct over 85 per cent of the nation's new building stock. HIA exists to service the businesses it represents, lobby for the best possible business environment for the building industry and to encourage a responsible and quality driven, affordable residential building development industry. HIA's mission is to:

> *"promote policies and provide services which enhance our members' business practices, products and profitability, consistent with the highest standards of professional and commercial conduct."*

The residential building industry is one of Australia's most dynamic, innovative and efficient service industries and is a key driver of the Australian economy. The residential building industry has a wide reach into manufacturing, supply, and retail sectors. The aggregate residential industry contribution to the Australian economy is over $150 billion per annum, with over one million employees in building and construction, tens of thousands of small businesses, and over 200,000 sub-contractors reliant on the industry for their livelihood.

HIA develops and advocates policy on behalf of members to further advance new home building and renovating, enabling members to provide affordable and appropriate housing to the growing Australian population. Policy development is supported by an ongoing process of collecting and analysing data, forecasting, and providing insights for members, the general public and on a contract basis.

Introduction

HIA welcomes the opportunity to provide feedback on the Missing Middle Housing Reforms. The proposed changes will be important to support the densification of Canberra.

While the consultation focusses on the planning reforms – which the industry, through HIA enthusiastically support – it must be noted that the consistent feedback from industry is also that without meaningful concurrent reform to other housing constraints, that the potential benefits from these proposed changes will be lost.

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.

Overview of key changes

RZ1 – Residential Zone		
Policy	**Detail**	**Comments**
Minimum block area for 2 dwellings	Remove 800m2 limit for additional dwellings.	Supported.
Maximum dwellings	Remove 2 dwelling limit.	Supported. Removal of dwelling limit is welcome to support the missing middle objectives – however, while supported, the focus of densification should always prioritize areas closer to the suburban core and infrastructure such as transport.
Apartments	Allow apartments to a maximum of two storeys in RZ1.	Supported. Provides additional typology without visible impact on streetscape and suburb character.
Secondary dwellings	Removal of block size limit.	Supported. Site coverage to control scale of dwellings on a block.
Car parking space	Reduction in mandatory parking spaces.	Supported.
Planting area and tree canopy coverage	Reduction in planting area of 5% to be offset by increase in canopy coverage by 5%.	HIA remains concerned at the ambition of tree canopy coverage on residential blocks. With the ongoing pressure on block size and increase in multi-unit development, an increase in canopy becomes even more problematic. HIA urges the ACT Government and Suburban Land Agency to prioritize the design of new suburbs to support public plantings on verges and other public spaces as a means to meet overall targets, rather than setting targets at an individual development level.
Other changes for MUH	Various including POS, PPOS, building envelope, setbacks and solar envelope.	Supported.
Subdivision	Allow subdivision and remove 120sqm site coverage limit. Reduce size limit to 600m2.	Supported. However, HIA questions the requirement that a dwelling is constructed on both blocks. All options to support more blocks (and therefore dwellings) coming to market should be supported. It is unclear as to how this would promote 'land banking' – the alternative being the block does not get created.
Consolidation	Consolidation permissible up to 2,000m2 (single block), 2,500m2 (adjoining open space) and 3,000m2 (end of section).	Supported, though important that limits have some leeway over the prescribed area through the approval process where it can be justified, to maximise the number of blocks that can be developed.

RZ2 – Suburban Core Zone		
Policy	**Detail**	**Comments**
Building height	Additional storey for apartment buildings.	Supported. Adds opportunity for additional dwellings and retains relativity between zones.
Minimum block area for two dwellings	Limit of 700m2 removed.	Supported.
Maximum dwellings	Removal of dwelling limit.	Supported.
Maximum height	Limit removed and replaced with storeys metric.	Supported.

With respect to Residential Zones RZ3 to RZ5, HIA supports the reclassification and moving from height limits to floor limits. This approach will be able to deliver better design outcomes, not just following a prescribed building envelope.

Given the limited differentiation in the higher density zones, in particular RZ4 and RZ5, HIA questions if there could be consideration of consolidation within the zones to promote efficiency and open potentially more development options.

Consistency with existing building regulations

In reviewing the documents, HIA has identified a number of issues where the specifications and guide venture into the realm of existing building requirements or are inconsistent.

So as to avoid confusion or inconsistency and also eliminate the need to update if other regulations change, it is recommended that all references legislated building requirements be removed. Following is a list of items that have been identified:

Residential Zone Specifications

- Section 17.6(a) Page 24 - Natural lighting is covered by the NCC. Whilst the minimum area required is consistent, the specification excludes borrowed natural light, which is inconsistent with the minimum NCC requirements. Suggest this could be removed to provide greater flexibility.
- 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.
- Section 17.7(b) Page 24 – Minimum ceiling heights should be removed as this is regulated by the National Construction Code (NCC). It is also inconsistent with the requirements of the NCC. The increased ceiling height requirements raise the building height which in turn limits the ability to blend the development into the built form within existing areas.
- Section 25.1 Page 31 – Electric Vehicle (EV) readiness in carparking is already covered by the NCC. Suggest removing to reduce duplication and potential for inconsistency.

Draft ACT Missing Middle Design Guide

- Section 6.3C Page 92 – Livable Housing is covered by the NCC. Suggest removing to reduce duplication and potential for inconsistency.
- Section 7.2D Page 106 – The Guide incorrectly states that the NCC requires a maximum air permeability of 10 m3/hr.m2 (@50Pa). Whilst the NCC requires a level of building sealing, this metric is specific to the Verification Method only where is it used to verify compliance with the performance requirements. The most common method of meeting the NCC would be through compliance with the Deemed to Satisfy Provisions, so this metric is not directly relevant.
- Section 7.2D Page 106 – Building Sealing is covered by the NCC. Suggest removing to reduce duplication and potential for inconsistency.

- Section 7.2E Page 107 – This section is referring to a range of proprietary products 'Weathertex', 'Paperock' etc. It is considered that such guidance should be generic in terms of the products referenced.

Site Coverage

While not highlighted as a specific area of review, HIA continues to have concerns about the site coverage requirements and again takes this opportunity to propose that as part of the draft Major Territory Plan amendment that the current specifications are modified.

As the site coverage control currently stands, the sliding scale goes from 60% for mid-sized blocks to 40% for large blocks. HIA considers this to be too much of a step, creating a perverse outcome where many blocks just above 500m2 will have a significantly lower coverage (on a square metre basis) than smaller blocks just below 500m2. This does not 'catch-up' until a block is 750 square metres. We have concerns about unintended consequences in the design of blocks, skewing towards either large or small, with less diversity in between. HIA continues to hold the view that a 'step-down' of 50% could improve this situation without causing a significant change to the policy outcome.

With such stringent requirements on open space and limits on the size of homes, it can be expected that a far greater portion of dwellings will be multi-level to compensate. A corollary of this is that there will be an increase in the cost of building per square metre for these homes, along with a reduction in the capacity to build homes that are accessible. There is also the potential for a detrimental outcome from a streetscape perspective, with the resulting increased bulk of dwellings.

Canberran's who need or choose a larger home will be forced to compete for larger blocks, inevitably putting upward price pressure on what is already some of the most expensive land in the nation. If the demand for larger blocks is to be met then greenfield suburbs will need to be larger, the yield decreased or newer areas developed – either scenario leads to less housing sites, or a greater environmental footprint. Due to the high costs of land in the ACT, there is already a division being created between those that can afford a detached home, versus those being compelled to live in multi-residential housing, whether this is their first preference or not.

Other Constraints

Lease Variation Charge

Taxation cannot be avoided, as it funds the shared services that benefit the whole community, such as education, healthcare and transport infrastructure. However, it is a basic truth that investment will move to where taxation is limited or of least impact. Put simply, the more something is taxed, the less it will be produced.

Modelling commissioned by HIA by the Centre for International Economics (CIE) in 2025, demonstrated that when regulatory costs, along with direct, indirect and hidden taxes are included, the total tax on a new house and land package in the ACT can be as much as 47% of its purchase price.

In the ACT, a unique and particularly egregious tax on new dwellings is the Lease Variation Charge (LVC). The LVC is a 'betterment tax' that is levied on any presumed increases in the value of land arising from a change in development rights.

Members regularly cite the LVC as being detrimental to the feasibility of housing projects and contributing to the current housing affordability and rental crisis in Canberra. LVC is relatively modest contributor to overall property taxes, at under 2%, yet on a project level it can be quite significant. HIA proposes that the LVC be paused for all applicable projects in RZ1 and RZ2.

Third Party Appeal Rights

Despite the ACT Government maintaining an urban development policy to promote 70% of new dwellings being built within the city's existing urban footprint, an ongoing problem has been the lack of acceptance by many within the community of development in their neighbourhood.

The problem of third party appeals was recently highlighted when the ACT Planning Minister sought to exclude public housing projects from appeal. Like many other jurisdictions, the ACT is in a housing crisis. HIA sees no reason why measures such as these to support critical government projects should not be supported.

However, the Territory's undersupply of dwellings equally applies to the private housing market as it does for public housing through government projects. With outcomes of third party appeals to ACAT overwhelmingly supporting the original decisions of the Planning Authority, it makes sense that all projects are afforded this same protection.

The risk of third party appeals to ACAT is potentially heightened under an outcomes-based planning system, with a decision being perhaps less transparent in a neighbour's eye, compared to a rules-based process. Should the third-party appeal process remain, it is essential that alternatives to the current system are investigated, such as introducing a higher threshold for appeals to progress or to provision to award costs if an appeal is not successful.

Approval Delays

Despite the record low number of approvals for both detached and multi-unit housing in the ACT, members report that the ratio of time and cost for approvals versus speed of project delivery and total cost continues to grow. It would appear that these delays are not necessarily in the statutory approval process, but relate to entity referrals.

This requires urgent intervention from government, as there is a risk that should the improving interest rate environment and the Missing Middle reforms start to increase housing construction, then there is concern that the current delays will worsen further.

Urban Forest Act

HIA notes that a review of the Urban Forest Act is currently underway, and supports this process. If Canberra is to achieve its aim of delivering an adequate supply of affordable and appropriate housing

primarily within the city's existing footprint, then there must be an acceptance within government of a more efficient and streamlined process for managing the removal of trees to facilitate development.

With the ACT Governments goal to increase density and provide a range of housing typologies to the community, the increase in Missing Middle style dwellings will put even more pressure on to address this issue.

Submission on the Missing Middle Housing Design Guidelines

From: [redacted]

Date: 18 July 2025

This submission draws on my background in urban geography and research and policy experience in housing for older people and aged care. A brief CV is attached and reference material can be provided on request.

Focus of submission

The Missing Middle Housing Design Guide focuses on design at the scale of buildings while the May 2025 Major Amendment to the Territory Plan 04 applies at city-wide scale. The two parts of this submission take up two intermediate elements that bridge these scales and each part concludes with a proposal for addressing the issues raised:

1. Design at the middle scale of the suburb, to bridge the Missing Middle Guide and the Urban Design Guide, particularly in relation to the District Strategies.
2. Design responses to Canberra's ageing population. Housing needs and preferences of older residents indicate significant latent demand for medium density housing.

Part 1: Design at the middle scale of the suburb

Two questions arise at the suburb scale if the goals of both the Missing Middle Housing Design Guide and the Urban Design Guide are to be achieved:

1. What level of medium density housing is seen as a desirable and achievable norm across Canberra?
2. Where should medium density development be encouraged to increase housing diversity and choice?

The principles of place-based design need to be expanded to designate priority localities for new medium density housing rather than leaving it open to spasmodic development across the whole of Canberra. Concentrating development in priority localities is more likely to come about through more manageable and consistent planning processes. It will also result in better outcomes in terms of suburban regeneration and increased choice in suburbs currently lacking housing variety, especially for older residents who are likely movers to medium density housing.

1.1 Current uneven spread of medium density housing

At the 2021 Census, single dwellings made up just on two thirds of Canberra's housing and one third was medium density dwellings, divided fairly evenly between townhouses and apartments. Medium density housing is currently very unevenly spread across the city, and new development is unlikely to occur evenly nor necessarily achieve greater housing diversity where it is needed.

To illustrate these variations, Table 1 presents sets of adjacent suburbs in Canberra's planning districts in order of the proportion of dwellings that are single houses. The balance between townhouses and apartments is also detailed to show the variation in the composition of medium density housing.

These figures show that the uneven spread is not simply a gradient from older inner suburbs to newer outer suburbs. Instead, adjacent suburbs often have contrasting levels of medium density housing related to past RZ 1 and RZ 2 zoning. In a few suburbs, medium density housing accounts for over 70% of dwellings; in others, it accounts for less than 25% of dwellings As the area of suburbs is

generally large, this past zoning has precluded local housing choice within many suburbs, making them focal areas for increasing medium density housing.

Table 1: Dwelling type and proportion of population aged 65 and over in selected Canberra Suburbs, 2021

Planning District	Suburbs	% of dwellings				% population aged 65 and over, 2021 Census
		Single houses	Town-houses	Apart-ments	Medium density total *	
Inner North (East)	Hackett	76	14	9	23	15.7
	Downer	67	16	17	33	12.6
	Watson	58	30	12	42	14.5
Inner North (Central)	Kaleen	91	6	3	9	20.0
	Lyneham	27	36	37	73	16.7
Inner South	Deakin	68	18	14	32	24.4
	Narrabundah	68	13	19	32	18.4
	Forrest	36	17	46	63	22.7
	Kingston	3	6	90	96	11.8
Woden	Chifley	68	26	6	32	16.3
	Lyons	52	20	28	48	16.7
Weston Creek	Duffy	87	8	4	12	16.6
	Fisher	83	6	11	17	19.1
Belconnen	Page	70	26	4	30	26.2
	Macquarie	61	14	24	38	17.9
Gungahlin	Amaroo	78	13	8	21	8.1
	Franklin	50	13	37	50	4
Molonglo	Denman Prospect	48	26	26	52	2.6
	Wright	39	10	50	60	4.5
	Coombs	37	35	28	63	3.2
Tugger-anong	Oxley	93	8	0	8	15.5
	Monash	86	12	1	13	23.7
	Greenway	3	34	63	97	18.6
ACT Urban Area		63	17	19	36	13.8

* Totals do not include small percentages of 'other' housing and so may not sum to 100%

1.2 Uneven spread of older population.

The proportion of the population in Canberra's suburbs that is aged 65 and over varies widely, reflecting the growth of the city and ageing-in-place of the population that settled in different suburbs at different times. When the band of now middle distance suburbs extending from Hackett and Watson in the north around to Narrabundah in the south were built in the 1970s, only 7% of Canberra's urban area population was aged 65 and over. The figure is now just on 14%, ranging from under 10% in newer suburbs to around 16% in this band of older suburbs and reaches 20% in some suburbs.

It should be noted that:

- Retirement villages boost the older population in a few suburbs, mostly with already higher shares of older population, and only marginally. At the same time, not all areas with high older populations have any retirement village provision.
- Residential aged care (RAC) accommodation has little effect as it caters mainly for those aged 80 and over who account for only some 3% of the population. Until recently, needs based planning ensured an even distribution in relation to the population aged 70 and over, but even so, only a minority of this age group live in RAC and it is not considered further.

1.3 Housing adjustment related to ageing.

Housing adjustment related to ageing makes older people active participants in the development of medium density housing, not merely passive recipients of choices offered to them. Most older Canberrans will adjust their housing through the general housing market rather than moving to age-specific accommodation such as retirement villages or public or community housing for seniors. Studies by the Australian Housing and Urban Research Institute report that some 25% of those aged 55 and over have adjusted their housing after reaching age 55 and another 25% wanted to do so but had not been able to find housing that suited them, where they want to live. As much as a smaller house, older owners and renters alike were looking to downsize to smaller blocks that are easier and less costly to maintain.

More medium density housing as a means of increasing housing choice is thus especially important in suburbs with higher proportions of older resident alongside high proportions of single dwellings. There is likely to be considerable latent demand for medium density housing but currently little choice for ageing-in-place in the same suburb. Increasing medium density housing in these suburbs can have positive complementary effects: diverting even further development from suburbs with already high levels of medium and high density housing can relieve pressures of over-development, housing mix and historic character can be retained and lengthy challenges to development approvals may be avoided.

The mismatch between medium density housing and opportunities for ageing-in-places is evident in many middle distance Canberra suburbs. Figures in Table 1 show that there is no consistent relationship between the proportions of medium density dwellings and population aged 65 and over. Rather, four different relationships are apparent and can be characterised as follow:

1. **Mismatch suburbs**. High proportions of single dwellings and high proportions of population aged 65 indicate a mismatch between large dwellings and low occupancy per dwelling by older residents but little opportunity for downsizing in the neighbourhood. e.g. Kaleen, Duffy.
2. **Ageing-in-place suburbs**. Low proportions of single dwellings and high proportions aged 65 and over indicate suburbs offering opportunities for established older residents to move into local medium density housing. e.g. Narrabundah, Lyons.
3. **Higher density younger suburbs**. This category includes two types of suburbs with low proportions of single dwellings and low proportions aged 65 and over, so little demand for ageing-in-place on the part of local residents:
   - Inner areas where redevelopment has brought medium and high density housing designed for younger residents, especially singles and couples. e.g. Kingston, Lyneham.
   - New suburbs with some mix of housing types, appealing to younger families, but again with few existing older residents looking to age-in-place. e.g. Coombs, Franklin.
4. **Family suburbs.** Low proportions of medium density housing and low proportions aged 65 and over. These are established family suburbs with little diversity in dwellings and population, although ageing will see occupancy change in coming decades and more demand for medium density dwellings both for ageing-in-place and young adult households. e.g. Oxley, Amaroo.

1.4 Regeneration instead of densification.

The two way process of older people moving to more suitable medium density dwellings and vacating larger houses that are more suited to younger families is better termed ‘regeneration’ than densification or infill. The effects extend well beyond built forms and physical change to encompass positive dimensions of social change. As well as bringing a mix of generations, regeneration gives each suburb opportunities to reassert its identity, drawing on its past and envisaging its future. It is this distinctive local character that contributes to liveability, not changes in density. Enhanced walkability means little without places we want to walk to. Regeneration will bring benefits to local shopping centres in suburbs with stable or declining older populations. Built when families typically had only one car,

these local centres are now increasingly bypassed for larger district centres. Maintaining and enhancing local identity is not only relevant to older residents who want to age-in-place but also to attracting younger people to these areas. Increases in local populations close to these centres will boost their viability and reduce reliance on cars.

Incentives should be considered to promote regeneration in selected localities. They might include fast tracking approval processes and modifying Lease Variation Charges. While former RZ1 leases will be varied for medium density development, the removal of the distinction between RZ1 and RZ2 under the 2025 Major Amendment to the Territory Plan prompts the question as to whether 'variations' still arise? Lease Variation Charges need to be reconsidered as the LVC currently poses a major disincentive to redevelopment at medium density and also adds considerably to the cost of completed dwellings.

1.5 Problems of block consolidation.

While older residents living in large houses on large blocks may want to subdivide their block, possibly in conjunction with consolidation of neighbouring blocks, there are many barriers to their doing so. Such developments yielding lots of two to six dwellings are however only going to make a small contribution to the total supply of medium density housing. Older residents are also less likely to have the capacity to undertake re-developments of this kind and may lack the required skills and up-front capital. They are sensibly risk averse to taking on such projects that involve what are lengthy timelines for those already in their sixties or older, with uncertain outcomes, and considerable on-site disruption if they wish to remain in their existing house.

These barriers and the lack of alternative preferred dwellings limit the capacity of older people to realise their housing assets. A further adverse consequence is that they cannot take advantage of the Commonwealth Downsizer Incentive. This scheme allows individuals to put up to $300,000 from the proceeds of the sale of a house into their superannuation if they move to a smaller dwelling, and up to $600,000 for couples.

Proposal 1: That priority localities be identified for medium density housing. Accepting that medium density housing should be more evenly spread to provide more diverse housing choices, a number of priority localities should be identified based on two criteria:

- a current low level of medium density housing, identifying a band of suburbs built from the 1970 to the 1990s;
- a proportion of population aged 65 and over above the Canberra average of just on 14% at the 2021 Census; and
- incentives be developed to promote medium development in priority localities and especially redevelopment of redundant land use sites.

Part 2: Design responses for an older Canberra

The Design Guidelines give insufficient recognition to the forms of medium density dwellings that offer preferred responses to population ageing in general and for older Canberrans wanting to downsize from houses on larger blocks in particular. This part of the submission is primarily concerned with responses in the general housing supply and only secondarily with specialist retirement housing. It is not concerned with residential aged care.

Ageing-in-place, a term coined by US urban geographer Stephen Golant some 50 years ago, refers to ageing in the same neighbourhood, not staying in the same house for ever. He also adopts the term 'right sizing' rather than simply downsizing.

2.1 Canberra's Age Friendly City Plan 2025-35

Canberra's joined the WHO Global Network of Age Friendly Cities in 2010, and the *Age Friendly City Plan 2020*-2024 is currently being extended to the decade 2025-35. The 2020-2024 Plan is not mentioned in the Design Guide and should be added to the Frameworks listed in the appendix Document References. The existing Age Friendly City Plan recognised older residents as a key group with interests in medium density housing. Actions to promote a City for All Ages called for:

Strategic planning (that) identifies opportunities for a range of housing options to meet the needs of older Canberrans, to support ageing in place and meet the diverse needs of the community.

- *Housing needs to conform to universal accessibility standards.*
- *Appropriate housing options that allow older Canberrans to age in place.*
- *Affordable housing for older Canberrans.*

2.2 Unsuitability of two-storey townhouses

Older Canberrans have expressed a preference for townhouses, but single storey townhouses are very scarce and while included in the Design Guidelines, they have a relatively low yield in increasing density. In contrast, two storey townhouses of two stories receive too much attention.

There is no recognition of the shortcomings of two-storey townhouses for many groups of residents. The main limitations are steep internal stairs and steps at the front entry or from a courtyard to the street; the latter are seen as a desirable feature, yet they are a total barrier to many. These features make the dwellings unsuitable for families with infants in a pram and young children at risk of falling down stairs as well as for older people and those of any age with a mobility disability. These dwellings are not likely to be the first choice of anyone who does not want to carry a vacuum cleaner, other cleaning gear, and washing up and down internal stairs. Stairs and landings in individual townhouses also take up internal space compared to lifts and stairs in apartment blocks. Two storey townhouses often fail to meet basic principles of universal design, especially ground floor provision of a room that can be used as a bedroom and a spacious bathroom.

Small individual courtyards in townhouse designs are also totally unsuitable for planting even medium size trees. As well as blocking light and solar access, problems arise with leaves blocking gutters and roots heaving up paving and getting into underground drains.

2.3 Lack of familiarity with Owners Corporations

Home owners who have always lived in separately titled dwellings are unfamiliar with Unit Plans and Owners Corporations. These forms of ownership and management can pose barriers to considering medium density housing, especially for older residents, and these barriers are exacerbated by 'horror stories' in the media.

The current inquiry into Owners Corporations provides an opportunity to address these issues. A particular outcome of the inquiry should be to commission the ACT Council on the Ageing to publish a guide for older residents that makes clear that Owners Corporations serve the owners and sets out what corporations can and cannot do. Roles and responsibilities of Building Certification and Owners Corporations need to be clearly differentiated in the case of dealing with building defects.

2.4 Models of diverse built forms catering for older people

The Design Guidelines need to recognise some further existing built forms for older residents that are not, but should be, available to the general population. This extension does not mean opening up age-specific housing such as retirement villages to all ages but applying the following four positive features more widely and resolving some present planning contradictions. Pattern books can promote good design on the basis of known successful models. Replication of good models can streamline approval processes while allowing for modifications to suit local sites and to give each development a distinctive identity. Medium density housing in identified priority localities provides opportunities for landmark buildings and building character that enhances the distinctiveness of each suburb. This outcome is consistent with replication of good design models modified to local sites.

While the Design Guidelines do mention a mix of apartment sizes, an increase from three to four or five stories can increase the number of dwellings by 20-35% and hence allow for greater mix of apartment sizes. Four to six storey higher buildings are grouped with three storey buildings as 'mid-rise' in NSW as part of the missing middle together with low-rise to two storey buildings; nationally consistent definitions would be useful. Such higher height limits especially complement the identification of priority localities. As well as recognising that stepped design can reduce apparent bulk of higher developments, such designs can make for desirable penthouses with larger terrace and so contribute to high quality dwellings. More examples of diverse and well-designed buildings of these types need to be included rather than the same single example but with no identified location (photo 21, 53); is it even in Canberra?

2.4.1 Retirement villages have some design features that can serve as models for more general development. Several villages recently constructed or currently under construction in Canberra have four or five stories and provide for around 100 units, and offer a choice of one, two and three bedroom apartments as well as single level villa units. Recent AHURI research confirms that retirement villages are a popular choice for many older people, but there is a lack of choice of comparable dwelling forms for seniors who want to live in broader local general communities rather than buy into a village. The anomaly that arises is why these built forms are available only to those aged 55 and over?

2.4.2 Residential developments should be kept to residential uses and not be required to include other facilities and services for non-residents. While retirement villages may include varying ranges of services, these are generally restricted to use by village residents and their guests. This approach should be adopted in all apartment buildings to maintain residential use only and avoid mixes with incompatible uses that create nuisances. Among the uses that impinge on residential quality are cafés and gyms that bring out-of-hours traffic and noise, especially loud, vibrating music from gyms, additional parking for non-residents, and larger scale rubbish collection. Instead, commercial uses should be located in local centres and revive the economic and social viability of those centres.

2.4.3 Granny flats are essentially the pioneers of secondary dwellings that are now permitted with block subdivision, but with two important exceptional conditions: they do not require subdivision, and they cannot be sold. This anomaly needs to be resolved in ways that allow for sale of granny flats that accord with secondary dwelling standards.

2.4.4 Dwellings for older renters and other age groups with special needs should be indistinguishable from the rest of the community rather than have different build forms. Notable examples of multi-storey apartment blocks providing social housing for residents at risk of homelessness are the Common Ground projects in Gungahlin and Dickson, and the recently approved Uniting MyHome Project in Curtin and Catholic Care's Toolangi project in Kaleen. A target should be set for provision of such projects across Canberra. The built form of these buildings provides models for more general medium density housing including public and community rental housing for seniors.

The much smaller scale YWCA project in Ainslie is another model. While having less capacity to meet special needs at scale, the experience of the Ainslie project should be drawn on in developing further projects and especially ruling out unwarranted objections. Objections to all medium density development, whether for the community in general or for special needs housing, should be limited to those living or operating a business within 1km of the site.

Proposal 2: Extend the scope of medium density housing to include mid-rise apartments.
In order to be more responsive to the needs of the ageing of Canberra's population, the Design Guidelines covering only townhouses and low-rise apartments as medium density housing forms (p.8) need to be

- *extended* to mid-rise apartments in blocks of four or five stories that have more potential for increasing density, and creating landmark building in priority localities; and
- *rebalanced* to give more attention to low and mid-rise apartments vis-à-vis terraces and townhouses. More examples of diverse and well-designed buildings of these types need to be given; these examples need to be in the ACT and their locations identified.

Attachment: **CURRICULUM VITAE** [redacted]

[redacted]

Submission on ACT Missing Middles Housing Design Guide

Missing Middle guide, section, pg	Comments
Key Factors in Developing Missing Middle, pg 3	This section appears to overlook existing issues that should also be acknowledged as critical factors 1. Planning and development assessment and building approval fees are major cost hurdle and disincentive for encouraging redevelopment of existing urban areas. 2. Demographics of encouraging downsizing for existing residents must ensure the solutions encourage existing residents to downsize into smaller accessible single level residences that encourage age in place within their existing neighbourhoods. 3. The state, condition and capacity of utilities to support additional demand of both densification and be resilient to climate extremes, such as heat waves appears missing from all existing planning strategies. 4. District strategies are poorly drafted, contain limited actual planning and do not support densification. A lot more effort is required to develop adequate district strategies, including additional planning and community engagement resources to appropriately support development and implementation of district strategies. 5. Urban heat island effect is already impacting recently developed, high density areas of Canberra, such as Molonglo and Gungahlin, where temperatures are already significantly hotter than older low density suburbs that have larger areas of green space and tree canopy. Provisions contained in this draft guide are commended, however, unless Urban Heat Island becomes a central factor in assessment and approval of future missing middle proposals, incrementally the missing middle initiative will contribute and exacerbate urban heat island and increase heat wave related mortality.
Why the need for design guides **Pg5** **Housing affordability**	Many planning documents and strategies make claims that a particular initiative will address housing affordability. This doesn't appear to be the case and actually undermines the credibility of the design guide.

	Can you indicate a price target that you are aiming for to benchmark missing middle against traditional housing supply to demonstrate missing middles housing affordability aspirations are achievable? How is affordability considered in the Territory Plan and planning/assessment rules?
What is Good Design / Missing Middle Design Principles Pg 6-7	While these principles are a good start, they are academic, aloof and fall short of addressing the existing residents expectations and needs. Key factors that must be addressed to allow densification of older suburbs 1. Demographics of encouraging downsizing for existing residents must ensure the solutions encourage existing residents to downsize into smaller accessible single level residences that encourage age in place within their existing neighbourhoods 2. Existing problems with Urban heat island effect that already impacting recently developed, high density areas of Canberra, such as Molonglo and Gungahlin will create resistance and friction for proposals in older greener and cooler suburbs,
How is this design guide structured – page 10	The design guide indicates thoughtful context analysis of neighbourhoods, streetscape and site – who undertakes this assessment, how is it baselined or benchmarked and who assesses whether the analysis is accurate or acceptable? How are existing local residents engaged in this assessment and support or object to an assessments findings.
Application of missing middle housing design guide – page 12	It is noted that the missing middle design guide does not consider the section, precinct or suburb scale. This diagram also creates ambiguity with other sections, such as design principles identified at page 7 and 11 that consider a neighbourhood context. Without consideration of cumulative impacts at these broader scale , the missing middle will not deliver acceptable planning outcomes, particularly given inadequacies of current district strategies.
Territory Plan Assessment outcomes – page 16 and 17	Relying on impervious surfaces and provision of canopy is unlikely to be a successful in mitigating Urban Heat island effect.

	Studies in Western Sydney (WSROC, Cooling Western Sydney A strategic study on the role of water in mitigating urban heat in Western Sydney) have found that building finishes and materials along with water features will have the greatest reduction in urban heat (29-43%).
Place based Design Thinking, Urban Character, Understanding your site – pages 20 -25	It is very unclear what these sections are trying to articulate or how this relates to urban densification and how these concepts will be assessed as part of approvals. Why is there no consideration of solar access, or ensuring urban design maintains existing neighbourhood skylines and vistas to surrounding ridges, mountains and valleys
Design Guidance. 3.1A siting - page 30	Current wording in the guide *Vii - Analyse and respond to the site orientation, solar access and prevailing wind conditions by allowing solar access to dwellings (particularly in living areas) and open spaces and considering mitigating cold winds and catching warm breezes (3.2E).* The current definition of solar access in the ACT is subjective and needs a clearer performative description - current practice by ACT planning 1) does not have to consider the impact of existing protected street trees on access to sunshine, 2), the planners only have to ensure that a tiny amount of sunlight hitting a window satisfies the current requirement to satisfy requirements of solar access provisions, 3) consideration of ensuring no overshadowing of solar panels, solar hot water or Passive House solar harvesting on the proposed residence or neighbouring existing residences is inadequately protected via solar fence provisions The NSW Planning and Environment Court also issued a planning principle for Solar Access that should be embraced as part of missing middle design. 1) solar access must ensure: • At least one habitable room (other than a bedroom) must have a window having an area not less than 15% of the floor area of the room, positioned within 30 degrees east and 20 degrees west of true north and allow for direct sunlight for at least two hours over a minimum of 50% of the glazed surface between 9.00am and 3.00pm on 21 June.

	Further, Moreland Council has developed assessment rules to ensure proposed development do not overshadow existing residences "Buildings should be: • "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 in a General Residential Zone, Neighbourhood Residential Zone or Township Zone are not unreasonably reduced. The existing rooftop solar energy system must exist at the date the application is lodged." Current ACT planning practice accepts a sliver of sunlight as long as it is direct sunlight or no sunlight at all *multi unit dwelling in an apartment, between the hours of 9am and 3pm on the winter solstice (21 June), is:* • *The floor or internal wall of a daytime living area of not fewer than 70% of apartments on a site is exposed to not less than 3 hours of direct sunlight* *No more than 15% of apartments on a site receive no direct sunlight.* *Daytime living area means a habitable room other than a bedroom.* *Note: Overshadowing from vegetation is not considered when assessing solar access.*
Design Element 3.2 Understanding your site	This section should include consideration of existing and predicted Urban Heat Island effects
Design guidance 3.4C overshadowing	Refer previous comment for 3.1A siting. The ACTs current approach to managing overshadowing and ensuring adequate solar access is inadequate.
Design guidance 5.1A Use, Size and Location	Current wording *iv. Design communal spaces that are versatile and usable throughout the year by incorporating both enclosed spaces that capture winter sun and protect from wind, and open, breezy spaces that cater to active uses in summer.* As per comment above on solar access

	• Communal spaces must consider existing and predicted urban heat to ensure the space is liveable, building materials, colour, shade and access to water may be required • Communal spaces should also ensure adequate solar access. Current practice in assessing solar access does not have to consider overshadowing from vegetation, despite vegetation playing a crucial role in cooling urban areas and missing middle targeting infill in established suburbs. Overshadowing and protection of shade must be included and assessed as part of missing middle proposals.
Design Guidance 5.2A principal private open space	Current wording *ii. Orientate private open spaces and balconies north, east or west, where possible, to maximise solar access.* Definition and application of solar access is inadequate in the ACT, refer to previous comments, refer previous comments and including overshadowing by established vegetation
Design Guidance 6.1A Building Height and scale	Current wording *iv. Consider the size and placement of windows and glazing that allows for adequate daylight and solar access for dwellings, neighbouring dwellings and open spaces (public or private), while capturing key views from dwellings and common spaces.* Refer previous comments regarding need to adopt clearer performative descriptions for ensuring adequate solar access for internal living spaces
Design Guidance 6.1B Materials, textures and finishes	Materials and colour choice also impacts urban heat, current trend for dark materials needs to be carefully considered in modelling contribution to Urban Heat in summer vs any passive heat retention benefits in winter. 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. WSROC Urban Heat Planning Toolkit - Download Summary - WSROC

	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 should trigger 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.
Design guidance 7.1A planting areas	The importance of solar access during winter months must be a consideration as part of landscaping. Currently, ACT planning do not consider long lived shade trees in assessing solar access, which is poor practice and inconsistent with ensuring a sustainable city. The missing middle design guide indicates that planning is now relying on trees to assist manage urban heat. The flip side is that these same trees should be considered as standard practice in ensuring residences and communal area have adequate solar access. Landscaping and natural features may also have to look at alternatives to supplement reliance on trees to provide shading in certain areas such as carparks, high heat areas and areas where trees are yet to reach maturity. Western Sydney University and Cumberland Shire have demonstrated that vine covered trellises can also assist mitigate urban heat. Refer the following references that may assist achieve cooling certain areas: Cumberland Council | Cool Carpark Project Carpark coming in cool in Cumberland - Inside Local Government
7.1D Integrated Green Infrastructure	Given catastrophic consequences of urban heat island effect, it is suggested that requirements to reduce urban heat should be quantified, measurable and enforceable.

7.2A Solar access, shading and thermal performance	As per previous comments, solar access is poorly designed, measured and enforced in the ACT and allows for a sliver of sunlight or no sunlight at all for multi-unit proposals. Thermal performance has to be balanced with risk of increased heat island effect. While the guidance principles outlined in this section are very good, the final design of every dwelling must ensure it does not contribute at local or neighbourhood scale to any increase in urban heat island effects. 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 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.
7.4B Urban Heat Island	Urban Heat Island is poorly defined, quantified, measured and enforced in the ACT, despite risk posed by heat waves to the ACT, most notably increased mortality rates and strain on the public health system. These risks will increase as a result of human-induced climate change. It is unclear why the ACT planning system is yet to adequately incorporate Heat Island Effect and Heatwave vulnerability into planning strategy and planning/assessment rules. 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 a planning toolkit which should form the basis of a comprehensive toolkit to consider / assess and mitigate Urban Heat Island in the ACT. WSROC Urban Heat Planning Toolkit - Download Summary - WSROC The WSROC urban heat planning toolkit provides useful guidance for planning objectives and assessment criteria. 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* *(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: Development control plans | City of Parramatta

Submission to Missing Middle Housing Consultation

[redacted] July 2025
Ngunnawal

A Summary for Canberra Residents

Our city can address the “missing-middle” issue—those mid-sized dwellings between standalone houses and high-rise flats—without pushing households or the Territory budget into extra debt. The answer lies in local financial markets called Fair Share Markets (FSM). These are not-for-profit cooperatives owned by current and future residents. Instead of borrowing from banks with interest, they purchase new money at its face value through the banking system, paying a service fee to the bank.

The payments that usually go to distant lenders now stay within Canberra and benefit the Territory treasury, replacing part of the rates, land tax, and payroll tax we pay today. By reducing the money flowing out to Sydney, New York, London, Beijing, Singapore, or Melbourne headquarters of financial firms, the ACT government’s need to raise revenue from its residents decreases.

Developers and builders still make a good living, but their profits depend on sound design and efficient building rather than rising land prices. Since the resident-owned co-operatives finance each project without compound interest, the total cost reduces by about half. Lower costs mean less risk. Sites that once scared small builders become manageable, providing steady work. The rule is simple: if a project benefits the community, it gets funded; if it only benefits speculation, it withers.

Young people take their first steps onto the housing ladder. A small fortnightly payment to the co-operative gives them equity shares instead of rent, which disappears. They can sell their FSM shares or transfer them to another FSM home if they move for study or work. Savings that used to vanish as interest or rent now support future housing, further education, starting a business, or buying their first pram.

Households already burdened by mortgages can switch. Imagine a family with a half-million-dollar loan. Interest over thirty years would typically double their total repayment to the bank. The interest is eliminated when they refinance through the local FSM, so their monthly payment drops significantly. Money that once leaves the suburb stays and helps fund street lighting, footpaths, and community sports.

Older residents maintain control over their neighbourhood. A widow can add a single-storey unit at the back, sell a share of her land to the FSM, and use the proceeds to update her bathroom and insulate the roof. She stays close to friends and services, yet her expenses decrease because she no longer pays bank interest or high rates. If she moves into supported care, she can return her remaining shares to the market and safeguard her nest egg.

Neighbours see a gentler kind of density. Instead of a developer buying up ten blocks to replace gardens and green spaces, residents decide block by block whether to add a pair of townhouses, connect two yards for a row of terraces, or keep mature gum trees untouched. Because each owner has a vote in the FSM company, every voice matters, whether that voice belongs to a renter, a mortgage holder, or a pensioner. Community decisions about height, solar access, and shared green space are made around hall tables, not in distant boardrooms.

The winners are clear: builders with secure contracts, young families looking for affordable homes, mortgage holders liberated from lifelong interest, seniors able to age in place, and the Territory budget gaining a new stream of payments that reduce reliance on taxation. The losers are just as apparent: the big banks and overseas financiers who use Canberra's interest payments to boost their quarterly profits and increased share prices. Under the new framework, those profits no longer leave the ACT. Instead, they are reinvested into resurfaced roads, upgraded libraries, and lower household bills.

This is not a speculative idea about the future. The legal frameworks exist. In Australia, community-owned businesses now manage shopping centres and solar farms; they can also provide housing finance. Zoning for dual occupancies and gentle density exists in many suburbs. What changes is who benefits from the value created by that zoning. FSMs ensures the value stays with the people who live and work here.

For Canberra residents, the choice is straightforward. Keep exporting wealth through interest payments and cover rising service costs with higher taxes.

Alternatively, let residents finance their own housing, save on interest costs, and use those savings to reduce everyone's tax burden. Most citizens, including developers, young couples, mortgage holders, retirees, and long-standing neighbours, will prefer this approach once they see how the figures add up and who benefits from the increase in land value where their homes are located. Those who don't can stay in the current system.

Overview of Submission Proper

This *"Financial and Governance Framework for Missing Middle Housing"* submission outlines a practical and lawful model for funding medium-density housing in Canberra without raising public debt or household financial stress. Its foundation is the idea of Fair Share Markets (FSMs)—community-owned, not-for-profit financial cooperatives that replace interest-bearing loans with a system where residents purchase money at face value through the banking system, paying a transparent service fee. FSMs lower the overall cost of housing. They keep financial flows within the ACT economy, rather than being diverted as interest payments to banks in other cities or countries, and increase the rate at which money circulates.

FSMs tackle a key issue in housing affordability: the interest cost over time. When homes are funded through FSMs, residents make regular payments that build equity, instead of rent or interest payments that move outside the community. Each FSM holds the title to land and houses and leases them back to residents, who gradually buy shares in the property through their payments. When they move on, residents can sell their shares back to the FSM or new

members, maintaining their investment. This approach helps stabilise household finances and allows housing assets to remain within the community rather than being turned into commodities for speculative profit.

A key strength of the FSM model is its ability to facilitate community governance. Each participant has voting rights, and decisions about design, zoning responses, solar access, and green space are made collectively and locally within the rules set by the ACT government planning. Instead of neighbourhoods being shaped by outside developers, residents can decide whether to add townhouses, combine backyards for terraces, or keep open space. This local governance model complements existing ACT planning frameworks and allows gentle density to develop with community support and benefit.

The economic advantages of FSMs are significant. Households avoid the burden of compound interest, lowering the cost of housing by up to half. Builders and developers secure steady work based on construction quality rather than speculation. Older residents can modify or partially sell their properties to suit changing needs, while young people can enter the housing market through small, regular payments that accumulate equity. The ACT Government, meanwhile, gains from a new revenue stream as repayments, which previously went to private lenders, now circulate within the territory, reducing the need to increase taxes.

Importantly, this is not a merely theoretical or future-focused proposal. All necessary legal mechanisms are already in place, including cooperative structures and zoning allowances for dual occupancies and medium-density development. Community-owned enterprises are already active in sectors like renewable energy and retail, showing that this model is workable. The true innovation is rerouting the financial value generated by land and housing to benefit residents and the Territory, rather than private investors.

FSMs provide a realistic, fair, cost-effective alternative to traditional housing finance. They align with ACT planning policy, tackle affordability, and promote long-term community resilience. This model deserves serious attention and backing for policymakers aiming to address the housing crisis without increasing public debt or reliance on taxes.

Financial and Governance Framework for Missing Middle Housing

This submission responds to the ACT Government's call for feedback on the Missing Middle planning reforms. It concentrates on a related, complementary structural reform: how housing in the ACT is financed, owned, and governed, and how that affects the planning of the missing middle.

Drawing inspiration from **Henry George's work, which was influential in establishing the Canberra leasehold system**, the submission recommends using **Fair Share Markets (FSM)** to protect the community value created through planning changes. Henry George noted that land value increases not because of the landowner's effort but because of **public infrastructure, zoning decisions, and community activity**. Similarly, planning reforms like higher density and increased design flexibility significantly elevate land value. Private

developers and absentee landowners typically benefit from this uplift under the existing financing system.

FSMs provide a system that keeps value within the community, not by imposing a land tax but by removing the need to tax profits. Instead of taxing profits for government revenue, new money flows directly to the government when community members make payments to buy their houses. Rather than lending money, banks sell it to local community groups at face value, allowing them to buy or build assets. Payments are made when the community uses these assets. The government oversees which communities can access the money and regulates their operations to ensure the funds stay within the community.

In an FSM financing model, mortgages are replaced by the direct purchase of new money from the government through the banking system. Since new money is free to produce, the cost of acquiring money is its face value. Banks charge a fee that reflects the cost of providing the money, as they would for any other commodity and the fees are taken from the payments. The rest of the payments for the funds go to the government to replace taxes, returning the money to the community as community services.

This financing model will **enhance diversity and flexibility in the built environment**, as development is guided by residents' needs and preferences rather than profit-driven developers. Planning regulations will become more transparent **and adaptable**, enabling **locally responsive solutions** that cater to the different accommodation needs of various people. This approach allows local communities to **fund, manage, and build equity** in their housing, reducing reliance on speculative development and maintaining long-term affordability.

The widespread adoption of FSMs will halve the cost of purchasing a home and remove the need for some ACT land taxes, payroll taxes, and other rates and levies. Eliminating mortgage debt frees up funds to replace these taxes.

Fair Share Markets (FSM)

An FSM is an asset or a collection of assets within a legal entity. These assets are managed as a single unit with shares in the entity. Shares are linked to specific assets for internal reasons. Buyers and sellers of shares are all members of the FSM and can enter or exit the FSM at no cost, but shares cannot leave the FSM. Assets can be transferred into or out of the FSM, while the entity issues shares in exchange for assets, including money. Depending on the members' preferences, the legal entity may be a company, cooperative, or trust, but it is expected that most will be co-operatives.

FSMs are designed to stop external entities from extracting capital gains and profits from the communities that use the assets.

Henry George and Fair Share Markets

Henry George (1839–1897) was an American political economist, journalist, and social reformer best known for his influential book **Progress and Poverty** (1879). His experiences with poverty in growing cities made him question why economic progress often caused greater inequality.

George proposed a bold theory: poverty and inequality stem from private land ownership and the **unearned wealth it generates**. He argued that land's value is created by the community, not the individual owner, and suggested a "single tax" on land value to replace all other taxes. He believed this would wipe out poverty, reduce inequality, and create a fairer, more efficient economy.

Henry George's ideas inspired land reform movements worldwide and influenced the thinking of later figures, including economists, urban designers, and social justice campaigners. He died suddenly in 1897, but his legacy lives on through campaigns for land value taxation and economic fairness.

Attempts at Implementing George's Ideas

Henry George's ideas, particularly the land value tax or "single tax," were attempted in various parts of the world with different levels of success.

George's ideas influenced land reform policies in **New Zealand** and parts of **Australia** during the late 19th and early 20th centuries. In the 1890s, New South Wales introduced a land tax to break up large landholdings and encourage productive use. In **Queensland**, land value taxation became a long-standing feature of local government finance.

In the **United States**, the most notable experiment was in **Arden, Delaware**, a utopian village founded in 1900 on Georgist principles. Land was owned by a trust and leased to residents, with rent based on land value. A similar model was used in **Fairhope, Alabama**, founded in 1894. Both communities still operate with land value-based funding mechanisms today.

In **Denmark**, a land tax based on Georgist principles was part of major reforms in the early 20th century and supported land redistribution and rural development.

Taiwan and **Singapore** have also adopted land value capture principles in their urban planning, public housing, and transport infrastructure funding.

Although rarely fully implemented, George's ideas have influenced many countries' tax policies and land reform debates.

Georgism Influenced the Development of Canberra

Henry George's ideas significantly influenced the early development of **Canberra**, Australia's capital. The city was planned in the early 20th century, with its designers incorporating aspects of Georgist philosophy, particularly the belief that land value increases should benefit the public. All land was publicly owned under a 99-year leasehold system when Canberra was established**. This approac**h initially prevented private land speculation and ensured that land value, generated by public investment and community effort, would benefit the government and the people.

The motivation behind the idea was political, as the States didn't want to fund Canberra's development. The plan was that the increase in land value resulting from the Commonwealth's development of Canberra would cover the costs of building Canberra, as

long as the proceeds from the land value increase went to the Commonwealth and not to land speculators.

Revenue from land leases was intended to finance public infrastructure, supporting George's idea of using land rent for the common good rather than private profit. This helped fund early development and kept land prices affordable.

However, over time, the Georgists' influence gradually declined. Political pressure and changing economic ideologies led to adopting de facto **freehold land titles used in other states**, and Canberra now resembles the broader Australian property market. The leasehold system weakened because land lease fees were not fully indexed to land value, and **land rent was replaced by general taxes**, reducing its role in public finance. Today, although some remnants of the system remain, Canberra's land policy no longer fully reflects the Georgist principles it was initially based on.

Fair Share Markets and the Introduction of New Money into Society

Fair Share Markets (FSM) apply Henry George's principles to **money rather than land**, viewing newly created money as a shared public resource. The value of new money should benefit the community that uses it to create or acquire assets, rather than bankers, financiers, and developers. They should be compensated for their services, but not receive Capital Gains like they do today.

Like George's view that land gains value from community development and should benefit all, FSMs recognise that **money derives from public trust, shared infrastructure, and collective productivity,** not private banks or asset holders who currently profit from its creation.

Rather than creating money as debt through banks, governments in an FSM system **sell new money directly to local communities** to fund long-term assets like housing, energy, or transport. The money is secured against existing assets that the communities already hold. Communities then pay for this money through regular contributions based on their use or benefit, not as taxes but as **payments into a shared fund**. As George suggested, these payments recycle capital to support future projects such as public infrastructure.

In this model, payments for the new money **replace taxes** because the money flow is directly linked to the services it enables. This keeps costs low, reduces inequality, and encourages efficient resource use, achieving the same goals as George's land value tax. The core principle remains the same: **unearned value generated by society belongs to society** and should be recycled to serve the common good. Creating new money creates unearned value and should serve the community to whom it is sold.

How Much Money Needs to be Injected into a Local Community

In a Fair Share Market (FSM) system, asset **depreciation** and the **rate of money circulation** are essential tools for the Reserve Bank and the government to manage the flow and volume of money into local communities, ensuring that money creation matches these communities' **productive capacity**.

Each FSM is connected to a tangible, durable asset, such as housing, energy systems, or transport infrastructure, which **depreciates predictably over time**. This depreciation informs the **payment schedule**: funds flow back to the issuing authority as users pay off the asset's value. This natural flow determines the pace of issuing **new money**.

Meanwhile, the **speed of circulation,** which measures how quickly money moves through the local economy, is a key indicator of economic activity. If money moves too slowly, it could signal underused capacity, prompting the Reserve Bank and governments to **increase issuance and** fund new FSMs. Conversely, if circulation is too rapid, it may risk causing inflation, and the Bank can **pause or slow re-issuance** until payments balance out.

By monitoring depreciation rates and local money velocity, the Reserve Bank and governments can **adjust the money supply to align with real productivity,** expanding or contracting it without depending on interest rates or broad taxation. This helps maintain a balanced and community-focused economy.

How Fair Share Markets Save Interest and Invest in Community Value

In a traditional housing market, when someone borrows money from a bank to buy a home, they usually repay the loan with interest over many years. For example, borrowing $500,000 at a 5 per cent interest rate over 30 years results in total repayments of around $966,000. This means nearly $466,000 is paid purely in interest and doesn't contribute to building or maintaining the home. That money leaves the local community and goes to banks and financial institutions as capital gains.

The same $500,000 is used to build or buy a home in an FSM. Instead of paying interest to a bank, the buyer repays the principal. These repayments go into a community-managed fund that can be invested in new homes or public infrastructure. The absence of interest payments saves hundreds of thousands of dollars over the life of a home.

The saved money can be reinvested into the local community by paying people for meaningful yet unprofitable work that increases well-being. Examples include creating community art, mentoring young people, researching local history, maintaining green spaces, or developing open-source tools and educational resources. These activities promote shared knowledge and social assets that benefit everyone, helping to build a more inclusive and productive economy without relying on traditional profit motives.

Alternatively, one way to use this saved money is by **retrofitting existing homes** to be more energy-efficient and self-sufficient. Many older houses suffer from poor insulation, inefficient heating and cooling systems, and high energy bills. Community funds can be used to improve insulation, install energy-efficient windows, replace gas systems with electric options, and enhance ventilation and shading.

Furthermore, these funds can help **install solar panels and battery storage systems**, reducing reliance on external energy providers. This lowers household energy costs and improves energy resilience, enabling communities to generate and store clean power.

The community benefits from long-term savings, lower emissions, and greater comfort through retrofits. These upgrades generate local jobs and skills, turning saved interest into lasting public and private benefits.

Why Landlords and Superannuation Funds Will Shift to Fair Share Markets

Landlords will transfer their properties into FSMs because they provide a more stable, fairer, and sustainable income. In a traditional rental setup, landlords rely on continuous rent payments, which often increase to cover debt and rising interest rates. This leads to volatility and exposes landlords to vacancies, tenant hardships, taxes, and interest rate fluctuations. In an FSM, landlords switch from charging rent to receiving **equity payments** on their shares. These payments come from occupiers gaining ownership and are issued as new shares to the owners of shares, who realise their profits by selling their additional shares.

Instead of deriving rental income indefinitely, landlords receive income **by selling shares** in the property over time at stable, predictable rates. This approach reduces risk, ensures occupancy, and aligns investor incentives with long-term property quality and community well-being. Investors can also retain a property management or maintenance role, earning steady income linked to their services.

Superannuation funds will be attracted to FSMs because they provide **low-risk, long-term, inflation-proof returns** that meet retirees' needs. These markets generate dependable cash flows from payments and community use rather than speculative price hikes. Since assets like housing, energy, or water infrastructure are always needed, FSMs offer **stable investment bases** with societal benefits. They also shield funds from volatility in global markets and align with rising demands for **ethical and sustainable investment**.

By investing in FSMs, super funds can support housing affordability, clean energy, and essential infrastructure while securing long-term income for retirees. This dual benefit of financial security and social good makes FSMs a natural fit for long-term Australian institutional investors.

Fair Share Markets Simplify Land Use Rules Through Community Governance

One of the ongoing issues in modern urban planning is the increasing complexity of land use regulations and development guidelines. Zoning laws, compliance requirements, heritage overlays, and usage restrictions have become more convoluted, often stifling innovation, raising costs, and limiting communities' ability to respond to evolving needs.

FSMs offer a strong way to **ease this regulatory burden** by moving decision-making closer to those most affected. The local communities share ownership and responsibility for land and infrastructure. In an FSM, housing, open space, and shared facilities are managed collectively, not individually. This shared governance approach allows for more **flexible land use arrangements** that are more responsive and inclusive.

Instead of requiring centralised planning authorities to specify every detail of allowable land use, FSMs allow communities to **try out new options**, such as mixing residential with light commercial activities or converting spaces for food production, workshops, or shared amenities if the community agrees and the proposals fit with shared goals.

Governments can maintain broad oversight **while easing many detailed restrictions**, replacing them with frameworks that foster **local consensus and innovation**. This streamlines compliance, reduces approval times, and encourages a more flexible, responsive approach to urban development.

The outcome is a **clearer, fairer, and more adaptable planning system that** promotes innovation while ensuring accountability through community involvement and transparent decision-making. By basing authority on community-led asset ownership, FSMs transform planning into a **collaborative and dynamic process** rather than a top-down and rigid system.

How FSMs and Henry George's Legacy Support the ACT's Missing Middle Housing Reforms

This proposal aligns closely with the ACT Government's goals under the Missing Middle Housing Reforms by addressing the primary cause of housing unaffordability and limited housing diversity: the misallocation of unearned gains from land and money creation.

The Missing Middle reforms aim to promote a broader range of housing types—such as dual occupancies, townhouses, and low-rise apartments within established suburbs—to increase supply, improve affordability, and support social inclusion. However, without fundamental financial reform, new supply alone will not achieve these goals. Land speculation, inflated asset prices, and rising debt obligations will concentrate housing wealth, decrease affordability, and hinder innovation in design and tenure.

FSMs provide a **complementary economic framework** that supports the fair and successful implementation of Missing Middle reforms. By recognising newly created money as a public asset, like Henry George's view on land, FSMs ensure that the value generated through rezoning, infrastructure projects, and community initiatives is returned to the public rather than privatised.

FSMs promote **affordable, mixed-tenure developments** that are self-financing, interest-free, and repayable through occupancy rather than profit-driven speculation. This approach enables delivering middle-density housing without displacing existing residents, avoiding reliance on private developers and preventing further price inflation.

Furthermore, FSMs can be managed within **specific Missing Middle precincts**, giving communities direct control over asset development and use. This supports ACT's broader sustainability goals, fairness, and long-term housing security while reducing dependence on strict planning rules, as local communities are supplied with the tools and motivation to **shape their neighbourhoods from within**.

In summary, introducing FSMs allows the Missing Middle vision to be **socially inclusive, economically stable, and locally managed** while building on the historic principles of fairness and shared value first proposed by Henry George.

The Ownership of Homes in an FSM

Community ownership is not the same as communal living. Some might want that, but most prefer privacy and secure home ownership.

Ownership is about more than just holding a legal title to property. It includes the ability to use, shape, protect, and benefit from something that supports a person's well-being and freedom. For most Australians, owning a home means stability, security, and independence. However, in today's mortgage-driven system, homeownership often falls short of that promise. In contrast, within an FSM, a home occupier experiences a more genuine, practical form of ownership that gives them more meaningful control over their home and greater certainty in their right to live in and benefit from it.

In a traditional housing market, ownership is closely linked to debt. Many homeowners do not fully own their homes; they hold a legal title subject to a mortgage. For decades, they must make repayments to a bank that covers not only the initial cost of the home but also layers of compound interest. If they miss those payments, even temporarily, the bank can seize and sell the home, no matter how much equity the homeowner has built up. The asset becomes a liability, and the occupant is forever at risk of losing control. Furthermore, ownership in this system is becoming increasingly out of reach for many as prices rise through speculation and investor demand, moving housing away from its primary purpose: providing shelter and privacy.

In contrast, an FSM separates ownership from speculation and ties it to use and stewardship. A home within an FSM is part of a community-owned asset, and the person living in it gradually gains functional shares through their payments. These payments do not include interest and are not made to a distant lender making a profit, but to a shared fund that reinvests in maintaining the housing stock or increasing access for others. The occupier becomes a **co-owner**, not just of their dwelling, but of the system that supports it. Their payments build their stake in the shared asset, and their rights are protected by community rules rather than market fluctuations or debt agreements.

What truly sets FSM ownership apart is that the occupier controls their home. They have the right to stay indefinitely as long as they meet their share of responsibility and contributions to maintenance. There is no threat of foreclosure, interest penalties, or ballooning repayments due to interest rate rises. If their circumstances change, they can sell their shares to the community at a fair, regulated price, ensuring liquidity without encouraging speculation. They can modify their home, participate in management decisions, and benefit from community-funded upgrades like energy efficiency projects, shared gardens, or maintenance services. Their security of tenure is **stronger**, not weaker, than in the open market.

Moreover, the occupier in an FSM holds **shared authority**. In traditional homeownership, an individual has limited influence in the broader housing system, even with legal ownership. They are subject to planning regulations, market pressures, and the commercial decisions of banks and developers. In an FSM, the occupier is part of a governing body that manages how the environment surrounding the house is organised. They vote on resource distribution, repair priorities, and rule changes over time. This ownership model is **private**

and democratic, based on the idea that control over one's home is connected to collective responsibility and participation.

There is also a deeper psychological and cultural ownership that develops in FSMs. Because the system is designed to be stable, affordable, and reinvested, people believe that their home is not just a financial asset but part of a larger living system. The lack of speculative pressure results in fewer forced moves, less stress, and more resilient neighbourhoods. Children grow up in the same place, neighbours support each other, and people take pride in their surroundings. This sense of rootedness is becoming increasingly uncommon in the speculative housing system, where ownership is often reduced to capital gain and property flipping.

Some might argue that true ownership includes the right to sell on the open market at any price. However, this kind of freedom often excludes others. In an FSM, ownership is redefined not as the right to profit from scarcity but as the right to live with dignity, participate in governance, and share in the long-term prosperity of a shared asset. This offers a richer, more human form of ownership rooted in permanence rather than speculation.

In conclusion, a person who lives in an FSM owns their home more genuinely than someone with a mortgaged title in the traditional system. They benefit from greater security, more control, a fairer route to building equity, and a voice in the system that oversees their living conditions. Most importantly, they are shielded from the financialisation of housing, which turns homes into commodities. FSMs reaffirm that homes are for living, and ownership means staying, shaping, and sharing without fear of losing it all to interest, debt, or speculation.

How FSMs Increase Housing Supply Without Building More Houses

FSMs can significantly increase the effective housing supply **without building new dwellings**. This is achieved by speeding up housing turnover, lowering transaction barriers, and promoting full occupancy of existing properties. Under FSMs, costs related to buying and selling a home, such as legal fees, real estate commissions, and financing charges, are mostly eliminated, saving around **6% of a property's value** on each deal. This makes moving homes simpler and cheaper, helping to free up underused properties.

FSM communities are also **motivated to ensure all homes are occupied**, as vacant homes reduce the flow of payments into the shared asset pool. As a result, local governance structures naturally encourage more efficient use of space. This includes **welcoming short-term occupiers**, who can become part of the repayment and equity system, and facilitating **shared occupancy,** making it financially and socially attractive for multiple people to co-live in larger homes.

Because FSMs make **purchasing more affordable than renting**, more people can access secure occupancy arrangements, even if only temporarily. These mechanisms collectively increase the available housing stock in practical terms, easing pressure on the market while strengthening community ties and housing stability.

On Census Night, 10% of houses in Australia were unoccupied. In Canberra, it is estimated that there are 1.5 beds per person available in the city and many more rooms available for

sleeping. Putting a fraction of these in place will help alleviate the housing shortage without building more homes.

Why FSMs Are Advantageous for the Canberra Wealthy

PSMs are often viewed as a way to redistribute wealth, rebalance assets, empower communities, and end speculative finance. However, it is often overlooked that FSMs **benefit the wealthy within their communities**. They don't require destroying or seizing wealth or excluding those with resources. Instead, they offer a method for the wealthy to **sustainably preserve and grow their assets**, **align assets with long-term stability**, and **rebuild trust in economic institutions**. For those with a multigenerational, social, and strategic outlook, FSMs are not a threat—they are a valuable opportunity.

FSMs offer **low-risk, long-term investment options**. Current markets show declining returns in productive sectors for those with capital, often pushing investors towards speculation: in housing, shares, or increasingly complex financial tools. FSMs direct capital into **tangible, productive local assets** like housing, energy infrastructure, and community amenities. People use these assets daily and will need them for generations. These assets are **morally sound and economically resilient**, providing steady returns without the volatility or ethical concerns linked to rent-seeking or extractive investment models. Wealthy investors can hold shares in FSMs and receive consistent, inflation-proof returns through structured payments, service contracts, or shared dividends, **without relying on interest or capital gains**.

FSMs offer a way for **intergenerational wealth transfer that boosts reputation rather than causing resentment**. In a world increasingly divided by wealth inequality, the concentration of resources can lead to backlash and instability. FSMs enable wealthy families, foundations, or philanthropic investors to **establish new shared ownership institutions**, maintaining influence and stakes in the outcomes while **leaving a legacy of positive contribution**. Instead of being seen as rentiers or asset hoarders, the wealthy can play a key role in creating new housing, energy, education, and care systems that outlast them and which their heirs can be proud to inherit.

FSMs lower **systemic risk** for everyone, including the wealthy. Boom-and-bust property cycles, spiralling debt, climate shocks, and social unrest are not just abstract worries; they directly threaten wealth preservation. FAMs promote economic stability by anchoring value in productive, non-speculative activities and aligning payments with genuine capacity, not financial trickery. A society where more people have secure housing, affordable energy, and a voice in economic decisions is **less likely to face upheaval**. Wealth remains safer in a world that is safer for all.

FSMs open the door to **ethical influence and new leadership roles**. Many wealthy individuals wish to do more than just accumulate wealth; they aim to shape a better future. FSMs offer platforms where capital can foster **collective intelligence, local resilience, and long-term well-being**. Wealthy individuals and institutions can play key roles as **founding stewards, supporters of innovation, or system architects**, helping to develop FSM frameworks that can expand across sectors. This is not charity but **participatory legacy-building** grounded in practical finance and long-term social value.

FSMs help maintain the **value of existing wealth** by bolstering the broader economy. If housing and essential infrastructure remain within speculative systems, rising costs will curb consumer spending, slow innovation, and weaken productivity. By supporting FSMs, the wealthy can help ease these pressures and **stimulate the real economy**, enabling people to live better, work more efficiently, and start new businesses that generate genuine wealth. This creates a stronger overall ecosystem where all participants benefit, including those with capital.

Finally, FSMs offer a **respectful way out of the conflicts surrounding wealth accumulation**. Many wealthy Australians recognise that their fortunes are connected to systems others see as unfair or exploitative. FSMs provide a means to escape that system without guilt, conflict, or loss. Instead of defending a crumbling order, the wealthy can help **shape a new one** where money retains value. That value flows through cooperation, stewardship, and reciprocity, not dominance or exclusion.

In conclusion, Fair Share Markets (FSM) do not require the wealthy to relinquish their wealth. Instead, they encourage **rethinking the purpose and structure of wealth** from a source of inequality to a foundation for shared prosperity. For those with vision, foresight, and a desire to leave a meaningful legacy, FSMs provide a bridge between current privileges and future responsibilities. They are not merely a tool for equity—they serve as a blueprint for stability, continuity, and contribution in a world that urgently needs new economic approaches and foundations.

FSMs Benefit the Elderly

FSMs offer specific advantages for older homeowners and those with property equity. For many retirees, a family home is a treasured memory and a significant source of untapped wealth. Under traditional setups, accessing that equity often requires taking on new debt, selling the property and moving, or relying on complex reverse-mortgage products with high fees. In an FSM system, however, homeowners can tap into their property's value via interest-free contributions to a community fund while retaining the right to stay in their home for as long as they wish.

For elderly people wishing to age in place, this means quick access to funds for home improvements, such as ramps, grab rails, better insulation, or innovative health-monitoring systems, without the stress of loan applications or the risk of losing their home. They remain actively involved in managing their housing community, voting on maintenance, upgrades, or shared services like communal gardens and care support networks. This shared responsibility ensures homes are well-maintained and that decisions reflect the needs of long-term residents rather than distant investors.

Homeowners wanting to downsize within their current community also benefit. Instead of selling up and relocating elsewhere, they can turn some of their equity into cash while moving to a smaller unit or an annex on the same property. This helps keep social connections, reduces upheaval, and allows for multigenerational living if desired. The released capital can be spent on travel, healthcare, supporting grandchildren's education, or reinvested locally to improve family wellbeing and the local economy.

Because FSMs replace interest with shared payments, existing homeowners face lower ongoing costs and more predictable housing expenses. They avoid exposure to rising interest rates and market fluctuations. For those who have built wealth in property, this model converts latent equity into a reliable income stream or lump sum, all without surrendering control or ownership. Their stake remains protected by community rules rather than at risk from lenders.

Finally, FSMs enable older homeowners to leave a lasting legacy. When transferring their share, the community fund provides a fair, regulated valuation that prevents predatory buyouts. Heirs receive a fair return, and the home remains part of a sustainable, cooperative system rather than being divided or sold solely for profit. This way, FSMs respect the financial security and the lifelong bonds of those who have invested so much in their homes, offering freedom, dignity, and choice in later years.

Why FSMs Empower Young People to Build Equity and Belonging

For younger Australians, the traditional housing and financial system offers fewer opportunities. The dream of owning a home becomes increasingly distant for many as house prices climb, rents consume a larger share of income, and wages stagnate. The mortgage-based system demands large deposits upfront, long-term debt commitments, and access to stable full-time work conditions that don't reflect the real-life experiences of many young Australians. FSMs provide a new way forward, making housing more accessible and giving young people meaningful options to build equity, even if they are living at home or sharing with others.

In an FSM system, young people can start building shares in a household, including their parents' home, through regular, modest payments that contribute to ongoing maintenance and the eventual buyout of shared community-held housing assets. Instead of paying rent that simply disappears into someone else's mortgage or property portfolio, these payments are recognised as **contributions towards equity**, linked to actual use and real value. If they live with family, their financial support can be recorded as equity in the shared home asset through food, utilities, renovations, or direct payments. This demonstrates their responsibility and a formal **stake in the home's value**.

What's transformative is that these shares are **portable**. When the young person moves on, whether to study, work in another town, or join others to form a new shared household, they take their shares with them. The value they've helped build stays with them. Their early investment becomes the foundation for their next step. It provides stability, recognition, and a **growing sense of economic agency,** without needing a mortgage or a significant inheritance to get started.

FSMs also support **cooperative living models**, which are increasingly attractive to young Australians facing high rents and unstable jobs. Friends, students, or young workers can create shared living arrangements within an FSM framework, making payments that gradually increase their ownership in the home or apartment. Unlike renting, where money benefits a landlord's profit, each payment helps build their shared stake in the property. Governance is shared too, so young people are not just tenants but **co-decision makers**, gaining practical finance, planning, and teamwork skills.

This model also promotes **social mobility without displacing residents**. Young Australians can remain connected to their communities—close to friends, workplaces, and family—without being forced out by rising rents or investor-driven redevelopment. They can gradually invest in the community assets they belong to, maintaining stability and ensuring continuity in their lives.

For young people eager to contribute to their communities, whether by caring for others, running creative projects, or launching purpose-driven ventures, FSMs offer **a supportive financial foundation**. Instead of being burdened by debt or excluded from ownership, they are welcomed as stewards and co-creators of shared value. They are recognised not for how much capital they already hold, but for how they participate in shaping the future.

In this way, FSMs provide more than just an affordable route to housing. They represent a **redefinition of ownership** that prioritises contribution, cooperation, and use over speculation and exclusion. For young people, this means living securely, gradually building equity, and moving through life without being held back by debt or rent. The system regards them not as passive renters or latecomers to a closed market but as active partners in a new economic generation. One that values fairness, flexibility, and long-term belonging.

How FSMs Support Families Through the Working Years

For many people, the stage of life centred on raising a family, working, caring, and contributing to the community is both the most demanding and rewarding. It is also a time when individuals often face financial pressures. Mortgages, childcare, education, medical, and household expenses all burden families during this period. The traditional housing and finance systems, designed around lifelong debt and speculative property markets, often leave families overstretched and insecure, even when both parents work full-time. FSMs provide a practical alternative that supports working families' goals, enhances family stability, and makes it easier for people to focus on what matters most: raising children, caring for each other, and building a life together.

In an FSM, families aren't burdened with high-interest loans. Instead, they make regular payments to share ownership of their home and community. These payments are interest-free and predictable, helping families **confidently plan their budgets**. There are no surprise interest rate hikes or refinancing traps. What a family earns through their labour can be used for their well-being rather than absorbed by financial institutions.

Importantly, FSMs give families **real control over their homes**. Unlike renting, where a landlord can sell or evict, or mortgaging, where missing a few payments can trigger foreclosure, families in FSM homes enjoy long-term security. They gain ownership not through speculation but through ongoing contribution and participation. This allows them to truly personalise their homes. They can modify them as the family grows, invest in their maintenance, and even create space for grandparents or adult children to live nearby.

This stability is essential for working parents. It allows them to concentrate on their jobs and children without the ongoing stress of housing insecurity or the fear of being displaced from their neighbourhood. Children also benefit. Growing up in a stable home within a familiar environment and community provides a **stronger foundation for learning, social**

development, and emotional well-being. Schools, neighbours, routines, and friendships become part of daily life, not casualties of an unpredictable housing market.

FSMs also support **multi-generational resilience**. Parents can accumulate shares in the home, which, when no longer needed, can be sold back to the community or transferred to their children. This provides a form of generational continuity and wealth transfer that doesn't depend on speculative price increases. Instead of the family home being a high-stakes investment, it becomes a **place of lasting value and contribution**.

For families with two working adults or a mix of paid and unpaid roles, such as parenting or caring for elderly relatives, FSMs provide greater flexibility. Contributions to the household, whether financial or in-kind, can be recognised and formalised through the community structure. This ensures all family members are supported and valued, not just those with a formal income. It relieves the pressure to monetise every aspect of life and **restores dignity to caregiving and domestic chores**.

Moreover, the community-owned nature of FSMs enables families to be involved in decisions about their local areas. This can include shared playgrounds, safety upgrades, communal gardens, local childcare cooperatives, or energy efficiency initiatives. Families can exchange ideas, participate in governance, and influence the environment where their children grow up. This benefits individual households and boosts **social bonds**, creating supportive networks that make parenting less isolating and more collaborative.

In these ways, FSMs support the core goals of family life: stability, belonging, legacy, and care. They offer a housing and finance model that aligns with the natural cycles of family life rather than working against them. Families are no longer trapped in the race for speculative ownership or caught in the endless rent cycle. Instead, they become co-stewards of the places they live, building equity not only in property but also in relationships, well-being, and long-term security.

FSMs don't replace the nuclear family or traditional values—they **strengthen them** by giving families the tools to live with dignity, plan for the future, and raise children in safe, secure, loving environments. They offer a modern economic system that reflects the values families already uphold: commitment, contribution, and care across generations.

Fair Share Markets as an Evolution in the Social Contract

Humanity has continuously operated within shifting social contracts—unsaid agreements about how we live together, share resources, and balance personal freedom with collective responsibility. These contracts change as circumstances do. The tribal commons shifted to feudal obligations, giving way to the market economy, eventually evolving into today's globalised, debt-fuelled, profit-driven financial system. Each system was formed to address the issues of its time, but ultimately showed limitations and contradictions that called for a new approach. FSMs are not the ultimate fix for our economic and ecological crises, but they are an essential next step in this ongoing evolution. This transitional framework addresses the current system's failures and lays the foundation for something more regenerative, democratic, and just.

The current social contract, inherited from the industrial and colonial eras, is falling apart. It promised prosperity through private ownership, productivity through competition, and freedom through markets. But it has caused rising inequality, ecological decline, and social division. Debt fuels growth in the money supply. Extraction increases profit. Public wealth is privatised, while social and environmental costs are externalised. This model is becoming unsustainable for the survival of life on Earth.

In this context, FSMs establish a new social contract rooted in stewardship rather than ownership. They focus on shared benefits instead of private profits and promote ongoing circulation rather than hoarding. They reframe the flow of money not as a competition of winners and losers, but as a way to support the real economy: housing, transport, energy, food, and care. They allow communities to co-own and co-manage the assets they rely on. They replace compound interest with shared payments and ensure that the value generated by people and places is returned to them, rather than being siphoned off.

This is more than just economic reform; it is a rebalancing of power and responsibility. Under an FSM-based contract, individuals are no longer left to struggle alone in a tough market, nor are they passive recipients of government intervention. Instead, they actively shape and maintain the systems they live within. They gain security not through speculation or inheritance, but through participation and reciprocity.

FSMs also begin to repair the fractured relationship between humans and nature. They recognise that the economy is not a machine but a living system, and that assets like land, energy, and infrastructure must be overseen with a focus on long-term planetary health. In FSMs, the value of an asset is tied not to scarcity or market demand, but to its usefulness, durability, and contribution to shared life. This signifies a major shift in thinking—from extraction to regeneration, possession to care.

However, we should not see FSMs as an ultimate goal. They are not utopias or universal solutions. They explore new ways of ownership and finance as transitional scaffolds for a post-extractive civilisation. These frameworks allow us to test alternative and improved ways of living without dismantling the existing systems we depend on. As they grow, they will develop, much like co-operatives, commons, and mutuals have historically. They will integrate with citizen assemblies, ecological governance models, or emerging technologies of accountability and transparency. The main point is that they propel us forward, shifting away from systems that cause harm and division, and toward ones that promote healing and connection.

The future won’t be built in a single step. It will develop through many small agreements, rethought and rewritten by those who see other possibilities. FSMs are not the whole answer, but form part of the solution. They are part of the evolutionary leap we now need—towards systems that reflect life’s complexity, respect everyone’s dignity, and give us a real chance to survive and thrive together on this shared planet.

Objections to FSMs for Housing and Counterarguments

1. **Objection: “People won’t invest if they can’t make capital gains.”**
   Counterargument: FSMs do not eliminate capital gains; they rearrange the distribution. Investors earn returns through predictable payments and share sales instead of speculative appreciation, making housing more stable and resilient. Capital gains often lead to inflated prices and exclude younger generations. FSMs maintain affordability while providing secure, long-term income aligned with actual housing use.
2. **Objection: “It’s too complicated and unfamiliar.”**
   Counterargument: Although the concept is new to many, its mechanics are based on well-understood principles like shared equity, trusts, and payments. Software and governance frameworks can facilitate participation. Many financial systems—such as superannuation, mortgages, and rental agreements—are also complex but widely used. Education, pilot programs, and local councils can support a phased rollout.
3. **Objection: “It threatens existing property values.”**
   Counterargument: FSMs work alongside current markets and provide a *non-speculative alternative*. By offering affordable options without increasing land prices, FSMs reduce pressure without devaluing existing owners’ assets. Over time, this two-tier system widens choices without causing immediate disruption.
4. **Objection: “Without interest, how will lending be sustainable?”**
   Counterargument: Interest isn’t the only way to reward banks for their work. Banks can be paid through a fee taken from the payments made to the government for the new zero-cost money.
5. **Objection: “Governments shouldn’t interfere in markets.”**
   Counterargument: Governments already influence housing markets through zoning, taxes, subsidies, and monetary policy. FSMs are a voluntary and transparent tool for aligning public investment with long-term public benefit, offering a market-based solution that complements rather than replaces private options.
6. **Objection: “It undermines private ownership.”**
   Counterargument: FSMs support **individual custodianship** and shared ownership models. Occupants retain secure tenure, control over their homes, and the ability to build equity. The main difference is that equity is connected to stewardship and community well-being, not exclusion or speculation.
7. **Objection: “It won’t scale.”**
   Counterargument: FSMs scale **fractally** through local groups and community trusts, supported by broader coordination. Like co-operatives and mutual banks, they grow via replication, not centralisation. Technology enables managing complex systems locally; pilot programs can demonstrate viability before wider expansion.
8. **Objection: “There’s no proof it works.”**
   Counterargument: The building blocks of FSMs already exist, including shared equity housing, land trusts, cooperative housing, and mutual finance systems. FSMs combine and expand these ideas into a self-sustaining model with wider relevance. Small-scale trials can generate the evidence needed to gain support.

Implementation

To implement FSMs under the model proposed in this submission, the RBA and Federal Government would need to agree on:

1. Issuing interest-free public money through the banks for productive, repayable community assets.
2. Coordinating monetary policy with local asset-backed circulation.
3. Legally empowering community trusts or co-ops as FSM managers.
4. Adjusting financial regulations to support non-interest, non-speculative lending.
5. Trialling FSMs with formal oversight and evaluation.
6. Recognising repayments as structured reinvestment in the public economy.

These agreements wo**n't replace existing systems** but will create a **parallel, non-extractive option** for public and community development. They align with Henry George's shared values and ideals, and enable a new social contract for the 21st century.

Summary

This submission contends that an alternative housing finance model should support the ACT Government's Missing Middle planning reforms. The model is independent of the planning and can be developed in parallel. Drawing on Henry George's principle that land increases in value because of public and community investments, the proposal recommends using **Fair Share Markets (FSMs)** to ensure that the rise in land value from zoning changes benefits the community. Rather than profit-driven development, FSMs enable all residents to purchase housing through **interest-free payments**, fostering long-term affordability, local control, and more flexible, responsive housing solutions tailored to residents' needs.

ACT Missing Middle Housing Reform

20 June 2025

Director-General, Environment Planning and Sustainable Development Directorate
ACT Government
GPO Box 158
Canberra ACT 2601

As an attachment to: YourSay Conversations

About us: Vivendi Cities specialises in policy and strategic advice on the integration of land use and transport; and the economics of place, walking and cycling in Australia.

Our recommendations

We make the following recommendations for the ACT Missing Middle Housing Reform:

1. Broaden the Missing Middle Housing Reform to include additional requirements that will improve liveability outcomes, based on clear evidence.
2. Require mixed use development (such as shop-top housing or local mixed-use neighbourhood) within 400 metres walking distance of all dwellings.
3. Where possible, require through-site links, particularly for development sites where the overall block (or distance between walkable intersections) is more than 200 metres.
4. Remove minimum car parking rates for residential developments. Failing this, require up to 0.5 car spaces per dwelling for central areas like Gungahlin, Kingston and Civic, and 0.7 for smaller centres.
5. Waive parking rates for non-residential developments under 1,500sqm.

Non-residential uses

In preparing the 'Healthy Streets Strategic Business Case' for Transport for NSW, Vivendi created a regression model that compared mobile phone data of the way people move around the city, with 144 other geospatial factors, to determine statistically what had the greatest influence on walking and therefore the liveability of neighbourhoods and precincts.

This analysis found that housing density and type is the most significant factor – and one that the ACT is now addressing. However, it also found that the next most important factors needed to be part of the mix - specifically local destinations like schools, parks and shops; public transport; and jobs. Together, these four factors account for around 50% of all walking in a given precinct.

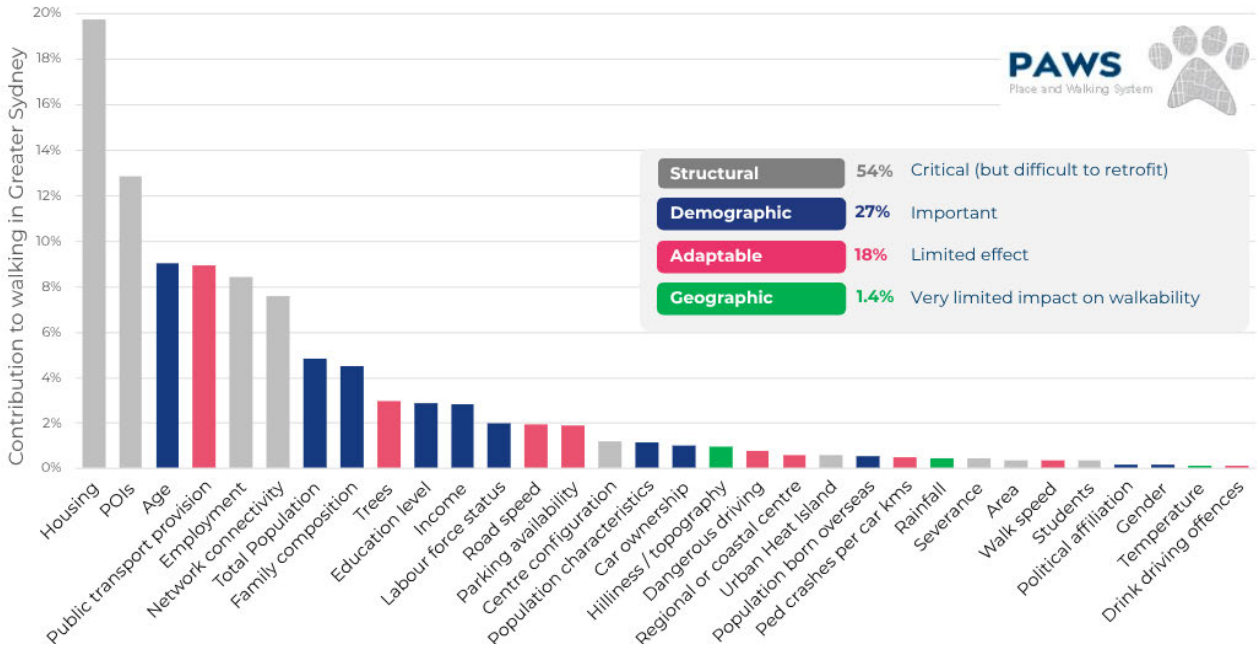


Figure 1 – Regression analysis by Vivendi revealed relationships between walkability and other geospatial factors

This analysis was repeated for regional NSW with similar results (but lower thresholds for detached dwellings and public transport), including Queanbeyan. We anticipate Canberra to have a similar profile.

Therefore, if an increase in local walking is sought (to improve social connection and health, reduce car dependency and traffic congestion, or to access local destinations like schools) then the planning requirement should also include more local destinations, particularly points of interest The easiest way of doing so is by permitting low rise mixed use (such as shop-top housing) as part of the reforms. The Western Australia Planning Commission for example, requires that at least 60% of dwellings must be within 400 metres of shops.

This was a key failing of the NSW reforms, and spurred Vivendi to partner with the Committee for Sydney to publish a Checklist for Walkable Density to address this.

- **Recommendation 1: Broaden the Missing Middle Housing Reform to include additional requirements that will improve liveability outcomes, based on clear evidence.**
- **Recommendation 2: Require mixed use development (such as shop-top housing or local mixed-use neighbourhood) within 400 metres walking distance of all dwellings.**

Through-site links

Another challenge in many suburban areas is the legacy of large blocks that inhibit walking. Our analysis found that 'network connectivty' (permeability) is the sixth most important factor, explaining about 8% of all walking. We found that the maximum distance between intersections should be less than 150 metres. Once blocks are longer than this, walking drops significantly.

- **Recommendation 3: Where possible, require through-site links, particularly for development sites where the overall block (or distance between walkable intersections) is more than 200 metres.**

Car Parking

While lower minimum rates are welcome, the Territory should consider low or zero minimum car parking rates.

When undertaking the research to inform the parking chapter (8) of the NSW Guide to Transport Impact Assessments (GTIA, TS 00085 v1.1) we identified that parking standards impact vehicle kilometres (car use) and therefore impacts on greenhouse gas emissions, public health, transport affordability and so on.

Our analysis found that Australian cities generally have an overprovision of parking, and minimum parking standards not appropriate in most contexts. In addition, mandating excess parking rates increases housing costs, with little benefit.

VPTI research indicates right-sizing parking requirements can reduce traffic demand by as much as 10%, which thereby reduces carbon emissions and local traffic congestion.

Our detailed technical analysis, and review of global best practice, identified that parking minimums should be removed:

- within 15 minutes' walk of major centres
- where there is frequent public transport of major centres –

Instead, this should be replaced with parking maximums in locations where car mode share is already low and density is highest. The map published with the GTIA shows that, at SA2 level Queanbeyan and Gooyong are Category 3. However, there are pockets at SA3 level that are Category 1 and 2 and therefore warrant lower rates of parking (see Figure 2).

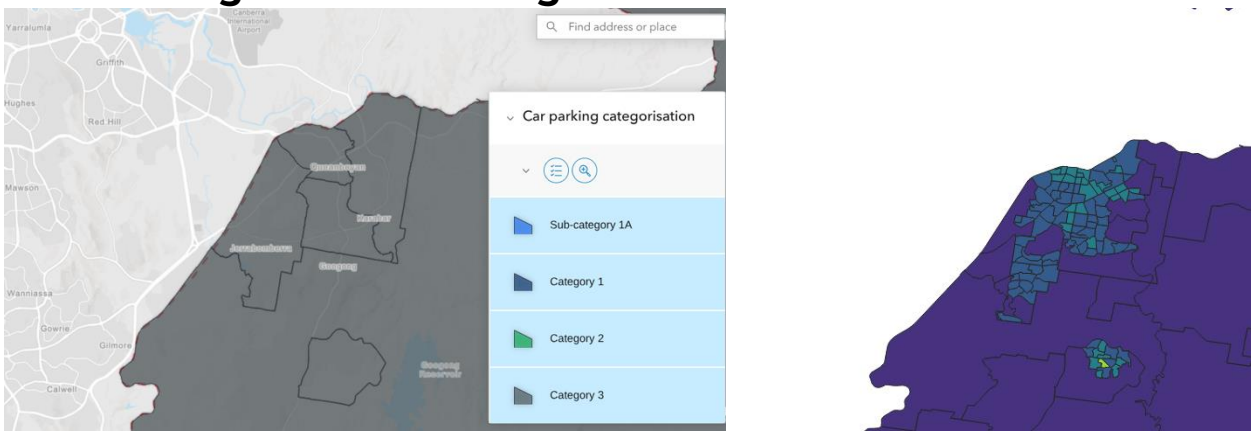


Figure 2 – SA2 map of Queanbeyan (NSW Government) vs SA1 level analysis – parts of Queanbeyan & Googong are Cat 1.

While the rates proposed in DPA-04 are marginally better than the lowest category (Category 3) rates in NSW, the rates will likely result in oversupply in urban centres. Consider starting rates of 0.5 per dwelling for central areas like Gungahlin, Kingston and Civic, and 0.7 for smaller centres, in lieu of 1.0 (or no minimum).

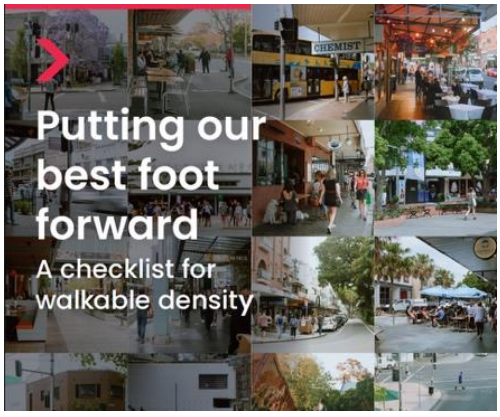
We also encourage you to consider waiving parking rates for development under 1,500sqm, as Japan has done to enable mixed use, gentle density which enables small businesses and local shops.

Our recommendations on car parking:

- **Recommendation 4: Remove minimum car parking rates for residential developments. Failing this, require up to 0.5 car spaces per dwelling for central areas like Gungahlin, Kingston and Civic, and 0.7 for smaller centres.**
- **Recommendation 5: Waive parking rates for non-residential developments under 1,500sqm.**

EXAMPLES

Territory Planning is not delivering walking – Lessons from Bruce



Vivendi was a key contributor to the Committee for Sydney's Checklist for Walkable Density (part of the Density Done Well series).
This checklist identifies evidence-based structure planning and transport elements that are shown to contribute to liveable places, including local points of interest, street network density, public transport and jobs.

As part of work undertaken on behalf of the NSW Department of Planning, Housing and Infrastructure (DPHI) we ran the checklist over Bruce, ACT as a non-NSW comparator. This exposed a low level of walkability, which correlates to the observed high car and low walking patterns in Bruce.

This should be a case study for the Missing Middle reforms. Bruce ought to be the missing middle model – surrounded by education institutions, with swathes of mixed use zoning and 'missing middle' density. Yet the roll-out of monofunctional residential medium density by developers, poor street connectivity, and distances that exceed comfortable walking times to parks, shops and schools, all highlight the need for a greater structural rethink.

Our analysis is reproduced below, including scoring against the checklist (using a more generous approach of giving partial points for percentage of land within catchment). **This example highlights that the reform must go beyond medium density housing, to ensure mixed use and connectivity.**

Figure 3 – GIS analysis showing some key challenges in Bruce

Land Use: All Mixed Up		2.8
All residents are within a 10 minute walk to:		
0.7	a park with a playground	
0.5	a sports space or facility (ie courts, public pool, gym, sports field)	
0.7	a grocer or supermarket	
0.2	a primary school	
0.7	a child care centre	
0	Minimum gross density of 35 dwellings per hectare to support viable local businesses	
Streets: Captivating and comfortable		1
0	All local streets in the development are slow, calm and 40km/h or under (ideally 30km/h)	
1	Unimpeded footpaths are provided on both sides of the street and are >2m wide, <1:20, colour contrast, kerb ramps	
0	Streets can be crossed easily because 30km/h or under, or shared streets, or crossings on every arm and <100m (high streets) / 200m (otherwise)	
0	Streets feel safe due to passive surveillance, activated edges, lighting	
0	Pedestrians are prioritised (continuous footpaths, small streets, raised crossings on large streets)	
0	The walking environment includes share and places to stop and rest	
Network: Making active and public transport easy		1
0	All residents can reach a major centre by frequent public transport (4 per hour), or within 30 minutes walk-all-the-way	
0	90% of residents are in walking distance of frequent public transport (4 per hour, 7a-10p 7d)	
1	Public transport is in place from day one [this is also in Future Transport]	
0	There is a shared path or cycleway for all streeets over 40km/h and 2000 vpd	
0	Separated cycleways where high ped/cycle use forecast (>300 peds or 150 cyclists per hour)	
0	Highest residential density and commercial intensity is within 400m of public transport	
Building: Walkable Homes for Everyone		1
0	Low or no car households have been accomodated w car share / unbundling	
0	Secure bicycle parking provided	
0	Affordable housing provided	
1	Facilitates WFH with fast boardband, study areas	
0	Communal spaces include play space	
0	No more than 30% detached housing, no more than 80% 0-2 bedroom apartments	
5.8	**out of 25**	

Observations:

- MU developed as residential
- Slightly supersized scale
- 60km/h wide streets, low density, circuitous routes
- Medium density housing is remote from amenity

Score	Walkability
0 - 4	Very poor
5 - 9	Poor
10 - 14	OK
15 - 19	Good
20 - 25	Amazing

Figure 4 – Scoring Bruce against the Checklist for Walkable Density

How many people live a 'car-free lifestyle'?

A good indicator of this can be found in Census data. Generally, 5.5% of ACT households do not own a car. In the suburb of Belconnen, this rises to 14% of households, while in neighbouring Bruce, the figure falls to 4.7%. Bruce is therefore more car-dependent than the ACT on average, and well below Belconnen.

While some of this can be explained by the public transport provision (20 vs 7 routes in Belconnen vs Bruce, serving 8 vs 2 unique destinations), **dwelling type also plays a significant part**. Both suburbs have low rates of single dwellings (0.5% and 20% respectively, compared to an average 63% in the ACT as a whole) - but in Belconnen this is mostly apartments (75% of all attached / 74.9 of all housing), and in Bruce mostly 'missing middle' (61% of all attached, and 48% of all housing).

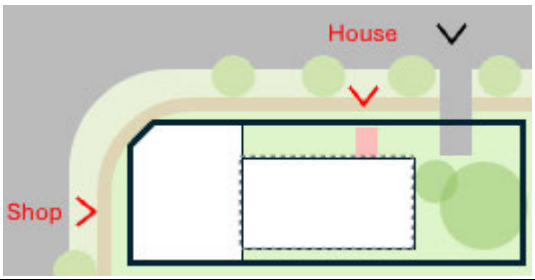
The high parking rates in these 'missing middle' typologies, reflected in the MMHDG, is a contributing factor that these reforms can address.

Small-scale mixed use is currently missing from the Territory Plan

The Territory Plan 2023 remains largely monofunctional with a strong delineation between Residential Zones and Commercial Zones. CZ5 Mixed Use Zone enables *higher density* residential above commercial around transport and in centres. A gap remains therefore for low-rise, low scale mixed use (corner shops) that are essential to walkable suburbs, and feature in pre-war neighbourhoods in Melbourne and Sydney.

Enabling local mixed business requires adding to the E1 – Residential Zones Policy, Land Use / Type Table the uses **cafe, community activity centre, early childhood education and care, produce market** and **shop**. Assessment outcome 6 already manages adverse impacts, and 12 already provides for reasonable active ground floor. With the removal of the apartment restriction, the first Assessment Requirement could be repurposed to deal with small shops, eg: **Distribution of uses – non-residential** ~ Assessment Requirement "1. Non-residential uses at ground level, at the street edge and no more than [200]sqm"

Relatively minor amendments to the draft MMHDG would facilitate this:

Page	Amendment
8	Add "→ **local mixed business** where a shop or business is located in front of or under a dwelling, often on a corner block, to provide neighbourhood amenity"
48	Introduce a new **3.1F Local Mixed Business** for small-scale mixed use such as: *Mosman, Sydney* *Brunswick, Melbourne* **Key characteristics** are 2 – 3 storeys, limited open space or off-street commercial parking **Where to use** where there is no CZ zone within 5 minutes' walk, preferably on corners. **Benefits** of encouraging walkability and reducing car use and emissions, providing for daily needs and compact housing ancillary to the commercial use should be included. Plans should minimise off-street parking and encourage compact low-rise mixed-use urbanism: 
57	**3.3B Non-residential Uses** This is excellent, and captures exactly what is sought. Rather than being passive to this being permitted, make this a standard consideration tied to Assessment Outcome 12. We recommend de-emphasising parking, particularly where on-street parking is plentiful.

Car parking permeates the MMHDG

As illustrated in the Bruce case study above, high rates of off-street parking for medium density typologies is a key contributing factor to the high proportion of car use and low proportion of car-free households.

This reform provides an opportunity to review the indicative layouts and Chapter 4.2 to move away from 'better carparking layouts' towards less parking as a whole. Principles such as encouraging zero off-street parking when an equivalent amount of on-street parking frontage exists would go some way to addressing the streetscape concerns of the design guide, as well as facilitating other better outcomes such as more tree planting and the roll-out of cycleways. (note as well that typically the move towards 'shared' parking availability can reduce demand by 15 – 30%, driving down car ownership and car use).

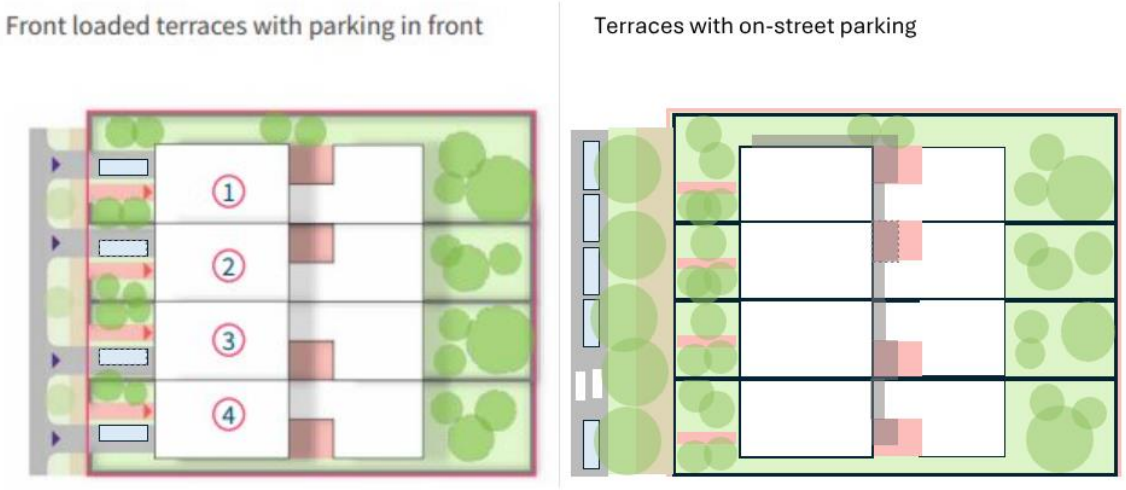


Figure 5 – Current controls require, and MMHDG designs always indicate, off-street parking (left) when more flexible parking and better streetscape / built form outcomes would be achievable (right) by encouraging on-street parking.

Also – Avoid a race to the bottom

The NSW Government spent two years developing the Design and Place SEPP, similar arguments for lowering minimum standards as a means of supporting more housing approvals were made – before the housing crisis. This was a period of unprecedented approvals during COVID – and no increase in supply.

We note that ACT is considering the same approach. Government Architect NSW research did not support lowering standards (and identified lower satisfaction with medium density and rental homes):

SATISFACTION WITH CORE NEEDS SPLIT BY DEMOGRAPHIC PROFILE

	Satisfaction	Male	Female	18-24	25-34	35-44	45-54	55-64	65+	CALD	NON-CALD	ATSI	NON-ATSI	Renters	Homeowners	Home Type, Freestanding /Terrace house	Home Type, Apartment	Home Type, Townhouse / Semi-detached / Duplex	$0-$59k	$60-$99k	$100-$149k	$150k+	Metro	Regional
Air, light & sound quality	**73%**	78%	69%	80%	66%	63%	66%	87%	81%	77%	71%	76%	73%	72%	74%	73%	72%	79%	74%	69%	75%	74%	73%	75%
Dwelling (External)	**67%**	72%	63%	70%	52%	57%	62%	78%	79%	64%	68%	64%	67%	54%	72%	73%	56%	64%	63%	63%	69%	68%	67%	65%
Access t green spaces	**64%**	67%	61%	68%	67%	55%	48%	74%	68%	68%	61%	73%	63%	64%	64%	60%	70%	68%	66%	63%	60%	63%	61%	68%
Dwelling (Internal)	**60%**	65%	56%	60%	48%	53%	47%	73%	76%	56%	62%	63%	60%	50%	65%	64%	54%	52%	57%	52%	61%	67%	61%	59%
Transport & Traffic	**58%**	58%	59%	38%	63%	66%	45%	63%	67%	60%	57%	43%	59%	58%	59%	59%	64%	40%	60%	53%	56%	62%	63%	44%
Local amenities	**51%**	50%	53%	40%	42%	50%	52%	58%	65%	47%	54%	43%	52%	45%	54%	51%	57%	45%	52%	46%	49%	54%	55%	43%
Home efficiency	**40%**	39%	42%	24%	40%	43%	34%	44%	51%	41%	39%	34%	41%	41%	40%	41%	41%	36%	44%	38%	29%	42%	40%	41%

Figure 6 - Extract from GANSW Commissioned Survey and Research showing lower satisfaction of renters (50%) vs owners (65%) and 'missing middle' occupants (52%) vs detached house owners (54%) in the amount of internal dwelling space.

ACT Missing Middle Housing Reform

Using lessons learnt from the NSW experience, we recommend:

- People value thermal control, access to sun and air very highly in surveyed results (see research link above). Therefore, solar envelopes should be purposive. 31° is an evidence-based proxy for sunlight to public space midday, midwinter, while 45° is not. Why not provide a performance-based exemption? (eg: 31° "or such greater angle as can be demonstrated does not overshadow...") - much like the NCC.
- Reduced areas for apartments and bedrooms should be considered against the increased rates of work-from-home. Ultimately, NSW retained bedroom sizes and introduced purposive considerations for the placement of study desks (which could be within bedrooms, or study nooks).

Who are we?

Vivendi Cities is a small consultancy with expertise in place, active transport and AI. It has three directors:

[redacted]

We have produced, led or provided key inputs to:

Committee for Sydney Checklist for Walkable Density

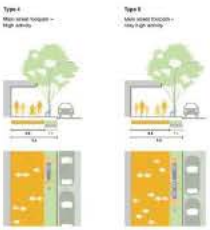
Transport for NSW Walking Strategic Business Case

Transport for NSW Active Transport Systemic Analysis

ATAP Valuing Place Guidelines (draft)

Australian Government
High Speed Rail Authority

HSRA land use assessment + demand modelling



NSW Walking Space Guide and Cycleway Design Toolbox

INSW Investor Assurance Framework

Macquarie Park PBTS and Strategic Business Case

Rozelle Master Plan (transport-enabled town centre master plan)

Guide to Transport Impact Assessment – Chapter 8 Parking

Yours Sincerely,

[redacted]

The ACT Government's Missing Middle Housing Reforms will reduce Canberra's travel distances, travel times, transport costs and transport emissions.

They will also substantially increase the unimproved capital value of around 150,000 homes.

The government has no plan to charge the owners of those homes a lease variation charge to recoup the increased value of their leases.

Without sufficient lease variation charges (which home-owners could pay progressively through surcharges on their rates), or without sufficient adjustments to the unimproved capital values that are used to calculate municipal rates, the proposed reforms would represent a massive transfer of wealth:

- away from the relatively poor tenants of more than 50,000 houses (including the 100% of aboriginal households that are rented) who pay rates indirectly through their rents, and
- towards more than 100,000 relatively wealthy property owners

The proposed reforms would also represent a significant transfer of wealth, away from the majority of home-owners who own just a single house, and towards the approximately 2% of people who own more than one property.

[redacted], 19 June 2025

Dear ACT Planning

I welcome the ACT Government's "Missing Middle" reforms to promote housing diversity, affordability, and sustainable infill in established suburbs. I am writing to request that blocks under the current 800 m^2 minimum — such as my 658 m^2 RZ1 block in [redacted] — be considered eligible for sensitive subdivision or dual occupancy, especially where existing secondary dwellings already comply with building codes and environmental performance standards.

My property comprises:

- A primary residence at [redacted]; and
- A self-contained 58.5 m^2 secondary dwelling at [redacted], which is currently rented as a separate residence with its own entry and amenities.

This arrangement has proven both practical and desirable — providing an affordable, low-impact rental option in a high-demand suburb, while supporting gentle, low-scale infill in line with the ACT's strategic planning objectives.

However, because I am currently unable to subdivide the property, both the primary and secondary tenants must share utility connections, including electricity and internet, requiring manual cost-splitting and informal arrangements. This is less than ideal for all parties, and a subdivision would enable separate metering and service connections, significantly improving the living experience and rights of both lessees.

More broadly, my block:

- Is located in a well-serviced, walkable suburb near transport, schools, and shops;
- Retains its garden character and privacy despite accommodating two dwellings;
- Represents an ideal candidate for subdivision that aligns with the aims of the "Missing Middle" reforms.

Allowing subdivision of mid-sized blocks with existing, compliant secondary dwellings would:

- Unlock more flexible and diverse housing options close to services;
- Support single-income homeowners, ageing in place, and intergenerational living;
- Improve tenancy conditions by allowing full residential independence for each dwelling.

I encourage the ACT Government to:

- Remove or reduce the 800 m^2 minimum where site conditions and existing infrastructure demonstrate feasibility;
- Introduce a design-led, merit-based subdivision pathway;
- Provide a pathway for recognising and formalising existing well-functioning dual occupancies.

Thank you for considering this submission. I would be pleased to participate in further consultation or pilot initiatives that support inclusive, sustainable urban housing in the ACT.

Kind Regards

[redacted]

[redacted]

MISSING MIDDLE HOUSING REFORM ENGAGEMENT

Quick comments received via YourSay

Date range: 20 May 2025 to 22 July 2025

“The existing site coverage requirements are too generous: this will make things worse.”
“Better planning of parking, street width, town centres, roads and general infrastructure is seriously needed.”
“This is a great way for parents to help their kids build their homes on our land. Very well overdue”
“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”
“The feasability study by [redacted] has a conflict of interest: they will benefit from the extra work their client developers get. New developments have no fit with existing character under the present guidelines. What is there in these new ones to imply different now?”
“Subdivision is good and allowing townhouses the same size as houses is fine. RZ1 block consolidation is an unacceptable change to character.”
“This change would make suburbs more vibrant and interesting.”
“You are ruining Canberra. The impact of these extra infill programs are compromising the way we live and our quality of life.”
“The response to FAQ 'Will this change the character of my street' is disigenuous: old streets were very clearly planned by housing type.”
“The guide and engagement materials are filled with question-begging terms: "missing middle" is the biggest. Also 'right-sized', etc”
“Sounds good”
“I am all for MM housing if its done well and we retain gardens and trees. Cbr did this well decades ago. Why not go back to those rules? Why would this approach work when current zoning doesn't? What will stop developers building huge houses instead of MM housing? Needs fix. Need a scheme for older people - they give up their old home for redevelopment and buy government auspiced energy efficient new build nearby Many older folk in Nth Cbra want to downsize but developers build huge single dwellings. Need creative policies to correct the mismatch. Better to: - ban single dwellings in RZ2 - use RZ3 rules for RZ2 - extend RZ2 - use 80/90s rules that created good missing middle in RZ1”
“The ACT should push back on the FedGov's immigration program. If not for mass immigration, Australia's population would actually fall.”
“There wouldn’t be this missing piece if act and federal gov didn’t create it. Regardless of what housing is built people can’t afford it.”
“With good design, incorporation of environmental technologies and sensitive use of open space this could really help the housing crisis”
“I support the concept of MM. However, the proposals need re-working to guarantee solar access in winter to avoid building cold homes etc”
“Yes, infilling existing suburbs is a better idea than the eye sore of new development. We also need to stop unending growth mentality.”
“Great idea. Should also revise RZ1 to allow basements, attics, and three-storey houses in exchange for lower block coverage.”
“Avoid 2 stories where all other houses are single in street. Glad to see privacy and light will be factor. Major concern about parking provision where on street parking results in danger.”
“where is Talk to the government architect Session? I have registered for this session but I do not know the location for Friday 22 June”
“This needs to be more dynamic. Inner north and inner south should have mid to medium rise apartments and outer areas need this reform.”
“Impossible to fit 3 abodes on single block. No views, no plants, no space, expensive”
“Need single level spacious townhouses near shops”

“Canberra has an ageing population who require single level housing. This does not appear to have been addressed.”
“I am all fo the missing middle however great design, quality & good regulation is vital. Canberra is filled with poorly designed apartments”
“I would love to see more missing middle housing particularly those suitable for people with disabilities or as they age eg single level.”
“Moved to Canberra for the reduced population, and lifestyle of living in the bush capital. STOP immigration and squashing us like sardines.”
“Sounds like a sensible approach, but the high cost of building, land prices, crippling land tax and contributions who's going to build it.”
“Townhouses in MEL or SYD are usually in a row, not in between existing single level houses. Overshadowing and overlook are real problems. I'm paying back a $15000 solar loan. What happens when a townhouse overshadows my panels? How is this fair?”
“Over all I think these reforms are fantastic and exactly what the city needs.”
“Concerns-Solar envelopes will restrict terrace houses builds”
“We want more trees, we want more houses, you cannot have both. 5% increase in tree canopy is just a 5% increase on something falling on my house without any greater benefit. canopy should not just be about trees, should be able any shade apparatus that provides a benefit to the dwelling. I dont agree that minimum for development should be unspecified. down to 700sqm maybe. too dense is not good. supported backyard infil the design book could also include KD1B2 designs with shared basement parking, single dwelling backyard dwelling with basement parking. ps 140 characters is really annoying. in the same vein, put out an EOI for builders/architects to submit designs for inclusion that meet the design/necessary criteria - less work Genius-create a book of multiple designs, incl prefab options to make it quicker, partner with builders, meet design criteria, fast track 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. consider the future aspect of tree root problems associated with increased canopy, including damage to the structure. Canopy isn't everythin create a specific "do you want to develop your backyard" guide, and ONLY include detailed, necessary for that type of build =less confusion page 66 of the missing middle housing design guide does not have the number plate (XQV088) of the car obscured in photo 46 if M&D knockdown 1 and rebuild 2 with a known, reputable builder, nothing huge, special or difficult, make it simple and be flexible. older people generally fear dealing with complex issues, 1, 80 year old living on 900sqm of land in red hill is not good use, help them. create a "mum & dad backyard development team" to properly assist people to use their backyard and not affect the streetscape. the partnership model could minimise negative pension outcomes for the elderly given they wouldnt get all the money. If backyard development is what you want, partner with owner who may not have cash or income stream and take from the sale. the idea you cannot have 3 levels is ludicrous. Only seeing 2 - great. enable basement parking with 2 visible levels with bedrooms=carpark selling backyards provide opportunity to age in place, frees up capital to make house upgrades. the 120sqm limit is too low, 140-150 If you want battle-axe, provide fixed costing for LVC and other charges to demonstrate viability for M&D's without spending on consultants”
“Why are are tiny homes not included and why are you not addressing building standards that necessitate larger dwellings.”
“I fully support this new inititive. I think it is reasonable and make sense to address our housing shortage issues. Thanks.”
“Concept is great! Respect heritage areas. In the builds, include garages (flexible areas) and laundries with space for hanging washing. Brilliant, much needed, creative. Make it beautiful architecture and landscaping working together for sensible, sustainable outcomes.”
“I am supportive of the concept but there must be strong incentives to adopt aging in place designs including residential lifts in townhouses”
“The requirement for dedicated bicycle storage is totally out of proportion for only 2 or 3 dwellings, give only about 5% of people cycle.”
“Housing density should be increased without reduction of planting area, open space or setbacks by growing up not horizontally.”
“In all of your image you have two story houses. This will not tempt older people to exchange their multi bedroom home for something smaller.”

“Thank you for looking at innovative solutions to housing in CBR. Looking for technical spec for RZ2??”
“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.”
“Delete 120sqm dwelling limit. Just follow plot ratio. Allow proper subdivision on RZ1 land instead of unit titling.”
“Old big blocks = big trees and stricter setbacks than newer suburbs. High lease change fees. Need 2 x rear easement access. Slow approval”
“You want more dwellings and more trees, without relaxing other requirements? How? The process needs to be simplified, not complicated!”
“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”
“I wanted to find a townhouse where I wouldn't need to drive around, but I couldn't. This change, with the right oversight, is great for cbr.”
“Pay attention to how multi-unit complexes are managed once they are built. Unregulated strata managers are the mobsters of the current era.”
“It's a good idea so let's proceed ASAP”
“Perhaps consider three stories in RZ1”
“As show options of two dwellings on top of each other”
“I’d happily sell my home and live in a unit, however the body corporate fees are too high with little value.”
“I am extremely supportive of Canberra becoming a more housing dense city. We really need to start creating more missing middle housing.”
“I strongly support the proposed amendment to subdivision policy to remove the 120m2 maximum size limit for second dwellings.”
“Groups of three villas with a common private garden area for verges and seating space. Important villas have two bathrooms and living space There is a shortage of single level villas with enough room to have the family over for older Canberrans and people with disabilities.”
“Tiny Houses have been ignored. They have no clear directions but are useful. Resolve them - yes or no - in the legislative upgrade.”
“there is no logical reason to enforce uniformity across Canberra suburbs. In the inner south and north, reduced canopy cover. Inconsistent”
“Retirees downsizing DON'T WANT 2-storey dwellings! There is a desperate need for SINGLE LEVEL, 1, 2, or 3 bedroom stand alone town houses.”
“Lack of disability requirement, aging population need single level. Multi-level focus. Single-level no steps won't be built unless forced to”
“This is a great proposal but only suitable for areas with larger blocks and higher housing demand such as Braddon and Garran”
“How about a design competition, highlighting innovative ways of reimagining single-family homes, 2, 3 & 4 bedroom units ,& Row/Townhouses”
“Loss of amenity: tree loss, shadowing from new developments reducing access to light for solar panels/windows, privacy loss, street parking.”
“Why has this taken so long? We could’ve been doing this for the last 10 years . Finally some common sense, it’s about time.”
“good idea but with the increased supply comes increased demand how are you going to make sure that it doesnt just make more people live here?”
“There are better examples internationally with gentle infill/densification. The answer is not more boxy dwellings.”
“I support these reforms.”
“What compulsory planning provisions for off street parking will there be to avoid our streets being clogged with parked cars?”
“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”

“areas of population increase must address public amenity EG community garden, playspace, skatepark, bike path to avoid chaos due to boredom.”
“This is great and well overdue. Absolutely support.”
“More online Q&A would have been useful.”
“I like the reforms to enable more missing middle housing. I hope they are accompanied by investment in local shops, services, and PT.”
“I am opposed to the MH idea. Rarely do low density apartments / townhouses look good and many are not maintained. Streets would be wrecked.”
“I think its a good idea, but personally I think the high density zones should be expanded in congruence with these reforms”
“The first and very important thing for this to work is to vary crown lease which is expensive. ACT Govt. should look into reducing LVC.”
“Very happy and excited about the missing middle housing reforms. I currently enjoy living in an old duplex home and hope to see more built!”
“You need more single level two bed homes for those ageing and can give up their bigger homes. Older people don’t want two story or a unit.”
“I dont have a problem with it as long as existing residents' concerns are taken into consideration such as proximity, noise and shading.”
“Wish list: all parking mandates abolished (eg NZ) - taller demand-responsive homes allowed by public transport, services and Inner Canberra. This is an essential reform that helps democratise housing growth across Canberra, which will become normalised like in other global cities.”
“I’m supportive of single residential land become dual residential. Need to ensure traffic flow.”
“Absurd proposal. The planning authority won't even let us build a garage on our 600m2 block, where we already have a shed and concrete.”
“We need much more medium-density housing. House plans need to be regulated (I've seen so many poorly-designed townhouses) and need amenities”
“Allow subdivided vacant land for sale before construction”
“These reforms are a much needed step in densifying our city, catering for demand in established areas. Fully supported. Well done!”
“This should have been done years ago.”
“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 the of Affordable and social housing.”
“This can't come soon enough. I wouldn't be able to live where I am if it wasn't for this type of housing and I want that for everyone.”
“We should give more 1st home buyer subsidies. Especially for older homes. So people will buy them instead of running behind brand new”
“The Government has left the construction to the private sector and they might choose to build other types of housing. What is the MM target What if builders ignore the MM design guide and maximise the number of units that can be placed on a block? Any neighbour protection? Housing affordability has been overlooked in these reforms and the terraces being built currently cost as much as houses.”
“Me and my friend want to build together. Dual occupancy. But act govt rules are tuff. If u guys allow to buy 500sq and make 2 same size house”
“The guide is too biased towards two-storey developments”
“I am supportive of the programme.”
“More options, less cost”
“The reforms do not address the pressing need for small single story homes with small gardens for older residents”
“I fully support this. City Edge, O'Connor is a brilliant example of "missing middle" housing. It provides public and private housing.”
“Strata costs are outrageous, our's has doubled in two years no fault of the EC. Defects still outstanding, [redacted] is shonky.”

“LVC and UT need consideration to make this accessible, having just done a dual occy with my dad, it was incredibly costly& convoluted”
“please build singapore HDB style public housing, back to basics housing, no flair, no luxe, community and environmentally minded.”
“Well done. It is definitely the right direction for increasing housing choices and affordability.”
“I like this but it needs to be joined with the total removal of stamp duty. Still penalised for downsizing for owners of big houses & blocks”
“As soon as this happens I’m leaving ACT”
“Feedback: Consider and allow the RZ1 blocks to be subdivided and sold without a need to construct the house. Especially for larger 1000+ sqm Feedback: Consider the large RZ1 1000+ sq meter and CORNER blocks separately and provide special entitlements Feedback: Consider removing or reducing the unit titling/sub division fees. This may encourage general public to sell.”
“These reforms need to be rethought for corner blocks in RZ1. The setbacks allowed are completely inappropriate on the secondary street front”
“Rates are so high now and you proposing to cut the existing blocks and doubling your rates again and saving on infrastructure.
“Less consult more build.”
“Time to look at subdividing the huge leasehold blocks along Mugga Way and other similar areas ... a colossal waste of space. I felt this initiative showed little thought for infrastructure - roads for example - unchanged and ill-equipped to handle extra traffic”
“It will not increase affordability: smaller dwellings may be cheaper. So what? Media panics when prices decrease, that'll matter more.”
“Why don't you make dual and tri-occupancies exempt - as long as it's zoned relevantly and size of development is based off block size.”
“Is what the ministers and politicians consider good housing the same or different from what the public as a whole thinks? Have you considered actually surveying a large portion of the population to see what kind of housing they actually want? Have you actually considered the ecological impact? In suburbs built before the 90s, the majority of area is planted usually planted”
“Right idea but need to apply to all heritage areas too otherwise no good (not precious about them). Also make sure not to overshadow others”
“I really like this reform. I dislike the car dominance in the guide. Please consider how you will allow for more shops in these areas too.”
“We are spending an extra 30g on extension materials because it took so bloody long to get through the approval process. We can't afford that”
“Sounds amazing!! Especially for uni students”
“good idea”
“You should also consider Rz2 rezoning by a few hundred extra metres from shopping areas. Shift the Rz2 out in the older suburbs”
“This is not the answer, not everyone wants to live packed in like sardines.”
“I strongly oppose this policy. This will not solve housing problems but will drive up prices for cheap, flimsy shoeboxes.”

CABINET

Do you currently own a home?	Do the proposed changes to enable 'Missing Middle' developments make purchasing a home, or an additional home, more appealing to you?	If no, why?	Are you considering redeveloping your block in the future for a type of 'missing middle' housing?	How well do you think the proposed changes allow for more diversity in housing and housing choice?	Does the draft MMHDG provide adequate guidance to deliver quality, site-specific outcomes where there is block consolidation / sub-division?	Why?	How well does the draft guide encourage appropriate transition in building height and scale?	Have we got the balance right between solar access and privacy for neighbours and enabling right-sized missing middle housing?	Do the diagrams provide clear descriptions of good design outcomes related to setbacks and building separation?	Comment	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)?	Have we got the balance right between the provision of car parking spaces onsite and allowing for more missing middle homes?	How well do you think the draft guide provides for car parking that supports a pleasant landscape outcome ?	Does the draft MMHDG offer clear guidance on good design outcomes? If no, what would you add / what's missing?	Do you think you would like to live in missing middle housing?	Please comment further	Please comment further	Would you like to leave any other comments about the proposed Missing Middle housing reforms?
Yes	No	Complicated DA process for householders, favouring developers.	No															The main comment I wish to make is: for all future housing development, that modular and pre-fabricated building forms be given priority. Such housing can be efficient, architecturally designed, more affordable, faster to implement on site, and involve less waste in many cases. Using best practice modern techniques, such as more use of laminated wood in place of concrete, will facilitate much construction, including in missing middle developments.
Yes	No	See comments below.	No					No My partner and our young children live in Woden in an RZ2 zone. Â There are many dual occupancy blocks in my suburb and we expected when we bought our house in 2020 that it was likely that the single story house next to us may be replaced with two dwellings. Â The block has now been sold to a developer. I'm horrified to read that the developer can put up a 3 storey development next to us and it's possible that we might not even be able to comment on the development. Even if we are able to comment it seems that the developer is unlikely to take any notice of our comments as long as the development fits in with the vague design rules. Â Â 3 story development will overlook our currently private back yard where we play with our young children and will reduce many hours of solar access that we currently have							No, I don't want to / I currently live in a detached house			My partner and our young children live in Woden in an RZ2 zone. Â There are many dual occupancy blocks in my suburb and we expected when we bought our house in 2020 that it was likely that the single story house next to us may be replaced with two dwellings. Â The block has now been sold to a developer. I'm horrified to read that the developer can put up a 3 storey development next to us and it's possible that we might not even be able to comment on the development. Even if we are able to comment it seems that the developer is unlikely to take any notice of our comments as long as the development fits in with the vague design rules. Â Â 3 story development will overlook our currently private back yard where we play with our young children and will reduce many hours of solar access that we currently have for our solar panels.
Yes	No	Uncertainty around how the area might change	No	I think is mostly pretty good. What people actually care about living in a place is the character, which is largely defined by what's visible from the street - not what's inside the building or what it's used for. There's really no reason not to allow a structure that would be legal to build as a single family home to be built as townhouses - if the size and shape is within what's legal already, allowing that different use seems fine. And subdivision is the perfect way to allow invisible densification - there are lots of subdivided blocks in my suburb of Ainslie, and other than the letterboxes out the front you'd never know. Maintaining the requirements for greenery and block coverage is sensible. My big gripe is the proposed block consolidation - this would radically change the character of streets, with buildings totally at odds with what's there. This sort of thing belongs in RZ2.	No	Block consolidation is unacceptable. The guidance for subdivision is good though.	It looks okay, but I'm not really an expert on such things. If you allow block consolidation you're never going to get the new to blend with the old though.	I think so, yes.	Yes		70	If anything you could go further and get rid of parking minimums entirely - if this leads to problems with street parking then just regulate the street parking.	It looks basically fine.	The guidance is good, but quite subjective. This will mean there's the potential for wide variance in application, and likely precedent will be set in part by ACAT.	No, I don't want to / I currently live in a detached house			Architecture, block consolidation is an unacceptable change to character in RZ1 and should be removed from the reforms. The character of RZ1 is defined by the succession of different buildings at regular intervals (along with the green space and height, which these reforms preserve). I suppose in some newer suburbs it might be okay, because the side setbacks are already so small, but in established areas where these reforms are targeted it's not a good change. Otherwise these are mostly good ideas - regulate the size and impact of the structure, not how many homes are inside. And subdivision is an excellent way to add density when done well - Auckland is awful, but the existing subdivisions in older Canberra suburbs like Ainslie are invisible from the street while allowing two or even three homes on a block. One thing that will need
Yes	No	Already own our home	Yes	I am supportive of increased density in our city. It is important to provide more housing to help the cost of housing under control, particularly for the younger generations. Suburban sprawl in a bad outcome for the environment and for quality of life. I support the proposed changes but worry that the pace of change will not be sufficient.	Yes											Yes, I'd like to downsize and stay in my current neighbourhood			

Yes	No	I'm happy with the home (an apartment) I own.	No	I welcome the proposals to allow for greater diversity and density in the RZ1 residential zone, though the proposed reforms may not go far enough. For example, it's not clear from my reading of the Missing Middle Housing Design Guide that the proposal for a 'manor house' development at 20 Blaxland Crescent, Griffith (2 up, 2 down on a 1166 sq m block), would be approved under the proposed RZ1 amendments, given apartment developments would require a minimum block size of 1200 sq m (p. 44 of the design guide). This is despite the fact that the manor house development was approved in 2022 as a demonstration housing project by the planning minister under draft variation 375 (https://region.com.au/gentlemen-planning-nod-paves-way-for-griffith-manor-house/564697/).	Yes		The draft guidance to allow for transition in building height and scale appears to be workable.	Yes, in general.	Yes			100	Yes. Many Canberrans have a fear of street parking, both in terms of safety and aesthetics, that is at odds with their reliance on private transport. If you insist on being able to drive and park anywhere you want to, you need to cope with the sight of parked cars in front of your property.	Satisfactorily.	It appears to be a useful guide.	I already live in this type of home			The proposed reforms to the RZ1 zone are not particularly ambitious, and could go further to provide for even greater diversity and density. See my earlier comments noting that the proposed 'manor house' project at 20 Blaxland Crescent, Griffith would not necessarily be approved under the proposed amendments, even though the proposed redevelopment of this corner block was approved in 2022 as a demonstration housing project.
Yes	Yes		Yes	Very well. Proposed changes seems like an excellent solution to providing more diversity in housing options.	Yes		Good. References to assessing local context is comforting and necessary.	I think so. Will be dependant on orientation of block however the considerations in the guide seem to be far superior to the currently utilising planning considerations in new housing developments.	Yes			90	I think parking on the street becomes a necessary evil when you try to amalgmate the on-site.	Ok. I'd like to see more consideration to traffic calming / slowing if there's going to be more parking on-street. It really needs to only be for visitors and I'd hate to see on-street parking utilised on a semi-permanent basis by residents.	Yes. I very much like the design aspects and considerations.	I already live in this type of home			Already happily living in a duplex. The efficiencies that come from this housing type are excellent. I look forward to seeing more modern duplex and similar built in RZ1 in future as a result of these changes.
Yes	Yes		No	Fairly well. Changes such as allowing manor style and walk-up apartments in RZ1 are positive moves, as are the relaxation of max heights in other zones for multi-unit housing.	Yes		I can't comment as to whether the guide 'encourages' this kind of transition, but it certainly provides useful guidance on how to integrate new missing middle developments within an existing urban fabric.	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.	No	I found Figure 70 on p.82 of the draft guide quite hard to interpret.		90	Yes. We cannot hope to achieve sustainable urban environments without some reductions in car parking allowances.	Car parking - both on-street and on-site - can be visually awful. I think the draft guide does a good job at suggesting ways to minimise this visual clutter.	Overall, yes I think it offers some good guidance. No suggestions at this current time.	I already live in this type of home			Implementation of these reforms needs to be accompanied by more comprehensive reform to car parking across the Territory, but especially in the city centre and group centres. This includes fairer pricing signals for on-street parking that support modal shift to public and active transport, as well as changes to parking limits (lowering or abolishing minimums, or establishing maximums) on residential and commercial developments.
Yes	No	Combined impact of high government charges, particularly LVC which can exceed $40k per dwelling, along with high land holding & construction costs, renders additional dwellings financially unviable (simply to cover costs, not profit)	Maybe	While the intent to promote greater housing diversity is positive, the proposed changes appear to broaden permissible development without addressing the core issue that has stalled infill to date: financial viability. Rather than examining why areas already zoned for higher density haven't seen more uptake, the reforms instead relax controls in more areas, yet the main barrier remains untouched. The Lease Variation Charge (LVC), often exceeding $40,000 per dwelling, continues to make most small-scale more affordable infill development, financially unviable. We've seen firsthand that this cost deters not only 'cannum-and-dad'landowners pursuing one-off developments, but also experienced small-scale developers. While some typologies may still be feasible - such as single dwelling	No	Subdivision shouldn't require dwellings to be built first. Allowing land to be subdivided enables end users to build their own homes supporting affordability & diversity rather than relying solely on developers. Other measures can discourage land banking.	The guide provides general principles for height and scale transitions, but in practice, these may be too reliant on discretionary interpretation. Without clear, measurable controls - particularly in areas with sensitive adjacencies - there's a risk that 'contextual response'becomes subjective, leading to inconsistent outcomes.	The guide outlines general principles for height and scale transitions, but in practice these are too open to interpretation. This is most critical in RZ1 of older suburbs, where surrounding homes are often single-storey and more sensitive to changes in bulk and scale. Without clearer, measurable controls, 'acontextual response'll becomes subjective, increasing the risk of inconsistent outcomes that undermine neighbourhood character.	No	Unclear on what's acceptable. Further, substantial separation between dwellings shouldn't require the proposed setback to respond to the neighbour. Proximity should be a key consideration.		70	Not sure. The intent is reasonable, but the practical implications need more consideration. Are Canberra's outer suburbs really set up for reduced parking? We already see verge parking, which isn't permitted or well managed. If street parking increases, how will it be regulated - or do we adapt the rules?	The intent is sound, but in practice, more guidance is needed to ensure parking doesn't dominate front setbacks - especially in RZ1. Without clearer controls, there's a risk that hardstand erodes the landscape character these reforms aim to retain.	With the changes to RZ1 being so significant, I think clearer, quantitative controls - like those in the previous Territory Plan - are needed. While the design outcomes approach of the new Territory Plan has merit, it relies too heavily on subjective judgment, which can lead to inconsistent and potentially poor outcomes, which will have the most detrimental impact in low-density areas.	I already live in this type of home			To explain in the previous item: I already live in missing middle housing, but increased density can take a toll depending on your stage of life - more noise, less privacy, and less space. As our young family has expanded, we've moved from apartment, to townhouse, to dual occupancy, and ultimately we're hoping for a larger, more private block as our kids grow. This highlights the need for genuine housing diversity. If the reforms go too far with increased density, the housing choices at the other end may disappear. I'm also concerned these changes are just casting a wider net rather than addressing why uptake has been limited in areas already zoned for higher density. Industry has been raising concerns for over a decade that steep increases to Lease Variation Charges (LVC) would curb missing middle
Yes	Yes		Yes	Extremely satisfied with the proposed changes. The proposal appears to provide significantly more housing options and diversity. Assessing projects alongside the local context is good.	Yes		Fine. I think the references to assessing local context to guide scale of developments is important and well articulated in the plan.	I think so. All the considerations listed seem very commonsense but often absent in the typical housing developments I frequently see currently.	Yes			90	I think so. Personally should emphasis single car is the future for most residences.	Happy with more on-street parking but could it be combined with reduced speed limits to accomodate the narrower roads due to possibly parked cars? I dislike people driving fast and moving aross lanes to pass parked cars on current residential streets.	I like it all very much. A marked improvement over whatever has been used in the past.	I already live in this type of home			I'm currently living in a duplex which I love the efficiencies. In our area of Campbell I'd happily see more missing-middle type structures.
Yes	No	No new land released or infrastructure being built, just degrades existing areas, reduces trees.Delivers more large, expensive duplexes and make existing houses more expensive due to redevelopment premium.	No	Unless the new housing forms deliver larger profits than knock down rebuilds, and building large duplexes and selling both of them for well more than double the original house, then there will not be more diversity. Builders and developers are about profits and reducing their risk, not about housing diversity. The steadfast stubborn refusal by govt to evaluate what was actually knocked down and built in RZ2, and previous relaxations of planning rules speaks to the desire of policy dreamers to keep dreaming rather than acknowledge reality of what builders actually build compared to what missing middle advocates and their captured dreamers in government thought they would build.	No	Guidelines speak more softly than $. Developers and land bankers will find ways to consolidate blocks regardless. The question is whether this actually delivers affordable housing and true fabled diversity, or more small 1 bedroom and 2 bedroom apartments		No. 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)			10	Not even close. Parking on streets because of inadequate parking degrades existing areas, and turns streets into dodgem courses. Ask the people who live in Nth Watson whether limited parking works well. Hot tip it is terrible.	Choices Made by developers will favour increasing yield and increasing size to improve profit margin, rather than pleasant landscape. Always.	What is missing is reality. Canberra has lots of existing medium density housing. Nearly all of which was built in green fields development when Gunghalin, Molonglo, Tuggers etc was originally developed. What is missing is developing and releasing land, which the govt has been rationing. What is missing is infrastructure to connect land banked by the govt. What is missing	No, I don't want to / I currently live in a detached house			Noisy wannabe politicians in Missing Middle and Greater Canberra are just a small minority of dreamers regurgitating dot points shared in workshops. They are part of the community but dont mistake volume for depth or breadth of support in Canberra community.

Yes	No	What the ACT Government (and developers) do not seem to understand is that there are a lot of us who want to live in small houses with at least: a bedroom & bathroom on the ground floor, a bit of our own garden, and our own title (i.e. no body corporate!)	No	It could add a little more diversity and choice. However, much more diversity and choice is needed. What the ACT Government (and developers) do not seem to understand is that there are a lot of us who want to live in small houses with at least: a bedroom and bathroom on the ground floor, a bit of our own garden, and our own title (i.e. no body corporate!). We also need a workable kitchen, including storage space, and to be able to move about the home with mobility aids. Multiple bathrooms are only desirable if they have any built-in and don't come at the expense of a proper kitchen and laundry facilities that actually vent outside. Most units & townhouses in Canberra are currently	No	Saying things like 'Ensure that the subdivision complies with local planning regulations, zoning requirements, and minimum block standards.	Not very well. 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).	p102 pretty good. Needs to mention insulation and reducing uncontrolled flow of air (including noise and odours).	No	6.2A(i) is clear & a great improvement on what has been happening (eg at old Stuart Flats site) but (ii) is not: what does 'where it positively contributes to the streetscape' mean? Lots of room for abuse!	50	No. Homes should not *have* to include parking for residents (apart from pods for share cars). 4.2A(i) & (ii) could be contradictory. In other places like Melbourne, some new semi-detached houses or multi-unit developments have parking at or near the front that is reasonably attractive. Convenience of access should be active transport (especially pedestrians, including people with disability) > cars etc		Focus should be on attractive, comfortable and convenient user experience: in the housing, in the gardens and in the whole neighbourhood.	Yes, I'd like to downsize and stay in my current neighbourhood			My answer to the last question is only if the following is met: Stop focusing on multi-unit, unit-titled developments. Much more diversity and choice is needed. What the ACT Government (and developers) do not seem to understand is that there are a lot of us who want to live in small houses with at least: a bedroom and bathroom on the ground floor, a bit of our own garden, and our own title (i.e. no body corporate!). We also need a workable kitchen, including storage space, and to be able to move about the home with mobility aids. Multiple bathrooms are only desirable if they have any built-in and don't come at the expense of a proper kitchen and laundry facilities that actually vent outside.
Yes	Yes		Yes	Excellent idea, we can subdivide some very large blocks to provide new homes in lovely old established suburbs. This will invigorate old suburbs and provide much needed high quality new homes.	Yes		Well enough.	Not really. I think more flexibility is required. Dependent on situations, sometimes flexibility is required for better long term design, rather than a short sighted rule. Eg, if the new home has all the restrictions because of an old home design, but then that old home is knocked down and rebuilt.	Yes		90	I'm worried about this. We do not have good street or public parking infrastructure, or transport. New homes must have adequate parking, at least 2 places.	Not really sure to be honest		Yes, I'm looking for an affordable home in an established suburb			
Yes	No	You are redefining the entire planning landscape. I now have no certainty that large development wont be built next door to me. Why wouldnt you apply this around suburb shops and areas density makes sense? Having it apply in outer suburbs is lunacy.	No	These questions are leading and flawed. You are not encouraging proper feedback. They encourage diversity in housing, of course they do - you've rewritten the entire planning laws to make anything be buildable anywhere. You are inviting mass confusion and street by street uproar. Maybe people want to live in an outer suburb in a non dense area? Whats so wrong with that?	No	This guide is incredibly vague. Not in character with the suburb - few of the existing suburbs will have housing of this type. You are inviting ambiguity and uncertainty in how vague it is. What is wrong with zoned areas? Theres certainty for everyone		Its very hard to interpret when you arent actually showing the referenced standard for shadowing is. Northern light in Canbera winter is more critical than any other capital city. You should be much more transparent with what these impacts are going to be. Show an example of the type of shadowing that would and would not be approved from high density two storey dwellings next to any existing house.			0				No, I don't want to / I currently live in a detached house			The questions and predetermined answers in this survey are leading, and really warrant review of how it was approved in this state. This is such a material change to planning in canberra, and I dont think youve done enough to inform the public. I would expect a letterbox drop on this scale of change and impact to every suburb in canberra.
No	Yes		No	I am really happy to see the ability for smaller, denser housing stock to be built throughout Canberra. I live in a terrace and would love to see more of this type of housing option for the chance to buy one day. I also like the ability for 2 storey apartments to be built, these are some of the cheapest forms of housing in Melbourne, and an attainable form of housing for me. It would be great to see these in Canberra.	Yes		I am supportive of the less block-like townhouses and terraces outlined, to make them more widely appealing to the public and align with the design expectations of detached houses, and I like the examples given in photos 56 and 57. However, some of the colour based design guides on page 80 seem overly restrictive (for example photo 61 seems fine, and looks better than photo 60 to me).	I like the different techniques and features used to retain privacy with new forms of housing, and I think this is done well. For street frontage, I think smaller setbacks would be appropriate, I think they contribute to a great street environment, and the smallest setback possible with large trees would be desirable.	Yes	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.	70	It is great to see reduced parking requirements, I do not own a car, and don't want to be paying for the land I don't need. Reduced or eliminated parking requirements has been shown to make housing cheaper and encourage construction in cities like Auckland, NZ and Portland, USA. I would like to see these requirements reduced further and other cities have scrapped them entirely, instead allowing people to choose how much parking they want. Parking in existing housing stock is also plentiful for those who want that option.	Reduced parking requirements should make the increase in tree canopy cover more attainable, and it is good to see more of a site being able to be taken up by green space. It is good to see the design guide acknowledge that laneways can be look bad and be unpleasant without greeney alongside them. I think there is an overemphasis on reducing garage frontage onto the street however, with larger setbacks result in more impermeable surfaces. I think laneways should always be preferred, and where not possible, setbacks reduced in order to minimise the land lost to driveways.		Yes, 'm looking for an affordable home in an established suburb			
No			No									No, the one parking spot per dwelling in RZ1 is too few. Maintain the current RZ1 requirement or even increase them. Reducing parking requirements will result cars being parked on the street or nature strips. These cars should be shown in you after streetscapes. For three bedroom developments the minimum requirement should be two spaces. My neighbour's house is a three bedroom house with one car park. The occupants always had two cars with one parked on the road, nature strip and for a long time my nature strip. People should not be forced to comprise moving into a town house by having only one car park and would reduce the appleal of MMH.	No it will end up with neighbourhood roads and public spaces chocked with cars, esp as missing middle housing become more common eg Moore St in Turner. Let's give people the opportunity to park off the street on their own property.					
No	Yes		No	Very well	Yes		Very well	Yes	Yes		100	There could be fewer car spaces - we don't need everyone to own a car.	It could be improved by requiring less parking	Yes	Yes, I'm looking for an affordable home in an established suburb			If we want people to be able to have good access to amenities and to be able to choose between owning a car or taking public transit, we need denser suburbs. More urban sprawl will deliver poor quality neighbourhoods at far greater expense to rateapayers.

Yes	Yes		No	The reforms are well targeted to address the housing supply gap, especially in the 'ommissing middle'(townhouses, terraces, low-rise apartments), and they go further by: 1)Removing outdated restrictions 2)Allowing new typologies 3)Enabling innovative models like co-housing This represents a strong shift toward enabling diverse, affordable, and adaptable housing options across suburban Canberra.	Yes		The draft Missing Middle Housing Design Guide provides strong and practical guidance to ensure appropriate transition in building height and scale. It promotes a contextual design response, supports the use of upper storey setbacks and articulation, and integrates landscape elements to soften transitions. These measures will help ensure that new housing contributes positively to neighbourhood character, while allowing for increased density and diversity.	The draft Missing Middle Housing Design Guide strikes a generally sound balance between maintaining solar access and privacy for neighbours and enabling the delivery of more diverse and appropriately scaled housing types. The approach relies on good design, setbacks, and landscape elements to mitigate impacts while avoiding overly restrictive controls that would limit infill potential. While some trade-offs exist""particularly with smaller lots and performance-based assessments""the framework appears robust and well aligned to the goals of compact, livable neighbourhoods.	Yes			90	The proposed parking provisions strike a generally sound and forward-looking balance. They prioritise housing diversity, affordability, and better land use over preserving car-centric design norms""particularly important for enabling missing middle housing. However, their success will depend on site-specific assessment, quality urban design, and transport system improvements to offer real alternatives to car use.	The draft Guide provides a thoughtful and well-articulated approach to car parking that supports pleasant landscaping outcomes. Through guidance on driveway width, parking location, landscaping integration, and surface treatments, it ensures that vehicle access does not undermine the visual quality, greenery, or walkability of missing middle housing developments.	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. However, its effectiveness would be enhanced by including more prescriptive minimum standards, stronger internal dwelling design guidance, and practical tools to support assessment. This would ensure the guide delivers both flexibility and rigour in shaping high-quality housing across Canberra's suburbs.	Yes, for another reason	I'd downsize into a missing middle home to live in an established inner suburb with better access to amenities, transport, and community.		The proposed Missing Middle housing reforms represent a significant and commendable shift toward a more inclusive, diverse, and sustainable housing future for the ACT. They remove outdated planning constraints and introduce a more flexible, performance-based framework that enables a broader mix of housing types""better suited to the evolving needs of the community. Importantly, the reforms are not simply about increasing density. The integration of the Missing Middle Housing Design Guide ensures that new development respects neighbourhood character, protects amenity, and delivers high-quality, liveable homes. The reforms also align with broader policy goals around infill development, climate resilience, and reducing car dependence.
Yes	Yes		No	The appropriate number of dwellings being dictated by the site context and site rather than a number I think is a great idea. The site coverage should dictate building not the number of dwellings. I hope this will result in more townhouses, manor houses and apartment blocks rather than the macmansions that look like they are multiple dwellings anyway. This will hopefully then result in more housing diversity and price points so there is less economic stratification of our suburbs. I would say though the maximum site coverage should be larger for multiple dwelling developments say an extra 10 or 15% because you are getting the additional social benefit of increasing housing opportunity for the community. Setbacks should be further relaxed to support more flexible designs that maximise quality green space not lawn outside houses that just gets occupied by	Yes		I agree with the modest increases in building height as it can significantly enhance housing availability while preserving the character of suburban areas. Allowing three-storey multi-unit housing in RZ2 and introducing apartments into RZ1 zones would help increase housing diversity without compromising the human-scale feel of these neighborhoods. 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. I wouldn't recommend step down design or graduated heights seems unnecessary red tape for minimal benefit. I really don't find three story homes offensive and are within the character of suburbs. I think 3-4 stores in a RZ1 context would not be visually offensive and	Yes increasing the solar building envelope angle from 31 to 45 will allow more practical building form while still providing solar access and privacy for neighbours.	Yes	Yeah they look good with good examples	100	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. If on street parking is perceived to be at capacity bring in limits or paid parking to mitigate parking pressure. In my street which is a combination of apartments and single dwelling houses there are certain houses that park on the street and on the vegetation strip and they have a garage so it's obviously laziness or just having an excessive number of cars for one family not only the presence of apartments. The cost of basement parking is also very expensive so if we can reduce the need for that then that will aid affordability.	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.	The MM+DG guide has the potential to support greater housing diversity by encouraging innovation. By prioritising flexible design principles over prescriptive rules, the guide enables more creative and context-sensitive housing solutions that can help deliver a wider range of housing types at different price points serving a larger proportion of the community. However, a level of clarity and certainty is still required as if the approval pathway is too ambiguous, architects and planners may avoid Missing Middle projects altogether due to uncertainty about compliance or likelihood in getting called before ACAT. Removing third party appeals for these kind of developments would help reduce the uncertainty and promote building.	I already live in this type of home			I do not agree with the general limit of 2000m2, 2500m2 and 3000m2 for consolidation in RZ1 it seems unnecessary and will not have efficient land use and likely to end up with just duplexes yes they are an improvement in density and housing supply but I think we can be more ambitious. Larger blocks will give more flexibility to developers to create developments with different dwelling types and sizes increasing the diversity of housing types available, improving choice and affordability. If the concern for the limit is to control development it is pretty difficult to convince a lot of blocks to consolidate together so I feel like these limits are far to restrictive. At least increase it to like 4000m2 or just remove it completely.
Yes	No	It is a BS concept. Why not use plain English instead of spin?	No	Everything related to land or housing costs a fortune in this town. Corruption is rife. Developers are still the most likely to put up their dodgy cheap builds.	No	Doesn't change the corruption of developers.	I will believe it when I see it.	Depends on each development, surely.	No	You need to provide more parking - you may need greater set-backs.		Hell no.	Insufficient parking. The dodgy development approved for next to the Tillyard shops is an example of what we can expect.	It is irrelevant without proper inspections by independent regulators.	No, I don't want to / I currently live in a detached house			I have previously lived in medium density in Canberra, and it is not missing. But I wouldn't invest in anything im Canberra that was built in the last 15 years.
Yes	No	Your development assessment fees and charges are prohibitively expensive	No	Missing middle is more about deregulating existing zoning and allowing greater development potential. Missing middle aspires to provide more choice and diversity but needs much greater oversight to ensure well planned outcomes. ACT Planning, the planning act and assessment techniques are inadequate to implement this initiative and ensure sustainability and liveability values are not compromised.	No	The guidance provided is poor and confusing, no real discussion on existing easments services, on and offstreety parking and street tree retention and consideration of all aspect of the proposal	It doesnt, its not clear how missing middle responds to neighbourhood context and character, how this neighbourhood context is assessed and what intensity of development is and isnt acceptable	No The current definition of solar access in the ACT is subjective and needs a clearer performative description - current practice by ACT planning 1) does not have to consider the impact of existing protected street trees on access to sunshine, 2), the planners only have to ensure that a tiny amount of sunlight hitting a window satisfies the current requirement to satisfy requirements of solar access provisions, 3) consideration of ensuring no overshadowing of solar panels, solar hot water or Passive House solar harvesting on the proposed residence or neighbouring existing residences is inadequately protected via solar fence provisions and failure to acknowledge existing or required landscaping	Yes		50	No, parking is already a nightmare on many local streets and allowing developer rights to extend to existing roads is very poor practice and will create access issues for essential services such as garbage truck, delivery vehicles and emergency services	It doesnt. Adequate offstreet carparking is central to pleasant outcomes, this is is subsiding developers at the expense of neighbourhoods. The likely outcome will be cars parking on verges, and under drip lines of existing street trees.	It offers guidance but its not clear. I suggest you develop /include several detailed scenarios and a few real world case studies to assist. There are so many design aspirations set out in the guide that it is unclear what the result will be. I suggest Planning ACT develop a set of guiding planning principles similar to those established by the NSW Land and Environment Court that are used to guide all planning decisions. I also strongly suggest use of a planning panel to arbitrate disagreements regarding missing middle proposals	No, I don't want to / I currently live in a detached house			Missing middle is a great concept but it needs better resolution planning and assessment rules than those articulated in the various documents to date
No	No	new houses and homes are costly, no matter the type or density of development.	No	Not well. Open space, access to regular public transport and community facilities seem to have been disregarded. The NCDC's urban planning and design of Canberra (1958-1988) were largely successful housing initiatives for populating Canberra, and these should inform any new housing opportunities. Past suburban and housing developments are fundamental to Canberra success as a city in the landscape. The key factors of this relate to the exceptional national capital open space planning, landscape amenity, economic, and social equality for all people and types of family units to own or rent housing. The successful urban planning schemes from the NCDC development and public transport improvements need to be at the forefront of all future residential zoning and long-term sustainability.	No	Open space, access to regular public transport and community facilities have been disregarded.	Not well.	Not sure. High density zoning would be difficult to achieve solar amenity.	No	The exceptional quality of living in Canberra, relates to the implementation of the national capital open space planning, landscape amenity, economic, and social equality for all people and types of family units to own or rent housing.	0	not sure	not sure	Filling in existing open space for high density and tall apartment buildings, is not the only solution for providing more housing. Greater respect and inspiration should be drawn from the exceptional quality of living that defines Canberra, and is founded in the design-intent of the national capital open space planning scheme. The NCOSS achieved landscape amenity achieved by street planting and community spaces, and a diversity of housing types, not just single dwellings.	No, for another reason		Small houses, medium density and low-rise apartments would be suitable. Places that have access to sunlight, established landscapes and good, regular public transport.	Filling in existing open space for high density is not the only solution. Greater respect and inspiration should be drawn from the exceptional quality of living that defines Canberra, that relates to the implementation of the national capital open space planning scheme, the landscape amenity achieved by street planting and community spaces and diversity of housing types, not just single dwellings; this in turn has provided benefits to economic benefits and social equality for all people and types of family units to own or rent housing.

Yes	Yes		No	See written submission	No		See attached submission. Missing Middle needs to include 4 and 5 storey in locations close to town and local centres.	See submission	No	Too many of the photos show houses with steps at the front or at gates to the street, making them totally inaccessible for anyone with limited mobility.	90	Need to take more account of older residents who are less likely to own more than 1 car per household.	Hard to tell until see in location.	Less emphasis on 2 storey town houses and more blocks of around 50-60 apartments. Two storey townhouses are not suitable for older residents wanting to 'right-size' or for many with disability. Most would not meet basic universal design criteria.	I already live in this type of home			Needs more references to Canberra as an age friendly city - see submission.
Yes	No	The type of housing proposed is not the type I would want to live in or near	No	Poorly. Given the general trend of housing design over the past three decades, the result in the long run is likely to be a reduction in the diversity of housing, because the large block (600-800 sq m) with a small (100-160 sq m) house is no longer made, and will be the target of this sort of redevelopment. A planning system that produced diverse outcome would actually prescribe different housing types by suburb. It would also have surveyed the housing sizes, block sizes and canopy coverage by suburb. This has not been done. The guide portrays almost exclusively two-storey, large coverage, multi-block units, which in fact are only a small amount of the types of housing available. The sixties and seventies developments	No	The allowance of consolidation combined with the overly relaxed evelopes and setbacks will encourage sprawling designs with a maximisation of footprint.	Poorly. The draft guide indeed shows little consideration of transitions, with the relaxation of envelope requirements making overshadowing and overcrowding more likely. This is emphasised by the changes to the technical specifications themselves.	Yes. If the frames of the guide read the news, they may have noticed that there are already As the ACT government is also looking to increase use of sustainable power supplies which will need expansion to aid uptake of zero-emission vehicles, the increase in building height and relaxation of will obscure The height race in that case would be like what has happened in America with SUVs: a small, single-storey house will not be able to have solar, just as driving a sensibly-sized car in America is a hazard because most people drive such enormous ones (some of which are now allowed here for some reason) 'Right-sized' begs the question. 'Right-sized' for whom? The mobile twenty-five year old who in five years will marry and then look for a detached home to raise a family, as most do? It is a slogan, a thought-terminating	No	The design outcomes described therein are not good. They allow vertical, slab-sided buildings that will overshadow neighbours and loom over the street.	0	No you have not. The policy does not understand that the need to drive from one suburb to another does not change because a block now has three flats rather than one house. Employment centres are still relatively fixed, and only so much business can be carried out from a home that is not already, and higher density is less suitable for home business if that is customer-facing: a person who runs a dentistry practice in their home, for example, probably wants their own front door visible, not that to a block of flats. Therefore, the result will be the concentration of the same traffic demand per household into a smaller area, as I have personally observed in Melbourne. Many streets are not safe to take higher traffic demand and especially more on that will overshadow neighbours and loom over the street.	The inevitable spillover of parking onto verges as has happened at multiple sights around Canberra (including outside the Featherstone Defence development in Weston, where there is permanent verge parking on Heysen Street even though no house there fronts onto it) will produce much worse landscape outcomes. The changes to parking and the way the question is posed make one question whether the designers of these guides have gone out and looked at the target suburbs to see the parking behaviour.	No. Overall, the diagrams and illustrations demonstrate a bias towards sprawling, double-storey designs with maximal block coverage. As noted before with parking, there is little appetite to learn from what has been done already: many 60s and 70s suburbs contain large areas of units or small apartments, which may be found extensively around Cooleman Court in Weston, Holder and Rivett, Kippax in Holt, and the Hawker shops. None of these are portrayed. The promotion of multi-storey development will not help downsizers, as they are likely to be elderly and less able to negotiate stairs. This also applies to the disabled, who receive very little consideration by the guide.	No, I don't want to / I currently live in a detached house	Has an ecological study been carried out to determine the effects of density on wildlife? Almost all multi-unit developments carried out under the present planning system replace large gardens containing multiple types of vegetation (lawn, shrubs and bushes, hedges, small and large trees all on one block) with tiny, walled gardens with a small area of lawn, an exotic hedge and maybe a small tree, all of which is much less favourable for animals. The actual premise of the changes has not been established, namely that there is a widespread demand for this sort of housing from the sort of people who talk about planning reform and urban planning all the time (a demographic likely to be wealthy and without children). To actually establish it, you would need to go out and do a random, unbiased, large-
No			No		Yes				Yes		100				Yes, I'm looking for an affordable home in an established suburb			
Yes	No	If there was evidence that the ACT had the ability to manage, enforce and demand compliance by developers many in the community would have more confidence	No	The focus of the guide ignores that some Canberrans still want to live in a single storey dwelling including younger generations. This cannot be ignored and needs to be considered in design of increased densification. The proposal appears more to be about revenue generation than affordable housing. There are opportunities across Canberra to increase densification however will this be affordable for younger generations entering the market or for the forgotten missing middle of women over 50 who are experiencing some of the highest rates of homelessness? Developers in the ACT continually push the envelope with ACT depts having little teeth to enforce, inspect and demand rectification of breaches, this already has the community on edge about what may be actually built next door to them or their next purchase.	No	In principle yes, however as per above, history demonstrates developers will push for exemptions for extra storeys, less setbacks etc. Adelaide has excellent examples of multi single level dwellings and two storey apartments on small footprints		Solar and daylight access is important for health and wellbeing, living conditions and building performance. Not getting this right creates a two-tiered system rather than ensuring a basic human right. This is especially important during a pandemic, and poor building performance may result in increased household costs for those least able to afford it. People are more supportive of increased densification if they can have their own private space respected both visually and with noise. Examples of good design include the Willemson apartments and townhouses in Baton and the Barton Court, both with central green spaces. With regard to setbacks below, if poorly designed this can have significant impact on the co-joined neighbour or actual	No		50	Again, reducing parking requirements creates a two - tiered system. This may change as there are better offerings of shared cars but this is unlikely to work for several cohorts of the Canberra community. Again this creates a two-tiered system disadvantage those carrying the greatest financial burden for example; 1. carers and parents often rely on cars and even with the best public transport it will be impossible for some carers and parents to live without a car. This is especially true for carers who are often not living with the person they care for, are already financially disadvantaged compared to the average Australian and are experiencing discrimination in the workplace (where they can work). 2. those living with a disability and older Australians relying on in-home support need available visitor parking that is not used		Current examples of new builds does not support a future of great design outcome. The government needs to ensure a variety of housing options and designs to ensure the integrity of suburbs beyond the political cycle and also secure our climate future with housing that is build to last rather than with a shorter life-of-type.				The government should be rewarding adaptive reuse of existing housing infrastructure, and ensuring the true environmental cost of knock downs is being paid for by the developer. There is little incentive for recycling of houses earmarked for demolition with components going straight to landfill whereas they could have been recycled. Without this incentive the ACT government is imposing the climate cost of demolition, poor quality design and heat islands onto our future generations.
Yes	No	I do not need more than one home	No	The changes to eliminate minimum block sizes for certain developments, allow units, and raise storey limits all will help to create a more affordable housing market, allowing a more vibrant and well-serviced city to emerge.	Yes		It does a good job	Yes	Yes	Setbacks in general should be removed however.	50	Yes	It provides well, but generally, street parking/public land should not be used to indirectly subsidize developments - developments should calibrate parking availability/landscaping according to actual demand					
Yes	Yes		Yes	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. The city will become more interesting. The suburbs will have more people and more of a village vibe. One issue is will there be more commercial space zoned?	Yes		The plot ratio may be too small.	No. The solar access beyond 4 metres for the second story will limit terrace house development. It could be too hard.	Yes		10	Underground great!!!!!	Pretty good		Nope, havent read it but I bet its too complex	Yes, I'd like to downsize and stay in my current neighbourhood			The Architect has a vision. makes me proud to be Canberran. I was born here and after a lifetime common sense has entered town planning. Thankyou
Yes	Yes		Maybe	I think they do a good job but more reforms could be enacted to make it better. We should be reducing the number of requirements, particularly requirements to step back storeys. The wedding cake approach is not conducive to good design and should be removed. We should also reform LVC to act as a flat percentage of land value increase instead of particular to each block. Lastly we should remove lease conditions as they overlap with zoning rules.	Yes		It should allow for higher scale of 3-4 storeys instead of the current two storeys limit. We should also remove side setbacks.	Remove side setbacks and allow for taller buildings.	No	Remove side and front setbacks	100	Sites closer to rapid public transport routes and key amenities (such as in town centres) should have no parking requirements. Otherwise 1 park per dwelling further out is good.	It still requires too much parking.	Yes	I already live in this type of home			These reforms are desperately needed in our city. Its time to get them done and more good density built.

								I'm concerned about the size of the outdoor space. There are lot of references to "planting areas" and not so many references to actual gardens. Please ensure there remains sufficient garden space at the front of housing to retain the "garden city" character of Canberra.				No, definitely not. All townhouse/terrace/apartment complexes must have suitable and sufficient off-road visitor parking. The current plan will isolate elderly and disabled people who may rely on visits from family or carers. On-road visitor parking will make our streets significantly more dangerous for children and the disabled. Please take an alternative approach - this idea will damage liveability in Canberra in a number of ways.		No, there needs to be more work done to ensure that this plan doesn't damage Canberra's character. The newer suburbs have been very poorly planned and a different approach is required. In particular, part of Canberra's character is diversity. The older suburbs have lots of visually distinct houses and in particular large enough gardens that the garden designs can be distinct. The newer developments in Canberra are bad for the mental health of residents, and I'm worried about these poor designs being forced into older suburbs too. The terraced designs in the report are particularly bad - these must be strictly limited (perhaps to areas very close to local shops), or the local character will be destroyed. I think that you should reconsider the zoning plans - please don't			I'm very worried about this proposal. I'm not opposed to the idea in principle, but the documentation doesn't seem to understand the many potential drawbacks. Please look at the older townhouse developments in Canberra - they are much better designed than the newer developments. The illustrations used in the report are concerning: these designs, particularly in the terrace section, definitely do not fit in the character of Canberra's design. Please reconsider the zoning - there needs to be protection against over-development concentrated in particular streets. Please place a limit on how much of the missing middle housing can be added to a single street or block. What protections will there be against poor designs damaging local character in practice?
No	No	I'm worried about protections for prospective owner-occupiers - what will prevent developers outbidding owner-occupiers on any current block?	No	I support more diversity, but I'm worried that this plan will eventually led to less diversity and choice, if there is too much redevelopment.	No	There should be a balance between flexibility and preventing too much redevelopment in particular locations. There needs to be a more strategic approach to ensuring that particular areas don't become too dense.	The illustrations are suggesting that the new buildings definitely won't respect local character and context. It will be possible to create better missing middle designs that aren't so damaging to the character of the older suburbs.	It doesn't look as though enough is being done to prevent increased urban heat in areas around the denser developments such as the terraces - the illustrated designs will create very hot streets in the summer.	No	Buildings seem too close in many cases - this will be a particular problem if there is over-development (that is, too many blocks converted to missing middle designs close together).	20	Very poorly. Please ensure there is suitable off-road visitor parking for all of these higher density development. This proposal will make our streets ugly and dangerous.		I already live in this type of home			
Yes	No	We already have a home	No	They're generally a good step forward, although they don't go far enough in some areas, while going too far in others: Opportunity to improve: Heritage areas really need to have same missing middle rules '" better yet, remove heritage altogether to improve outcomes for all parts of the ACT Pull back: Still need protections for people's access to sky, and sun in particular "" increases to building envelopes will lead to poorer outcomes	Yes		Generally okay, but see comments above re heritage and also per above: need adequate protections for access to sky and sun. Current protections are the minimum really "" take them away and amenity for all decreases and poor outcomes result	Per above, balance is wrong in the proposal. Need adequate protections for access to sky and sun. Current protections are the minimum really "" take them away and amenity for all decreases and poor outcomes result	Yes	With the articulation need to consider impact of new builds on surrounding dwellings as even current rules can have poor outcomes, and these would be more permissive	40	Visitor parking on streets is fine where: (1) streets are wide enough, and (2) it is not ruining the views from other unrelated dwellings	Need to be careful not to have cars in front of unrelated dwellings obstructing their views into the street all the time	Generally good, but should be careful of window placement and privacy for surrounding dwellings	No, I don't want to / I currently live in a detached house			I recognise this kind of change is needed, it just needs to be carefully and uniformly (see comments re heritage) implemented to deliver the best outcomes for all, rather than creating avoidable poor outcomes across the board. I would also be really keen to see height and density limits in town centres removed so we can get much more density into them; better use of underdeveloped non-housing sites (eg. horse paddocks); and time limits for development of derelict / unliveable blocks (there are plenty wasting in inner areas with years of no use)
No	No	They do not create the kind of dwelling I and many other people would like to buy.	No	They do not allow for the kind of housing people actually want to live in. Canberra already has a severe shortage of detached houses and this will make the problem worse. It will instead lead to the development of family-unfriendly two bedroom terrace units. Furthermore, these terrace units, being two storey, will be not be useful for downsizers, who tend to be older and prefer single storey housing. The open space and vegetation requirements are totally inadequate, and are actually being weakened from existing guidance. The amount of mandated open space is tiny, especially when they will be replacing 150+ sqm backyards.	No	Block consolidation delivers huge power to investors giving them assets they can leverage to buy more property and outbid families who want a house. Consolidations should be disallowed, and subdivision for small three-bedroom detached houses encouraged.	It does not encourage any appropriate transition. The proposed developments will be out of character and intrusive in height and scale in most locations. The only way to ensure this will be appropriate is by restricting most development to single storeys unless adjoining houses are already multiple storeys.	No you have not got the balance right. It would allow for structures that would place neighbouring houses in shade all day during winter, defeating the point of 'solar access' altogether. Furthermore, it will allow windows and balconies that directly overlook backyards and neighbouring houses' windows, forever destroying the privacy of those properties. This is an unacceptable loss, as privacy is one of the most appreciated features of detached houses. To remove it without recompense is an unacceptable externality. The only solution is to return to the original solar fence height of 1.8 metres and a 31Â° angle, which would mean most development is single storey.	No	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.	20	No. The minimum provision of parking will be inadequate for many people's needs, regardless of the unrealised fantasies of 'mode shift'. This will lead to excessive verge parking, as a major issue in densified suburbs in Melbourne. It will degrade road safety and increase tensions.	Poorly	The MMHDG does not fit the suburbs onto which 'missing middle' is being imposed. Quite the opposite. It instead reflects the desires of what the designers want the suburbs to look like, regardless of previous character and built form. By using modern designs the designers have ensured new developments will stand in stark contrast to their surroundings rather than blending in, as adopting 1970s style designs would do. Furthermore, the guide dramatically understates both the visual impact and the intrusion of developments that will actually be built. These, thanks to the weakened height and solar access provisions will be much more wall-like and have much bigger second storeys than shown in many examples.	No, I don't want to / I currently live in a detached house			'Missing middle' is not the kind of housing people want. All over the world people prefer to live in detached homes with yards when they can. This applies even in Europe, where in cities like Paris people have been moving from the dense core to outer, less denser areas for decades. The reforms will leave a large amount of ugly, family-unfriendly housing that does not address people's actual needs and desires. The government should consider returning to pre-2004 setbacks and instead release more land sooner, and look proactively for new development sites.
Yes	Yes		Yes	Provided amenity of neighbours and scale of developments is prioritized I believe the relaxation of some of the guidleines/rules will enable more flexible designs that will respond to their specific site conditions.	Yes		The guide allows for this and sets out examples and ; however whether affected neighbourhoods may take exception to projects that (in their opinion) transform the character of the area too much. Where a new development of say a row of terrace houses on a large consolidated block or blocks with Terraces of two stories (and possibly and attic) in a long established suburb of typically single story low rise bungalows I can see some objections being raised. The determination of appropriate scale and character is extremely subjective and when it impacts long established residents where they live it can be very emotive. Even discussing such issues at the Public Information Forum became "lively"	That is a question that will only be answered when the MMHousing begins to materialise. However the guidelines are a good start and as they follow established guidelines from the ACT Housing Design Guide so there should not be too much angst. One aspect of Solar Access that does not seem to be addressed is: INAPPROPRIATE tree planting. I believe there needs to be some flexibility when it comes to "Heritage Trees" that block solar access. I have lived in a house set up on Passive Solar principles for over forty years now. Solar orientation was the main driver of my decision to purchase the block and the orientation of the house for maximum solar access was the only siting consideration. It has been a delight to live in. However not long after moving in my	Yes	This could be problematic and sensitive assessment of any proposals must be undertaken. Any substantiated objections from affected neighbours must be addressed.	30	This aspect concerns me. whilst it can be argued that street parking is an accepted practice in cities around the world I do not agree this is something that suburban dwellers really embrace. I believe high volume kerbside parking in suburban areas is a severe loss of amenity for the residents of that area. On street parking in most cases is NOT a design outcome it is more a failure of design (to incorporate adequate on site parking) or in the case of older cities the result of "pre-motorisation" development having to accomodate the rise of motorised transport. I can accept that freeing up more "green space and private open space" on suburban blocks is a very desirable outcome. However if it comes at the cost of packed kerbside parking (even worse when it	Covered by comments above	Yes, I found it very informative even though my interest is quite specific to Dual Occupancies	Yes, for another reason	I intend to demolish a poorly sited, energy inefficient, rather bland and badly degraded ex-govie house and replace it with a multi-generational main house with a smaller dual occupancy at the rear. Both dwellings will be energy effecient&solar oriented.		I attended an information session at Tuggeranong, the Face to Face with the Government Architect and have read in full the draft Missing Middle Housing Design Guide. All have been valuable in me understanding the changes proposed and have helped me in my progress towards realising a dream of building a new energy efficient dual occupancy. Of particular value was the One on One time I spent with one of the staff after the session at Woden Library. At that time my ideas about what was possible and permissible were very vague. Alyce answered my numerous questions and clarified a number of misconceptions I had about the process and really encouraged me to explore the possibilities my situation offers. I had been a little overwhelmed by the prospect of doing this

No				Very well, because the missing middle encompasses basically the widest varieties of housing types, and legalising that everywhere means legalising all of those options for people to choose best for them. I think it could go even further (eg height, density + consolidation) in well-located areas for the reasons of choice and housing affordability.	Yes		While this is a good direction, I disagree with prescriptive height and visual treatments which may not be so worthwhile over time (eg livability or density loss)"The idea of a desired street is always changing, and any initial change (responding to demand) stands out as an outlier until the rest of the street follows naturally. Reducing scale probably isn't harmful in most suburbs, but in the high-demand districts of Inner Canberra it makes it harder to achieve the elastic housing and character actually desired by revealed preferences needed now and in the future. More important to people's experience of street character in my opinion are the street trees Canberra is so famous for.	When considering the balance of potential stakeholders (eg established house and multiple modern townhouses) removing side setbacks and parking requirements, with trees and proximity to public parks might improve the transition to courtyard/perimeter blocks more at less expense	Yes	Could even remove side setbacks, and better use the nature strip rather than front setbacks (unless exceptions) and increase usable rear courtyard	90	Allowing a much higher proportion of homes in walkable and public transport-rich areas will greatly reduce the demand for driving and parking, while high-cost mandates may inadvertently increase it here		Good as a guide for reference, but not as a barrier to diverse or effective designs. Lots of things make Canberra special (like the wildlife and ever-new and old culture), and I think the public realm's accessibility and interpretation of all those things is important	Yes, I'm looking for an affordable home in an established suburb			Good to get this done, tackling the house and climate crises in one, Canberra leading Australia !
Yes	Yes		No	I think it is a good start. I think a balance between progress and conservation is important. In general would like to see more green space and active corridors, like the garden city cycle path, even if it means acquiring/carving out land from private residences. Ideally public transport should grow in line with increasing the density of an area because car parking is still a problem.			Unsure, but think consistency and planning ahead (when changes are made) is important. I am aware of several constructions, along and adjacent to Northborne Ave, where developers have sought (via DA) to vary conditions such as height or number of floors. There should be very limited reasons to vary such requirements (and reasons/decisions should be more transparent) when so much planning goes into requirements. People's homes (castles!) should not be impacted by individual outliers/developers seeking to make an extra $.	Unsure, but again consistency is important. In general in think we make some poor building decisions in the name of privacy. I live in a townhouse with 3 bathrooms/ensuites. None of them have windows and the ventilation is terrible leading to mould and other humidity related issues. I also think that external screening across windows, in general, looks terrible. Curtains, small/high windows should be more prevalent.			50	No. I live in a townhouse in Dickson and the street parking is terrible/dangerous. More parking should be required onsite. I read one DA where the submitted plans exceeded the 'minimum' number of car parks and the developer was asked to resubmit, among other issues, to explain why they had exceeded the 'minimum.' So the developer reduced the number of car parks in the re-submission. This was a terrible outcome in my opinion. Min should be just that, there is no max to my knowledge!	Unsure. Except to re-emphasize that onsite parking is much more pleasant to me than street parking.	Unsure, not a builder/developer. Issues i have with my townhouse - poor build quality. Poor water proofing. Poor ventilation of bathrooms. Poor soundproofing. If you can fix some of those issues for future builds, that would be nice.	I already live in this type of home			Strata (miss)management is a significant burden/cost to owners. Strata management regulation/oversight should be part of this reform if the end result is more body corporate entities, as i imagine it will. I'm not sure we do basements properly - I think we should build up in the majority of cases instead of going down.
Yes	No	Because the system is designed to favour developers and financiers rather than the community	Maybe	Yes they do.	Yes		Cannot comment as I am not a builder.	Difficult to set general rules			30	It depends on closeness to public transport.		No comment	No, I don't want to / I currently live in a detached house			The planning changes give the opportunity for the ACT to revisit its financing roots where the uplift in land prices paid for the development of Canberra. We can return to these Georgist principles and reduce the cost of purchasing a home as explained in the attached document.
Yes	No	This is the second round of significant changes in a couple of years, who can trust any of the planning regulations or zoning system? If I buy a house with a nice back yard and a view, how long will it be before it's all been built on?	No	I think generally the proposed changes will help this. It will also look at areas being built in current RZ2 areas, such as where I live in Pearce/Chifley which has a very big chunk of RZ2 (not just near the shops) so gives a good indication of what will happen under these changes. To make a viable development, with all the regulations and the LVC and rising building costs, they have to buy land in popular suburbs then maximise the sale price. That means the biggest house possible on the smallest square metres of the most expensive land. Minimum possible private open space, two storeys,, multiple bathrooms. Where is the diversity or benefit in more and more $1-2 million houses? Most RZ1 streets are well away from shops or public transport and often up-hill. You should only be changing the allowable housing for RZ1 blocks that are on feeder roads through suburbs. We have a hierarchy of roads in our suburbs, for a	No	Whatever guidance is provided, who's going to choose to build that kind of development? Will it be commercially viable? How will owner occupiers finance block consolidation for multi-unit developments?	The real question is, will it be enforced? I had a neighbour who got one set of plans approved but then it was going to cost too much to build that version, so he changed it completely - including a lot more overlooking of my property. He was self-building so could do what he liked. Last I heard, he was having trouble finding a certifier who'd sign off on it, but that doesn't help the neighbours. Once it's been built no-one's going to make him knock it down. I sold up and moved away, so thankfully I'll never know how it ended.	Yes, there are plans in place vague terms used, that are open to interpretation, such as "minimise". Either the design is required to do it or not, what does "minimise" mean? For example, if I could potentially design the dwellings to look straight into each other's kitchen window and instead I offset or otherwise reduce this to only three-quarters as bad as it might have been, is that "minimising"? Or does it need to be half as bad, or one-quarter? Why not zero? What is the criteria, what other factors will allow me to leave it somewhat intrusive, rather than removing the intrusion altogether? This applies even more so to the use of "where possible". Why would a requirement of the good design guidance NOT be "possible"? For example, it says there should be room for screening planting "where possible". No, there should be room for screening planting - in	No	The diagrams on page 82 are incomprehensible. What is the horizontal dotted line with arrows? Is the middle (mid-grey) building the old one or the new? It's back futher than the right-hand one, so what's the issue?	70	I have no issue with cars parking in the street - having grown up in a city where that was considered normal. But only if there's room for it. In really old suburbs nothing can be done, but it's crazy to deliberately allow for insufficient parking. In new suburbs the streets are too small and the driveways are too frequent to allow for significant amounts of street parking, and this causes major problems when anyone has friends over. Therefore the realistic amount of street space for parking, and the effects of additional driveways, need to be taken into account if approving developments with less off-street parking. I would be more in favour of accommodating this balance by allowing carports to come closer to the boundary than currently allowed.	The guide only seems to talk about multi-dwelling developments with shared driveways and parking. Doesn't seem to provide guidance for two side-by-side dwellings or on a corner block. Sometimes the guidance might be contradictory for those situations. For example, the guide says garages and carports have to be set back to make a nice street frontage. But I favour allowing carports relatively close to the street boundary if the carport is over what would be a driveway anyway (not a shared driveway) and it frees up space further back on the property for more outside private space. This is especially true if the carport would only be a smallish proportion of the overall property/boundary width, eg less than half of the boundary width.	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. At the end of the day, if the government actually wants well-designed housing to be built, they need to a) mandate the requirements not "guide" them and b) do everything in their power to make well-designed options commercially viable. This means looking at policy levers other than a design guide, such as waiving the LVC for well-designed dwellings built in lower-cost locations (such as cheaper suburbs with large blocks, in Tuggeranong and Belconnen). Or, only	I already live in this type of home			be able to take advantage of these proposed RZ1 changes, even if they have a large block and want to sell part of it, because that won't be allowed. They are supposed to build the new house(s) themselves, then sell the final product. But if they're a retiree, how do they finance that, or manage that process? Instead it will only be developers who can finance the redevelopments and they will do it for maximum profit to their own preferences. It should at least be possible to just cut off some land and sell it (or demolish, subdivide and sell) so long as the block being sold is a reasonable size, shape, position (relative to the road, easements etc) to be viable for someone to reasonably build on. That's how you get diversity, because then someone could sell their own larger home and buy a little block and build their own little house on it, to suit
Yes	Yes		Maybe	I think generally the proposed changes will help this.	Yes		I think building height in RZ1 should be raised to 9.5m to allow for enough room for attics.	I'm working in RZ1 & I'm not clear in what it is seeking to achieve and seems to dramatically increase the distances required between buildings for no good reason, in many cases: 16.1(a) - why should there be always be a mandatory minimum distance of 3m between two blank walls built with proper noise attenuation, whether they are on the same or the adjoining blocks? Two garages could be built right next to each other without causing problems to privacy or solar access. In another example, a designer may wish to include an additional narrow side service area to a townhouse in order to provide an area for washing, air conditioners etc or to provide a private side access. These are useful additions and are much more likely to be included in a design if they don't have to be an unnecessary 3m wide. The old standard of either making	Yes	yes, although as noted above the excessive requirements for separation in some cases where it is not necessary are likely to undermine some of these more desirable outcomes.	100	yes	I think it the changes work to allow for efficient placement of parking while encouraging higher value uses.	yes	Yes, for another reason	I really like the increased flexibility towards light commercial/home businesses/micro retail in surburban areas - I would really like these things within walking distance.		

Yes	No	They only make it appealing as a investor. It has no long-term desire to buy a property as the suburb may change substantially in a short period of time because of the positibility of a development next door which will change where you want to live.	No						No	Diagrams are not a good result for planning. There needs to be requirements set for developers otherwise outcomes will be poor. Whilst the diagrams may show what to expect, they do not envisage every situation and therefore will be taken	10	The current parking is inadequate and the changes are baffling. There are apartments currently being built in Belconnen town centre with no visitor parking. This is unacceptable and there should be minimum standards for any dwelling regardless of size. Developers will always short cut parking as it is more profitable. The governments role is to provide places where people want to live and support their needs. Reducing the amount of parking required for dwellings is poor. Recently we tried to sell an apartment in Belconnen and many people did not want to purchase the property as it only had one car park. This is often the case in Belconnen and visitor parking is limited with minimal on-street untimed parking. More needs to be done to address parking issues and ensure that developers are making enough parking to support their	It is great that they are looking at a pleasant outcome. However, there is no pleasant outcome when a lack of car parking has been designed. Then people will park where they can which may be where there was intent for trees. This is a poor outcome for the future of Canberra if parking is not solved. At this stage we are set up for really poor outcomes in dense areas with a lack of parking.					Parking needs to be increased.
Yes	Yes		No													Yes. for another reason	I'd possibly be interested in this type of housing when I retire.		I would like more townhouse style housing to be developed so that my children could have more of this type of housing as an option when they are older since it's u likely they'll be able to afford a free standing g house. But I would greatly prefer it to be done in an attractive way with plenty of greenery, plants & privacy provided. I'm not impressed with most of the very angular and not very private looking multi-dwelling housing in Coombs/Wright, for instance.
Yes	No	The proposed change will enable overdevelopent that compromise neighbourhood character, will impact on privacy, natural light and road safety due to increased congestion and on-street parking.	No	The proposed draft does not provide any strict limits regarding the number of dwellings that could lead to overdevelopment. Indded the proposal use loose description on the density targets based on very vague site context. This is particularly true for older suburbs whit blocks often exceeding 1000sqm. Thus, hte current draft offer opportinity to overdevelopment at the expense of neighbourhood identity, privacy, open space, and overall liveability. I find it alarming that the proposed flexibility in RZ1 planning appears to prioritise development outcomes over the amenity, wellbeing, and expectations of existing residents.	No	The current draft is very vague and therefore lacks clear, enforceable standards for quality, site-specific design and parking provisions, risking dense developments that don't fit RZ1 suburbs and worsen parking and safety issues on narrow streets.	The current draft is too flexible regarding transition in building height and scale and lacks clear enforceable standards. There is a high risk of inconsistent constructions, where some developments will overshadow or clash with neighbouring lower-scale buildings. The proposed draft will encourage the abscence of respect of the character of the existing buildings and it will promote oversized construction. This should be discouraged as the ACT Missing Middle Housing Design Guide is supposed to promote appropriate transition in building height and scale. The prosed guide does not set any standards but considerations that can leave to interpretations from new developpers. Also, the guide demonstrate clearly that the priority is to increase housing density over protecting neighbour amenity. This will lead to potential imbalance	Again, the proposed draft is excessively too flexible regarding new constructions under RZ1, and does not clearly consider existing buildings, road size, steet access. The current guide lacks standards which prevent overshadowing, thus can have a significant impact on everyone's solar access and affect one's privacy. The prosed guide does not set any standards but considerations that can leave to interpretations from new developpers. Also, the guide demonstrate clearly that the priority is to increase housing density over protecting neighbour amenity. This will lead to potential imbalance between constructions and potentially harm liveability.	No	Again, the proposed guide lack specific details regarding guidance on integrating new constructions in varied site conditions as well as managing transitions between new and existing houses.	20	The proposed draft is not suitable for the vast majority of RZ1 properties. The current proposal is making a big emphasis in using on-street parking, limiting car park on the new properties to only 1 car per dwelling. The vast majority of suburbs in Canberra have narrow and sinuous streets. The current guide will impose cars to be parked in the streets, leading to street engorgement, limiting property access, reducing liveability. It should be noticed that road safety will become an issue for all road/street users including children and all pedestrians, due to increase number of cars in the street, reduction of visibility for pedestrians as well as vehicle drivers.	Pleasnt landscape in our neighbouring is very important to increase liveability. The current proposal is making a big emphasis in using on-street parking, limiting car park on the new properties to only 1 car per dwelling and no enforcement for visitor parking on the properties. Most of dwellings today have at least 2 vehicles. Thus the current guide is promoting on-street car park leading to street engorgement, overcrowding cars on narrow street and obvious safety issues for all road users and predominantly pedestrians. I found that beautiful landscape improve liveability without a doubt, but the current guide while forcing cars to be parked on the street, will completely negate any effort to improve landscaping in any suburbs, therefore impacting on liveability.	The current guide draft is not convincing at all and fails to provide clear guidance on good design outcomes. Indeed, the guide does not provide clear enforceable guidance on good design outcome. The guide does not provided detailed mandatory details in delivering quality housing by new developpers, which in turn can lead to inconsistency, poor quality developments that will clash with local context and neighbourood character. The guide should include strong and clear rules to fulfill its role in managing building scale, transition privacy, solar access and parking.	No, I don't want to / I currently live in a detached house			I understand the reasons behind this guide and this proposition from the ACT Governemt. I understand the need for increase new home for new Canberrans. There are two major points that this new guide does not take into consideration and the Government fails to take into consideration which are : 1- Offering protection to the current and established owner by avoiding as much as possible the impact of new structures on liveability by seeting clear rules in this guide. 2- Offering quality, human size new dwellings for new families for many years to come, but instead offering small and overcrowded housing that will satisfy only developpers looking for maximising their profits..
Yes	Yes		Maybe	I think it will be great especially for first home buyers	Yes		I think it fits well	Yes	Yes		80	Yes	Very well	Yes I think it's achieved week	Yes, I'd like to downsize and stay in my current neighbourhood			
No	Yes		No	Currently, the ACT is predominantly single family homes. Currently, RZ1 makes up 80% of residential zoned areas in Canberra. Current zoning rules disallows anything other than single-family homes on these blocks. There are a lot of good baseline changes that could allow a higher limit on density, like: - More than one house per block - The creation of smaller blocks in inner-city suburbs, like Aranda However, there are still limitations that do not allow true diversity: - The consolidation size limits - Tree canopy sizes on smaller blocks	Yes		Overall, I think that the rules do to maintain existing local character. They limit new developments to the same built form of large houses in Canberra. However, I feel like its recommendations don't do that much to appropriately transition between adjacent houses. It primarily predetermines that adjacent houses are single family homes. It would require that e.g. terraced homes on different blocks with different developers dip down and come back. In my opinion, this would result in housing with worse transitions between blocks than if the odd angles on the building envelope were removed.	Overall, I think that the focus on screening is a good idea. However, I think less screening around communal areas can result in less isolation and a stronger feeling of community. Requiring screening for areas like balconies for low-rise buildings may discourage more casual community interactions.	Yes		100	I think that the parking requirements are overly extraneous. The planning requirement requires at least one parking space per building. In areas with very good public transit coverage, I feel like this requirement is unnecessary. Most of the problems that come from parking are predominantly from people using their garage as storage, which is not enforced by zoning law. So parking requirements only really matter at building time, and are never re-checked when people actually buy cars.	Car parking will always degrade landscaping quality, so I think the reduction in car parking improves landscape outcomes. However, I am unsure how it will interact with tree coverage requirements. Will trees end up being placed in car parking areas, reducing the amount of nice open space?		Yes, I'm looking for an affordable home in an established suburb			
Yes	No	Increased density needs to be accompanied by increased services and transport. Otherwise, lifestyles of existing residents are inevitably compromised by crowding and competition for resources.	No	Offering diversity of choice is appealing. But the consequences of increased density will be deferred many years. Planning for synchronised increase and improvement of community facilities and transport needs to precede approval of development applications.	Yes		It seems fine		Yes		50	I think so	Car parking seems fine but increased density must be accompanied by increased options for public transport and active transport.	It seems to, but there are a lot of unknowns for how the guidance will be interpreted and implemented in the future.	No, I don't want to / I currently live in a detached house			Facilitating development approval for increased housing density can be proposed in a manner that supports good housing design. The much greater challenge is ensuring the corresponding obligation of government to invest in upgrading community facilities and transport to maintain or enhance residential amenity and lifestyles.
No	No	Makes it worse. Not interested in increasing housing density in established suburbs	No	I don't see diversity in housing to be a good thing.	No	I don't think combining lots to make more efficient housing is a good idea for most of the city. We came to Canberra because it wasn't like Sydney, and don't want it to end up like Sydney.	No comment	These middle housing should not be in established housing.			20	Visitor parking means suburb is too dense. Not needed.	Not well		No, I don't want to / I currently live in a detached house			Keep this in the city centres

No	No	This greatly concerns me because I want the option to purchase a house and land. If there are more developments on a single block that only gives me the option of a smaller property which is not what I'm saving for - and I think most people are the same.	No	This will make the ability to buy a house with a block of land even harder. It will force more young people like myself into purchasing townhouses or dual occupancy blocks of land with strata and body corporate which is not what many young people want - we only have to because there are more of them and less homes. If this is agreed it will only lessen the availability of full blocks of land, defeating the purpose of wanting to own												No, for another reason		We live in Canberra for the space and lifestyle, we don't want it to become like a big city with every squashed into apartments like big cities	
Yes	No	I support the changes but as an existing home owner I'm not looking for an additional home	No	Very well and I'm supportive of the changes. They help both existing owners with more flexibility with their land and those seeking to enter the housing market. My only suggestion is DPA-04 should more specifically define the terms 'primarily', 'low density' and 'low rise' in the RZ1 zone objectives. These terms will be critical in the success of the reforms - they should spell out more specifically what you would like to achieve and should be more ambitious. They should for example, also enable 'medium density'. The RZ2 objectives are more successful in this regard.	No	The proposed 2000 sqm limit is arbitarary and will significantly curtail block consolidation. The limit is already too low to consolidate even two blocks together given many Canberra blocks are very large. The consolidation limit should be removed.							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.	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.	It's unclear to me why Canberra wouldn't adopt the NSW design guide.	Yes, for another reason	I own my home, but would be very happy to live in a low rise apartment or townhouse		I'm very supportive and think they could be still more ambitious.
Yes	No	I feel that this will drive house prices up even more as syburban land blocks will become more attractive to investors and so drive prices up, not down.	No	No, I think it will drive house prices up even further. And enable develops to put monstrous developments onto tiny suburban streets, further reducing the bush capital's amenity. I am not concerned for myself as i purchased a home in a small block already, but i want my kids to be able to 'sebuy in'It honestly don't think this will help at all. In addition, it will devalue the homes around those blocks with apartments or townhouses right next door.	No										I already live in this type of home			It should be designed for new suburbs, not for pre-existing suburbs. It's not fair to change the rules after the current owners have purchased. Also, I have little trust in government systems to be operating in reality rather than theory.
Yes	No	Will ruin neighbourhoods for kids	No	The push for missing middle housing reforms is a misguided attempt to address housing affordability at the expense of living standards and family well-being. By prioritizing density over livability, these reforms are forcing people into subpar small houses that are unfit for family life. Compared to previous generations, today's homebuyers and renters are being squeezed into tiny homes with limited space for families, hobbies, or personal pursuits. This is not progress; it's a regression. The emphasis on efficiency over quality of life is a recipe for disaster, leading to: - Increased stress and decreased well-being due to cramped living conditions - Difficulty raising children in homes that lack adequate space and amenities - A decline in overall quality of	No			The push for missing middle housing is utterly destroying privacy and solar access in low-rise neighborhoods, and it's a travesty. People bought homes in these areas specifically for the peace, quiet, and sunshine, only to have it all taken away by cramped, cookie-cutter developments that prioritize density over quality of life. The results are devastating: - Homes are plunged into darkness as taller buildings cast long shadows, ruining outdoor spaces and making living rooms feel like caves. - Privacy is non-existent as new developments loom over existing homes, allowing neighbors to peer into windows and backyards. It's nothing short of a neighborhood takeover, where the interests of existing residents are sacrificed for the	No	Ruining the streetscape	0	The balance between car parking spaces and missing middle homes is a complete disaster. In my area, the streets are already clogged with cars due to medium-density housing, and it's getting worse by the day. The lack of onsite parking is forcing residents to park on streets, creating a chaotic and unmanageable situation. The push for more missing middle homes without adequate parking provisions is a recipe for disaster. It's clear that the policymakers are out of touch with the reality on the ground. The streets are already overflowing with cars, and it's becoming a major issue for residents, emergency services, and waste management. The situation is unsustainable, and something needs to be done to address the parking crisis. Until policymakers prioritize adequate onsite	It doesn't.		No, I don't want to / I currently live in a detached house			
Yes	Yes		Yes	I generally like the proposed changes. I know lots of lower income people (like divorced parents with kids and apprentices) who would really like to be able to stay close to family and friends by renting or (at later stages) buying into established suburbs away from the town centres where the smaller, more affordable, flats are now being built. Having more houses and much greater housing diversity would really benefit my friends by offering housing choice at price points they can afford. The changes look like they would help facilitate that, while still maintaining the amenity of blocks for people who value (and can afford) single dwellings on large blocks. I also understand the need for requirements about minimum quality standards, to avoid the more horrific potential outcomes of people getting greedy about trying to fit too	Yes		I generally like the changes and the minimum requirements imposed, such as being required to actually build in some storage, except for two areas. The bedroom sizes and ceiling heights seem to be a reflection of the needs of large scale apartment towers and what is seen as acceptable in the expensive inner-city suburbs in which apartments are currently being built. In most established suburbs of Canberra, these minimums would be unusual luxuries. Large secondary bedrooms are reasonable in inner areas where an apartment will often be rented as an adult share house and high ceilings make sense in large apartment blocks with minimal windows for each dwelling. However, most of the existing housing stock in RZ1 is built with 2.4m ceilings and children's bedrooms commonly have	I think this is fine. The amount of tree planting (particularly large, non-deciduous natives) means that (once grown) there will be far more overshadowing by trees than other buildings. As for privacy, realistically, the small spaces between houses even on large blocks means that there is not much acoustic privacy as is. Attached townhouses and apartments with proper noise attenuation in the walls and floors between dwellings and double glazing have much more acoustic privacy than 6m of air and a couple of single glazed windows between houses. I think the private open space requirements are sufficient to achieve visual privacy outside the house and have no concerns about overlooking into windows (I also find strategic use of curtains, sheers and window coatings or films is very effective at blocking anyone	Yes	I liked the design ideas. I also like the ability to articulate setbacks - it is one way of adding visual interest and it often avoids the first building in a row from completely blocking a favourable aspect.	100	Yes - I think as long as people have at least 1 car space allocated then they won't excessively clog the streets and often people will still be able to park tandem in driveways as they currently do. Though, I don't think people should be allowed to sell their carparks separately from their dwellings (or at least not below the minimum for the type of dwelling). It may suit one owners' lifestyle to be car free but realistically most successive occupiers will not have the same lifestyle and will just park on the street. I think visitor car parking on the streets is fine at current densities in most areas of Canberra. Areas in the inner suburbs where it is starting to be a problem tend to indicate a high level of spill-over commercial activity and so are probably best dealt with via individually tailored solutions via precinct plans.	I think the more relaxed rules about car parking (such as being able to cluster all the garages around an access driveway and more relaxed basement parking rules) will allow the rest of the buildings and gardens to be placed much more sensibly on each block. Also, shared garages are much less likely to get used for storage - which can be a fire hazard and lead to unnecessary street parking.	I thought it did a good job. Probably a bit simplistic for professionals in the industry but reassuring and instructive for residents.	Yes, I'd like to downsize and stay in my current neighbourhood			I think this type of managed housing development has been missing from Canberra for a long time and I hope it gets through. I would really like to live in a denser city with much more housing choice, more light commercial and retail within the residential areas and walkable from my house and much more access to all the services that come with denser cities.

No	Yes		Maybe	I strongly support the overall intent of these proposed changes. We desperately need more housing diversity and housing choice in Canberra to address our housing crisis. RZ1 makes up approximately 80% of the residentially-zoned land in Canberra, and it's essential that we unlock this land for more housing. We can't just have homes for new Canberrans in greenfields developments on the outskirts - we need more homes in established suburbs to control carbon emissions and give people better access to services and jobs. Overall, these changes are a good idea - the changes to RZ1 and RZ2 will unlock a tonne of residential land, and the changes to RZ3-RZ5 will also ensure more development in our higher density areas that are well suited for this.	No	Need to make sure subdivisions can be approved as part of the same DA as dwellings, so that there isn't unnecessary risk. The consolidation rules in RZ1 should be more flexible - I don't see clear grounds for the maximum size limits.	RZ3-5 changes are good for enabling appropriate transition in building height. Would be simpler if we just had a straight metres guideline for building height, not height and storeys. A lot of architects' views on what makes for good "breaking up the bulk", "visual interest" etc don't really add much value.	Solar access and privacy are important factors. On the one hand, 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. On the other hand, appropriate rules can reduce a legitimate negative cost on neighbours. These provisions of the design guide should be applied with enough flexibility that it ideally extremely rarely reduces the number of dwellings that can be delivered on a block, and acknowledging that not 100% of dwellings have to be "ideal" as some residents will trade this off for other amenities or lower cost.	Yes	We should get rid of side setback requirements - medium density benefits from allowing a nice continuous streetscape as seen in many cities	80	Requirements to provide parking contradict well established planning and economic literature (see Donald Shoup, The High Cost of Free Parking), and should be completely removed in favour of permitting proponents to develop as much parking as they feel necessary. The excuse that Canberra is car-centric doesn't matter - parking mandates have been abolished in New Zealand and increasingly much of America, both countries which are far more car-centric than Australia and Canberra - and removing parking helps achieve our environmental targets of mode shift to public and active transport. The new parking provision rates are a significant improvement on the current rules though, and I support that.	There's a lot of good suggestions in the design guide, I'm not sure whether all elements are always practical though. Obviously it gets easier to comply with all the design suggestions the fewer parking spots are required. I like the idea behind 4.2B(iv) and (v) (design with future conversion into habitable spaces in mind) but I'd like to know how practical this is, what additional costs or complexities it adds, and what a future conversion might look like - I genuinely don't know.	There's a lot of RMHDG elements that rely on subjective aesthetic judgements that are going to make things unnecessarily complex and may or may not actually look better. I showed the design guide to a friend and when we looked at the pages that showed examples of homes that were considered "good" and "bad" on various subjective criteria like "visual interest", "use of materials", etc she immediately said that some of the so-called "good" examples look much uglier than the "bad" examples. Fundamentally, subjective aesthetic requirements can be a bit silly - we don't all agree on what looks good, and what is considered to look good or bad today won't necessarily be deemed good or bad tomorrow. Overall, there are a LOT of requirements in the MMHDG, and most of them I think are	Yes, I'm looking for an affordable home in an established suburb			Broadly, I think these reforms are really good - a huge step forward for Canberra, and I look forward to how it will reinvigorate established areas like my own suburb of Griffith. It's great to see the ACT learning from other cities and the effect of reforms in countries like New Zealand. However, we need rules and guidance that are clear enough, otherwise there will be too much risk in proposing a development (especially with the risk of ACAT appeals - the rules and guidance must be clear enough for an ACAT panel to apply consistently too). The new RZ1 and RZ2 Policy Outcomes should be firmer in supporting a transition to medium-density as a default assumption in suburban areas. In particular I'm concerned that saying "primarily low density" and "mix of low and medium
Yes	Yes		No	Very well. I entirely support the principle of allowing medium density in RZ1 and RZ2. I support legalising townhouses, terraces, low rise apartment blocks and other typologies throughout our suburbs. The changes as proposed generally do a very good job of realising this. There are problems - the RZ1 zone objectives as drafted may accidentally constrain missing middle adoption. The soft consolidation cap creates a lot of uncertainty (how hard is this cap? Why and where might it be relaxed) and is an arbitrary limit that constrains housing supply and ensures worse outcomes. But thrust of the reforms are good.	Yes		The Major Plan Amendment sets out clear height limits - and these are good. I don't understand what the Design Guide is doing here exactly - a lot of it just seems like aesthetic policing rather than promoting any objectives - like for instance why is "reducing the perceived mass of the buildings" a legitimate objective of the policy? Letting people build up to 2 storeys with design freedom is not a bad thing. Also I've noticed that page 56 current seeks to introduce wedding cake setbacks to the ACT in a stronger form. this is a terrible idea, we don't want to copy Melbourne here. https://setbacks.yimby.melbourne	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.	Yes	Look, setbacks in general probably should be less much of a thing - front and side backs in particular.	100	My own view is that parking minimums should be abolished. Various other cities, including in New Zealand have abolished parking minimums, Canberra should too. 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.	No comment.	The very principle of the MMHDG in some ways is in my view flawed. Too much of it is about an attempt to police aesthetics for things that only have tagential relationships with notions of public welfare - things like "visual bulk" and "attracting visual interest". People should be free to build the homes they want to build, especially as architectural trends and fads change in the coming decades, rather than being constrained by the MMHDG. Less, in some ways is more.	Yes, I'm looking for an affordable home in an established suburb			the RZ1 Policy Outcomes in DPA-04 are ambigious, unambitious and will potentially constrain missing middle housing. What does "low density" mean - what does "primarily" mean in this context? Too much of it is too deferential to the existing suburban reform - allowing change in that form is the entire point. It should more closely resemble the RZ2 Zone outcomes in ambitious, and the key terms should be defined. Above all else, it should be clear that it is legal, acceptable and desireable for the entire RZ1 area of a suburb to move from single family homes to missing middle housing.
No	Yes			I really think these changes will improve housing affordability and housing choice across Canberra. Allowing apartments and cohousing in RZ1 is a really simple change that increases housing choice while maintaining the general built form of the area. I currently rent an apartment, but I think this policy will help improve the affordability of other apartments and townhouses in well-located areas across Canberra that will mean that I might be more able to purchase one in the future.	Yes		The transitions in height and scale sound very reasonable to me. The height increases to RZ2-5 allow for a good increase in capacity over what is currently allowed, and they create a smooth hierarchy from low to medium-high density.		Yes	Side setbacks don't add valuable space to a block, so reducing these is fine	100	I support the reduction in minimum car parking requirements. As we increase density in areas where it's possible to use active and public transport more, we shouldn't require so much parking. Outside these areas, developments are still likely to include sufficient parking so they can sell well. Almost half of the households in Canberra only have 0 or 1 cars (see 2021 Census results).			I already live in this type of home			I don't have any more specific thoughts, but I believe these reforms are crucial to Canberra's future. I can't wait to see it become reality.
Yes	Yes		No	I support the proposals to increase the density of housing in Canberra, and believe it will: 1. Lead to more more housing choices for Canberrans in different life stages. I have retired parents in a big inaccessible Belco family home, who don't currently feel they have good options to downsize because they want a small garden and not an apartment. 2. Make it easier for first home buyers by creating opportunities for smaller, more affordable housing types that could help people enter the market. I have friends and family who have found Canberra's housing market so dire price-wise that they've had to move interstate. I believe the reforms could and should allow for more diversity: 1. RZ1 dwelling density limits should be increased so that option currently proposed for RZ2 are available to all, and	No	Assessment req. 11 (page 10, Draft Major Plan Amendment) requires that subdivision can only occur where each block contains a lawfully constructed dwelling, creating a financing risk for developers who have no guarantee they can subdivide.	I do not agree that "appropriate transition' is the issue this question presumes, to anyone but cranks and NIMBYs. Canberra has changed in 50 years - having a one story home next to three storey apartments will not cause a heart attack. The concept of 'visual bulk' is extremely arbitrary and subjective, and should not be a principle.	Yes - the solar envelope angle changes from 31Â° to 45Â° for multi-unit housing allows more practical building forms while still enabling solar access for neighbours.	Yes	Yes, but setbacks are silly - get rid of them.	100	I support the reduced parking requirements, but believe it needs to go further. We need more substantial reductions to meaningfully increase housing supply and affordability - e.g. 2-bedroom unit parking reqs (page 33, 36, Residential Zone Specifications). I support the full removal of parking requirements, as has been implemented in New Zealand and many cities overseas. As someone who has recently purchased a unit, it is clear the market already prices in parking spaces.	Less parking requirements and a greater green space requirement would actually support more pleasant landscape outcomes.	It's a good start, but it could be clearer. The guide references aesthetic standards that are arbitrary and subjective, like 'visual bulk', which it encourages the reduction of via setback requirements. I have never, in my life, ever heard a normal person use the phrase visual bulk or say a home is ugly because of a lack of setbacks.	I already live in this type of home			needs to go further and enable more types of more homes. The RZ1 policy outcomes in the Residential Zones Policy continue to embed the Canberra of 50 years ago by refering to 'character' and 'low density'. The only people who can now afford this beautiful 'character' are older Canberrans who haven't had to think about housing in one or multiple decades. I have a lot of siblings. My dad bought his 1/4 acre block when he was in his early 20s and a poorly paid painter. My older brothers and sisters bought free standing homes. I am now paying more or less the same for an apartment. I don't expect to get what they got, but I do expect the government to change the rules so more people can afford smaller-scale but amazing homes that
Yes	No	I'm happy where I am and it's suitable for aging in place	No	I don't think it provides anymore diversity or choice than is available now	Yes		Depends on how well it is enforced.	No. The block sizes are too small for this to be achieved	Yes		50	No, creates street chaos	The only way to provide a pleasant landscape on a tiny block is to minimise car parking space but totally impractical		No, I don't want to / I currently live in a detached house			A retrograde step for society and the environment by decreasing gardens and personal space
Yes	No	Creating suburban overpopulated communities. Sculling I already a high density zoned area with higher level apartment living. This would add to an already existing problem	No	I think there is already minimal choice for single dwelling housing in scullin which is essential for larger families and sustainable living.	Yes		No comment	This is a real concern if sustainable living is proposed as best future solution.	No								

Yes			Yes	People who purchased years ago are now being taxed into poverty for what are small workers houses on large properties. More than 3/4 of their elevated rate bills may be going towards paying for undeveloped land. Elderly people may be richer on paper due to the unconscionable rise in property prices, elevated by decisions of government such as mass immigration, limited land release and negative gearing incentives for people to own multiple properties. However, their actual lived existence is more impoverished as they live in the same old house, with a greater share of their limited income being appropriated for redistribution by the Government. It is unethical to not allow people in these circumstances to divest themselves of this unproductive land through subdivision. This also has the advantage of increasing the housing stock.								80	All these niceties are great, but we are talking about basic survival. Housing is an essential human need.					What has been done to this country is disgusting. We are being dispossessed and impoverished. Anything that increases the housing stock given the government's unwillingness to adjust other parameters is not just welcome but essential.
Yes	No	A major omission from the draft plan is a discussion around how to incorporate trees, gardens and welldesigned, interesting buildings.	No	It sounds ok but see comments above. To keep the green nature of Canberra, any discussion about housing must contain rules about leaving space for greenery, gardens and trees. Currently I see blocks full of building and only a toke consideration of greenery.	Yes		Yes I think it's ok but there needs to be mention of building attractive, innovative buildings. In the sixties, the Netherlands instituted a revolutionary design program for building exciting housing for people. It encouraged creative design that also helped people to feel part of a community. I'd like to see more discussion about those aspects.	I am not qualified to comment on that	Yes			50	Only if the streets are wide enough e.g. in Palmerston, this would be impossible.	OK	I would like to see a competition to encourage innovative design, as opposed to white boxes.	No, I don't want to / I currently live in a detached house			
No	No	We have plenty of land. We want low density. Big backyards, traditional Aussie homes. I dont care if I have to commute if I can afford a home and it be spacious, somewhere where I could start a family. I'm going to buy a townhouse and raise a family!?!?!?!	No	I don't agree to start cramming everybody in. Not what we want. But less regulation for housing is better so I agree with the changes, since we need more of it, since the younger generation has been screwed by unaffordable housing.	Yes		Sure	Yes	Yes			50	Let people park where they want for free.			No, I don't want to / I currently live in a detached house			Can we focus on developing more housing in new areas, and a lot of it. Don't have a problem with the laws but can we address the real issues and give everyone a fair chance to have what the boomers eot.
No	No	Making more [REDACTED] homes but not enough to cope will all the foreigners moving in	No	Ruins character of existing suburbs, while lots of farmland and empty paddocks being unused. We dont want to live in pods. We got want tiny homes on tiny blocks cms awaybhom neighbours. No rent-to-buy schemes like my grandparents got. Also put some rules in to stop all the ugly houses, make houses pretty again.	No	Written to line boomer pockets and house [REDACTED]	Not well. Needs to improve the aesthetic of local area not ruin it or say "it's already being spoiled by [REDACTED] or other ticky tacky lego builds so let's build more fugly properties'. If you are going to build tiny houses why can't they at least look like pretty old European buildings instead of all this jewish modernism and brutalist crap.	If you can't get any sun in your yard you can't even grow grass.	No			10	No our streets are too narrow for all the on-street parking. People should be able to have visitors park on their property not the road be littered with cars. Especially consider how many [REDACTED] you're importing who overcrowd their dwellings so they have more cars then [REDACTED] for all their residents and then have lots of regular guests on top of their overcrowding!	Very poorly.	Open more land stop shoving everyone in tighter and tighter space. Make a law that only those born in Canberra can buy.	No, for another reason		No because I already live in this type of home and it is horrible	Deport all foreign nationals, stop letting them buy houses.
No	No	Canberra is the 'bush capital' and I believe that building apartments and housing with minimal land is changing the nature of our Capital.	No	the new builds are not build well. They look dated and seem to fall apart after a few years.	No	Once again, Canberra is a bush capital. We need more nature.	N.a.	Houses around these new larger builds will miss out on sunlight and warmth.	No			10	No	Not well.		No, for another reason		I want to own a home. Not a home attached to other properties with minimal land and sunlight.	
Yes	No	Too old, too expensive. I already downsized once, don't need to upsize.	No	It just like Dickson to me. High rise along Northbourne, townhouses and low-rise apartments in the streets behind. It's great living here. I hope the far flung burbs might benefit from greater density without also needing the high rises.														
Yes	No	I'm not in the market for a new home.		Very well.			Don't know.	Yes.								I already live in this type of home			
Yes	Yes		No	I think that the proposals go some way to address the missing middle but I don't think that they go far enough. The amount of space that remains allocated to parking will continue to encourage car ownership and allow planners to forget about alternative transport mode such as light rail, cycling (pedal and powered) and walking when planning supporting services such as medical and retail services. Non car owners will continue to have to rely on poorly serviced bus routes or some form of private or public car transport. Continuing to force all services into group centres and town centres except for micro retail maintains unacceptable distances between dwellings and services people rely on for daily life. The strategy doesn't seem to consider how people will occupy these dwellings and what they require to be in close	Yes		It seems to make it difficult to redevelop a block to comply with the new requirements.	The drawings indicate that buildings will be of poor quality with no architectural value. Precincts with particular architectural characteristics should be developed and residences in those precincts should all meet the architectural guidlines.	No	There seems to be no allowance for shared walls on boundaries, maintaining the single residence concept. Bald face buildings opening directly onto streets should also be allowed.		100	No - less parking should be encouraged to reduce the number of private vehicles. The Dutch continue to remove parking from their streets creating human focused livable streets	Parking should be reduced. People should be encouraged to reduce car ownership. If people can walk and bike safely to their destinations, cars will not be required. Streetscapes should be altered to prevent parking and residences should not have any parking entitlement. Where cars must use a street, it should be at 30 kmh and as guest users, meaning people and bikes have right of way over cars.	This proposal brings no life or character to the suburbs, only more residences. I support increased density but it must improve the quality of life, such as in the Dutch experience, not just endless rows of bland buildings along stroads.	Yes, I'm looking for an affordable home in an established suburb			Whilst I support the increase of the housing density, it must be done in conjunction with broader precinct and neighbourhood plans. The livability of an area must also be considered as the current housing stock is renewed to create human spaces rather than a denser desert of cars and houses as exists now. I give the example of Tavener St Wanniassa. A car only road that has an expressway speed limit, dividing two suburbs and which has no pedestrian or bike uses. It could be reduced to two lanes with no median and 50 km speed limit. This could then be lined by street level shops with residential above shops and small apartment blocks mixed in. This could then become a Main St connecting the suburbs and bringing services to the people of those suburbs, within walking and biking distance and provide additional medium density housing to the area,

Yes	Yes		No	More secure parking is needed in any multi density living development. Increasing break ins are a joke. In Gungahlin, the reliance on street parking is out of control. Imagine if housing developments were designed better to accommodate parking. You wouldn't have the streets looking unclean, messy and unusable by the general public. Such an eye sore. Canberra and developers can do better. Much better.	Yes		Well at least we won't feel like we're in a big city. Parking would be better managed as you wouldn't need so many, due to smaller developments.	No idea				If you allow one car park per bedroom in each development, you have the right balance. Anything less leads to issues in the future.	No idea. Haven't read it. If you allow one car park per bedroom in each development, you have the right balance. Anything less leads to issues in the future.	No idea	Yes, I'd like to downsize and stay in my current neighbourhood			If you allow one car park per bedroom in each development, you have the right balance. Anything less leads to issues in the future.
Yes	No	too old	No	Quite well but please do not pressure owners of large blocks with large gardens to subdivide to make easy missing middle developments possible. In my opinion this will reduce housing choice for those who prefer to live on larger housing blocks. I would like to see more encouragement for building small single-level houses on small blocks with small gardens and minimal owners corporation regulations and strata levies, like "Lincoln" in Bruce. And encouragement for terrace houses with a different title system which allows for individuals to have very little common property and be able paint their houses in different colours etc, as in inner Sydney.	No	I remember the opposition to the manor house demonstration development on Block 6 Section 31 Griffith which the proponents seem to have had to handle on their own, without any Government help.	The newer suburbs like Whitlam and most of Molonglo show what a dog's breakfast can be built when developers 'shout' with housing designs that have no respect for their neighbours. More stylistic restraint should be encouraged by EPSDD.	Yes, if the planners at EPSDD actually insist that developers follow guidelines for solar access and privacy. Not like "The Residences" at Capital Fresh Food Markets where residents walk very close to their neighbours' bedroom windows in order to reach their front doors. And there are too many developments which ave poor solar access, like "Eden" next to the servo at Kippax.	Yes		80	I think the Government should explore more radical parking solutions as in Rochford Street Erskineville and other suburbs in inner Sydney where narrow streets have been made one-way and parking is permitted down both sides, instead of the previous two-way streets with parking on just one side. And more Government provided public electric vehicle chargers.	Sorry, I missed that but I think the Government should take more responsibility for well designed streets and communal spaces. For example, Crace.	It ignores the financial side which all mum-and-dad developers need to understand before seeking professional advice. I could not find any mention of the Lease Variation Charge and it should be there, shouldn't it? Perhaps some examples of how some successful missing middle developments have been costed should be provided.	No, for another reason		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.	
Yes	No	Already have stable housing	No	The proposed changes are good, but are contingent on the ACT government's ability to actually process development applications. Current government (and utilities) capacity to support development within the existing policies and guidelines is woeful. The delays and bureaucracy embedded by the government institutionalized within its processes are the real issue preventing development.	No	There is no consideration to the capacity of the street to handle traffic. There are plenty of narrow streets that cannot manage street parking while maintaining safety.	Poorly. There is no alignment between suburban and rural housing standards. If middle housing is desired in suburbia, then multi-generational living on farm should also be supported.					50	No. Missing middle near good public transport will be ok, but where there is no reliable or fast transport the parking will be inadequate. There's no thought to the age and demographic of the people who are more likely to live in missing middle, and how this relates to their car/transport needs.			No, I don't want to / I currently live in a detached house			The reforms are irrelevant if the approvals process for developments (and renovations) can't be fixed. Recently I've experienced first hand the issues with development approvals. It is taking 7 months and counting to get approval to replace an existing garage structure. Icon water was a big contributor to this delay. Plans had to be submitted BEFORE being able to get access to accurate mapping of the infrastructure. Plans were then rejected because the accurate mapping was not included. The mapping could then be provided. (Insane power tripping - other local governments make all these mapping layers freely and readily available.) The plans then had to be resubmitted. The plans were then rejected because the garage line was next to the line of the easement. If two lines cannot be next to each other, what is the point of
Yes	No	I already have a home.	No	They are probably fine - there is an important element missing about the design requirement for open spaces and planting areas to have access to sunlight. Sunlight, like deep soil and water, are critical for plant growth. Planting areas and open space /permeable areas on a block should receive access to a minimum of 6 hrs of sunlight year round. This will result in a functional plant growing area, rather than areas where plant growth and health is limited by low solar access. Most plants, particularly those under plantings required for supporting biodiversity, food production, or those commonly used in ornamental gardens, won't grow in the shade. Those which do tend to be architectural type plants such as hedges, spiny rushes and other grass like species, and non-flowering ground covers. There are 5-10 species which have become ubiquitous across	No	I am very surprised that the MMHDG is targeted toward land owners. The flow chart suggests that families residing in these areas might just pick up the guide and become developers overnight, in partnership with their neighbours. I think that's unlikely.	I do not support the change from 31Â° to 45Â° in terms of solar access provisions. The position of the sun in the sky throughout the year hasn't changed, so why should the solar provisions? I am very concerned about the potential impacts of adjoining areas on solar access of both living areas AND planting areas of adjoining properties. Consideration as to the use of any areas on adjoining properties where solar access is impacted should be required. E.g. lawn, ornamental garden, vegetable garden, orchard, green house, deck or patio areas should not be allowed to be shaded. Areas covered by bin storage, sheds, etc. may be ok if these structures are permanent.	No. See above in regards to protecting solar access for gardens as well as inside areas.	No	I found it hard to understand how the Roman numerals on the diagrams linked to concepts. Suggest using Figure references in the text to make this more explicit.		I suspect that uptake of active travel and public transport has a way to go before people are willing to stop having one car per person in many homes. I think this will be overruled often in practice where the block is not in very close proximity to a rapid transport route or town centre (which most RZ1 won't be).	I think there will be cars parked all over the place, including on verges, and this will impact tree health, canopy coverage targets and water infiltration due to soil compaction. I think people will continue to vandalised street trees on verges which could otherwise be used for parking. I don't think this is realistic, although I like the vision.	I think this document will need to be supported by targeted outreach to home owners in areas where densification makes sense, including letter boxing and regular events where people can go and get further support in navigating the system. I also think the design guide will be ineffective while limitations persist around availability of trades to undertake the work. For people that are not developers, the process described would probably be prohibitively expensive.	Yes, for another reason	I enjoyed living in my apartment previously where we had high density living spaces and a large shared community garden (chickens, orchard, vegetable gardens, play spaces). Too few of these exist though that also provide sufficient secure storage.	I think use is a great initiative and will address important gaps in housing affordability - particularly for people who only want indoor spaces (assuming town houses, units etc. are a few rooms plus a parking space and maybe a small balcony). People who want something affordable with a few extras, like a patch of sunny soil to grow plants in, or a shed space to support other hobbies, may be able to find opportunities where a second dwelling is built adjacent to a primary living space (e.g. granny flat or subdivided block) but often these are not that much less expensive than a stand alone house. Most of the units built which provide ample outdoor spaces to support community gardens etc. are old, have low energy efficiency, and are constrained in their ability to adopt more
Yes	Yes		Yes	It is a great idea. There are many people in Canberra who own the home but do not need the block space . My block is over 800m2 and I would love to be apart of this plan . As I am on a disability pension my ability to do this would mean using my super and as I am 65 I am nervous to commit.I think if you could offer more advice on the different financial possibilities for those who would be apart of this but do not have money /job. Is there a way? Also if the was more information on the smaller house i.e tiny /1and 2 bed homes so that people like me see it as a possibility. Thanks Moira Nelson	No	As I said above the variety of housing should be included too	Well	Yes	No	More examples would be good in picture form	100	This will work in quieter streets for sure	Yes fine	More variety of living styles	Yes, I'd like to downsize and stay in my current neighbourhood			

Yes	Yes		No	I think it does allow for more density and diversity in the types of dwellings available for occupation close to shops and public transport routes. However I think what hasn't been addressed is that for current RZ1 dwellings further away from shops and public transport is the increase in traffic and the number of cars in the area.	Yes			I think this will be a shock to some people who may not be seeking to redevelop their sites especially if there are zero setbacks.			50				Yes, I'd like to downsize and stay in my current neighbourhood			There seems to be quite a bit about walk up apartments and townhouses but for an ageing population single storey dwelling without steps are better. Hopefully there will be some in the dual occupancies.
Yes	No	bc this useless govt keeps. ripping up natural environemnts for housing, destroys natural habitats, made garden city in a nanny city, dormorties	No	none. where are the native animals gonna live eh	No	bc i said so. any plan by ACT is all about getting more revune	anything above the water table is bad	No, miss all the housing and return it to natural habitat	No		0	no act gov never gets anything right	appaling	Add natural habitats and no houses	No, I don't want to / I currently live in a detached house			vote TEAL
No	Yes		Yes	Well	Yes		Well	Yes	Yes		100	Yes	Well	Yes	Yes, I'm looking for an affordable home in an established suburb			
Yes	Yes		No	I support the missing middle proposals, to allow more diversity and hopefully make housing more affordable	Yes										I already live in this type of home			It's not just about building multi-unit complexes, but also give consideration to how they are managed going forward to keep them affordable. Currently about 8-12 weeks of rent a year for most units goes to pay the strata management fees. Sounds unbelievable but please do the research because it's true. Please watch the 4 corners TV show by Linton Besser which explains the background of the culture of rorts and kickbacks in this unregulated industry. Building companies allocate management of properties they build, to strata businesses by their grace and favour. They retain a few units so they can be on the executive committee of the owners corporation. Then the strata managers want to stay in sweet with the Builders, to make sure they get the next big contract. This means they are hopelessly compromised by conflict of interest when for eg
No	Yes		No		No	More.			No		60				No, for another reason			Needs to consider disability access also. Note that giveong tax incentives to allow housing co-ops would likely be a good additional step.
Yes	No	As a retiree my partner and I would be looking for single level townhouses. There is no recognition that when a retiree/older couple want to downsized they may not want an apartment but townhouses are normally double storey. Finding a single level.	No	Not enough. Need to recognise the needs of older Canberrans who don't want to live in an apartment and are looking for single storey small houses/townhouses.	No	Neighbours don't want two double storey houses as this increases traffic and on street parking issues. Need to allow for parking and privacy still. Block consideration should consider impact on street parking.	Ensure that there are single storey options for older people.	Privacy is an issue when multi-storey homes are built in a single storey neighbourhood	No	Parking impacts on the streets.	40	This is a major issue. An example is BellHoise Drivenin Moncreiff. There are so many cars parked on the street you the road in basically one way and a safety issue when turning onto Crackjack Way.	Not well enough. Suburban streets are too narrow	Unable to answer as I'm not one of those listed.	Yes, I'd like to downsize and stay in my current neighbourhood			Planning is too much aimed at people coming into the market and families. Need to consider retirees who would like to downsize but aren't ready for aged care.
No	Yes		No	Better than what we currently have. Suitable housing for downsizing older residents is hard to find. We want single story, no stairs, smaller outdoor spaces to maintain, while having flexibility to still live a normal life with a full kitchen and have family stay over. And be affordable. For example my parents property, now empty, could have multiple dwellings but is restricted by under roof rules. It could be subdivided sympathetically to the suburb, but can't due to current rules.	No	Because bumet rules wont allow	It provides hope	Hopefully	Yes		90	Parking on streets not made for it is unsafe and this shows in suburbs like Ainslie and gunghlin. At least Gunghalin has nearby spaces for overflow parking that abut green spaces while keeping them separate.	It's been considered		Yes, I'm looking for an affordable home in an established suburb			It's no surprise that current government rentals do not have homes that suit multigenerational families. Consolidation of blocks to allow these to be built and rented would be good for that section of our community that have not previously been considered.
Yes	No	Because they are not single story with some surrounding garden all around the home and cost way too much especially theland orice	No	No idea, but I am not confident. I would love to downsize from 3 bedroom to a 2 bedroom townhouse to my own design, with a little bit of garden all around, preferably backing onto nature reserve so is quiet and not be pushed into an aged care living apartment where you have to pay extra fees. Open up the CSIRO land at back of Kaleen/Spence/Fraser at an affordable price. Canberra is no longer the bush capital and has been turned into an overpopulated [REDACTED] as Governments are only interested in building infrastructure for international students and immigrants to accommodate the tram obsession nobody wants to use.	No		Who wants neighbors with double story dwellings overlooking your house and blocking out the natural sunlight you should be allowed to also have.	I highly doubt it.	No	Housing and land should be how it was back in the 70s in the suburbs. Kids could play and everyone was happy		Absolutely not, there is less and less parking because the government allows developers to put up apartment blocks instead. And if you can find a parking spot you have to pay for it anyway.	It doesn't	No	No, I don't want to / I currently live in a detached house			

Yes	No	The shortage of housing is indeed a crisis but not one caused by having too few houses, it is a population crisis caused by too many people seeking to utilise increasing amounts of the finite resources on this planet. Every additional new 'abetter"house.	No	Not at all it is a directed outcome that like all previous ones will run out of capacity due to the ever increasing population of people who want or need. Address the population crisis, work out a sustainable plan and solve the real problem	Yes		It moves the debate along but unfortunately like all such plans will result in a high degree of uniformity and a lack of real choice or options as it reaches capacity	Balance is subjective. As with above, when everyone is the same and there is no more capacity because the population has again increased beyond what the plannners envisioned changes will have to be made	Yes		50	No absolutely not. Planners are always overruled by ideological considerations and the idea that public transport eliminates the need for cars and therefore garages and parking spots. A great theory that holds some weight on good days for routine (going to work) types of activities but falls short on windy wet and cold days when people don't want to face the elements. It also fails on weekends for those who seek to 'ratour"Rather than merely coffee shop. Whether it's for going to the beach or grandmas house most folk keep a car some also have bicycles, surfboards and electric scooters the issue for these folk is storage and while they might be lucky and usually be able to get a street parking spot within 50 metres of home they can't store anything else on that spot. An on-site garage or parking space and some storage should be mandatory for every new	No cars will overload the 'atcalculated"Need	I'd like to see more emphasis on disability access not because I'm disabled but in order to make it the baseline standard rather rather than special thus the disabled can live anywhere I can.	No, I don't want to / I currently live in a detached house			Address the crisis of the ever increasing population not as a housing crisis else we we will soon enough have crises in other limited resources eg water
Yes	Yes		Maybe	I think they are positive	Yes		It seems appropriate	Solar access is important and so is solar passive design to minimise heating and cooling costs.	Yes	Will provide for a more attractive streetscape	80	Yes - less private vehicle use in long term future.	Yes	More incentives for permeable paving and rainwater tanks.	Yes, I'd like to downsize and stay in my current neighbourhood			Planning approval process needs to be streamlined and less costly
Yes	No	I already have a home	No	The proposed changes will not help, giving developers scope to build more ugly, box-like, defect ridden residences, as they will maximise their profits. Until developers and the building industry show commitment to true sustainability, building quality, climate protection, solar access and green surrounds, their productions will continue to be a blot on our city.	No	The blocks will be too crowded, tree protection waived, privacy compromised - as is currently the case with block consolidation. It will only get worse.	Not well. There should be more provision for single-storey, townhouse developments, which Canberrans prefer. Apartment blocks are famously prone to water leakage and general engineering and quality problems. I am very concerned that corporate megaliths such as [REDACTED] will continue to blight our city with their shoddy buildings. I know several apartment owners who have been in dispute with developers like these for years after purchasing an apartment. Body corporates leave individuals to flounder while water streams in their windows and light fittings.	No. Solar access and privacy are non-negotiable, and should not be compromised. The projected guidelines will not guarantee this.	No	We should preserve the green margins in front of dwellings, for amenity, privacy, vegetation.		No, there will be too much parking necessary on the street. This compromises the nature strip also, where people want to walk. Driving in suburban streets will become more difficult as the spaces for turning, passing and exiting driveways will be narrower.	Not at all.	No, there will not be good design outcomes. Architectural and sustainability values will be sacrificed to maximise dwelling size and profits to builders/ developers.	No, I don't want to / I currently live in a detached house			I'm not against increasing densification, but it needs to be done on a more modest, liveable scale, and with quality guidelines ensured. The building industry act like cowboys in this town - even more so, developers - and I have no confidence the government will be able to change their culture. "Missing Middle" is a tag that shows how limited ACT planners' vision is: a better tag would be "Missing Quality" or "Missing Excellence". Why not mandate true sustainability such as that shown in Sustainable House Day displays? I love this city and I will be sorry to see more license given to shoddy, defect-prone, architecturally bankrupt dwelling construction that causes misery for those not wealthy enough to buy something better, and generously lines the pockets of developers and (through revenue-raising formulae) the
No	No	Canberra is too expensive to live in	No	None, the new houses that are built in Canberra are badly built, ugly and especially in the new suburbs soulless.	No	It doesn't consider gardens or nature and just stacks more badly designed and built houses onto one lot	It won't do any such thing. House are being bulldozed everywhere around deakin and big expensive boundary to boundary houses built.	Not currently	No	I can't see it changing from the current setbacks. Why do people need such massive houses?		Don't know	Don't know	Smaller houses and better designs. Look at some of the Scandinavian countries. Australian construction is boring, unimaginative and not fit for purpose. Especially the shoebox apartments, they are horrible and expensive.	No, for another reason		Don't trust the government to provide anything that is good to live in	Stop using Chinese materials Design small attractive houses Reuse building materials from older houses Have more garden space for birds and wildlife in private dwellings. Encourage verge vegetable gardening
Yes			Maybe	The proposed changes are welcomed, they will result in more flexibility to meet the ACT's housing needs while assisting in reducing the need for further greenfield development. I fully support the proposed changes in their current form.	Yes		Does a reasonable job, although the proof is in the pudding with relation to how the Territory Plan, Design Guides and particularly Tech Specs will be interpreted by the ACAT. Its understood that in a recent hearing the Tech Specs were raised as needing to be adhered to. This potentially threatens the ability for interpretation and nuance in the Territory Plan as intended.	The guides are a bit of a nothing for solar access and privacy.	No	Few more depictions and view angles and examples could help more. Although understand the risk of being too prescriptive.	90	Yes, can you do something about waste requirements while you're at it?	Good	Yes	Yes, I'm looking for an affordable home in an established suburb			
Yes	Yes		No	While there is more diversity for housing, there is no planning for extra water supply or extra sewerage processing.	Yes		How will this affect people who have already spent money transitioning to solar power when they are faced with a new building blocking their access to generate power?	It will depend on the individual buildings height and the existing dwellings that have already installed solar.	No	The plans are too general.	40	People should always have the option for off street parking, that does not interfere with waste collection.		More detailed planning maps.	No, for another reason		Our block sizes are not large enough	
No	Yes		No	Make rentals affordable. As I approach 60 and look to retire I have lived on the rental uncertainty- my children have left home. Moved interstate due to affordability here and low cost housing will be my only option when I finish working. Alternative is homelessness. I raised my children as a single parent. Never been able to afford to save a deposit and live hand to mouth fortnightly. This may give me the only opportunity to remain in ACT. More low cost housing is needed. Medical instability is REAL.	Yes			All considered, yes.	Yes		100	Suggest yes	Single small vehicles. No casacity for vans or trailers or boats. Needs addressing.		Yes, I'm looking for an affordable home in an established suburb			Need Low cost accommodation based on income/age/ health/ former ADF veterans. Help everyone that matches a criteria for assistance, not just First Home Buyers. Widowed, Divorced","we all matter and count.

Yes	No	I don't want to continue increasing housing and moving away from the initial design of canberra as the bush capital	No	I believe it will fracture the appeal of canberra. Our infrastructure is not developed to resource and support an increasing population. True canberrans want the opportunity to have a backyard and be part of a neighbourhood. Additionally body corporate cause extreme stress financially and on people's mental health and well-being. This need to be reviewed at a legislative level to protect home owners safety and welfare.	No	Unclear how this will impact on Canberra's initial vision developed by Walter burley griffin	It risks displacement of fauna and flora and additional will impact on city values	No where near, please review legislation specific to strata and body corporate before implementing this and consider financial stressors, legislation need to be in place to protect home owners from strata services and EC committees.	Yes			0	No, please look at newly developed suburbs to understand the errors of the proposal each property needs a minimum of 2 parking spaces	Safety needs to additionally be prioritised	Na I disagree with the proposal	No, for another reason		It does not fit within my hopes for Canberra and vision of what I expected for the city	Please do more liaising with community and review recent suburb developments prior to implementing this. Resources education and health to support the likely increase in population.
Yes	No	The new overly crowded suburbs look like an unattractive place to live. I can't fathom what living in each others backyards feels like day to day. And with hardly any yard there's no chance at having a veggie patch or having kids playing safely outdoors.	No	I think the new plans simply pander to greedy developers and people who want to make a quick buck. The once lovely suburb I live in is being filled with poor quality housing jammed into once lovely blocks of land. Overcrowded, cheaply and badly built and ugly. It's not a lifestyle that's attractive or good for people and families.	No	For obvious reasons these changes are a reduction in standards that were put in place to keep Canberra from becoming an overcrowded ghetto. Sorry for the negative language but Canberra was once lovely and the older suburbs are the only nice places left	It doesn't. It's a reduction in standards to pander to developers.	Hell no. Have you actually walked around these new developments and seen how little privacy people who'll live in these houses have? That and the increase in noise pollution from living in each other's pockets. At the moment my street is being ruined by government allowing too many houses to be squashed together. It used to be lovely but now older trees are being pulled out to build oversized cheap looking houses that you can see have been badly built with lack of oversight to ensure building standards have been followed.	No			10	Is this a joke question? Driving around new developments it's obvious standards have fallen to rock bottom levels in the ACT in recent years. Many of the places built are already showing signs of poor build quality - let alone looking ugly and dominating the streetscape. As for car parking spaces most of the streets that have been infilled have very little in terms of car parking spaces. It's just not designed for people to have visitors.	It doesn't. Car parking has been inadequately addressed. When tradies, plumbers etc, for example come to work on homes there's nowhere for them to park.	You might have to go back to the time where Canberra had building inspectors working for the government rather than the current rules which allow builders to buy in their own inspectors which has resulted in a huge drop in building standards and many homes build that do not meet even basic building standards.	No, I don't want to / I currently live in a detached house			I'm very disappointed in our local government which has over the years lessened building standards to the point now that even the older suburbs are not safe from over development and poor building standards that are the norm in new suburbs around Canberra. I don't know anyone who dreams of living in houses with no yards and no privacy.
Yes	No	Not presently considering purchasing another home	No	The proposed changes potentially increase housing diversity and choice within Canberra, but the extent to which this occurs will depend on many economic and policy/political factors beyond the control or influence of the ACT government. The proposed changes may do little to facilitate affordable housing, as building costs and interest rates are still going to mean that housing is expensive, even if the individual lots and buildings are generally smaller. Existing problems Australia-wide in supply chains for residential construction may also mean that housing costs will remain high. The proposals also impose a range of unquantified costs on existing communities in the vicinity of missing middle developments, eg greater congestion, increased parking on local streets, greater noise,	No	Most minimum lot size requirements and dwelling number requirements have been removed, with some limitations on consolidated lots sizes where the lots are located in particular areas. Outcomes rest on specific assessment outcomes, some of which are vague.	The guidelines aim to promote a gradual transition in height and scale between RZ1 and RZ2. However, it is possible to have a 3 storey plus attic (4 storeys) building in an RZ2 zone which is immediately adjacent to a single storey existing home in an RZ1 zone. In this case there will be considerable adverse impact on the existing owner in terms of loss of privacy and other amenity.	It is hard to determine whether the guidelines do adequately balance solar access and privacy. More illustrations of options showing potential outcomes would be preferable.	No	The diagrams are very general, and it is difficult to appreciate just how close, or otherwise buildings will be from each other within		No. There should be a requirement for at least two off-street car parking spaces per dwelling. It is unrealistic to think that there will be adequate street parking in all neighbourhoods to cope with the additional parking demand generated by a requirement for only 1 car space per dwelling. Inner Sydney and Melbourne streets illustrate the adverse impacts of not providing for adequate off- street parking.	Not at all. See above.	The RHDCP is unclear in some respects. In many cases there are no guidelines, just a reference to the development needs to demonstrate how it meets assessment outcomes. It would also assist if the link to key technical specifications could be made at the appropriate part of the guidelines so that people using the guidelines can know what the requirements actually are and communities can understand their impact. For example, density outcomes for blocks in RZ1 and RZ2 are determined by the target density formula in the technical specifications. If I apply that formula to the current dual occupancy block where I live, the target is 5 dwellings (subject to other guidelines and technical specifications) whereas currently there are 2 dwellings on the block.	No, for another reason		I already live in a dual occupancy. My current home is larger than the dwellings likely to result from these proposals and has 2 parking spaces Why move to a smaller home with one car parking space?	The various district strategies/policies establish some key areas for change in each district. It is better to concentrate on taking forward these proposals, and determine their impact on the number of available homes and the consequent demand for services and infrastructure before embarking on a series of reforms which are aimed at increasing residential densities in an ad hoc manner without any apparent consideration being given to the impact of increased congestion and demand for services and infrastructure in different communities across Canberra. Given the significant changes proposed, the ACT government should further consult with the community after considering community comments from this initial round of consultation.
No	Yes		Maybe	I think it has potential although without a robust supply of public housing (not limited to social housing run by ngo's) then the market won't really be balanced and people won't have genuine housing choice. If it is primarily composed to private rentals and investment property ownership it's just going to be more of the same and the rot at the foundation of the housing crisis won't be mitigated.	Yes		Ideologically ok, although the only problem I am concerned with when it comes to high density urbanisation is that historically when you try to cram too many people into one condensed space it usually creates a tense enviornment and toxic living space marred with congestion and push comes to shove culture. I am not suggesting this is going to be the certain outcome in this situation but over millenia history has shown too many people in one particular spot is a recipe for disaster as opposed to more evenly balancing out development across the regions. You could argue that Australia's history of been more spaced out with suburbia and residential design is one of the reasons we have managed to avoid the more radicalisation and polarisation of our population the way we have seen in Europe, Asia and parts of America. We have managed	I think so, there needs to be a firm commitment to renewable energy and this leads the way. Privacy for neighbours is always going to be a challenge the more dense you make the community.	Yes	No comment	50	I think so, people do need to have access to car parking spaces, trying to encourage people not to drive by punishing them and reducing available parking spaces as we are seeing in some other states is not the right way to go, because people want to drive still, instead of punishing them adapt either by setting up more ev chargers to encourage an uptake in EV's or provide the means to convert combustible engine cars to EV's whilst augmenting it with a decent public transport network.	People need to have the option of private transportation along with public transport so as long as everybody who resides in this development has access to a parking space there shouldn't be too many problems.	I think the bigger underlying problem is the lack of the means of production for housing materials supply domestically, we have lost a great deal of our manufacturing and local production of housing materials and have become heavily reliant on cheap flimsy overseas imports. Most notable example is the recent loss of Australia's last remaining producer of architect float glass (Oceania Glass) which makes window glass. In Australia we cannot produce window glass anymore whilst at the same time require a bigger order of housing stock than ever before. No longer having the means of production within arms reach means a longer wait period, higher shipping costs and more debt which blows out costs but also means that the whole process of building a house is longer and complex. That's without considering the amount of local jobs lost and	Yes, I'm looking for an affordable home in an established suburb			Ensure you get the right balance and try to also think of the bigger picture.
Yes	Yes		Yes	Very well. They are also well thought out to minimise viable complaints from the wealthy Boomers that will oppose them.	Yes		Very well. They could go further and allow underground garages on RZ1 blocks.	Yes, in my opinion it doesn't really change the status quo meaningfully.	Yes			100	yes	Good. 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.	It is good to see guidance rather than strict rules.	Yes, for another reason	I would like to build an extra dwelling for extended family to live in		I've lived in Weston creek for 33 years and it could easily support double the population that's currently here, but instead we have predominantly retired couples or singles living in small houses on gigantic blocks with lots of time on their hands that oppose any development. They then often complain that "there's no young people or kids around anymore", "the rates are so high", "taxes", "the government no longer does x", etc. People can be their own worst enemies, and we should develop guidelines/rules that stop people from becoming parasitic to society, which these guidelines broadly do.

Yes	Yes		Maybe	I generally support the notion of addressing the missing middle by building more within a single block of land such as two (dual occupancy) or three (triocccupancy) dwellings but want to point out that there is all but a dearth of ground level style one or two bedroom homes. This is especially important for the disabled/differently-abled in our community where single level is a fundamental need and it is impractical to buy into a typical 3 bedroom existing home and impossible to consider apartments and multi level townhouses due to access and distance issues. Please, please factor into the design guidelines this consideration. I applaud the efforts made on Stage 1 of the LDA's Compact Housing Project in Wright. The single level designs are exactly what is needed, but at a greater scale. I do feel it lamentable	No	as per above comment	Reasonably well.	Always tricky, but yes in the main.	Yes			60	Yes	To be honest, unless there is a minimum of two carparks for any dwelling I think you are kidding yourself. That might be as simple as a carport with roller door (for one vehicle) and sufficient driveway space for another (and some shared overflow) like at the Compact Housing Project at Wright. That would be the minimum I feel.	I think they are not too bad, but think there can never be too much emphasis or guidance (or indeed rules) to encourage better design outcomes - especially design to maximise light and space. Clearly there are many builders today who aren't applying even basic principles of aesthetics, exercising moderation with materials and unfortunately focussing on skating as close to or consistently below the minimum building standards. Why do we even have such a model. All it encourages is achieving the lowest possible outcome. Ludicrous. We should have tiers of building level that integrate energy standards, architecture, finishes and other standards, and mandate that building dwellings of each tier could only be attract certain price ranges, structured in a way to encourage developers to build to increasing standards of	Yes, I'm looking for an affordable home in an established suburb			While this is a really good step, it does I think miss out on parts of the middle (or what I feel is missing in what you call the middle). I also think there are major issues in the home building industry that demand change. We need to change how land and dwellings are developed, built and sold ™ specifically how builders/developers deliver to a minimum standard (or under minimum quality) dwelling and reaping returns largely undeserved. The Government needs to fundamentally change the system and change the philosophy around building standards (minimums in particular)
No	No		No		No				No		50				No, for another reason			
No	Yes		Yes	Very well.	Yes		Well.	Yes.	Yes			There should be less car space. Give more space for greenery instead.	Well.	Yes	Yes, I'm looking for an affordable home in an established suburb			
Yes	No	I have a home so I don't need another.	No	Extremely well	Yes		Extremely well	Yes	Yes		100	Parking on streets is normal. You have the balance right.	Extremely well	Yes	I already live in this type of home			The issue with implementing subdivisions and secondary residences is now fees and costs. The government needs to recalculate these costs to further incentivise the ultimate goal of increased housing.
Yes	Yes		No	Exceptionally well and are a vital step in the right direction. Now just pair this with expedited planning approvals! It's too slow right now and too much red tape (besides for insulation - please add more requirements on that because the buildings are too cold for the climate).	Yes		Perfectly. We need more missing middle houses!	Yes!	Yes		100	Yes - could even do with less parking, and make better use of our streets for parking.	Good, but could do with even less parking. Sell more units and invest the stamp duty fees into public transport to that area. We need the full light rail plan to be built, not just to Tuggemong. We need that more than that convention center or stadium!	Yes - the only addition needed is higher insulation requirements, even new townhouse builds these days are too cold for Canberras climate. I know I live in one. Need better insulation requirements, otherwise it's great.	Yes, I'm looking for an affordable home in an established suburb			This reform is absolutely essential - we desperately need it and I am so pleased to see this finally being seriously considered. If the ACT government does not take this forward it will be engendering inequality for the next generation. It's already too difficult to find a suitable property, with population growth it will be impossible unless something is done now. We must act urgently to put in place these planning reforms, and they should be paired with quicker planning approval processes.
Yes	No	I want to live in unit in max 3 story building (noting unit is my preferred housing option, I don't want a house/townhouse).	No	Very supportive of higher density housing. I think RZ4 is critical zone to get right - people want units that aren't in high rise but have access to social hubs. This should be capped at 3 stories (max). The areas in Lyneham, Turner, O'Connor, Braddon with max height 3 stories have created such lovely neighbourhoods, keeping strong and positive community and neighbour vibes (even with constant new builds - the space still keeps the same vibe). Building more 3 story unit complexes gives ability to house multiple people but with a sense of space (I say this from experience, as someone living in 1 bedroom unit). I am looking at 2 bedrooms for potential growing family, but am not considering any buildings above 3 levels - it just wouldn't have the same community vibe that I've grown to love about Canberra (and one of the city's best distinguishing features).			Not well enough - I think there will be a massive difference from 12.5m to 4 stories (which is open to much more interpretation and I think will blow out heights). Maybe a story limit or max height limit, to give more flexibility for builds.	See comments above about 3 story units. Best of both worlds (higher density housing, still lots of light for all in both units and on footpaths etc).							I already live in this type of home		
Yes	No	Not required	No	Appears appropriate to achieve the purpose of allowing for more diversity.	Yes		I do not support increasing building height limit to 10.5m for multi-unit housing in RZ2. The existing height of 8.5m is under-utilised for all building types and is adequate to achieve the desired purpose of increasing density in RZ2. There are many good examples of multi-unit housing within the 8.5m limit across different zones in Canberra. More like this should be prioritised. I strongly feel that buildings of 10.5m height in RZ2 will adversely dominate the scale of the RZ2 suburban streetscape and be disproportionate in scale to other buildings in the zone. Buildings of that height are more appropriately built in RZ3+ zones where their scale is more consistent with surrounding buildings.	I do not support reducing solar access by changing the value of x from 31 to 45 degrees for multi unit housing. This will by definition block solar access to adjoining blocks during winter in Canberra, when solar access is most important.	Yes	Nil	100	Not really ;) It's unrealistic/optimistic to think people will not have at least one car for every dwelling for the foreseeable future. Car-free households are uncommon - Canberra doesn't work like that and most people will still need a car. Affordable small EVs are likely to promote more car ownership. Current parking in many more-densely developed areas is chaotic and poorly controlled ,with parking on nature strips common, and flow of traffic restricted by on-street parking. Also, taller or longer vehicles are a particular problem being unable to easily fit in tight on-site parking areas and commonly seen parked on nature strips and filling up on-street parking. This needs careful attention to avoid creating unworkable parking that leads to neighbourhood conflict and reduced amenity for all.	Not as well as is is required-see previous comment.	Yes overall. But, I would also like to see a mechanism that enforces long-term maintenance of planting and other landscaping when it is required for initial planning approval. I have seen many examples of dead trees and poorly maintained landscapes that are ignored and left to decay after initial development. I support including a requirement for ongoing compliance with the original approved planting and landscaping elements.	No, I don't want to / I currently live in a detached house			I support the proposal in general however do not support the increase in height to 10.5m for multi-unit housing in RZ2, or the changes to solar access for multi-unit housing from an x value of 31 to 45 degrees. Thank you for the opportunity to provide feedback.

Yes	Yes		No	I am pleased to see the potential for more diversity in housing but also pleased that height restrictions and thoughtful management of issues like canopy coverage should mean that the amenity of suburbs will be retained.	Yes		I think the guidelines strike a good balance between providing more flexibility in dwelling types and retaining the amenity of our residential areas.	I haven't studied this section in detail but I'm pleased to see it addressed and hope that developers and architects can come up with creative solutions to provide passive solar housing that also ensures privacy for neighbours.				Noting that decisions will be made based on a range of factors including proximity to public transport, I am reasonably confident that the parking arrangements can be accommodated in residential areas.	I haven't read this section in detail	Yes, however the actual outcomes will still rely on the creativity and quality of the builds.	I already live in this type of home			Thank you for the work you have done to promote the consultation and explain the changes
Yes	Yes		Yes	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.	Yes		Looks good.	We should be doing all we can to encourage more renewables so I think the balance is right. We have to be realistic and accept some intrusion if not unreasonable.	No	Can't follow what is happening in the front section on pg 82 or via the diagram, what does articulate mean in 'articulate new buildings...' Plain English would help throughout.		Half of Canberra looks like a car park, be good to put the parking away in actual parking spots where possible and stop all the verge parking, it's ugly and leaves no room for gardens and trees.	Looks pretty good.	Yes.	Yes, I'd like to downsize and stay in my current neighbourhood			Support it very much, density actually brings better services and we need a much better mix of housing to support viable living for all types of people at different stages of life.
No	Yes		No	The changes are better than the current zoning, however the RZ1 zone should be eliminated and I would argue that RZ2 should also be removed.	Yes		It seems like it does a good job of providing guidance.	I would say yes. Density shouldn't come at the expense of a total loss of privacy, and the guidelines seem to account for it well.	Yes		80	For the most part yes. Canberra doesn't currently have the infrastructure to allow residents to on average be without a car.		Yes.	I already live in this type of home			These reforms don't go far enough, and should instead remove RZ1 and ideally RZ2 as well. Up to 3 or 4 story apartments should be allowed in all areas of the ACT. Just because you can build that tall doesn't mean that every suburb will suddenly be full of 4 story apartment buildings, but allowing this would mean that desirable suburbs can change more readily. Everywhere in the inner north and south should be zoned to up to 3 or 4 stories at a minimum. These are places people want to live, but cannot because there simply aren't the houses available. Current zoning laws drive inequality and reduce opportunities for economic growth in the city, and individuals opportunities. These changes would go a long way to addressing the housing crisis in the ACT long term.
Yes	No	Due to the risk of overdevelopment that compromises privacy, natural light, neighbourhood character, and safety through increased congestion and on-street parking.	No	As a resident in an RZ1 zone, I'm concerned that basing the number of dwellings on vague 'onsite context'and density targets""without firm, enforceable limits""could lead to overdevelopment, particularly in older suburbs where blocks often exceed 1000 sqm. Increasing housing diversity shouldn't come at the expense of neighbourhood identity, privacy, open space, and overall liveability. I find it worrying that the proposed flexibility in RZ1 planning appears to prioritise development outcomes over the amenity, wellbeing, and expectations of existing residents.	No	The MMHDG lacks clear, enforceable standards for quality, site-specific design and parking provisions, risking dense developments that don't fit RZ1 suburbs and worsen parking and safety issues on narrow streets.	The draft guide's approach to building height and scale transition is too flexible and lacks clear, enforceable standards. This broad guidance risks inconsistent outcomes, where some developments may overshadow or clash with neighbouring lower-scale buildings. Without stronger, site-specific controls, there is a real chance that new buildings will not adequately respect the character and scale of existing RZ1 suburbs. The lack of firm limits makes it difficult to ensure a smooth and appropriate transition between different building types and sizes.	The MMHDG does not adequately protect neighbours' solar access or privacy. Its flexible, performance-based approach lacks clear, measurable controls to prevent overshadowing, which could negatively impact sunlight to neighbouring properties. Privacy safeguards rely mainly on design suggestions like window placement and screening, without mandatory separation distances, risking reduced neighbour privacy in small, consolidated lots. The guide often prioritises increasing housing density over protecting neighbour amenity, leading to a potential imbalance that harms liveability.	No	The diagrams lack detailed guidance on adapting setbacks to varied site conditions (irregular lot shapes, slope), and managing transitions between new developments and existing low-scale neighbours.	10	The Proposed Territory Plan provision for parking doesn't suit existing RZ1 small street suburbs, where narrow streets and limited parking already cause problems. Only one space per dwelling and no visitor parking won't meet real needs, increasing pressure on street parking. This not only reduces liveability but also raises safety risks due to congestion and limited visibility on narrow streets.	While increased landscaping around parking areas is positive, if the number of parking spaces per dwelling is not adequate, it will likely push more cars onto narrow streets. This can lead to overcrowded street parking, congestion, and safety issues, which landscaping alone cannot resolve. Without appropriate onsite parking provision, streetscapes risk becoming cluttered with parked cars, negatively impacting both the visual appeal and liveability of the neighbourhood despite improved greenery.	The draft Missing Middle Housing Design Guide falls short in providing clear, enforceable guidance on good design outcomes. It relies heavily on broad, performance-based principles without detailed, mandatory standards, which can lead to inconsistent and/or poor-quality developments that don't respond well to local context or protect neighbourhood character. Key aspects such as managing building scale, transitions, privacy, solar access, and parking are addressed only generally, lacking site-specific detail or measurable benchmarks. To improve, the guide should include stronger, clearer rules.	No, for another reason		Due to concerns about reduced privacy, limited parking, increased density.	I appreciate the intention behind the Missing Middle housing reforms to increase housing diversity and affordability. However, I am concerned that the current proposals lack clear, enforceable design standards, especially regarding the importance of privacy and access to natural light. The reforms should avoid introducing two-story buildings on streets where houses are predominantly single-story to maintain neighbourhood character, protect privacy, reduce noise impacts, and preserve access to sunlight. Additionally, the proposals need to address on-street parking issues, as increased parking pressure will create safety risks. To ensure successful outcomes, stronger protections for existing residents and more detailed site-specific guidelines should be included.
No	No	I want to own a detached home	No	I support it generally but they go too far in allowing a reduction in green space. Relax the other provisions but don't reduce the green space. Protect people's sight lines. There are a few ridgelines across multiple suburbs, it's not going to heavily impact on the ambition of the plan and will save the government thousands in development objections.	No	It needs to exclude the possibility of people consolidating to have larger blocks for singular, palatial residences. Relaxation should be subject to *increases* in dwellings/residences. Separately, there is not enough protection for green space.	Saying the setback is "4-6m" just means 4m. Making things arbitrary to the planner's discretion will just lead to inconsistency, frustration and corruption. This should be mapped ACT-wide, in advance, so it is clear where 4m will be applied vs. 6m. Decreasing gardens by increasing canopy will not decrease urban heat because trees take decades to grow to full canopy height. Garden size as a proportion of the block should be maintained. Or the ACT Govt should offer free mature trees. There is not enough protection for restriction of views. People being built out is avoidable if you strengthen the language around impacting on neighbour amenity. Not at planner discretion but in specific and clear cases eg, you have views of the Brindabellas. the missing	Regarding overshadowing: - allow taller builds on north side of street so overshadowing falls on the road, but no 3 story on south side of street where overshadowing affects neighbours behind. Large tall developments should bare the cost of privacy screens and walls to minimise privacy impacts on neighbours.	No	Figure 45 implies there will be gaps between behemoths but that isn't actually required. New bigger buildings built forward within a 4m setback *will* impact on the character of the street if everything else has a 6-8m setback.	10	No. Having 1 visitor space per 4 dwellings should be maintained. Or maintained at per 6 dwellings. It's not really for visitors, it's for the one family with two teenagers and four cars. The amenity of the street is absolutely impacted when the street becomes full of cars. It's also dangerous as it reduces visibility and increases people backing out into each other. Let the larger apartment blocks put their parking underground so it's only 2+attic high but has all the parking it needs below.	Put the cars in garages or underground. These type of reductions are supposed to encourage active transport, but no-one is going to ride bikes if the streets are full of parked cars.	Wind patterns. Research from UNSW shows that the movement of air through a suburb is often as important as canopy cover to reducing dangerous urban heat. Large hulking developments need to be designed with the passage of air through the suburb in mind. Tree cover also needs to be a net increase - so guidance and assistance for home owners to plant large trees that a) don't drop branches and b) don't drop leaves the directorate then needs to spend money to clear drains and gutters.	No. for another reason		I like low density housing.	I think a neat solution would be to create a new 'neighbourhood' development zone to give the choice to families that want to have that neighbourhood/cul-de-sac existence of single detached housing. You can plonk that onto some select heritage street scapes and a few well appointed suburban streets without a significant impact on the ambition of the plan to create the exciting vibrant middle communities that would be amazing to enliven places like the Narrabundah shops or the Ainslie shops.

Yes	Yes		No	The Missing Middle Housing Design Guide aims to increase housing options in Canberra's established suburbs, but it doesn't go far enough. While it opens the door to more dual occupancies, terraces and townhouses, it leaves out one of the most important and effective forms of housing "" mid-rise apartments. This is a major gap. Mid-rise apartments (3""6 storeys) offer an efficient way to increase supply and provide more affordable, accessible housing in areas close to shops,, transport, and schools. They're a proven model in cities around the world for creating walkable, well-serviced neighbourhoods that can support a mix of residents "" from singles and young families to older people looking to downsize. By excluding this type of development, the guide limits	Yes		The approach is conservative and may limit the overall positive impacts by capping the amount of density in Canberra. I would say that considering the benefits of allowing greater building heights and density it doesn't go far enough.		Yes			If parking on the streets becomes an issue for residents the introduction of pay parking could be used in affected areas. Parking on local streets seems to be a solution to what would be restrictive parking regulations for new developments.			I already live in this type of home			
Yes	No	too costly	Yes	all blocks above 1000 sq metres should be able to subdivide and build another house on the block			ok	ok	No			70	more green space			Yes, I'm looking for an affordable home in an established suburb			
Yes	Yes		No	Agree. However, general amenity should be maintained. 'e Treescape - Trees and green spaces should be increased with the minimisation of gardens v built footprint. 'e Shadow and loss of direct light must be considered. There are some examples of this NOT taken into account - very poorly located Woden High rises and also around City Hill - very poor design of location and also visual appeal.	Yes		Variation in design type in the same area allows for pleasing visual outcome.	Hard to determine. Sound insulation is vital in the buildings with density of housing, especially with the use of air conditioning outlets currently visible (ugly), and noisy. Consider solar drying of clothes - environmentally better than a dryer indoors, but require space and sun. Also, clothes drying on balconies is visually unsightly. Question why you'd spend thousands or millions on a property only to look out on washing. Use of outdoor cooking can also impact on usability of neighbouring balconies or small gardens.	Yes	Looks good in theory, but will it happen later when developer actually builds?	100	I have noted that people tend to be two car families and generally have two - four car visitors per household from time to time. Observed in Watson, Hackett and Holt. Narrow streets make off site parking difficult for passing traffic and pedestrians - particularly if there is no footpath.	It seems sufficient, but trees need a reasonable amount of space to grow well, and grassed areas need maintenance. Will the spaces be a Body Corporate responsibility? If not, can the ACT government keep up with maintaining extra public spaces - already observably under pressure.	Strict control over the development necessary, will that occur?	Yes. for another reason	IF I wanted to downsize, I would like to live in attractive, well-designed, missing middle housing.		Do consider the needs of elderly, children or disabled with designs. Single level, or ramps on some of the builds. Also, the need for these people to be in walking distance shops, schools and or to public transport (not the tram as it is necessary in all cases to cross a main road).
Yes	Yes		No	I own a unit in Greenway. Canberra has become accustomed to large blocks, large homes. It must make better use of its land. Provide more affordable housing. And options on sizing.			Wouldn't we love all buildings to stay at low level and not ruin our views. But it is not realistic. Metres between properties does concern me, eave to eave,	Very difficult. It is already difficult for new homes to pass DA approval on a large block say in Mawson.	Yes			70	eg Forde, street parking is awful. I would prefer parking myself. Canberra has so so many green spaces, beautiful reserves.	50/50	But is it as good as say European countries and their current planning measures?	Yes, I'm looking for an affordable home in an established suburb			
Yes	No	What I'm looking for is the same thing most people a lot of people in my age group are looking for that is a single level three bedroom townhouse in the suburb where I'm currently living if we were able to obtain something like that that wasn't out in th.	No	I support urban infill but the infrastructure to support it needs to be there. For example, in Watson basically a new suburb was built next to Watson and it's made the public schooling Watson Private Mary, North Ainslie, and Lyneham High, which has been left to run down and become dilapidated is now overcrowded.			It's not all about two bedroom flats along transport corridors. A lot of older people like myself would like to stay in their own suburb in a three bedroom single level flat. I don't see anything in the plan that's addressing what a lot a lot of people like myself would be willing to give up their four bedroom houses for.											
Yes	Yes		Yes	I think the 600m2 is a good step. It is difficult to tell for Isabella Plains, if this zoning will be applied or not in the design guide but believe that is a ripe for development. It has good active and public transport links with multiple local shopping and amenities choice.	Yes		For residential areas like Isabella plains which is predominantly RZ1 with some previously developed exceptions, I think it will be difficult to maintain the character, as everything is single story. I think this suburb would be a great location for increased missing middle development, but would require homes to be built closer to the road frontage and higher than what they currently are.	Yes - this is crucial for a healthy happy home life	Yes	Set backs from road should be minimised in Isabella plains to allow for block subdivision while giving residents ample space for private yards	100	yes	ok		Yes, I'd like to downsize and stay in my current neighbourhood			I can't find where suburbs are specifically identified or if this is an amendment across all RZ1 zoning. I would encourage Isabella Plains RZ1 to be included in this reform
Yes	No	I am concerned I could buy a nice property that gets suddenly surrounded by horrible townhouses	No	I would want to see these changes made in "right suburbs" first unlike the current developments being conducted by ACT Housing	No	Does not say how we can ensure it doesn't happen.how can objections be given weight?	I do not feel confident this will be applied given the current developments going on there will be no restrictions applied/upheld.	I don't think so. Given your tree plantings did not take any of this into account and even planted gum trees under and next to powerlines. I doubt enough consideration has been given.	Yes			20	NO	Given recent developments i van say no you do not. Nor have you considered impacts on streets flow.	I don't think so. You need to be more restricted on what can be done and give greater consideration to neighbours already in the suburbs.	No, I don't want to / I currently live in a detached house.			
Yes	Yes		No													I already live in this type of home			
Yes	Yes		Yes	I like the flexibility being provided, but there is added complexity on how a single block could be developed and what restrictive factors need to be respected. The current design guide is a financial prop up for developers there is no way single home block owners will be able to practically affect the missing middle guidelines.			The visual guides are sufficient and communicate the concepts well. If anything I'd like to see a bolder change (ie, more up front imposition allowed now) that supports an injection of additional housing across Canberra ASAP, rather than allowing for incrementally more and more density/housing in the future.	Maybe - this guide doesn't forefront community/coop models of solar and presumes that solar to the sides of a building is a necessity. I'd like a discussion of what would be possible if solar access also included deep light wells/skylights, encouraging bold designs and revisiting architectural concepts. We previously lived in these townhouses, where the huge and oversized skylight/light well was enormously beneficial to solar access while retaining privacy.	No	I am not confidence I could understand how all of this applies specifically to my block, in a way that would maximise the additional housing.		Maybe, but this could only be supported by a bolder policy stance that not all homes need parking AND a deep commitment to accessible transport. I'd like to see more options for few car parks, and an aligned policy position on rates or similar that is attractive to non-car users, and incentivises those without a car.	I'd like clearer underground options, or perhaps the requirement for underground parking, to maximise mixed housing options.	Yes, but it is too difficult to understand how a non-developer (ie, a homeowner of a large block now available for missing middle housing) could maximise their single opportunity.	Yes, for another reason	I am conscious that if/when we sell, it will likely to be for a missing middle style home. I would like more collaborative solutions to things like transport and gardens/green spaces.		The Missing Middle will not succeed as a stand alone policy objective. The Government needs to make a bold commitment to enabling policies (transport, for example), AND be willing to take a harder line on the minimum standard of living. The current standards for insulation/energy efficiency for example are beyond woeful. I think a lot of people would support compromises on things like solar access if you guaranteed a level of comfort and empowered creative solutions (instead of boring, dog box homes currently being produced).

Yes	No	I have a home already	No	Although I would get no direct or material benefit from these changes, I fully support them to create more vibrant suburban neighbourhoods throughout Canberra. But it would also a be a good opportunity to allow as part of these RZ2 changes the ability to add additional complementary uses to neighbourhoods such as small cafes and child care centres to help create more binding community nodes. The more housing density we create the more community services we will need			Looks fine to me	Yes	Yes			60	Yes	It is a good balance	Yes	Yes, for another reason	It will allow my children to afford to live near me		
No	Yes		No	Many people rent because they can't afford to buy a home due to intense competition in the housing market. To help first-time buyers, a portion of newly developed properties should be reserved exclusively for them. This would prevent investors and those looking to hoard houses from dominating the market, ensuring that real people, not corporations or speculators, can own and live in their own homes.								Driving through Lawson right now is a nightmare, if you can even squeeze through the streets, that is. Cars are parked on both sides of the road, turning every trip into a battle for space with neighbors and visitors. It's shocking that these development plans were approved without adequate parking. Parking isn't a luxury; it's a necessity like having a bathroom in a home. I have friends who live there, and if they park in a different spot because theirs is taken, they sometimes wake up to slashed tires. The situation is out of control.					Focus on people and what people want. Affordable homes, well built with parking. If you improve the conditions such as lifestyle and usability you will see huge success.
Yes	Yes		Maybe	Yes, relaxing the rules to allow more building types across Canberra will mean more choice in building types for residents.	Yes		I feel that the design guide provides sufficient guidelines	Yes	Yes	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.	100	Yes, however while limiting parking spaces is a good idea, if the number of vehicles allowed to be registered at a property is more than there are parking spaces, any visitor space or public parking would be just taken up by residents.	Very well, we need plants around these hard surfaces to reduce the heat island affect	Yes	Yes, I'd like to downsize and stay in my current neighbourhood			That having reforms is necessary first step but if the planning approvals are slow and cumbersome new builds will be slow and not add much housing. Perhaps a design guide of pre-approved plans that any builder or developer could use would speed up the process, eg. the existing ex govie housing or the Vancouver Special design in Canada
Yes	No	Reduces privacy, increases demising and business in suburban areas	No	Not well.	No		Not well. It is not adequate and not fair to those who have bought stand alone houses in these area due to the type of suburb and the current restrictions in place.	No. 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 the solar on and this could greatly reduce the sun the solar gets.	No	Is not adequate for privacy and solar		No. The limited parking and visitor spaces will mean more parking on the streets. Many of the streets in these suburbs are not designed for on street parking. This will make them harder and let safe to navigate, especially since many don't have footpaths which makes it unsafe walking (especially with small children or a with a pram) and navigating increased cars parked in the road or verge.	No well. More cars will be parked on the verge, medium strip and wherever they can as there will not be enough parking for that density of housing let alone any visitors.	No it is not clear. Would add clearer guidance that reduces the ambiguity of what is and what isn't allowed.	No, I don't want to / I currently live in a detached house			I live in Lyons in the Woden Valley in an RZ1 zone. However I have friends in the Woden Valley who live in RZ2 zones. They're all first home buyers like me. We've all saved and sacrificed a lot to get into the market to live and raise our families in Canberra's suburbs. They're really worried as I am that the proposed changes will mean that they could have 3 storey developments next door to them with the associated loss of privacy in their back yards and possibly reduced solar access. The proposed guidelines expect more people to do without cars: this is just not feasible in Canberra, especially for families with children. In addition to reducing the number of car parks provided for residents, visitor car parking will no longer be required under the proposed reforms. This means more people will be parking in suburban streets that are not
Yes	No	Is that the purpose of the changes - to make ownership more appealing? I'd have though ownership was appealing enough, isn't the point to create a liveable city, where ownership is affordable and within reach? It definitely does this.	Yes	Very well, provided that planning laws are brought into alignment. E.g. the limit on number of storeys that prevents you having a 2-storey house with basement underneath should be removed as long as the other requirements for overall height and setbacks etc are met.	Yes		Well, provided planning laws are brought into alignment. See above comment.	Yes	Yes	It seems like a good compromise to achieve higher densities while retaining character.	80	Yes.	Well, car parking options below grade are excellent and should be supported by the planning laws.	Yes, however it would be good to see more specificity around providing family size apartments (3-4 bedrooms) that aren't just expensive penthouses. The new apartments being built in Canberra are generally 1-2 bedrooms, cramped (often	I already live in this type of home			If seems there isn't a tangible link between these great plans that are put forward and what actually gets done. Who checks on the planning authorities to see if what they approved in the past 5 years meets the plan? What are the consequences? Who checks on the private certifiers? What about some quantifiable targets for the ACT planning authorities with relation to these missing middle developments that actually meet the intent of the reforms? E.g. 30% of new apartments are 4 bed, 30% 3-bed, 30% 2-bed and 20% 1-bed/studio to reverse the current trend.

Yes	Yes		No	Broadly - the addition of forms of housing style between multi story and standard blocks gives opportunity to select a housing type more suitable to an individuals preferred lifestyle. At the same time it should allow for cheaper housing because infrastructure is already in place. It wont of course.	Yes		Design Guide has a reader unfriendly layout - 2 pages per page, inconsistent with other documents. This is disappointing. 6 stories in residential areas beside single level housing will look rubbish - 4 would be the maximum. In transitional areas between apartment blocks and 3 and 4 story would be more acceptable. Responding to context and local character isn't a hallmark of current infill & consolidating blocks for residential. We seem to be providing Coombs style housing in Weston Creek which is unsympathetic to local character.	I would have to examine more closely but I can't see how a 12metre high building can work in residential areas without blocking neighbors winter sun. At the winter sun angle the shadow would be more than the 12metres so can't see how we will use less land. Further, overlooking buildings will limit window types in most of these new buildings	Yes	Huge amount of information so my responses are based on my scanning over the provided material.	50	Time will tell but, public transport is inadequate to replace cars in most cases. Where a residence is occupied by 2 people it is reasonable to assume there will be 2 cars. In areas like Gungahlin the duplex/no path/ narrow streets doesn't allow on street parking. I can't see this turning out well given the track record. As the infill occurs the older suburbs, having wider streets, allow some on street parking. The newer the suburb the opportunities reduce to zero. My immediate response would be no.	I think the single entry to multiple residences is a plus. Combining this with providing half underground parking (and fully underground) will support a more pleasant appearance.	"How the missing middle fits in" is the key. The Territory Plan is about10 minutes old and already needs changing following previous changes last year. To me this is symptomatic of ACT Gov propensity to cock things up. Example - 2 concert venues of 1200 to 1500 with a proposal to build a third, same size, within 200 metres of the existing 2. There is an indoor concert venue (5000) but it is currently hosting and ice skating rink. The design guides concentrate on the individual buildings with no overall city plan which worries me greatly. Also, the plane lacks terms like beauty and social consideration. I am concerned a potentially good idea will go the way of the tram.	Yes, for another reason	Social amenity is missing from the plan. A view to consult on what people would want would be much more useful.		I believe we have an opportunity to create something great but the risk is we recreate Chicago 1920. I lived in Canberra when NCDC was planning and building the city. I had confidence in the NCDC because of the expertise, the well thought out and consolidated approach to building Canberra and dealing with issues as they arose. The pace of quality planning, then building, has not been matched since. "Outcomes based" is code for - we will take an inordinate amount of time and expense to approve construction/variation, you build it but, if we don't like it, you wont get certificate of occupancy. I am completely unconvinced much has changed.
Yes	Yes		Maybe	Very well	Yes		Well.	Could have more focus on solar access. As people become more educated on the benefits of solar passive orientation, the demand for north-facing orientation is likely to increase, so we will need more properties that meet this demand. There is now such a long history of properties being oriented without regard to solar aspect, this balance will need to be consciously redressed.	Yes		100	I'd like to see even more encouragement and facilitation for people to live car-free. Could there be the option of building some missing middle properties - ones close to shops, cycle/pedestrian paths and public transport - that are built and promoted specifically as car-free dwellings?	Pretty well.	Again, a bit more focus on presenting living car-free as a positive alternative. Perhaps also a bit more mention of more visionary options such as those done by Nightingale Housing - eg that small living spaces can be very high quality, that communal spaces can mean each dwelling doesn't need to be so big. The smaller "missing middle" developments offer greater scope for multi-generational living or groups of friends/siblings/like-minded people to live in, say, three separate dwellings on one block with lots of shared space. A bit more could be made of these positive opportunities in the design guide. I'd also like to see pictures of designs that incorporate the heritage elements that I think are vital for "missing middle" developments in heritage-rich	Yes, for another reason	Happy in our current rural location but as we age, we envisage moving back into Canberra - probably in five to fifteen years, depending on health and other factors - and a "missing middle" home seems ideal.		I think this is fabulous. There are so many vital reasons to increase Canberra's density and improve the quantity, quality and variety of its housing options. I very much hope that the positive responses outweigh the curmudgeons who will reject any kind of change.
Yes	No	I do not want to see a loss of backyards, gardens and nature. Increasing housing density also pushes more cars to "on street parking" making the streets less appealing for kids to play and walk safely.	No	I am not totally against all the proposed changes. However, I find many new developments in this category (medium density duplex, townhouse etc) have some or all of the following issues. 1. They are not aesthetically pleasing, using cheap visually unattractive materials etc. This tends to create buildings and areas which are unloved as the cheap feel renders little love or care for the building and it's surround. Your brochure about the missing middle is misleading as it only shows a representation of the better-looking developments, and not the ugly cellblock looking buildings also typically built in this category. If it looks good, people will like to live in or near it! 2. 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	No	The guidance is all about maximising what developer can do and squeeze on the blocks. What about the existing community requirement. The parking rate is joke and will litter suburban streets with cars parked everywhere.	It's not great. Due to Canberra's latitude, we should not be building tall buildings above 2 or 3 stories outside town centres. Look at much of Europe which have similar latitudes in the norther hemisphere. Solar access in winter is greatly diminished given this latitude and this should govern how we build to maximise solar access.	No. I could only reallly see solar access info for RZ1 blocks. Due to Canberra's latitude, we should not be building tall buildings above 2 or 3 stories outside town centres. Look at much of Europe which have similar latitudes in the norther hemisphere. Solar access in winter is greatly diminished given this latitude and this should govern how we build to maximise solar access.	No		20	No. 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. Developments don't provide adequate parking/garage spaces for modern housing situation. Many of these houses are group/share or multi-generational (adult kids etc) houses which cannot all utilise a single car garage. Most people need cars. You cannot use public transport for all situations. School and work fine. But family's need to be able to visit friends and family efficiently, not catch a bus home with kids @ 8pm. There are many areas not serviced by public transport. People still need cars, even if there use is greatly reduced. So these cars which are not as heavily utilised still need to be accommodated. Street parking will also likely	Not well. 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.	1. They are not aesthetically pleasing, using cheap visually unattractive materials etc. This tends to create buildings and areas which are unloved as the cheap feel renders little love or care for the building and it's surround. Your brochure about the missing middle is misleading as it only shows a representation of the better-looking developments, and not the ugly cellblock looking buildings also typically built in this category. If it looks good, people will like to live in or near it! 2. 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. Developments don't provide adequate parking/garage spaces for modern housing situation. Many of these houses are	No, for another reason	This is pushes people to settle for sub-par outcome. Given the choice nearly everyone would choose to live in a standard house with a yard without cars parked all over their street.	No
Yes	No	I'm not convinced privacy of the existing residents are sufficiently protected.	Maybe	No, the changes proposed had little regard to whether certain types of building was appropriate in the community.	No	The analysis provided in the report does not accurately reflect reality. It's all theories and modelling, without site inspections and real measurements.	No. The analysis provided in the report does not accurately reflect reality. It's all theories and modelling, without site inspections and real measurements.	No. Re lighting on page 57, the new building shouldn't be taller than the existing building at all. While the photo illustration shows in theory the lighting of existing building will not be impacted, in reality, only the bottom of the existing dwelling will get decent amount of light. Re privacy, when the new building is taller than the existing building, the elevated position enhances its overviewing position, unless mostly blocked by tall plants or fencing. However, the practicality of fencing and plants diminishes in older suburbs when wires and poles are often between two blocks.	No	The proposed rear setbacks are not sufficient to protect the privacy of the existing dwelling, in terms of the backyard and part of the indoor space, especially in circumstances where the existing dwelling is situated to the north of the new dwelling.	40	No. One parking space for one dwelling is not sufficient. The proposal is pushing more cars out onto the street.	Not well. The guide is pushing more cars onto streets, which is a terrible outcome for street view. Landscape outcome is not about how many carapaces there can be. It's about setting up minimum landscape area within blocks. People need car spaces, especially Canberrans who predominantly commute through private vehicles.	Not very user friendly for everyday land owners.	No, I don't want to / I currently live in a detached house			If the government is really wanting to roll out a policy like this, at least make onsite inspection mandatory when ACTPLA decide on a DA and equip ACTPLA with the real building expertise so they can conduct a genuine assessment of the impact of the DA.
Yes	Yes		Maybe	It's a step, but I believe there's more to the missing middle than just more houses (many being smaller. < 3 bed) on smaller blocks. Multi- generational housing should be considered. This may mean larger detached single dwellings on smaller blocks, with consideration to all missing middle housing being able to build basements.	Yes		Needs more work. Consideration to slopes in regard to building height. Single storey building on a sloped block can sometimes appear more opposing than a double storey on a flat block.	Pretty close			50	Allow basements! Regardless of missing middle or detached dwelling, single storey or double storey.	Doesn't do it well enouah.		No, I don't want to / I currently live in a detached house			
Yes	No		No		No			No	No			No..most families have morecthan 1 car	Mo..Suburbs will be over parked		No, I don't want to / I currently live in a detached house			

Yes	Yes		Yes	I think it's a great move and well overdue. I do think the apartments minimum size block should be lowered to 1000m2 or 1100m2 however, from the current proposed 1200m2. Otherwise it's a good step forward.	Yes		I think it's well thought out and provides clear guidance while balancing the needs of the local environment	Yes I think so	Yes	It seems pretty clear	60	Yes, however I think most new parking should be underground so the above ground is preserved for gardens/greenspace. We might need to update the storm water system however, as even now in the older parts of the city it's at capacity when it rains due to urban intensification.	OK, but I would prefer it to be almost all underground	Yes, it is very clear	Yes, I'd like to downsize and stay in my current neighbourhood			I hope these get passed
No	Yes		No	I'm quite happy with teh increased density and removed maximums. However I do still have minor concerns about "character" being a barrier for development in general, but also leading to unpleasant homogenous neighbourhoods.	Yes		Quite well, however it could always go further in directing / pushing rather than simply allowing higher density	Yes. And with regard to next question about setbacks: decreasing setbacks are great.			100	Good but again could always go further in pushing rather than just simply allowing less car dependency	As a general rule, the less cars the more pleasant a landscape	Not sure, haven't had a chance to fully read through it yet	Yes, for another reason			
Yes	Yes		No	I think there's no doubt that the housing plan in the ACT needs to change to enable more downsizing, first home buying, etc. I myself live on a block that used to hold three houses and now holds eight townhouses. My comments relate more to the kind of regulation needed to ensure that higher-density housing in the ACT is built according to code. Our block is 2.5 years old. In our situation, the builder (DBC) and the developer (AIT) are essentially the same entity. We are in a situation now where we (the EC) has established some serious infrastructure defects in the building, ie the failure of waterproofing of the building plus non-compliant balconies. In the case of the balconies, our insurer refuses to insure us except at 4 times the usual rate, an assessor who wrongly found one aspect non-compliant refuses to rewrite his report, and the builder/developer			The key point is to make sure that builders build according to the codes, and that they are enforced by certifiers who should be working for the government and not the developers/builders. There is no point in enabling the building of multiple residential units if they cause buyers to have to put up with potentially dangerous conditions or fork out tens of thousands of dollars to remediate what builders won't. And please don't tell me I can make a complaint, because what would that do, exactly? Would that resurrect a phoenix builder so that there's an entity to go after?								Yes. Change the system so that builders are better regulated by inspectors who are government, not developer/builder paid, employees. Enable a system such that builders are forced to fix their building faults or pay a serious penalty. Don't leave it to residents to try and sort the system out.
Yes	No	more street parking (reduced on site requirements), overshadowing (reduced access to sunlight), reduced privacy	No		No		Not well. Three storey developments are allowed in RZ2 zones - adjacent to single level family homes	No	No		0	No Reduced requirements for cars based on proximity to public transport. Any parent with a child needs to have a car, generally two parents have a car to enable pick ups from day car, school, sport etc. Public transport is no substitute.	It doesn't. Reduced requirements for on-site parking means that street parking will become the norm, with associated reduction in safety. Streets near hubs eg suburbs near town centres often have restrictions on street parking to 2 hours - street parking is not feasible alternative to provision of parking on the development site.		No, I don't want to / I currently live in a detached house			My daughter, her partner and child live in Chifley in an RZ2 zone. The block adjacent to my daughter's block is a corner block with a single, single story house on it. The corner block has been sold to a developer. My daughter and her partner are first home buyers who live carefully, managing the cost of living crisis. They installed solar panels on their roof at significant financial cost. They have an 18 month old and a new baby on the way and need to keep the house warm throughout the day in winter and cool in summer and they do frequent washing and drying. They are able to manage their cost of electricity because they currently have access to sunlight on their solar panels throughout the entire day. RZ2 zones may now have 3 story developments on them. To achieve the required setbacks from the two streets, the developer will be able to put up
No	Yes			I think allowing for missing middle housing in RZ1 and RZ2 areas is a good idea. Ensuring that the houses fit the character requirements and also ensuring it is true middle housing (e.g. no high or mid rise apartment blocks) are key considerations that I am glad are taken into account. I think that any densification should continue be focused primarily on already built up areas (e.g. each of the district hearts + northbourne & other areas near light rail) as as well as new areas (Lawson, Strathnaim, Moncrieff, Jacka etc). These areas already have middle housing, but many do not have the population density to have conveniently located amenities (for example, local shops cafes etc within walking distance of the suburbs). I think any densification to these areas would encounter less resistance and also benefit the								70	I think missing middle housing should focus more on public transport options and less on parking options. I think it is key in some suburbs to (older ones) to allow for increased parking to avoid congested roads alongside mainfairs etc, but for some of the newer development I think making the spaces more walkable and with more transport options etc will do more than allocating alot of space for cars. I think for new suburbs it would be worth trialing entirely 'car free' suburbs. This would increase the use of public transport + community feel whilst not increasing the number of cars on the road.			Yes, I'm looking for an affordable home in an established suburb			I think missing middle housing should focus on the following areas: 1) design and character One of, if not the, major reason I may not consider living in Middle housing is the lack of diversity. Every new townhouse has the same modernist facade which adds nothing to the character of the neighbourhood. Even though they can be lovely on the inside, from the outside they all look the same. I would want some diversity regarding exterior facades and building materials (eg bricks, stone etc) to give it a sense of character 2) alternative housing models Adding to the above, there are many different housing models to missing middle houses, and it would be good to see some additional housing models available beyond low rise apartments and standalone
Yes	Yes		Maybe	Looks good. Need to ensure there's sufficient housing suitable for the elderly or those with disabilities - most current townhouses have stairs.	Yes		Yes looks good.	Yes										

Yes	Yes		Yes	Most RZ1 blocks have sufficient backyard space; however, the current requirements "" including a 6-metre rear and side setback and a 6m x 6m private open space (POS) for a 3-bedroom dwelling "" make it nearly impossible to add a second dwelling or duplex without demolishing the existing house. This undermines the intent of the Missing Middle reforms by limiting the potential for gentle infill and additional housing supply within established suburbs. I would suggest reducing the POS requirement to 5m x 6m or, alternatively, making it more flexible by allowing a minimum area of 30 square metres rather than mandating exact dimensions. This would better reflect the diversity of lot shapes and existing	No	see coment above the texet box doesnot have enough cahrater limit to write my comment	Most RZ1 blocks have sufficient backyard space; however, the current requirements "" including a 6-metre rear and side setback and a 6m x 6m private open space (POS) for a 3-bedroom dwelling "" make it nearly impossible to add a second dwelling or duplex without demolishing the existing house. This undermines the intent of the Missing Middle reforms by limiting the potential for gentle infill and additional housing supply within established suburbs. I would suggest reducing the POS requirement to 5m x 6m or, alternatively, making it more flexible by allowing a minimum area of 30 square metres rather than mandating exact dimensions. This would better reflect the diversity of lot shapes and existing		No			100	Yes	Good- Achelvable	Most RZ1 blocks have sufficient backyard space; however, the current requirements "" including a 6-metre rear and side setback and a 6m x 6m private open space (POS) for a 3-bedroom dwelling "" make it nearly impossible to add a second dwelling or duplex without demolishing the existing house. This undermines the intent of the Missing Middle reforms by limiting the potential for gentle infill and additional housing supply within established suburbs. I would suggest reducing the POS requirement to 5m x 6m or, alternatively, making it more flexible by allowing a minimum area of 30 square metres rather than mandating exact dimensions. This would better reflect the diversity of lot shapes and existing	Yes, I'd like to downsize and stay in my current neighbourhood			The Missing Middle Housing Reforms currently under consultation. These reforms represent an important step toward addressing the growing housing supply and affordability issues in Canberra, and I commend the Government for recognising the need for greater housing diversity within our established suburbs. To support the success of these planning reforms, I strongly recommend that the RZ1 Lease Variation Charge (LVC) Partial Waiver be extended through to 2030 and that the Government consider being more flexible in its application. The current LVC framework, even with the partial waiver, can still present a significant financial barrier for homeowners, small developers, and community housing providers who are looking to contribute to the
No	No	There is no mention of body corporate fees. These tend to be very high in Canberra and constitute an excessive cost for small dwellings.	No		Yes				Yes			100	Canberra's small streets often struggle when there is increased urban development in suburbs. Where possible, visitor parking to be restricted to onsite only.			Yes, I'm looking for an affordable home in an established suburb			
Yes	No	There are already plenty of choices for 2 and 3 bedroom houses in Canberra. They just exist in the form of ex government house that people don't want to renovate.	No	I think it's a terrible idea. I moved to Canberra because it is unique in major cities around the world. High density housing meets an immediate need to deliver more housing at the expense of home ownership and resulting degradation in the quality of maintenance of the houses. This invariably leads to less desirable areas to live, higher crime rates and longer term costs for public services.	No	I want to live in a suburb without blocks of terraced houses. That's what makes Canberra a great city.	It addresses it well by introducing a design guide that pampers to architects dreams of asymmetric housing. This was experimented with heavily in the 70s and has led to many very tired outdated housing that have not stood the test of time. Great for the first 10 years but soon loses it shine to the detriment of the suburb around it.	The document makes a great play to identify access to solar but then shows the placement of trees to provide privacy at the expense of solar access. Seems countridictory to me.	Yes	Terraced housing is the only next logical step. Which would undermine the fabric of what makes Canberra a great place to live.			Cars will always be necessary for a city that is isolated from its neighbours by 100+ kms. Stop trying to force cars off the road and focus on providing facilities to enable choice for residents. Scooters have shown the utility of on providing on demand transport in locations that are convenient to the residents. Scale them up to cars so people can get their children to sports events, after school activities and to a from work without an hour long overhead of catching a bus.	Who cares about parking when the street is overshadowed by two story houses.	Build houses that will look good in 20 years time. Not houses that cost a lot because architects think that the variation in pallet/textures looks good now. Low maintenance, clean lines, traditional designs that have stood the test of time.	No. for another reason	I grew up in terraced housing. It was a fix for the rapidly expanding London but has created large swathes of towns that can't be improved because they are all connected to each other. Leading to greater and greater deterioration and lower socio economic	Please please please stop trying to pamper to developers and investors. Delivering short term solutions at the expense of the character of the city is not in the best interests of its residents. High density housing usually does not mean cheaper housing. Make the land releases cheaper and facilitate cheaper builds instead.
Yes	No	I have a home, and I don't want live somewhere where it will be overcrowded with no nature parks and constant traffic jams with some many people packed into suburbs	No	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.	No	I feel this fast development in suburbs will remove the our bush capital feel, nature and the environment will disappear to accommodate houses	It doesn't, I live in Whitlam, and in this area you build a single storey home with solar, then your neighbour builds a 2 storey home and blocks most of your access to the sun and your solar is useless. In most cases there is nothing you can do about this, it's just bad luck', the blocks are small and homes are built on border lines and there's no room for gardens. Etc	No, in the newer suburbs all houses are too close together, no room to move, tiny yards, no room for children to play in their own yards. Solar panels on single storey homes are usually useless because of shadowing. No services provided to new areas, and if you don't have a car then you can't go anywhere	No	The plans are there but are amended by developers and are never respected and followed			No - there is never enough parking and if you park on the nature strips either you get booked or you damage the environment- so no one wins. People park on side roads making access and passing very difficult	Plans are plans and reality of the situation is always difficult and there will be group homes with many people sharing a house where everyone has a car and the problems arise quickly with no solution and the whole area becomes a car park	No - consideration for over population in these area, services availability, parking, schooling, shopping etc	No, I don't want to / I currently live in a detached house			Canberra is a beautiful place, but such a quick increase in its population and packing in more homes into established suburbs will create a unusable environment, take away from our famous bush capital of a clean city, our services are already under pressure and access to school and medical will become unsatisfactory, our transport development like the tram is too slow to connect the whole city
Yes	Yes		Maybe	Based on the design guide I think it has the right approach and balance to infill to maintain amenity	Yes		Again I think it has the right balance to achieve objectives and encourage transition	I think so	Yes			70	Yes	Well	Yes clear	Yes, I'd like to downsize and stay in my current neighbourhood			None
No	Yes		No	I think it's great to redevelop homes which are older style It could give the current home owner a profit on their block but increase houses for the ACT. I love ACT commitment to build better quality homes in regards to insulation and heating. Australian homes are mostly like tents with lots of drafts no insulation and or appropriate heating and cooling.	Yes		Great	I think you have got it right, privacy and security are imperative.	Yes			100	Parking is an important issue especially with multiple dwellings on one block. I've noticed new Australians rent together and sometimes there's 4 adults in a two bedroom apartment which results in 4 cars or 6 adults in a 3 bedroom home which results in 6 cars on that one block. Canberra public transport is horrible and the tram is expensive to the ACT government and will never reach Tuggeranong.	Car parking is imperative double garage supports some of it	Private court yards for people to use to get outside or provide nicer community parks the parks are not inviting	Yes, I'm looking for an affordable home in an established suburb			I think the price of the property will impact buyers Everything is based on money and builders want a massive profit so I believe the property won't be any cheaper than buying anywhere else If your sitting on a small part of a block it could still cost as much as a full 30 year old home
No	No	At this stage as I believe rezoning traditional housing blocks (pre NCDC days) for medium density is a very bad appeal for the existing suburbs. But where I believe is acceptable is around the local shops or near shopping centres with PTransport.	No	I don't think this proposal really adds much value to the existing residents that now will unfortunately if these new planning laws come into affect that we will fear to have a higher density apartment to tower over our backyards. Let alone these new towhouses that won't have a sufficent backyard space like they use to in the older medium density townhouses.	No	It isn't fair to the suburb that was built for free standing homes. So by allowing sub divisions you are taking away the character and good value out of the older suburbs.	Higher desnity is only appropriate in town centers or mixed use shopping precients like Dickson and near local shops.	By allowing high density and especially in newer surbubs with much smaller backyards which is not fair to home owners that feel like they are living like termites.	Yes			70	Absolutely not. Whoever is in charge of planning here should be replaced. Seeing these new suburbs where you can't park on both sides of the street let alone allow cars to pass eachover is a danger to pedestrians and vehichles that can be hit by other cars or rubbish trucks during pick up days.	None at all, there won't be enough parking so residents like they do already in many Canberra suburbs is by parking on the grass where there could've been parking spaces.	- A good distance from the fence line on both sides should be equal or near 1.5m so there is access both sides of building for maintenance etc.. - A proper size backyards for townhouses unlike what is allowed now. Palmerston is a good example on how good backyard space, enough to have gardens trees for shade/ privacy.	No, I don't want to / I currently live in a detached house			I hope that these existins suburbs are mainly left alone and that these new proposals are to be looked at again with proper thought.
Yes	No	Not on a large block	Yes	LVC for any additional unit on any urbsoand non urban block should be codified so developers know how much to factor into costs. Rural Worker cottages are a missing middle for non urban developments	No	There's no minimum lot size on rural blocks so it's unclear how many additional worker cottages or farm tourism accomodation units are allowable													
Yes	No	The infilling of existing open spaces is making Canberra less appealing as a place to live. It is lowering our quality of life and contributing to more urban pollution, noise, stress on existing services and facilities.	No	They don't. They are just allowing development which will contribute to further disruption in the way we live. They are placing increased stress on existing established neighbourhoods , and leading to increased disharmony in the local established suburbs; terrible idea.	No	Quality has nothing to do with living and our families and existing neighbourhoods	Needs to be in keeping with existing houses and buildings. Woden and the proposed developments in Curtin by the churches and clear display of the lack of consideration for existing houses and infrastructure.	I do not agree with the government on this suggested plan.	No	No consideration for existing neighbourhoods and families who live near these.		0	Needs to be at least one parking spot per bedroom in the house.	Not enough car spaces in the first space. Look at the developments in Curtin suggested by both Churches near the shops. The whole area is being ruined.	You are not taking into consideration existing developments and impact 'seaffordable housing'Is doing to existing established suburbs. How is this being considered to impact in a more holistic view to the impact to streets,traffic,noise and the environment.	No, I don't want to / I currently live in a detached house			Should not be happening; the impact these stated plans made by the ACT Government are lowering our standard of living and quality of life.

No	Yes		Mavbe	Its a good start however is not enough uplift to reflect and respond to land values. It might be better to go much taller like 4 storeys. We see in the inner west of Sydney it isn't economically feasible to demolish a $2m house for just 2 townhouses - housing will never be affordable if we are subdividing land to a whopping $1m. It needs to permit a lot more..at least 10 units.	Yes		It is a start but doesn't permit enough, Europe is a lot taller and busyer. This is a city, people move here for economic opportunity and amenity, they move to the nullarbor for peace and quiet. Land is too expensive to be preferencing trivial, unmeasurable vibes and nostalgia of low density villages. Bulk and scale of development is not harmful and should be permitted.	No comment	Yes	These restrictions provide no measurable value, just let people build more housing	10	I prefer less parking. I do not own a car and want the option of a place with no car space to save money.			Yes, I'd like to downsize and stay in my current neighbourhood			
Yes	Yes		Yes	It's time to move on from the 1950's quarter block and deal with the reality. If Canberra wants to be a city with young family's units do not cut it and houses on large blocks are unaffordable. Urban infill is inevitable and choice is lacking. The proposals are week in context, taking baby steps when large repurposig is needed.	Yes		The fact that your asking shows how much you're catering to existing home owners. Let it go. Show some leadership.	The fact that your asking shows how much you're catering to existing home owners. Let it go. Show some leadership.			100				Yes, I'd like to downsize and stay in my current neighbourhood			Get on with it.
Yes	Yes		No	Good idea - I am already a RZ2 zone but planning should allow more development when there is a large block that could be utilised, anywhere	Yes		Draft guide is excellent	Mostly	Yes		100	Yes	OK	It looks good	Yes, I'd like to downsize and stay in my current neighbourhood			No
No	No	Units have more associated costs, we are putting off having kids because houses are expensive but owning units are just as bad with smaller space as body corp only goes up	No															
No	Yes		Mavbe	I think the changes will make a significant improvement to housing choice. Current RZ1 locks around 80% of land to single occupancy dwellings which are expensive and not suited for my personal circumstances, as well as many others' circumstances. Allowing townhouses, apartments and other density in these zones will greatly improve choice.			I am generally supportive but concerned about the emphasis on setbacks. These naturally reduce the amount of building space and sometimes costs more to develop. So we get less housing for more cost! There should only be clear practical reasons (ie. severe overshadowing) for enforcing setbacks, not aesthetic preferences like 'reducing visual bulk'.	No. I believe there may be too much emphasis on overshadowing. Recofnising that with a cilhanging climate, some shade is actually beneficial. I am also concerned that including too many 'guidelines' may create new, excessive, veto points for blocking new housing.	No	Generally does an ok job but I'd like to also see an example of where a very small frontal setbackwould make sense. ie. to integrate with existing terraces. I also think that upper storey setbacks are unnecessary. I support articulated front setbacks.	100	No. Only because car parking minimums should be abolished entirely.	Generally speaking the draft guide does a good job by reducing required parking minimums which will improve aesthetic outcomes and most importantly affordability. I think emphasising 'hiding' away parking is a positive outcome.	Yes.	Yes, I'm looking for an affordable home in an established suburb			Very supportive of this necessary change that will improve housing choice and affordability in the ACT. There is room to be more ambitious and increase what can be done in RZ2 as well, and consider how to reduce other barriers to housing (ie. LVC).
Yes	Yes		No					Yes	Yes		70	No.		Yes.	No, for another reason		I just purchased my apartment.	
No	No	But they will be for MANY others.	No					Yes	Yes		100	Yes		Yes	Yes, for another reason	I'll need it one day!		
Yes	Yes		No	I believe that the reform allows for more flexibility with in the lower density blocks to create more housing without compromising on overshadowing, privacy or green space, by allowing dwellings to get taller where possible. I believe the outcome based assessment method allow for good quality control.	Yes		It appears to deliver on this, however, it may be short sighted as it punishes the dwellings that get developed first.	I think solar access is over balanced in the documents, 7star plus houses don't necessary need northern light to perform, there should be a matrix to allow 7 star houses to not face north. This would be particularly useful for developments on north south oriented streets.	Yes	Having clear metric for what is good overlooking is helpful too	100	yes, less cars will create a reliance on public transport and e scooter / bikes. We do need to think of the mums and dads with prams though. I think cars and parking in Canberra will always be a bane on the city	The biggest problem with permeable paving, is that its recommended to be installed on a slab - there is no great solution when it comes to parking v landscape, but at least the conversation is being had.	Great diagrams	Yes, for another reason	It would be a good investment for my children, to be able to buy land and create three dwellings for them in the future.		I think we need to consider offsets, more kickbacks to ensitivise: - for low carbon footprints - high performing dwellings (passivehaus etc) - higher quality landscapes (more permability / more trees) - EV / Solar / Grey water infrastructure If the above allowed for more height / less cars / more plot ration / or the like, this would allow developers to invest more in these outcomes. The territory is doing fabulously with their planning reforms, but I fear that the TPU-Urban forest bill / entity requirements especially Icon / TCCS verge trees, are still making these developments incredibly difficult to pull off smoothly and affordably. Overall we support what the government are doing, but think that more reform needs to be
Yes	No	People want family homes with enough space to play and garden, and spread enough to let sun into the house.	No	It gives too much freedom to subdivide. It will lead to developers pricing out families, meaning more subdivision will occur than is actually wanted, people settling on smaller houses and blocks than needed. This will end up reducing housing diversity, especially affordable family homes with backyards.	No	It should ensure a sufficient level of affordable family homes (>700 sqm) are preserved in the suburbs.	It is good that they prioritise not blocking sunlight and maintaining privacy and green space.	It is important that housing has enough sunlight, which is addressed. The regulations do not do enough for sufficient private open space to accommodate families. Outdoor space is very important for wellbeing, and especially for children to have safe (therefore private) outdoor spaces to encourage healthy lifestyles.	Yes	It is good to emphasise rear setbacks, especially private consolidated garden areas. This could be more strongly emphasised.	70	With greater housing density, street parking becomes less viable. Basement car parking is viable only with careful planning and well-constructed and maintained drainage. Many households require multiple cars and this is not accounted for.	Care is taken to optimise living space and privacy which is good.	It does detail important points such as green spaces, sunlight, privacy and for suburbs to be accessible on foot. Care should be taken to avoid 'missing middle' houses from becoming 'majority middle' housing. Although these do have a place., especially closer to town centres, more needs to be done ensuring all types of housing are more affordable, especially free standing houses with bigger gardens that are best suited for families.	No, I don't want to / I currently live in a detached house			Often townhouses are inhospitable to the surrounding suburb, with signs up warding non-residents away. One of the best advantages to Canberra over other cities is that it is very accessible, there are very few dead-ends for pedestrians, with regular breaks between houses. Townhouses and larger, denser blocks may greatly impede the free-form, open walking that helps make Canberra so welcoming and enjoyable.

Yes	No	I want Canberra to maintain the Bush Capital look and become heat islands with narrower roads and no ability to plant trees.	No	I think the developers are the ones to win. The quality of building us disgusting. No inspector should approve occupation. Both my adult children work in the private sector and have reported major defects plus builders ask for 'the cheapest' which means everyone refers to the Molonglo Valley as lego land. What are those properties going to look like in 50 years? Falling down, builders gibe out of business, no recourse fur residents like ones in Bruce. Social housing numbers are an absolute joke. You kicked out how many people? The proposed number to replace them is not even half of what you took away. Be more transparent. But I suppose you will just do what you want anyway. Minister Berry stuffed up previous procurement and the public education system so what will happen in her current housing portfolio? Not much is what I think.	No	Ugly eye sites resulting in no privacy fir existing residents plus low quality builds will make Canberra ugly and not thrive. ACT Government takes years to respond to fix my street requests. This change will put more pressure on those services.	Nothing should be built above the tree canopy. It is like you haven't heard of climate change. Heat islands will continue. Survey current residents of buildings where pools leak onto their apartments from the roof or the builder has gone bankrupt and they can't get help. What resolution is offered for them? Why does the population need to grow so much?	No	No	Parking is an issue. Look at Tuggeranong apartments. If you cant get town centres right I am very concerned the suburbs are next. Increased crime will result. Roads are now jammed. No line markings after recent sub standard work. Who signed off on that?	0	No	Not well at all. Older trees need to be maintained! You are making everything hotter. How do garbage trucks and emergency vehicles manage narrow roads. Ask them!	No. Better approval process with true town planners not public servants making the decisions. Once properties are built they are substandard. Where are the inspectors? Not ones appointed by the builders or developers.	No, I don't want to / I currently live in a detached house			Make sure all the business cases are available for public comment not locked down by Andrew Barr using his 'executive privilege' unlike the absolute mess of the light rail. No more AAA rating which will never come back. Debt for many generations. Do the budget properly!
Yes	Yes		Yes	Looks good, would be great if you consider rezoning blocks near proposed tram stops that is to come to Woden. For instance block next to mine is an apartment block all behind mine are apartments but ours with road at the front and also back is RZ2.	Yes		Looks good	Looks good	Yes		100	Yes	Looks good	It's doesn't include a site ours which is rare where there is road at the front and at the rear too. Note - Next door is an apartment.	Yes, I'd like to downsize and stay in my current neighbourhood			
Yes	Yes		Yes	The proposed changes provide greater flexibility in the housing arrangement. I particularly like that the reform is promoting development that demonstrates good design outcomes over statutory requirements such as dimension and maximum size.	Yes		The draft provides an excellent guide to good design outcomes in solar access, parking and livable spaces. The draft guide is well considered and clear in promoting good outcomes.	The proposed guide provides an excellent narrative on good design outcomes with an emphasis on natural light, building orientation, passive solar/living, air movement and thermal mass. A possible improvement in the document is how these can be measured in reviewing/approving a proposed development.	Yes		80	Yes, but obviously dependent on developments geographical location, availability of public transport, walking distance to amenities, etc.	Generally, a good outcome. A fine balancing act of cannot be achieved in an economical way for development and inadequate provisions. Suburb of Lawson with a high proportion of medium density is an example of where inadequate off-street parking has created a poor oriented vehicle problem.	The guide is excellent, well researched and written with clear text. A means of measuring a proposed development could be an improvement.	Yes, I'd like to downsize and stay in my current neighbourhood			Congratulations to the team that has produced this document.
Yes	No	Not looking to purchase a new home	No												I already live in this type of home			
Yes	Yes		Yes	Not particularly well. The blocks that allow for redevelopment under these proposed changes, largely will have been benefited by previous changes in the last 5 years allowing subdivision of 800sqm blocks. Greater flexibility and interpretation should be allowed and encouraged to ensure that these proposed changes, actually come to fruition.	Yes		These section seems reasonable and self exolanatory	Scale models are likely needed for most people to understand the true impact of this. Given the small building footprint permitted on sites it's unlikely that RZ1 properties will be affected.	Yes		20	Greater inclusion of basement parking should be permitted and encouraged across all sites in the ACT.		Yes.	Yes, I'd like to downsize and stay in my current neighbourhood			Current reforms fail to capture existing duplex properties in existing suburbs which are perfectly suited to terace developments, with typically regular rectangular blocks, on main streets with exceptional access to public transport and local amenities. These should be seriously considered where an owner is able redevelop two existing duplex's and encourage 4 terraces with basement parking
Yes	No	appealing if a dual-occupancy, but the other options will be too dense to comply with Missing Middle Principle 3: minimize impact on natural environment	Maybe	1. Yes to dual occupancies, providing the second dwelling does NOT eliminate too much of existing greenery/tree cover 2. Most second dwellings already completed are built fence to fence - leaving no meaningful greenery/tree cover 3. Allowing second dwellings to be as large/larger than the existing dwelling is simply GREENWASHING - insincere claims about preventing heat banks due to lack of tree cover in existing RZ1 zones 4. There is no missing middle in RZ1 Griffith with currently a good selection of so called "missing middle' throughout the suburb 5. Allowing higher density of dwellings than dual-occupancies completely cancels MISSING MIDDLE PRINCIPLE 3: minimize impact on natural environment. JUST NOT POSSIBLE to preserve sufficient existing greenery/tree cover to comply with	No	Because apart from FORMALLY REQUIRING retention of adequate existing greenery/tree cover, there is no way this PRINCIPLE can be achieved. And indeed, evidence of infill already built in Griffith RZ1 is almost exclusively, fence to fence.	NOT WELL -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.	NO. Allowing more than single dwellings and dual-occupancies denies families the ability to enjoy living in homes surrounded by sufficient greenery to enjoy outdoor activities and wildlife. There must be CLEAR LIMITATIONS as to how LARGE and DOMINATING in appearance/design any additional dwellings in RZ1 can be.	No	Many diagrams are appropriate in RZ 2, not in RZ1.	10	Street parking is acceptable & preferable to taking up garden/green space Alternatively, underground parking		NO - it seems to allow a very wide range of dwellings such as rows of town-houses -these belong in RZ 2 not RZ1. RZ1 should remain not just visually retaining the appearance of current residentials, but ACTUALLY RETAINING CURRENT RZ1 visually - re greenery/gardens/trees . CLIMATE MITIGATING TREE COVER/GREENERY is crucial - allowing rows of town-houses, wall to wall developments is NOTHING MORE THAN GREENWASHING	Yes, for another reason	YES in a dual-occupancy like to one next door		We believe that the Missing Middle as proposed is not what RZ1 needs - RZ1 should not end up looking like RZ 2 which is what existing criteria would allow. Claims that families with kids would benefit from proposed Missing Middle developments are insincere UNLESS sufficient greenery is retained for kids to play outside in their own gardens
No	No	We moved from Sydney to Canberra to have a backyard, and for school to have green land. Turning Canberra into an outer suburb of western Sydney is not appealing and thus would leave.	No	No. It is forcing poorer people into crammed living conditions akin to western Sydney, or any suburb in Sydney next to a train station.	No	Needs of children and teenagers are not included.	One week it will be two stories, then it will be 20 story towers build in the middle of suburbs, just what happened in Sydney, with no infrastructure to support.	All new housing should include solar access, whether renting or owning a home or apartment.	No	Gardens to play in and native vegetation will be greatly diminished.	50	Yes	Fine	Children, teenagers, pets.	No, for another reason		Not healthy to raise child in cramped environment.	I already see that Canberra is becoming an outer suburb of Western Sydney, and it will loose its appeal very quickly, and the locals will simply move elsewhere. It is currently the 'bush capital', and should keep it that way, let the other capital cities become third world slums, not us.
Yes	Yes		No	Very well! I'm pleased by how ambitious the reforms are. If implemented in full I expect we'll see a large expansion in "gentle density" dwellings thoughout established suburbs.	Yes		Yes, even though there are some relaxations in the height limits we will still avoid situations where residents are excessively towered over by their neighbours.	Yes, the balance is sensible.	Yes		100	Yes, the current planning system requires too much on-premises parking and I'm glad that the rules are being relaxed.	Quite well		Yes, I'm looking for an affordable home in an established suburb			

Yes	Yes		No	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. This is just basic microeconomics. In terms of diversity specifically, I hope that the reform will create more medium and high density housing in the 3/4 + bedroom category. This will make it more affordable for young families to live in our city.	Yes		It should have gone further. Canberra is experiencing a housing crisis and the government is still buying into terminology like 'local character". "Local character" is and always has been nothing more than a weasel word used by NIMBYs to keep out new residents that they consider undesirable.	The reforms could have gone further to promote in-fill and density, but they are fine. I would note that 'solar access' seems to only ever come up as an issue in the planning system when NIMBYs need a justification to stall development of public and community housing.	Yes		100	It does not go far enough. Minimum levels of parking should not be mandated by government. The market will provide a socially efficient level of housing if it is allowed to do so. If a person does not need car parks, why should the Government force them to pay for them? Ideally, I would remove all minimum parking requirements for developments, and remove barriers to people renting out spaces they don't need. Car parks should also contribute to the 'unit entitlement percentage' for rates. A unit with no car parks creates a lower social opportunity cost in terms of land use, compared to an identical unit with a car park. As such, car park should be rateable.	It is fine.		Yes, I'm looking for an affordable home in an established suburb			The Government should consider reducing the lease variation charge (LVC) from 75% to 50%, at least for land owned by natural persons (ie, humans and not corporations). While the economic logic of the LVC is sound (socialising the boon to property value obtained by upzoning), the issue is that it creates a very significant cash flow barrier for individuals interested in utilising these "Missing Middle" reforms for a subdivision and redevelopment. If it is too costly for people to take advantage of the scheme, the tangible benefit to housing supply will be minimal. I would also anticipate that the loss in revenue may be negligible, in part because these reforms will dramatically increase the number of lease variation applications the government will receive. As an alternative, government
Yes	Yes		Yes	I reckon current 120 msq construction is not big enough and the cost will be similar to a bigger house.if the restriction taken away it will be great	Yes				Yes									
Yes	No	Changes don't safeguard an individuals existing purchase. They give unfair weight to a new home buyer over someone who has owned their property and invested a great deal into that property. New proposals threaten that investment.	No	I think they unfairly favour the new buyer and not the existing property owners in the neighbourhood. More homes do not equal more home buyers. Only more property investors.	No	More properties on a block do not equal more home buyers. Only more property investors.	It doesn't	No. There must be greater consideration to an existing home owners significant investment in attempting to manage their environmental footprint, ensure their existing privacy and access to their property.	No	See earlier comments	10	You're giving greater concern to gardens and private open space for new developments at the expense of the gardens and private open space of existing properties.	Very poorly. 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).	No because the dynamic, issues and concerns of each suburb is unique. The cookie cutter approach doesn't work.	No, I don't want to / I currently live in a detached house			The ACT has been rapidly building new homes for over 30 years. Housing prices have increased dramatically (not decreased). With the current (same) approach housing prices will only rise which means larger loans for first home, young buyers who can't get them or afford to maintain them. The government must do more to remove investors from the markets and allow home owners fair access. One way to do that is getting rid of capital gains. More housing won't work. That same, useless approach hasn't worked to date. If it did, houses would be cheaper after 30 years of building. Not 5 to 10 times more expensive.
No	Yes		No	Opening further choices and opportunities for development beyond freestanding single dwelling homes is a great choice, and the only sustainable answer to the housing crisis, whilst also allowing for more diverse communities and neighborhoods	Yes		Yes	Yes	Yes		100	yes	Yes	Yes	Yes, I'm looking for an affordable home in an established suburb			NA
Yes	Yes		No	They increase diversity and choice at the expense of destroying the appearance, amenity and architectural merits of some well established and highly valued suburban locations. For example , those streets with high quality housing backing onto ridge reserves. These should remain under the present Rz1 zone if the suburban character of the city is to be maintained.	Yes		Adequate but should not apply to rz1. I have no problem with large parts of rz1 being rezoned to rz2 with the new Rz2 requirements applying. Indeed it strikes me that a farming out of this zone over time along existing infrastructure assets would be a suitable way of progressive densification. Indeed by doing this you could reverse the proportions of the areas covered by rz1 and rz2.	Don't know must be judged on a case by case basis.	Yes	Setbacks not always necessary if public verge and street vegetation is adequate.	100	No .Despite the governments good intentions re better public transport and the more efficient (shared use)use of private vehicles petrol of hybrid powered cars will dominate transport modes for many years to come just ask a working mother with school age children whether scheme can do without her car.	No	Yes. But I would add designed to comply (or pattern book) provisions for smaller Rz2 developments	I already live in this type of home		1.While I think that a reduced rz1zone should remain exclusively single dwelling residential I see no reason to continue with very small scale local shops in many suburbs. Bread and milk shopping could be satisfied by individual shops as an allowed use in this zone thus freeing up existing shops for housing. 2.Canberra has just been ranked in an Oxford Economcs survey as the most liveable city in the world. This in part has resulted from good past planning particularly as it relates to integration of the natural and built environment. This legacy must and can be retained by a more targeted and careful change proposal. 3. I was led to believe in a public consultation session that the recently announced size limit on allowedsecond buildings had been lifted but I notice that the guideline document still
Yes	No		No	I think it is an effort for the government to increase their Government housing and stuff more houses onto smaller blocks which is ruin the original planning design of suburbs.	No													
Yes	Yes		Maybe	While the changes allow for more diversity of residential medium density, a key missing element is low-scale mixed use, and a 'mixed business' typology should be introduced to improve liveability and walkability - see our long-form submission.	No	Consolidation is not a necessary precursor, but the guide does not really guide the outcomes sought eg: no driveways on principal streets to facilitate future cycleways etc - it is just mechanical about site arrangement.	In the context of broad densification this may not be an issue.	The guidance on 45 degree solar access is not scientific and should be replaced with a performance criteria like the NCC, with a deemed to satisfy (which should still be 3 1 degrees from north, but could be proven to be different in different orientations / sites).	Yes	Again this could be more purposive around solar access and privacy, and 'negotiated away' by consent with neighbour for proper terrace forms etc.	50	No - parking rates are too high - see our long form submission.	No - see our long form submission.	Too much emphasis is placed on off-street parking. Through site links are not facilitated where needed. Local mixed use is not facilitated. See our long-form submission.	Yes, for another reason	I have lived in terraces in the past. Where supported by transport and amenity, they are excellent.		See our long-form submission.

Yes	No	It will remove the bush capital intent of Canberra. The city will become more concreted and compact like other cities of Australia. This is not what Walter Burley Griffin intended. Keep Canberra's forested look and feel.	No	It allows for diversity but will degrade the type of city that Canberra is. Canberra is becoming more and more like other clogged cities of Australia and it is sad to slowly watch the old ''bush capital' of Canberra disappear. These reforms will accelerate that negative change. Smaller blocks and less trees is already seen in all the new suburbs, don't change the old ones that have a much better design.	Yes		I do not have the expertise to comment.	I am strongly for good solar panelling policy.	Yes		10	No	Dissatisfied		I already live in this type of home			It is sad that none of the new suburbs have trees like the old ones do. Canberra had a vision for a forested city and there is nothing else in the world that I have seen like it. Please don't ruin that and make it a clogged up city like everywhere else in the world.
Yes	Yes		Maybe	I think the changes are well-targeted and well-written. They will enable the diversity that we need in established suburbs like mine, but ensure we retain the natural character. It will help more people to live in this suburb and have the same excellent access to schools and public transport that we have here.	Yes		Yes, the guidelines are clear and appropriate. The main issue at the moment would be compliance - how will these be enforced through the development and building phase?	Yes, this seem like the right balance. Again, my concern is more about how these guidelines would be used (enforced)? Would it be easy for developers to do something that doesn't agree with these?			10	yes, I think this is right, and I think the flexibility is good in that it needs to be assessed in relation to proximity to services (shops and public transport).			Yes, I'd like to downsize and stay in my current neighbourhood			This is a fantastic initiative and the design guidelines look excellent overall. I live in an established Belconnen suburb in an detached house and I fully support this change in planning. I want more people to be able to live in this area, and these design guidelines show how it can be done in a way that isn't alienating to those who enjoy detached housing suburbs.
Yes	No	Older and disabled people do not want multi storey houses	No	Totally disagree and is morally wrong I bought my place 20 years ago on a large block with building restrictions of RZ1 now you have changed it so my neighbour can build a new 2 storyey building out the back blocking my views. It will make me feel like I am in a inner city house where everyone is built on top of each other	No	Being able to do this is destroying the bush capital feel		No There does not seem to have any concern for neighbours affected by building out the back. Detailed studies on sun and and privacy needs to be done and presented to neighbours before approvals given. Thus is happening to me now.	No			No - You are do not appear t investigating requests for new buildings , just taking word of owners or builders		Neighbours need to be involved in developments.	No, I don't want to / I currently live in a detached house			I am currently affected by this. I am in RZ1 A neighbour who does not live in the house below. He just rents it out to multiple families. It is a multi storey house. He is now proposing build a mother 2 storey house at the back. The government does not care if this will result in the value of my house , the encroachment on privacy and sun light to my place . I bought this house based on rules as per RZ1 and now they have changed the rules to effectively destroy the feel of the place but having these missing middle housing incorporated into sites which had a bushy type feel. After all we are supposed to be the bush capital.
Yes	No	The reforms will cause a massive redistribution of wealth away from relatively poor people, and towards relatively wealthy people.	No															
Yes	Yes		No	I think the proposed changes do allow for more diversity of housing choice. I'd love to see the changes help create good design choices in older established suburbs. I'd like if there were more incentives for folks redeveloping blocks. Especially incentives or grants to help new development by those subdividing in older suburbs fit the 'heritage' look while still creating more density.	Yes		Yes	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	Yes		80	I think in the inner suburbs parking really needs to be an obligation for all housing. At least car space per dwelling. If the dwelling has 3 bedrooms it may be strongly advised to have 2 car spaces. Complexes that want to have fewer car spaces should offer secure bike storage and bike charging facilities and be within 1km of a bus stop. Canberra really needs to have more public transport for any reduction in car spaces. Streets also need to have more parking restrictions on congested streets.	Maybe more focus on car parking	I think the designs provided as an example are good but I'm still not sure how they are enforced. If they are only guidance with no likely hood of being enforced at an approval stage I'm not sure if they will be implemented. And what are the penalities for complexes that advertise more beautiful design at planning but then end result isn't as pleasing	I already live in this type of home			I would love to have more missing middle housing, I currently own a small apartment and I'd love to be able to live a small town house or a slightly larger apartment.
Yes	No	Building an additional home on the RZ1 block with the current and the proposed rules, doesn't make financial sense of the investment	Maybe	Pretty well. The proposed rules should open up more housing in Canberra's existing suburbs. However there is no financial benefit with either the existing rules or the proposed, therefore public might not take up the risk of investment without much incentive.	No	It would be better to provide clarity on the costs of sub division. Also clarify on the large 1000+ sq mt corner blocks and any special consideration for such perfect parcel of lands.	Not sure	Not sure	Yes		60	Yes	Faitly well.	Clear guidance on the large 1000+ sq meter CORNER blocks. Hoping an ablity to subdivide such blocks without contructing a dwelling would be a smart move to release good portion of lands.	Yes, I'd like to downsize and stay in my current neighbourhood			The proposal doesn't provide a clarity on what is the incentive for the land lords to invest and risk a move to either subdivide or unit title. Its wasn't a financially viable decision for the public earlier and believe it is still the same now. Ability to subdivide and sell WITHOUT constructing a dwelling would provide incentive to the public. Special and lenient rules for larger corner blocks would be a smart move and is completely overlooked.
No	Yes		Maybe									We should prioritise landscapes and greenery over car parking			I already live in this type of home			
No	No	Purchasing a home is not possible for people in my age and income bracket	No	Unless all of the new proposed developments are going to be public housing, they will not provide any meaningful assistance to Canberrens under 35. They will be bought up by investors, and used to squeeze as much profit as possible from the most desperate, keeping all of us below the poverty line. It's honestly disgusting to hear from my government that you want to invest in making it easier for private investors to keep vulnerable people impoverished in our city, whilst the wait time for public housing is years long.	No	They would if they were public housing. They are more likely to be bought up by investors and kept either vacant or used to impoverish vulnerable people if they aren't public housing units.	More housing doesn't fix the homelessness problem. It just provides more investment properties for investment firms. If they are public houses, you are more than welcome in my (and most vulnerable young people's) opinion to level any part of Canberra you wish and build the highest density housing you can physically manage.	Neighbourly privacy cannot be a part of decision making if you are serious about addressing the climate crisis. It is insulting to even suggest such a thing.	Yes	As long as it's public , it's ok. If it's private, I don't know why you care.	100	This is fine, it's great for public housing communities to have visitor parking, especially for disabled residents who need support worker access. If it's private, I don't know why you care what anyone thinks, it's just going into some psychopath's investment portfolio.	See above	You need to make it clear that all of the new properties will be public housing.	Yes, for another reason	I want to live in public housing. there is not nearly enough. I've been on the high needs list for over a year.		If they aren't ALL going to be public, this project is insulting, and should be thrown out.

Yes	No	It does not address the root cause of housing issue in Canberra	No	Not at all. It creates many new problems as ACT government has mentioned during this process, such as constraints on infrastructure of these existing suburbs. Why ACT gov cannot make the new suburbs more attractive- attract more jobs to new town centres, so people do not have to drive 30 to 40min or catch a bus+light rail+bus to work. These "new options" created in the end only reduce the living standard for all.	No	Micro manage the details while overlooking the big picture won't work.	No. The idea of "encouraging" won't work for developers- they will just do what ever most money is at.	No. Developers will exploit all the loopholes.	No	Even the "good design outcomes" is not good enough, as it doesn't create more infrastructure for existing suburb.	0	No. Not enough parking is just one of the problems this will create and affect all people.	No. It will just create streets full of cars hard to passing by.	No. It should be more serious about maintaining high standard such as sufficient car park.	No, for another reason		It just creates houses next to each other's window.	Please look at systematic approach to solve housing crisis.
Yes	Yes		No	We need more single level houses with minimal garden. We want to move from our large family home with stairs to a smaller single level home with minimal garden and a two car garage to allow us to live comfortably and continue our retirement activities. We are not interested in apartment living and don't feel ready to move to independent living retirement village.														
Yes	No	Low quality and unattractive multiple dwellings on blocks lowers property values and creates transient neighbour. These seem like policies of a government that can't afford to create new suburbs due to economic mismanagement	No	Yes, if diversity is cheap out-of-character multiple dwellings next to established houses in a community. Imagine spending your hard earned money on making a beautiful house in the suburbs and then having a cheap stack of units dumped next door to you. There are places for medium density housing and these places shouldn't be where existing low density communities are built. This is an economic decision made due to the government running out of money. More rates and land taxes per block without having to add infrastructure. Meanwhile, residents get screwed over whilst a labour government (without a mandate -35% voted for them) and developers, again, take advantage of Canberrans.			Broad terms used. There is no trust in the government looking after existing streets.		No	Again, no trust		No. You will jam as many rate payers on blocks as possible and without enough parking. So tenants will park on the streets , cluttering them and creating unsafe streets for kids.	See above. The streets will be jammed with cars	No.. ugly apartments, townhouses and the like will be built cheaply by developers to maximise profits.	No, I don't want to / I currently live in a detached house			Yes. Can the government please look at things from an average family's point of view? It seems that the term 'unprogressive' and the attached points of view are the only views ever considered. We don't all want to live in the inner north and hang at Braddon.
Yes	Yes		Yes	It depends on how far they go. Most RZ1 blocks should be automatically made RZ2 if the government is serious about this. Restrictions were relaxed for Mr Fluffy blocks, which could not apply to blocks next door to them.														
Yes	Yes		Maybe	Excellent idea to increase the flexibility of housing types. Also think about tiny home community.	Yes		Seems to consider surrounding area.	Yes.	Yes		90	Yes.	Seems like a practical approach.	Yes.	Yes, I'd like to downsize and stay in my current neighbourhood			Hopefully this draft will get through. Diversity in accommodation is essential in Canberra looking forward. Smaller and clever homes can meet many needs. Tiny homes are also a great option.
Yes	Yes		No	I love the idea of more missing middle housing, but honestly don't think this plan goes for enough. Restricting changes to low rise only will further stifle density. They just slowly increase the density in the suburbs without addressing how to remove car dependence and provide increase access to services and amenities. I appreciate that this isn't the public transport or active travel plan but they are of course linked. if you live in eg. Hughes and are now allowed to subdivide, this doesn't change the fact that it is a 15+ minute drive to get anywhere with reasonable active travel or public transport options. Improving density the outer suburbs is good but I want to know how you intend to make them less car dependent and improve quality of life and sense of place in these areas.	Yes		It encourages maintaining a restriction to only low-rise buildings. I disagree with this and believe we should be aiming for medium rise pretty much everywhere.	Looks good to me	Yes		90	Car parking minimums should be abolished, and all roads should have paid parking on the street with no exceptions. Free parking on public land promotes car dependence.	Car parking should be explicitly banned on the street and on nature strips. Public land should not be available to store private property on it for free. Residents should either have to pay the true cost of storage of their private property on public land or store it within their own house. I like the way you have designed garage accesss so that it is not a dominant feature of the road. For housing with private garages, work should be done to discourage people from filling their garages with things to then store their car in their driveway. One should be able to walk down a street without seeing any cars whatsoever.	Looks good to me	No, for another reason		I live in high density living already. I would be happy to live in missing middle housing as long as it was close to shops / amenities / work / etc	More density please.
Yes	No	It would not create high quality housing	No	Let's be real "Canberra's suburbs aren't designed for apartments. They were built with a certain number of people, cars, shops, schools, and connections in mind. Now, Labor wants to cram more homes into established suburbs without upgrading roads, transport, or essential services. That's not smart planning" "it's turning good places into a mess.	No	It just licences overdevelopment	No. It opens doors for overdevelopment.	No. It just pushes for more housing at everyone else's cost.	No	Way too little set up		No. You should allow at least two car parks each dwelling.	Not it would not.	No. Stuff more shoe boxes in would only turn good place into bad.	No, for another reason		It would be low quality shoeboxes.	
Yes	No	It turns Canberra into a rubbish place.	No	Not at all. It will just turn attractive places into apartments blocks flooding cars to the streets.	No	It reduces parking standard and will create a poor quality living environment.	Not at all. It will just licence over development.	No. It is an overdevelopment process that will push people out of their homes.	No			You should ensure two car spaces each dwelling. There are other options create attractive housing.	Not at all. It provides way too little car parking.	No. It is just more red tapes on the end. I would think create a code based scheme- if it is intine with the code, no DA is needed. That would really accelerate many housing.	No, for another reason		The missing middle housing would be built under a low standard.	Pls maintain hiah standard.

Yes	No	you have not addressed the very expensive Government fees to enable unit titling- an excessive charge for little effort	Yes	There are many positive aspects to the proposed changes but you have been silent on the fees charges for unit titling and realities of parking requirements. We have built a 120sqm development in line with the recent changes. Limiting this size meant the $130,000 required to unit title meant we will remain to dwellings on one block until this is more reasonable. While the charge per dwelling is $43,000, there are several additional charges by government, costly government requirements (separate parking, fencing etc) to achieve unit titling and then solicitor, valuer, certifier and surveyor costs. This is a disproportionate cost of a 120sqm development. So was the holding cost for land while the ACT Government took 6 months to approve a compliant development that was supposed to take 3 weeks to approve.	Yes			This is beyond the understanding of most land owners and without wider awareness you risk NIMBY reactions. Please make the effort to raise awareness of residents and have your implementation staff and systems properly tested and ready.	Given we have the stock of existing stock of residential blocks and the Canberra climate, priority should be given to providing north facing internal living and open spaces. This will improve the quality and affordability of life for residents. This might mean there needs to be flexibility about what garaging is and where it's located on blocks. The Lawson cafe on p57 is a success but out of a failure to provide suitable retail and community space in this treeless suburb. This suburb is too dense and will never achieve the required tree canopy. It includes many 'second' bedrooms with no window or sunlight.	Yes	If front yards are to be used, then there should be more flexibility on fencing to provide suitable privacy	40	The guide barely mentions this and only in the case of low-use residential streets (not defined in the guide). Resident parking permits is a sensible way to manage this. Not all developments will need 2 car spaces, or even 1 space, per home. Adequate gardens and better landscaping are higher value outcomes. Discounts on Government fees could be offered to incentivise new but expensive permeable paving options.	Its barely mentioned in the guide and it is so vague and not specific that its unclear where this could be considered.	More detail on fees and charges and timeliness obligations for Government to consider the reality of this as a new approach. At the moment it is not grounded in reality for landowners and developers. My experience is that the funds I had for permeable paving, better landscaping and other preferred MMHDG outcomes was chewed up by the holding cost of the land as the ACT Government took many months more than their timeliness indicator to complete the approval process. Your staff and local certifiers are very rules based actors, they have incredible aversion to outcomes based design, and so we were forced to go with their most risk averse approvals as no-one knew where the boundaries were.	I already live in this type of home			Please do your implementation planning, train your staff and build your systems prior to roll out. To incentivise these new changes, forgo the fee income and get some runs on the board that will win over the community I am happy to be contacted on 0412519684 to discuss this further
No	No																	The problem with these programs is that the builds are usually cheap and nasty. We seem to focus on volume rather than quality. We need to look to Europe for how to build housing for all. Our housing needs to be insulated and sound-proofed, we need options where multi-generations of the same family can live near each other and live there for their lifetime. In Gungahlin, there's a monstrous block of flats that when my sister in law was living in, just having the TV on or even having a conversation meant that the people both above and below would use a broom stick to bash on their floor or ceiling telling us to keep the noise down. That's what I'm talking about when I say cheap and nasty. No thought to people 'living' in these dwellings. Please, I beg you, make robust and thoughtful housing, you will not be thanked for more 'crap' housing.
No	Yes		Maybe	Excellent idea	Yes		Great	Yes	Yes		100	Yes	Well	Yes	Yes, I'm looking for an affordable home in an established suburb			No
Yes	Yes		Yes	It's good. I support relaxing limitations on development in RZ1 zones. Particularly when other blocks (writhing the same vicinity) can develop almost indefinitely and to the extreme. Could do with more detail. Can existing infill be developed? Are there block size restrictions?	Yes		They are ok.	Unsure			50	Provided this is limited and planned for.		Not for the lay person.	Yes, for another reason	I want to stay in my neighbourhood but need different housing		There should be special allowances for development not aligned with the rules but agreed to by neighbours.
Yes	No	I have a mortgage (battle-axe house) I'm happy with	No	I have only skimmed the proposed changes, but they look great! I'm glad to see some regulation in the designs. I live in a "missing middle" house (the second of two houses on an old block) - it's very nice. But when looking for a house or townhouse, I saw so many poorly designed and cheaply made places with tiny courtyards and (bizarrely) full of bathrooms and toilets. Developers, left to their own, seem to like to squeeze as many "3 bed 3 bath" townhouses into a small area, leaving a glut of properties that could never be satisfactory long term homes; only rentals or short-term compromises to "get onto the property ladder". I am all for the proposed changes and the regulation associated. I also think it's really important, with more people living without backyards, to have adequate community spaces: parks, shops,	Yes		I think so, though I'm not across the detail here. I am glad these things are being considered.	I think so	Yes		80	Yes, I think so		I think the guidelines are good. I would like to see them being enforced, at least to a degree.	I already live in this type of home			Very important and exciting proposal. I do live in a property that fits into this category. Sometimes we hear neighbours in their backyard (when we normally probably wouldn't). But the house is very nice, and a good example of this "missing middle" working. With this housing, and indeed with all housing, I would like to see more regulation to ensure homes are built, rather than investments. I do think housing is under-regulated. Unrelated, but when new suburbs are developed I would love it if at least some of the large established trees are left standing. I know clearing an area makes house-building much more practical, but it must be possible for some established trees to remain, in a designated site for a park, for instance. It's sad to drive through Molongolo and see only rooftops. It will be lovely in 20 years, I'm sure, but in the

Yes	No	Increasing the density of the suburbs, which has already been increased by reducing block size and road width will make noise and congestion a lot worse.	No	I think people that want to live in the suburbs want a house and some yard - this won't give people what they want. The problem is that houses with some yard in the suburbs are too expensive, and giving people a townhouse or apartment with no yard in the suburbs won't give people what the want.	No	There are too many barriers being removed that will end up with constructions that do not fit within the expectations of people already living in the suburbs.	The changes appear to be more about removing barriers that should not be removed. When someone buys a house in an established suburb you can usually be pretty comfortable that the size and location of houses around you will not change either at all or for a very long time. You can make decisions about your house and yard based on those reasonable assumptions. Now we have to be concerned about blocks of flats/apartments going up next door - this is not what I signed up for when I bought my house.	Solar access in Canberra is critical during winter when the sun is low in the sky. We live on a street when our neighbours to the north have a higher block, so even with their house only being one level we only just have enough solar access to get sun on the solar panels on our roof and a thin sliver of direct sunlight through the very tops of the windows on our northern side. If the house above us was more than one level we would get no sun, and my expectation is that despite assurances that we wouldn't lose our solar access there are not enough protections in the changes to ensure that it is impossible for us to lose our solar access	No	It just looks like you are trying to use fancy words and diagrams to shove as many buildings into a small space as possible.	0	No. In newer suburbs with single houses on each block there is already next to no space for visitors to park. The changes you are proposing only make this worse. It is like you have no idea how people live in the suburbs - or perhaps you are all well off enough to live in large houses on large blocks with wide streets in the older suburbs and have no lived experience of living in the packed in suburbs you are creating.	It doesn't. 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 other than maybe one or two cars in your own driveway. 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. It is the reason we bought a house in place with a cul-de-sac that is large enough that a few cars can park around the cul-de-sac and it can still operate as a cul-de-sac.	Stop trying to pack more and more people into the same space. People move to the suburbs to get some space and you are ruining that. If people want to live in apartments there are plenty in the town centres.	No, I don't want to / I currently live in a detached house			I know you are asking for feedback, but I fully expect given the history of this Government that you will say you listened to the feedback given but you will ultimately do what you want - basically what gives you or the developers more money.
Yes	No	We have more than our share of appartments in Griffith already. I want to preserve the single dwellings that are left	No	Don't take into account existing mix of dwellings	No		Not well	No	No		10	No	Not right		No, I don't want to / I currently live in a detached house			
Yes	Yes		No	This is a comprehensive package which addresses the planning and non-planning barriers. The supporting report does raise some concerns about project feasibility. Time will tell how effective the reforms actually are. Making this style of housing legal is a great start though.	Yes		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.		Yes		100	Reduced minimum parking requirements are welcome. It is unclear why such requirements are needed at all as the TPA will ensure that parking provision is adequate through the DA process.	On street parking helps narrow the roadway and reduce speed in a way that speed signs simply can't. Parked cars also provide a protection to pedestrians on the footpath from cars running off the road. The wide streets of established Canberra suburbs are ideally suited to this.	Yes, the inclusion of diagram makes it possible to visualise a "good design outcome".	Yes, I'm looking for an affordable home in an established suburb			Consider removing the size limit on consolidated blocks. It is isn't clear how this arbitrary measure contributes to achieving a good design outcome.
No	No	Too many developments that require expensive upkeep, such as strata commitments. Increases risk of financial loss in the long term.	No	There are too many apartments, terrace houses and townhouses being erected. There needs to be further efforts to increase separately titled homes, whether they be duplexes or terraces. This is increasing the risk of 'estrata'ffees and builders associations profiting off middle income earners.	No	Because the percentage of strata reliant dwellings are increasing, which are a financial loss and risk to middle income earners.					10			Transparency on regulating strata fees for share occupancy dwellings. Reduce reliance on strata companies.	Yes, I'm looking for an affordable home in an established suburb			We need reforms to regulate the amount of strata based dwellings growing in Canberra. This is not supporting middle income earners trying to enter the property market.
No	Yes		No	The changes remove the unnecessary restrictions on density that will allow for more diversity in housing	No	It doesn't explain why the consolidation of site should be limited in area (as detailed in the tech spec).	It explains the important concepts well and provides useful diagrams to assist the architect in designing the building mass.	I think there is too much ambiguity in the guidance to figure out where the balance is. However, the guidance provides suitable advice on how to use the side and rear setbacks and ways to ensure solar access to adjacent dwellings. In doing so, I don't think the guide provides for too little or too much overlooking/overshadowing.	No	The diagram doesn't explain why the existing front setback of a street is worthy of being maintained, purely because it is already present in the street.	100	Yes, there is already a substantial amount of space in all suburbs dedicated to cars. We should encourage less land be dedicated to cars and more dedicated to places where people live. The road is already used for cars and in many NCDC suburbs the roadway is wide enough for three or even four lanes of traffic. Cars parked on these roads perform two important functions; a place to store your car (that doesn't remove on-site amenity) and as a way to reduce vehicle speeds without needing to upgrade or re-design the street.	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 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.	Yes, I'm looking for an affordable home in an established suburb			There should not be a limit in the technical specifications (or anywhere) with regard to the size of a redevelopment where subdivision and consolidation are proposed. There is no justified reasoning provided, it really feels like it has been vibe-checked. If someone can organise the money and other resources to provide more missing middle housing, why is there a limit to how much land they can use? The target density in RZ1 is the theoretical maximum, so it appears unnecessary. If it needs to remain, there should also be target densities provided for all zones so everyone can differentiate between what is low-density, medium-density and high-density.
No	Yes		No	It provides the option to build a style of housing that is less exclusive and more suitable for people of all walks of life. Particularly with the economic conditions and the aging population, we need places for our elderly to live with family as opposed to burdening people with buying units in retirement houses.	Yes			Mostly. Natural light has magnificent health benefits and helps people feel at home, rather than being lost in a metropolis. It wouldn't hurt to make roads smaller though and making them more walkable and human scale.	Yes		50	less parking, more organic growth.	Try to encourage walking and biking more. It is much better than it currently is though.	Yes	Yes, I'd like to downsize and stay in my current neighbourhood			
Yes	Yes		No		Yes		09-Oct		Yes		70				I already live in this type of home			I wholeheartedly support measures to substantially increase the density of Canberra's housing through these reforms. In freeing up space for housing we need to go up not out.
Yes	Yes		Yes	The proposed changes are long overdue. They will give many options to RZ1 which has been prohibitively inflexible in the past. I support them wholeheartedly	Yes							I'm not sure	I'm not sure	It seems so	Yes, I'd like to downsize and stay in my current neighbourhood			I want to subdivide my 810 metre block. It is too big. I want to stay in my street but live in a modern terrace style home rather than an outdated 60s cottage in need of repair, and also be able to sell the second home and create a little boost to retirement funds. All around me, original homes are being knocked down and replaced with oversized mansions for single dwellings. Why not allow for more homes on those blocks rather than creating one type of dwelling? It must happen.

Yes	No	I have a house with a decent sized block. Why would I get rid of that? If I wanted higher density I would live closer to the city or town centre	No	They won't you will hit end up with smaller houses with less green space	No	Too complex like the rest of the planning laws which allow loopholes for developers	Not at all	No there should be no effect on neighbours properties	Yes		20	No you keep trying to push us on to public transport but Canberra is a car city. A normal 4 bedroom house with mum dad and 2 kids will eventually need 3 or 4 cars. So you will end up with cars all on the street our older suburbs are already suffering this with infill development closer to town centres. Don't repeat the mistakes in the suburbs	Not at all	Private open space. It keeps getting smaller and smaller. Kids need backyards to kick footballs etc	No, I don't want to / I currently live in a detached house			
Yes	Yes		No	As a retired senior, I want to see more single level, 3 bedroom apartments or duplexes which are walking distance to shops														
Yes	No	Already own	Maybe	Well	Yes		The guide encourages appropriate transition, but the Plan amendment needs to ensure allowable development in RZ2 remains sufficiently different from RZ1, so that RZ2 continues to be used to direct where greater density should be sited.	Yes	Yes		70	No, minimum car parking requirements should be abolished, especially in central areas. It is currently too easy to choose private vehicles for trips in Canberra's inner suburbs.	Moderately	Yes	Yes, for another reason	Currently live in detached house, would like to add another dwelling on site for ageing parents.		
Yes	Yes		Yes	I think they seem like a good option	Yes		Well	Yed	Yes		100	This could be a problem- Canberra residents needs cars as the public transport system is not adequate. The suggested parking will not be enough without improved options for transport.	Ok	Yes	Yes, I'm looking for an affordable home in an established suburb			
Yes	No	Im retired and live in a unit, i dont need another house	No	When owners decide to put more houses on their property will the government make sure that the existing infrastructure eg drains, power etc	Yes		I hope the drafting experts take all issues into account especially medium height units that might cause problems with views, shading etc. Development of 4/5 storey buildings in an established suburb could cause a lot of anger and dispute.	Its whether there is a watering down of planning given the eventual increase in revenue for government eg ratesand service costs.	Yes		40	I believe that middle housing is fine with new suburbs but there might be a lot of problems on older established suburbs. We dont want some of the problems that western suburbs of Sydney have experienced where 3 or 4 houses are squeezed onto one block, causing massive problems with existing infrastructure and no parking. Given the fact that modern blocks are smaller than the old days and builders wont care, they are just out to make money and dont consider outcomes for people, eg no gardens difficulties in parking.	Ive answered this above. Its all very well to have marvellious draft plans but we also need more inspection/inspectors!	As long as standards such as insulation, sound solar double glazing is put in the draft.	I already live in this type of home			I dont understand why given the size of housing required governments around Australia refuse to look at new building techniques aren't encouraged. The current building industry is a cottage industry respondant on weather etc. If one looks at the time taken to build a house its no wonder we have a housing crisis. We should be looking at prefabrication, prefabs after the ww2 was temporary and have a bad name however modern prefabs are well insulated and come onsite with all the facilities. Take a look at German prefabs built in several weeks, inside a factory with all modcons. The only thing needed is then the site preparation and within seval months a modern house is being lived in.
Yes	No	I can't afford another house.	No	We are told that the equation of supply and demand are key. The proposed plan will, in relative terms, reduce supply of " 1/4 acre " blocks, which will increase their price, given the increased population (demand). I presume the demographic of population growth will remain constant (?). Where are growing families who want a backyard for their kids and pets going to afford to live? In that respect the plan reduces diversity.	No	If the desired outcome is to increase housing density while disturbing the least number of existing residents the rules should be designed to encourage the most number of blocks as possible to be consolidated reducing potential hodge podge effect.	This is a major concern. The new guidelines essentially allow for additional residences on a block to be built along the fence line or very close to. This does not provide balance, as suggested. Rather, like most lll conceived plans, it takes from one person (an existing resident with clear views from their backyard - that they paid for) and gives it to another (an opportunity for a developer to make a quick buck, and potentially to a buyer who wants to live in a shoebox in a "desirable suburb").	This is a major concern. The new guidelines essentially allow for additional residences on a block to be built along the fence line or very close to. This does not provide balance, as suggested. Rather, like most lll conceived plans, it takes from one person (an existing resident with clear views from their backyard - that they paid for) and gives it to another (an opportunity for a developer to make a quick buck, and potentially to a buyer who wants to live in a shoebox in a "desirable suburb").	No	The diagrams are misleading and do not accurately represent the impact on neighbours.	0	No. Of course additional premises will increase activity including parking on existing streets.	Ultimately it doesn't.	The guide is misleading in that it doesn't adequately highlight the impact on existing residents.	No, I don't want to / I currently live in a detached house			If this plan is to go ahead, it would be good if smaller owner operator builders could be encouraged to increase diversity in the market, rather than just cater to the larger firms like [REDACTED] .
Yes	Yes		Maybe	We need higher density housing across all of Canberra where possible, relax zoning restrictions for all blocks over 600m2.	Yes		I don't know, increase height limits on suburban blocks.	Yes	Yes	Allow all residences to constuct a front fence, given the explosion in pet numbers over recent decades this would be useful, and child safety.	100	There is too much green space in older suburbs, and too many unused playgrounds. We want quality not quality.	OK	Don't be too prescriptive, excessive planning rules slow down building and increase costs.	Yes, I'd like to downsize and stay in my current neighbourhood			You promised to get rid of stamp duty, do it! This is one of the largest impediments to people moving, changing the planning laws can only get you so far.
Yes	No	Parking will be a very biel issue	No	This could work providing there is adequate parking provided off the street and all townhouses going into peoples backyards are single storey so it doesn't invade the neighbours privacy. Also things like smoking should be addressed as nobody wants there backyard being invaded by horrible cizarette smoke.	No	parking needs to be a major consideration, nobody wants clogged up streets	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.	No it should be single storey allowed in backyards only	Yes		60	Depends if they guidelines are actually followed, one household can have many cars that needs to be taken into account.	It doesn't		No, I don't want to / I currently live in a detached house			
Yes	No	Too many people moving in without appropriate infrastructure set up. The Barr government is continually reactive vice proactive. Where's the police, firefighters and ambos for the north side? How will roads handle the increased traffic? Poor planning.	No	Mate, poor civil planning and debt have been the hallmark of the Barr government for over two decades. Stop being a reactive government and start being proactive. Your public servants at a higher level are also really good at sweeping stuff under the rug so it doesn't hit the news. Unfortunately, the public then believes that all's good. It's ok to make mistakes. Acknowledge them and tell us what your plan is to fix them. Northside needs police, firefighters and ambos. Also, the Cavalry Public Hospital hostile takeover was really quite disturbing. Not cool.	No	See above. Work on your infrastructure before cramming more people into a small space just to increase tax revenue.	Not well. You're just looking for a way to cram more people into a small space to generate tax revenue to try and fix the incredible debt you've generated with the light rail.	No. I've got solar and have watched the amount that the ACT government is giving as a rebate/purchase of excess electricity gone down quite a lot. Also, if taller housing gets built around my house, the folks who live in these places will be able to see right in my backyard. Again, not cool.	No	As above. No privacy for me.	0	No. There's hardly enough parking as is. And when are you going to mow the government strip?	I don't think it does.	No. Work on bettering the civil infrastructure before cramming more people into a small area just to increase tax revenue to pay for the light rail.	No, I don't want to / I currently live in a detached house			Do better, Barr government. You keep cramming people into small spaces without investigating in civil infrastructure. Where are our police, firefighters and ambos? Let's not get started on teachers. Ok', let's get started. No matter how much money you offer to pay ACT public school teachers, the endemic issues are still there. You're asking your current teachers to do too much with too little. What about the majority of kids who aren't causing issues having to stop their learning due to a disruptive student. There seems to be no consequences for the disruptive student other than, It's ok, little Johnny.?! Seriously, do better.
Yes	No	not interested	No	hopefully will help.	Yes		Yes	Yes	Yes	Do require more off street parking	90	No. Off street carparking is important for blocks with multiple dwellings. there needs to be a requirement to include parking in the designs.	Not enough better to have off street parking	Yes	No, I don't want to / I currently live in a detached house			Off street parking needs to be included

No	Yes			Very well	Yes		Very well	Yes	Yes		100	Yes	I think it is good	Yes	Yes, I'm looking for an affordable home in an established suburb			I think it's great
Yes	Yes		No	I think this is a fantastic change. My husband and I live on a dual occupancy block in an RZ1 zone in Downer - the block was subdivided during a period when this was allowed prior to our ownership. We would not have been able to afford such a well located house if it wasn't for the subdivision. Even more beneficial, my brother and his family live in the other house in the dual occupancy (he also purchased it). This would not be possible without the subdivision. This type of housing in well located areas is enormously beneficial.	Yes		It seems fine to me. Retains the benefits of the old, while allowing more density to slowly build up.	Yes. Both are important.	Yes		100	Yes. I think it makes sense to deal with this on a case by case basis. Not every house needs a minimum level of parking, particularly if the houses are built in well located suburbs near public transport.	Very well.		I already live in this type of home			Please don't water down the changes. Housing is a fundamental human need. The Missing Middle is a vital reform that will allow people to find homes.
No	Yes			I think it's great, I'm really glad to these changes effectively allowing for the diversification of the housing supply.					Yes		100	Yes			Yes, I'm looking for an affordable home in an established suburb			This addresses physical spaces, but I also think occupancy agreements need to be addressed. Student accommodation is poor because ACT occupancy agreements give students no rights, driving more students into the private market that would otherwise be happy to live on campus. The ANU has high vacancy rates, particularly amongst the UniLodge buildings. You can free up supply and lower demand by making student accommodation more attractive. This means habitable conditions with temperature management (insulation, quality heating, AC) and exterior windows, appropriate response times to maintenance issues, and important facilities/amenities like ovens in self catered spaces.
Yes	No	Housing in this town is profit driven and very expensive. I'd be surprised if your proposed changes makes housing more affordable. As a younger generation, we aren't living better than the previous generation; they're simply profiting from increased price	No	I think the language you use of ''more diversity' and '' housing choice' is misleading. It's code for bad housing options at more cost. In the past the housing dream was a standalone house on a quarter acre block. That's long gone thanks to poor planning and previous Howard govt housing and tax policy changes. The housing in gungahlin and molonglo is an example of what housing looks like according to your proposal. And that's a terrible lifestyle you're offering future generations. Houses in Taylor for example are so close you can stand at your back door and literally touch the back fence. There is zero room for a decent yard even with just one tree, and there is no on-site visitor parking spaces. But please tell me what wonderful reliable public transport gets me to Taylor'; there are none, so you have to drive. But there's somewhere to safely park, not even on the	No	Block consolidation in other cities has shown neighbours sell up together to make more money. All to the detriment of those left behind, when a developer throws up townhouses or apartments.	I really don't know, but I have zero trust the local council truly cares about the impact of these height and scale changes. I challenge the act chief architect to live ling-term in a 'athouse'ßh Taylor where you live on top of your neighbours and have nowhere for visitors to park. And then let me know what they think of this type of terrible planning';	I live in a complex of four townhouses and there are adjoining walls from the neighbours that act as a property line. My solar access as a result is terrible. I get terrible glare from the neighbours roof and their solar panels, which I can literally touch from my back deck. There is literally nowhere to plant any trees in my backyard! But that's considered 'athousing choice and diversity'ßWhat a joke';	No	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.		The council needs to stop thinking that more people will catch public transport. So please do not reduce car parking spaces; it's a terrible terrible mistake and will only limit people's ability to get around town. Fewer parking spots would be okay if there was a decent train network that spread out to all the suburbs like in Sydney or Melbourne. A toy tram is okay for those that live on the tram corridor; otherwise it's pointless for the rest of us. I previously caught the bus, when I could take a direct bus from work to home. With the new tram, my direct bus route was removed; I was subsequently forced to take a ''bus-tram-bus' route that added 40+ minutes to my one-way commute. As a result, I bought a second car and completely stopped using public transport. I work 12 hr days, so now I can get home in	I live in Nicholls where the streets are terribly narrow. Near the primary schools people park on whatmore court on both sides of a narrow road, making it dangerous and near impossible to get through. People park over footpaths and on verges and even on roundabouts. The garbage truck can't even get through and has changed his schedule to avoid collection during school hours. So many parents drop their children at school these days and they park all over the place; regularly I've had people park in front of my driveway- completely blocking my access to leave. Their excuse? They just had to do drop off and there was nowhere else to park'; which is incorrect. They just don't want to walk. So if you force more street parking, you will cause more stress and more road rage and more arguments between residents and drivers. But thanks so much for that'; building social	I have nothing further to add here.	No, for another reason	I hate living so close to others, there is no privacy and people are terribly inconsiderate about noise, parking and access.	Stop squishing people in where they don't want to be. Canberra was a planned city, so don't ruin it because it's the easy answer. If the chief architect or chief minister want to live in Melbourne then go live there. But leave Canberra and its garden city design alone. I truly wish people who want to ruin this place would just go away'; However I suspect you won't. So when I retire, I will simply leave Canberra. It used to be such a nice city that was well designed and maintained. It's no longer a place I'm proud of. It's just getting worse on so many fronts, and your middle housing reforms will only make it worse. It will become another uninspiring and boring cookie-cutter design and social cohesion will continue to fall apart.
Yes	No	We don't need more density in existing beautiful suburbs	No	It is a terrible ideal to cram more houses on existing blocks, reduces the outlook from existing homes windows and therefore makes it more unpleasant to live there. Our inner south suburbs should remain as per the original Canberra architecture intended.	No	Bad idea overall	I don't think we need this reform	No	No	To congested		No	Poorly	No	No, I don't want to / I currently live in a detached house			
Yes	No	It would keep a lid on prices, which makes housing a less appealing investment. But the lower prices are the point and should be pursued, regardless of investor sentiment.	No	More options will help to create the right homes for each family or individual. These changes should be pursued vigorously.								Parking minimums for residents should be abolished. Residents should have to prove they have somewhere to park their car, as occurs in Japan.						
Yes	Yes		No	Very well	Yes		Very well	Yes	Yes		90	Yes	Very well	Yes	No, I don't want to / I currently live in a detached house			It is critical to made this happen ASAP Availability of affordable housing will likely become a competitive inter city issue. Canberra is in a good position to take advantage of this in order to draw talented people and their families to move away from places like Sydney to our region.
Yes	No		No	I'm concerned about equitable rental rates and rental conditions which works for both renters and landlords in our tougher than usual times. What can be done to enable landlords to make it worth it, but so renters have reasonable minimum conditions. Complex but needs urgent discussion							90						

Yes	No	This is a terrible idea that will destroy the character of multiple established suburbs, devaluate real estate value and move the goal post for people who worked all their life to afford to buy a house and your plan will effectively devaluate their estate	No	It will not. This will only allow government officials to receive more bribes from real estate developers for the approvals required. These changes will result in a massive increase in corruption.	No			No	No		10	No	No	No. The whole idea is pretty bad	No, for another reason			
Yes	Yes		No	I think the proposed changes are an excellent step towards allowing for more diversity in housing and housing choice. I would love to see the adopted in full.	Yes		I support the draft guidance's changes to allow densification. I support reasonable considerations for local character and appropriate transitions to adjacent homes but I would be disappointed if these provisions are used to block good densification.	Yes	No	The design guide should encourage the design of homes that rely on solar access at the front and rear of lots so that side setbacks can be eliminated in favour of more row houses.	100	I support reducing parking requirements in conjunction with improving alternatives to driving (active transport and public transport).	I strongly support locating garages and carports away from frontages where possible to create more engaging streets.	I strongly support the missing middle housing design guide and would like to see it implemented in full. I believe it will enable necessary densification in Canberra. This is a great step towards combating urban sprawl, creating better outcomes for the environment and creating a more vibrant and financially sustainable city.	I already live in this type of home			I strongly support these reforms. Please don't water them down.
Yes	Yes		Maybe	It is important to increase high quality density in older areas with big blocks and excellent greens space access. Looking for a property to downsize to at the moment. So much of this sounds good unsure why the existing high and medium density housing was allowed to be so bad - unbelievable that bedrooms without external access, views or natural ventilation, terribly small balconies and car parks, poor orientation. Dont want to downsize to a "2-3 bed" townhouse/unit where 1-2 beds are effectively storerooms. Car parking. Understand few car trips are a priority for ACT govt but as an older person who uses all forms of transport and have many disabled friends it's getting very frustrating. Every home with two bedrooms or				Yes, please keep this. We live in an new energy efficient house and it is important to energy use, vegegation and home food production, mental health.				100	No - pls see my earlier response. Really sorry but as a Green/ALP voter interested in ageing and social policy generally housing really needs private car park spacing, even if its their own bit of driveway. Careworkers, relatives and tradies need to park. Our community buckles where only single car parking is provided for multi occupancy homes. Onstreet is not magic answer for everyone. Need private driveways or garages. Dont care (much) about looking at garages now I finally have one. Garages are for people (not cars). We can access warmly and safely, whether we are young or old or vulnerable . We can charge our cars, we can store safely our bikes, scooters, sporting and recreation gear, garden/food production gear, baby gear, items being shared with neighbours and community and hobby gear.			Yes, I'd like to downsize and stay in my current neighbourhood			1) pls pls help working on parking. Imagine all the occupations we need and have, all the reasons to access a home and all the lifecycle and employment options and needs a homes occupants might have. The tests in newer suburbs are not going very well. Homes with one parking do not sell well, especially if no onstreet. More disadvantaged households situations will be worse if the teens cant get into construction, trades or careworkforce or older/pwd cant get support visiting. 2) I both live and have rented in the leafier areas of Campbell and I say that tri housing should not just be corner blocks. Why should richer people on huge blocks in the dress cicles of our swankier suburbs (often over 1000) not have to live next to three tasteful dwellings. Bring it on I say. More people can access urban recreation and
Yes	Yes		No	A good start. There is already a pressing need for affordable, single-level, lift-serviced dwellings near shopping/service centres, and the proposed changes will in time increase this pressure.	Yes		OK	Yes	Yes		100	Most people living in the envisaged circumstances would trade-off private green space for more on-site parking.	Excessively so.		I already live in this type of home			The policy should not erode future options for higher rise developments close to shopping centers.
Yes	Yes		No	I think the proposed changes do a great job at allowing for more diversity in housing which leads to greater housing choice.											Yes, I'm looking for an affordable home in an established suburb			I think the proposed changes will play an important role in addressing the current housing crisis, by allowing a larger number of homes to be built in the vicinity of existing infrastructure, at more affordable prices. It will have such a positive, real impact on Canberra's families. This initiative will also help to future-proof our lovely city, so today's young people can access affordable homes in the future. There is a real demand in Canberra for missing middle housing, which I would personally like to buy in the next year or 2.
Yes	Yes		No					In the push for more uptake of sustainable solar power, it is vital that access to roof top sunlight is maintained.			50	2 car spaces per residence are needed, otherwise streets will be unnavigable.			No, for another reason		Only if single storey houses are provided. 2 storey townhouses are no use to older people downsizing. We will continue to stay in our family homes that could be occupied by new families. At the moment have nowhere to go except retirement villages nowhere	Who do you think will live in these developments? You have to provide age suitable houses for older people so that families with children can occupy the houses we have now. We're not going to move into multi level townhouses.
No	Yes		Maybe	Very well	Yes		Well	Yes	Yes		100	Yes	Well	Yes	Yes, I'm looking for an affordable home in an established suburb			
Yes	Yes		No	I think the proposed changes are great to allow for more diversity. In particular they will open the possibility for more affordable options in inner-city suburbs with higher amenity. I'd like to see a range of housing options permitted across Canberra and this is a step towards that.	Yes			I don't think solar access is something that requires much government regulation - it's generally apparent when people are making a purchase or renting decision, so to some extent the market can figure this one out. I wouldn't want requirements for solar access to be an impediment to improving housing outcomes, although I do think that cutting off someone's existing solar access is an externality that should be considered.				I support relaxing car parking minimums. This will make it cheaper to build more housing. Households that don't want or need multiple car parks should not be forced to pay for more car parking than they require. This seems an area where the market can amply figure it out.	I think it does a pretty good job.		I already live in this type of home			We should make it easier for people to build more housing.

Yes	Yes		No	I do not think that this will allow for more diversity in choice unless there are mandated figures (percentage overall) for numbers of bedrooms per unit. Without some form of mandate for bedroom size, developers will just maximise profits by squeezing in as many 1 bedroom units as possible. There should be a requirement for missing middle housing to prioritise 3/3.5 or 4 bedroom options. There also needs to be mandates for accessibility (internal lifts etc) so that terraces/duplexes are accessible for people looking to downsize their family homes.	No	There needs to be specification on number of bedrooms per dwelling to ensure housing that meets family needs is provided. Otherwise developers will maximise number of dwellings through building studios/1 bedroom units which doesn't actually diversify supp	It seems fine. Some aspect of local streets Cape needs to be considered. for example in a R2 zone where everything is 1 storey a 3 storey apartment might not fit with the streetscape. There needs to be consideration of what each specific location will support.	Not without mandates to bedrooms per dwelling for these homes. I'm happy to trade my privacy for 3 or 4 bedroom terraces that are affordable. But not for 1 bedroom units which don't help with diversity of supply.				This depends where the development is proposed. For example our local streets are narrow and would not allow for street parking. In these areas 2 parks per 3 or 4 bedroom dwellings are required. A blanket mandate without consideration of local infrastructure doesn't work.			No, I don't want to / I currently live in a detached house			You need to ensure that other impacts are considered. For example - expansion of local schools to support inceased population. This needs to be done before schools are over capacity. There are primary and high schools in the inner north that are over capacity or have very aged infrastructure.
Yes	No	Lack of necessary infrastructure	No	The schools and shops in my area are already full to bursting. Build and extend the schools BEFORE putting in the new housing. Put in the traffic lights that will be needed. Develop a new community hub that will not become a Gungahlin traffic nightmare and build around that.														
Yes	No	This would significantly increase noise, reduce privacy (houses are already very close together) and squeeze car parks even tighter	No	Not at all	No	As above	Not at all	Not at all.	No		10	Not at all	Not at all		No, I don't want to / I currently live in a detached house			
No	Yes		No	This looks to be a long overdue move in the right direction. My situation: I have been living, on my own, in ACT Public Housing apartments since 2012. I have been employed on non-ongoing as APS 6 since 2015 and permanent since 2019. Yet despite this regular good income I haven't been able afgord to buy my own "secure shelter" as I would be the only source of income. I do not want a "family home" with lots of rooms (including bathrooms). All I want is a small "affordable" place, preferably one bedroom townhouse or low-rise apartment that is comfortable to spend time in (current place is not this, I'm there at night yet can't abide spending any time in it's dank claustrophobic confines during the day). I have been looking for a place for the last few years yet have only just recently managed to save the 20% required for a	Yes		Have not explored this. I see little reason it shouldn't get this right.	Still to early to determine. Also this question bundles to much into it. Right-sized is a separate question entirely to solar access and privacy. Right-size also is very much dependent on what the price (allI included) will be for a given size. I would very much like to see the properties proposed mapped across to expect minimum income leveal of occupant(s), as this is the ACT APS pay grades would be a resonable self adjusting guideline. Single person occupant place should assume single income in both saving to buy and paying cost offer this.		40	Will get back to you on this.	Will get back to you on this.	TBC	Yes, for another reason	Not fussy		Still to early to determine. Also this question bundles to much into it. Right-sized is a separate question entirely to solar access and privacy. Right-size also is very much dependent on what the price (allI included) will be for a given size. I would very much like to see the properties proposed mapped across to expect minimum income leveal of occupant(s), as this is the ACT APS pay grades would be a resonable self adjusting guideline. Single person occupant place should assume single income in both saving to buy and paying cost offer this.
Yes	No	I would want to buy into an established, stable area. These changes take away stability.	No	I wonder whether it will just end up that developers are trying to shove as many properties onto a piece of land that they can to increase short term profit. Adding to this would be a government getting more land tax in the long term.	No	This should be restricted to particular areas in canberra. Say woden to Belconnen where people are looking and expecting more inner city living.	This seems appropriate.	Only being able to have two storeys and enough distance to enable people to keep their northern aspect and access to solar is important.	Yes	I liked that breeze, northern sun and solar were demonstrated in a diagram. People's view also should be considered.		No. The parking was of great concern to me. Our public transport is such that every resident needs a car. On our street that equates to 29 cars on our small cul-de-sac. We all accommodate our cars on our blocks. This would not be possible within the proposed plan.	It will be ugly. I have been in areas where everyone is parking on the street. It is not safe for pedestrians, visibility or community relationships.	There seems to be clear guidance but I'm not sure it fits into our suburb. Our suburb is green, clean, limited traffic and has a variety of homes from units, small, medium and large homes. Some blocks have been divided into two but in general this is not suitable. Our suburb is a closely held one because it is such a lovely place to live. I don't see how adding residents to our suburb enhances our lifestyle.	No, I don't want to / I currently live in a detached house			I would like to see a commitment to infrastructure to support infilling. How will this affect traffic, schools, roads, etc? People come to Canberra for work but decide to stay for the work life balance. We don't want to lose this.
Yes	Yes		Mavbe	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.	Yes		Not sure	Yes	Yes	Set backs are excessive in the ACT, a lot of wasted land which is bad for the environment. Consider reducing these.	100	All extra developments should provide sufficient off street parking i.e. two spots per extra dwelling off street to remove pressure on the on street parking.	Moderately well, but I think it should prioritise parking over retaining huge nature strips.	Yes	No, I don't want to / I currently live in a detached house			I am looking to the future where we will likely need add an additional dwelling to our family home to help our three children have somewhere to live independently from us.
Yes	No	I am in a duplex now so no need to change	No	it looks like it would make more diversity possible.														my main concerns are regulation of the developers and builders. The regulations currently do not always achieve well built buildings. Cutting corners seems possible and then avoidance of responsibility by declaring bankruptcy has been known. Sub-contractors also need better protection from developers and builders who are slow to pay or avoid paying bills. Lack of appropriate cashflow severely impacts on these smaller contractors. More innovation needs to be supported by government in styles and environmental sustainability in buildings. Encourage installation of car charging sites in multi-occupancy buildings.
Yes	Yes		Yes	I would like for my 800 meter corner block to be turned into townhouse or something like that. It would be great if the policies and law allowed that.	No	Na	Na	Na	No	Na	100	Yes	Great	Na	Yes, I'd like to downsize and stay in my current neighbourhood			

Yes	Yes		Yes	As someone that has lived abroad in Vancouver/Seattle that are limited in land development oppportunities. Their missing middle housing policy has made great improvements to both Cities. I think this is a great way forward for Canberra and look forward to returning home to also see this first hand.	Yes		I think the scale and height proposed is great. In some cases the middle height buildings could be even taller 4 to 6 storeys depending on the zoning/area.	I think the balance proposed for solar access is good. I think there is also more opportunities to enable solar access and privacy in the development process.	Yes		100	I think the policy is good but there is also more opportunities here. Especially if the government allows for shared care solutions or more bike centric developments.	I think car transport options are pretty good in the guide. But allowing for other transport opportunities could be better such as better integration with bus network or car share solutions.	I think the draft is a great starting point.	Yes, I'm looking for an affordable home in an established suburb			I really hope the missing middle housing reform comes to life. As someone that was born and raised in Canberra and has hopes of accessing more housing options (i.e. A townhouse) and raising a family in more established suburb this policy will facilitate this.
Yes	Yes		Yes	Partially. I think we'll need other measures to direct development to community needs and not just the financial benefit of current land owners.	Yes		Well enough	Yes	Yes		100	Yes	Very well	Yes	Yes, I'm looking for an affordable home in an established suburb			No
No	Yes		No	I support the changes to allow more housing density. It is important that ACAT and objections are not allowed to be weaponised by disgruntled neighbours and neighbourhood associations who fight to prevent any development. The changes should include additional protections to prevent these anti development abuses of the appeals system.	Yes		`Local character' should not be used as an excuse to stop additional housing stock being developed.	The ACT Government should first and foremost focus on expanding housing stock above aesthetics and petty neighbour complaints	Yes		100	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						
Yes	No	They are not directly relevant to me as I am not planning to change my housing. However I would like to make a comment.	No	I think overall the changes are reasonable to allow for greater diversity of housing types.				I am definitely concerned that solar access and privacy are at risk from these type of developments. I am even more concerned that tree coverage, bush coverage, and space for flora and fauna will be reduced and not offset in any way. Many older Canberra homes, especially in my suburb, are home to native trees and associated wildlife. How are they being considered?			80	I think it is extremely important to allow adequate parking on site. Parking for each resident plus a few visitors. Allowing housing without parking on site is a mistake.		My main point would like to make is to consider the needs of older people who may like to downsize from their free standing homes on large blocks. Downsizing is considered an execellent outcome, freeing up home and space for others and allowing older people to free some money to find their retirement. However if all the mid sized homes are two or three story, older people will not buy them! Older downsizers do not want a tiny apartment in a multi story tower, nor do they want a townhouse where they are tied to using stairs. They want age friendly medium sized homes on a single level. This could be single level townhouses/duplexes with a small yard or courtyard (ideal) or for some people, spacious apartments with decent sized living areas. When i see new suburbs built with rows and rows of 2 and 3			
Yes	No	There doesn't seem enough single level townhouses available or planned.We have looked for a separate title single level townhouse to enable us to downsize but there are few to choose from.	No	I think there is diversity of choice but at the moment there seem to be more 2 storey townhouses than single level and I hope this will change with this new plan.											Yes, I'm looking for an affordable home in an established suburb			As I've already indicated, my partner and I looked to downsize but there are few quality single level townhouses and we have decided to stay where we are. However as the population ages, more single level townhouses will be required so please include more in the new plan.
Yes	No	Concerned that almost no reference to adaptable, accessible housing, or SDA. This is such a big part of "missing middle". We need to ensure that members of our community with accessibility needs (ageing, disability) can stay in their community !	No															
No	Yes			I agree, but i am unsure if this can be led by apartment companies, that are likely more interested in high density, rather than suburban development	Yes		Yes	Yes	Yes		90	Yes		Yes	Yes, I'm looking for an affordable home in an established suburb			
No	Yes		No	Very well	Yes		I agree with the guide	I think well	Yes		100	I think so	Well	Nothing missing	Yes, I'm looking for an affordable home in an established suburb			I support the reform
Yes	No	Erosion of building regulations mean new builds are often poor quality	No	I think the proposed changes mean there will be more undesirable housing built in the ACT. Poor quality builds without appropriate supporting infrastructure	No	"Prioritising pedestrian movement and reducing the reliance on vehicles ... encourage active transportation." Canberra is freezing in winter and hot in summer and it's SPREAD OUT. Just plan for decent public transport FFS	It encourages appropriate building height and scale, but will it be enforced? What will stop developers from making neighbouring homes unliveable?	"Orient primary outlook and provide visual connections to street frontages, rear gardens..." No.	No			Absolutely not	It's ridiculous. Canberrans are tired of suburbs that have become non-navigable parking lots. "Typically allow for one on-street car parking space to be available in front of each development." Canberra no longer has reliable public transport, as much as you would like it to happen, people aren't walking for 2 hours in -2 degree weather to get to work. People will need cars until the ACT gov't gives us our busses back ... Which is not going to haopen.		No, for another reason	As mentioned previously, new builds in Canberra are woeful		
Yes	Yes		No	Good start but more work needed to reduce the friction, delays and difficulty of paperwork like development approvals.	Yes		I would like there to be fewer restrictions actually.	Yes	Yes		100	yes, more parking on the street is a small price to pay for better and more affordable housing.	ok	The guidelines are confusing to me, but I'm not a designer.	Yes, for another reason	I'm currently in high density apartment living, can see the appeal of middle density but probably won't move.		A good step forward, but much more is needed to allow Canberra to grow and progress as a city.
No	Yes														Yes, I'm looking for an affordable home in an established suburb			
No	No	I live in a retirement village so the proposed reforms won't directly affect me. Also, as I live where I do, I don't 'own' my home but I can live where I do until I leave the house either through death or extreme old age.	No	I think the proposed changes will enhance choice for citizens as well as make housing more affordable and accessible in areas closer to existing infrastructure while also limiting urban sprawl.	Yes		I think the draft guidelines are very clear and very comprehensive. As a retiree with no building experience I found the guidelines very clear. The guidelines for height and scale were clear, as were the guidelines for parking and road/street access.	Yes I think you have, especially for Canberra where access to winter sun is so important (and appeared to be lacking in previous developments).	Yes		100	It appears that you have, just so long as developers don't fudge the rules.	It appears clear so long as developers don't make up their own rules as they build and that adequate sanctions and rectifications are in place for those developers who do flout the rules	Yes as far as I can see	I already live in this type of home			I support the government's proposals as I think we need to increase our urban infill to reduce urban sprawl and provide more housing options closer to existing infrastructure.

Yes	No	why would they?	No	They seem to provide for diversity - though the relaxed onsite carparking requirements will be detrimental to our streetscapes	No	there should be a no opinion option for this question - otherwise your data will be invalid	Regardless of what the design guide encouragesm the tech specs do not encourage it at all - increasing the building envelope heights, decreasing the side setback and effectively disabling the solar fence are inappropriate for standard blocks. These new provisions should only be applied to the internal boundaries of consolidated blocks.	NO - increasing the building envelope heights and effectively disabling the solar fence are inappropriate for standard blocks. These new provisions should only be applied to the internal boundaries of consolidated blocks.	No	these are best case examples, not worst case examples	90	No - most homes are 2 vehicle minimum homes, even a couple living in a 1 bedroom apartment are likely to be a two vehicle household. It is wishful thinking, thinking that this will change in the majority of the RZ1 suburbs that these developments will be built in.	no opinion	It's only guidance, it's the technical specifications that need strengthening	Yes. for another reason	Only if it is well designed with sufficent ammenity.		PLEASE REVIEW THE POSSIBLE IMPLEMENTATION OF THE TECH SPECS IN RELATION TO CORNER BLOCKS. The potential negative impacts on the neighbours of these blocks are unacceptable.
Yes	Yes		Maybe	The proposed changes seem appropriate to enable greater housing density and choice.	Yes		The draft guide looks comprehensive to encourage sensitive built form design. "Operable windows" needs more definition. Too many new buildings have big windows and sliding doors but no small windows. Small windows that can be safely left open for natural fresh-air ventilation need to be installed in all living rooms and bedrooms - it is impractical to leave big doors open, which then means the occupants are forced to use air-conditioning, driving up energy consumption and bills. For instance, Figure 85 on p89 shows a whole wall of glass doors opened up - this looks spectacular and might be great if you're entertaining on a summer evening, but hopeless for 98% of daily living. Provide stronger minimums for ceiling heights, ie push up the minimum height. It is widely understood that higher ceilings make a small room feel more	Solar access is super important for comfort, energy efficiency, and climate resilience. This needs to be really strongly encouraged. I see so many homes still being built with poor solar orientation eg bedrooms on the north side with living rooms on the south side, or lots of west-facing windows (our house overlooks a duplex that was built just a few years ago with a very disappointing orientation and gas appliances). Living rooms must be on the north side, even if this means a non-typical floor plan. Deciduously shaded (or adjustable built shading structures) outdoor space is also vital - a sunny spot in winter, shaded in summer makes a substantial contribution to the livability of a small home, such as the ability to dry laundry in the sun, allow pets and children to play outside. I see a lot of apartments with deep boxy	Yes		100	Public transport needs to be more frequent to encourage residents (and visitors) to own fewer cars.	Seems reasonable, as long as public transport services increase to support reduced car ownership.	The draft guide looks good, with plenty of pictures to help people understand how MMH will fit into their suburb.	Yes, I'd like to downsize and stay in my current neighbourhood			Climate resilience, architectic utilities and use of recycled building materials could be given more prominence - it feels a little bit tacked on at the end of the guide. There should be a stronger requirement to include solar power and battery installation (or at least suitable roof design and utility space for them) for all dwellings ** EV ready is a "must", so should solar power and battery be. Requiring incorporation of recycled materials is vital to minimising construction waste and driving a circular economy. This seems particularly relevant given that the implementation of the MMH reforms is entirely dependent on knocking down a significant number of existing dwellings ** those materials cannot be allowed to be dumped in landfill, yet I see demolition of old homes where all sorts of materials are smashed together and dumped in big skips.
Yes	Yes		No	They are adequate, bit I think you need to limit the idea, that a whole street could become 3 story apartments in the RZ2 section, it disadavantages anyone who still wants to live there.	Yes		I think the limit should be jsu three stories - no attic.	This seems OK, the 45 degrees is hard to quantify.	No	I accept it should be OK, does it change the fence building requirements or lack thereof.	70	They are not OK, the parking provisions should require that on street parking be available 24x7 or spaces be made available. Many streets are not suitable for on-street parking, in which case more parking needs to be provided in the development.	Not good at all, a street littered with cars, boats, trailers loos poor. Different streets may need parking restrictions, and different parking requirements.	No coment	Yes, I'm looking for an affordable home in an established suburb			No
Yes	No	The proposed changes will only ruin the garden city character and heritage of the ACT.	No	Theyban t. Density in housing should be in group centres, town centres and local centres. Further density should be considered on major avenues and thoroughfares. As an example, there are areas in group centres which are only allowing 5-8 storeys of development. This height should be increased. There is no reason why group centres can't be developed in the same way town centres are. Therefore infrastructure will be easier and more cost affective to implement. There is no indication or assessment of traffic and infrastructure issues that these changes may impact in established suburbs. Why would battleaxes living be any more diverse than living in a townhouse? This is poor planning, and if ACT Government wish to maintain a	No	Again, there is no appreciation of maintaining the garden city concept, nor heritage values where applicable. i.e. nearby	Not well at all, for the reasons previously mentioned around density in established suburbs.	No.	No	There needs to be greater setbacks and building separation, however, our view is it should not occur at all.	0	Visitor parking should occur within the development. The streets are already overloaded. This is demonstrated by as an example, the streets surrounding the Kingston Group Centre, which are now single lane to allow parking.	It doesn't. Landscape is paramount to support the garden city concept.	No. The maintenance of the garden city concept is missing i.e. more landscaping, greenspace.	No. for another reason			If should be abandoned, and the focus should be on town centres, group centres, city centre and local centres high density development.
Yes	No	I don't believe in investing in residential property, it should only be for people to live in. I hope they get rid of negative gearing so more people can be owner occupiers	No	We need more higher density housing more service and public transport hubs, and less single dwellings, to provide affordable housing where services are available	Yes		Not really my area, but we should look at the Nightingale model which has worked so well in Victoria	We should also look at bipv, which enables facade mounted pvs,which also extends the generation period for solar PV now that solar PV panels are so cheap	No	Not my area so no comment		Should also look at space for car sharing schemes, like pop car spaces in town,to give people options other than car ownership	Not my area	Not my area but we should look at the Nightingale Model from Victoria	I already live in this type of home			We should look at the Nightingale Model from Victoria, it is won many awards and particularly helps support more vulnerable groups.
Yes	Yes		No	I think potentially it is good but I think there is also a danger that traditional houses with backyards big enough for pets and kids will be in danger as investors buy up older homes and sub-divide them	No	Suggestions are not rules, will these actually be followed? What about visitor parking if multiple of the sub-divided dwellings want visitors on the same day? Or more than one person has a car?	It encourages it but there should be included mandatory landscaping requirements so the new builds aren't just large blocks of concrete					No, if there are now multiple dwellings on one block it's ridiculous to expect visitors to park on the street. It will disrupt the rest of the residents and block traffic especially if the streets are narrow already			I already live in this type of home			
No	Yes		Yes															
Yes	Yes		Maybe	It will help young single people or even starting families to have a property that is not too small or too big for them and at the same time affordable.	Yes		It describes well the plan for different zones and even the proposed height of a building in a certain zones. Also, the land size proposed for co housing is good.	Yes, it's good to have a plan where plants or trees are included so it doesn't look like all building structure around the neighbourhood. Having plants around a house can make it more feel like a home.	Yes		80	Yes.	There were choices depending on the land where houses will be built so that is good.	Yes.	I already live in this type of home			
Yes	No	Will just make the population denser. Canberra will lose its originality. Unclear to me how existing schools are going to cope with increased population in the area. Are they going to be extended/enlarged?	No	Not well, I am against it.	No										No, I don't want to / I currently live in a detached house			
No	Yes		No	More house supply hope make prices affordable for first-home buyers.	Yes		Good	Yes			50	yes		Yes	Yes, I'm looking for an affordable home in an established suburb			Please implement this as soon as possible.
Yes	No	Will block access to sunlight and cause loss of privacy	No	Not well, new housing should fit the character of the suburb	No	Loss of trees and sunlight will contribute to adverse climate outcomes	Not well, out of proportion to the suburb in scale and height	Not well, Will block access to sunlight and cause loss of solar access and privacy	No	Reduced setbacks and building separation to out of character with the suburb and will lead to loss of dolar access and privacy the suburb		No, loss of parking from reduced parking requirements will provide negative outcomes for the populace	No, loss of parking from reduced parking requirements will provide negative outcomes for the populace	No, the emphasis appears to be on reducing requirements for strong neighbourhoods	No, I don't want to / I currently live in a detached house			

Yes	No	Another exercise in smoke and mirrors by politicians	No	Just trying to jam more people into area where the road network and other infrastructure is from the 1950s and cannot take anymore expansion on these systems. The roads choke as it is, services are swamped. So really an exercise in government seeking more land tax and rates rather than effective town planning and infrastructure change to support population and car increases.	No		Streets with single story houses, should not have a towering double story dual dwelling monstrosity put up next to it. Tell me it does not change a streetscape and I will laugh you out of town. And really, well one block now becomes two lots of rates and land tax. Money grab, not problem solving.	Nope, soon if this whacky plan goes ahead, single story dwellings will not catch sun in their solar for the trees and the buildings	No	People jammed on top of each other		Roads are 1950s infrastructure, so no parking as it is as most modern families now have two cars on streets whereby historically families had either no family car or one family car was the norm.	Piss poor	Nope, how about the rest of the support infrastructure	No, I don't want to / I currently live in a detached house			Could not stand the idea of some asshole living on my backdoor or on-top of me. Let alone if it was some drugged out ACT social housing recipient who sole existence is drugs and crime to support their drugs. Lets increase the size of ACT borders, build infrastructure that supports population growth, stop cluttering inner city suburbs with people and vehicles beyond what was their once socially acceptable limit. As for public housing, all outer suburb only, and stop sticking all the filthy smack heads together in one building block in the city and inner north. All they bring is social unrest, crime and drugs. At least have house ACT place people so they dont gather to cause unrest.
Yes	Yes		No	Good in theory. Retaining a suburb's character including setbacks and tree canopy are critical. The key question is how the ACT Government enforces these standards with developers (who will seek to maximise built footprint) in the planning and building stage, noting that developers may change their plans once they have approval. Maintaining limits on building height are sound too.	No	The text uses soft words (avoid, minimise). Risk is developers creatively interpreting guidelines to maximise build space that impinges on neighbouring properties. No set back or tree coverage standards?	Seems OK to me.	I think so. The question is how these standards will be enforced.	No	As above, ca 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.	100	No. Locating visitor car parking on "low use residential streets" will soon turn those streets into high-use and clogged streets if there is significant infill development. Need off site visitor parking that can be repurposed later on as innovative transport options become available.	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.	In addition to what I have said above, what is the Government proposing to do about compliance and lifting the quality of construction? E	No, for another reason		I would like to remain living in Curtin. But i would not live in any newly constructed home because of poor building standards.	Nothing extra.
Yes	No	Lack of privacy noise	No	not at all	No	In fill is a big problem	Anything for profit. No consideration for privacy and peaceful living.	Not at all	No	Not at all	0	Not at all	Not at all	The ACT Government has a history of allowing people to circumvent laws regarding property usage and poor design. Nothing will be done to stop badly designed housing.	No, I don't want to / I currently live in a detached house			There is plenty of land in the ACT without infilling suburbs and creating slums. It could be okay if it is restricted to Red Hill and Forest.
Yes	No	The growth in multi-dwelling housing in Canberra has meant that, as someone who is looking for a single-story family home on a reasonable block, we are being priced out of the market in favour of developers looking to demolish and built 2-4 townhouses.	No	The changes would increase diversity, but that doesnt make it a good thing. One of the attractions of Canberra used to be affordable housing for families, and the ease of getting around. As you push more housing into the existing suburbs you increase congestion, house prices and reduce the appeal of Canberra as a whole.	Yes		It depends on how do you define "appropriate".	This is one of the key issues to introducing "missing middle housing" is that houses become packed in and we lose the green space that is so appealing to suburban living.	Yes	The descriptions are clear, but I'd argue the outcomes are not "good design"	80	No. The roads/streets are already congested without pushing more parked cars onto them. Doing so creates safety hazards for people moving around, especially children.	If you want better parking whilst maximising space, then push for underground parking. Look at the typical houses that were build on a sloping block 50yrs ago, and they had a garage on the lower level and living space above.	Yes, the guidance is clear but the outcomes are not ideal for Canberra	No, I don't want to / I currently live in a detached house			
Yes	Yes		No						No	The guide enforces a distinction between side and rear setbacks that isn't as flexible as it should be. The guide should encourage good design outcomes even where these depart from convention, to maximise solar access and private green spaces	100		More use of permeable driveway and parking surfaces should be encouraged. I am concened about the flood risk and environmental impact (heat, polluting runoff) of densification increasing percentage of hard surfaces		I already live in this type of home			My complex, Silver Gums on Collings Street Pearce, is a good example of townhouses with generous private space. It is working for different ages and family types, and is very popular with residents. I am concerned about the provision of amenities for denser housing. Our complex is close to Melrose Drive and previously enjoyed excellent bus service with stops directly adjacent. With changes to bus routes, we are now more than 900m from even the nearest local route, well outside of the policy settings. Thought should be out into how the siting of denser residential properties can be done in a way that fosters and secures accessibility, and promotes 15 minute neighbourhoods. Policy settings should consider neighbourhood context and guarantee local amenities
Yes	Yes		No								100				Yes, I'd like to downsize and stay in my current neighbourhood			Need more single story small houses with small garden for old people like me.
No	No	I like the existing layout and density of the suburb.	No	I think it increases diversity for a very small market at the cost of other people. Suburbs like ours are too far from major city centre for it to really be worth increasing the density. We live our here because we want the suburb life, the space for gardens and veggie patches, for fruit trees and a view. Building in the missing middle houses would take away some of those opportunities and fixing instead dwellings just big enough for a family just too far away from city centers with just not enough actual space for a family to grow.	No	It doesn't necessarily account for all the impacts redevelopment could and would have on surroundings dwellings.		No	No		10		Not very well	No. It doesn't account for keeping the distinctives of a neighborhood and adding to it rather than changing it	No, I don't want to / I currently live in a detached house			
Yes	Yes		Maybe	I've been disheartened with downsizing due to prices of body corporate fees. I would consider a townhouse where it has level access when I'm older and provide a level of safety as a single aged person.	Yes			Solar access and privacy is not always achievable on the older blocks. It may require mediation measures and definitely promote sustainable energy if possible, bit not enforced if it's unaffordable for the elderly downsizers	Yes		90	Add parking spaces to the roads			Yes, I'd like to downsize and stay in my current neighbourhood			
Yes	No	Not relevant	No	You are missing the point. Demand control is required			No change is the only appropriate option	No			0	No	Not well		No, I don't want to / I currently live in a detached house			Since when did demand become a four letter word?

No	No	There is an abundance of open grass lands that could be developed into housing	No		No							The problem will become aparent, when the roads are blocked do to parked cars everywhere.			No, I don't want to / I currently live in a detached house			
No	Yes		No	I think the re-zoning of suburban areas is long overdue and positive step forward. Canberra is a car dependent/centric city and ongoing urban sprawl is not without significant cost to future generations.	Yes		It seems to be okay.	Solar access is nice but only for true north orientation. East, west and south block boundaries should not be so restrictive.	Yes	Historically, suburban block set backs and envelopes were designed for quarter acre blocks but lead to expensive and inefficient outcomes on smaller blocks.	100	A car park should not be part of the gross floor area in low rise residential buildings. It severely limits design options and return on investment. Remember, small scale taxpaying builders are under tremendous financial pressure to build houses these days. Internal habitable floor area is much more valuable than a car space. Parking should be encouraged on less valuable and otherwise under utilised land like the front set back and median strip between roads and homes.	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?	The proposed policy on tree canopy and garden space is vague. Land is very tight. For urban infill to succeed, first the taxpayer must be incentivised to re-develop their land without onerous restrictions. Return on investment for building homes is already at all time lows - don't make it worse.	Yes, I'd like to downsize and stay in my current neighbourhood			Incentivise small mom and dad developers to increase Canberra's supply of new homes by speeding up development approvals. Reduce land tax and stamp duties. Reduce building and development compliance and costs. Stop micro managing everything and let the local taxpayers and businesses do what they do best.
Yes	Yes		Maybe	I support this project to build more middle housing in Canberra. I am a single young working professional and would like to make Canberra home in the long term. However there are very few options for me, that is, only apartment in high rise buildings or older buildings. I don't mind living in high rise apartment buildings but there are just too many built and being built. In Belconnen, there are construction sites everywhere building high rise apartment buildings with more than 20 storeys. There are several DAs approved and being assessed, it feels depressing when thinking about living in my own home where I cannot see anything but other people's lounge room. Woden is in a bad situation now and it's sad to see Belconnen is becoming the second Woden. If there is no option but apartment in high rise apartment buildings or older buildings for single young	Yes		very well	yes	Yes		50	yes	very well	yes	Yes, I'm looking for an affordable home in an established suburb			I support this project, which will provide more housing options. There are just too many high rise apartment buildings built and being built, it is not sustainable and it is not good for mental health and long term development.
Yes	No	I personally want to buy a home with some land (a decent backyard for my kids and pets to play). I feel we should hang on to our larger blocks, especially in South Canberra. I feel adding more houses will cause traffic issues, social issues, lack of thin	No	I think the additional dwellings will wreck neighborhoods, attract lower-socio economic families into established neighborhoods which will in turn increase crime rates (vandalism, drugs, etc), increase domestic disputes, increase air pollution (if wood fires are allowed), put pressure on infrastructure and busy networks	No			No				No			No, I don't want to / I currently live in a detached house			I think areas of the ACT that have apartments, close dwellings, etc look ugly.
Yes	No	I'm not keen to become a landlord	No	I think we need more townhouses and this allows for it.	Yes		Seems okay	Yes	Yes		60	Probably not. 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.	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. Bon Scott in Moncrieff is an example of how terrible it can be when single dweller households are the only consideration.	I think there's a lot of buzzwords about community and infrastructure and not real connection. Is the education department going to be advised and provided with plans to accept increased numbers? Are shops going to be able to meet increased capacity? Moncrieff was supposed to get shops. Gisalang was a nightmare for shops and keeping the school open and that suburb is prime for this kind of development.	No, I don't want to / I currently live in a detached house			I like it, I think it's needed. How you sell it to people and not get swamped by developers being greedy and cutting corners, I don't know. Moncrieff has been going for about 8 years and the houses here have issues you wouldn't expect in a house under 30. Poor construction, poor building approvals, dodgy builders. That stuff still hasn't been fixed.
Yes	Yes		Yes	Fully support them if it means cheaper housing for young Australians who wish to enter the housing market.	Yes		Very well. Infact make housing denser where there is walking distance access to the light rail.	Yes	Yes		100	Yes	It is adequate	Yes	I already live in this type of home			No
Yes			No	open green outdoor spaces and opportunities to live with Nature are vital. Builders always go concrete from fence to house, then hard roof and drive for the rest of the build. Water tanks are OK but the water isn't managed well. ALL the landscape would ideally be set up using Waterharvest techniques integrating storage in the landscape that roots can grow into. There are many landscapes with this infrastructure set up in the region, that have been working systems for decades. Also mini community gardens, social spaces/communal BBQs seats etc are preferable													
Yes	No	The proposed changes will not address the key issue: affordability	No	Very poor proposed chanegs.	No		Very poor.	No	No			No	Very poor.	No	No, I don't want to / I currently live in a detached house			The reforms are a solution looking for a problem. The real problem is affordability, which requires massive increase in housing numbers (which can't be achieved through 'missing middle' infill). We need thousands of homes and we need them quickly!
Yes	Yes		Yes	The new housing density can provide more options for people live in Canberra and also can buy cheaper property in a more convenient location.	Yes		The height and scale is reasonable to accommodate the needs for resident.		Yes		70				Yes, I'm looking for an affordable home in an established suburb			

Yes	Yes		No	The allowed size of houses are excessively large. New homes have almost no outdoor space, leading to increased childhood inactivity and obesity and developmental delays (gross motor etc). I specialise in this area. The ideas are good however the 'aecharacter 'ce is not currently observed. Heritage and older style homes are bulldozed to build massive monstrosities that do not sit well with the other homes in the area. Not enough single level disability and aged friendly housing with a courtyard and outdoor space. Older people would move into smaller (well designed- currently totally unavailable as builders and architects who have no idea design them. Many don't even have a linen cupboard, any kitchen storage. More extremely badly designed tiny boxes are not what the city needs or wants which is why so	No	Cost is prohibitive	Ok in principle but bad design and too many tiny rooms in properties. Instead larger living anes, less bedrooms and bathrooms that unnecessary. A three way bathroom can be used by a whole family. Ridiculous small useless rooms sold as a study, bigger rooms and less of them make more sense. Ugly box like structures made to poor standards, with flat leaky roofs, unsuitable for the environment without eves for sun protection in summer. not well built or double glazed or sealed makes EER a joke as the air rushes in around the doors and windows.	Overshadowing and houses poorly placed on block lack of setbacks from each fence has become a major problem in the suburbs. The rules were thrown out in favour of bigger monstrosities, all with 5 bathrooms and a cinema room and 6 car garage. Totally unacceptable for solar rights of neighbours.	No	Too close , ACT government removed the 1.5m from each boundary years ago to the city's detriment	0	Two, or one car park is all that is needed, parking pass like in other major cities so residents can park unlimited time on roads is desperately needed.	No room for trees on many of the existing plans and over use and footprint of buildings does not all enough outdoor space.	More well designed homes, almost non existent with current architects unable to make anything resembling good design. Not enough single level wide entry homes for disabled and elderly. You all need to watch the progam on design on the ABC that Malcolm Turnbull talks about this.	Yes, I'm looking for an affordable home in an established suburb			Community spaces for veggie garden play, walking etc essential in every suburb, multiple may be necessary.
No	No	More and cheapersnd and more houses. No one wants to live in a box	No	Atrocious. More land and homes with yards less migrants and a change of government	No				No			No no no not enough parking at Curtin			No, I don't want to / I currently live in a detached house			
Yes	Yes			With overlade. Canberra has been ruined by the developers. High rise blocks, constant construction going on everywhere and unsuitable/limited housing options. We have been looking for a smaller abode as we need to downsize and free up money to live on. Our options are limited. We would like a freestanding single level townhouse, preferable without body corporate fees. ideally near shops so we can walk and not have to drive. But the Government has not been building such townhouses. We do not want to live in a high rise. The townhouses that are built near shops are 2 storey with steps. And expensive. For us to downsize we would not free up any money and end up in housing that is too cramped. We cannot afford to pay expensive body corporate fees. The proposal to put 3 abodes on a single block is ridiculous. We									We need several single level free standing townhouses with a small courtyard. Preferable with low or no body corporate fees. Good design is important. There is often no storage in townhouses. Don't build up close to the road due to the noise issue. Privacy is important too. Often the traffic on busy roads can see straight into ground floor apartments or townhouses. Perhaps these could be angled to improve orientation and privacy	Yes, I'm looking for an affordable home in an established suburb			We bought our block of land in 1977 and established our garden over the decades. We now need to downsize as we cannot afford to remain here (the cost of maintenance and other factors). We would like a single level townhouse or a smaller house in an established suburb. We do not want to move to a new area that is raw without an established garden (been there,done that). We would like to live near some shops so we can walk rather than drive. Current developments near shops are mostly 2 storey and too expensive (eg. Chifley). I am tired of the lack of variety in housing in Canberra. We have looked for years at housing options. Nothing but slick grey, black and white apartments. Apartment blocks look like office blocks. We need more of a village feel. Housing needs to have some "character". If residents living on large blocks would like to remain
Yes	Yes		No	The emphasis on landscape and urban context is welcome. The design guide should encourage greater diversity of well-designed built form.	Yes		This matter is well handled	There is a good balance	Yes		80	I live in a 1980s townhouse complex which does not cater well for the increased vehicle density of the 21st century, let alone the increased size of individual vehicles. The guide needs to acknowledge that vehicle density is unlikely to decrease in the medium term.	As above, the guide needs to acknowledge increasing size and density of vehicles.	The ACT produced a good range of missing middle housing in the 20th century. The guide is a useful re-orientation away from the false dichotomy of detached single housing vs apartments. A brochure-style summary of the design guide would be a useful tool for architects, developers, real estate agents and house buyers. A series of short videos would also be useful for social media.	I already live in this type of home			Good design is critical to the success of the missing middle reforms. A missing middle award presented by the ACT Government as part of the ACT Architecture Awards would be a useful way of highlighting achievements in this housing category. I also propose the introduction of a missing middle design review panel, chaired by the Government Architect, to oversee the implementation of the reforms for at least a ten year period.
Yes	No	One house is plenty, and mine suits my circumstances. It was rare though, and others should be able to benefit from similar housing.	No		Yes		I think this is fine.		Yes		90	I don't think so, I feel there should be more parking. As background I live in an area of 2 story duplex blocks with land sizes under 300m^2, and the lack of parking is the largest downside of the area. Remember to take into account that with these smaller block sizes (and plenty of driveways) there is very little parking space on the side of the road, which makes having parking spaces on people's blocks much more important than it is in other areas. I feel the width and busyness of the road also comes into play (my road is narrow). Cars parked on narrow roads or very busy roads can be problematic. I'd be ok with less parking on streets with quiet wide straight roads (wide enough for cars parked on both sides to not block traffic).	I don't think masses of cars parked by the side of the road are a pleasant landscape. Having more car spots would help move them out of sight. But this isn't a big factor.		I already live in this type of home			I feel there is also an opportunity to place missing middle house on new land, rather than wait for existing houses to be demolished and replaced. In Ainslie there are a number of low use green spaces. These are characterised with uneven ground (not suitable for sport or even games of frisbee), grass (often long) and with a few trees. I'd recommend using some fraction of these as locations for houses, while keeping and upgrading the remainder. Examples are: * Fisher Place (put houses on the North and South sides, keep the scout hall, improve the west side and center with play equipment, seats/tables/bbq, flat grass and more trees (along the road) & maintain walkways through the area). * Sutter reserve

Yes	No	Happy with current home and its amenity. Do not want to live closer to others.	Maybe	Generally happy. Removal of minimum block sizes is a major improvement in densification.	Yes		Seems a readable document. The requirements are prescriptively over the top. I see the $$ signs mounting up as each requirement in the document emerges. It may achieve infill but not affordably. I don't expect a redevelopment would be cost effective.					50	No!! You will generate ghettos of streets filled with cars with these approaches to reducing parking available. (I speak from current experience in our relatively low density neighbourhood but with limited street parking.) Perhaps you can reduce current parking if the location is IMMEDIATELY adjacent to tram services but elsewhere it is a fiction that materially less car parking is needed for families.	No - see comments above. It is all but impossible in most non-town centre suburbs in Canberra to run most households with nil / only one car.	No. Speaking from experience your planners will consider these "good design" documents as locked in stone, and generate impractical / expensive design constraints.	No, I don't want to / I currently live in a detached house			Requirements to abolish existing gas connections?? Why?? Requirements for analysis of embodied carbon etc.... ?? The architects will have a field day in fees to meet all these requirements / analyses, and the DA approval times will extend out proportionally. Based on other ACT govt consultations I expect that none of these comments will be taken seriously and these drafts will all go through for approval without any material alteration - but I tried....
Yes	Yes		Yes	I think the proposed changes address the housing situation in Canberra sensibly and will make a positive impact on the liveability of the city.	Yes		I think the guide is good but is not clear how the concepts will be applied to existing residence who don't have the luxury of planning from the start. How will they be treated. Will there be some scope for existing properties that may meet most but not all the requirements exactly to still convert to unit title etc. The focus is on new builds but there is so much housing that could be opened up through existing situations. I don't think this is addressed much.	Im not an expert here	Yes			100	yes	currently cars park on nature strips all the time even though they arent supposed to but there is a need so formalising this only makes sense.	It does, my concern again is some flexibility for existing properties that may struggle to meet all on the new design requirements.	I already live in this type of home			I already live in a housing mission type situation that we hope t convert to unit title. My concern is will exisiting properties have to meet all the requirements or will meeting most of them be enough to convert. I fear many existing opportunities will be lost if there is not some flexibility provided in these circumstances. For example I have ben told that the current policy does not allow me to convert to unit title because our second dwelling is 123m square which is just 3 square metres over the new limit. This does not seem to take into account that our block size is well over the 800 sqm as it is over 1200sqm which cleanly is very large and can easily take into account the 3sqm that the second property is over. We dont have the luxury of planning from scratch to meet the requirements, but are so close it seems ridiculous to exclude us. I worry this will be the case
No	Yes		No	Very well.	Yes			Build community batteries!! Please! It doesn't make sense that we still pay energy companies despite feeding excess energy into them.	Yes	Community Batteries		50	Have parking spaces with shades that can have solar panels on them. And attach charging stations to the parking spaces.	Have parking spaces with shades that can have solar panels on them. And attach charging stations to the parking spaces.	Just please build well-insulated homes. Every home is so cold.	Yes, I'm looking for an affordable home in an established suburb			Please build community batteries and train builders to insulate homes well.
No	Yes		Maybe	A modern city should have diverse choices, while respecting the needs of residents amenity, access to walkways, parkland and community facilities.	Yes		I believe the design parameters for smooth transitions using the step-down approach addresses typical scenarios.	Some sites would require modelling, for overshadowing of community spaces, with consideration to insulation. (Access to daylight throughout the day)	Yes			80	As many households have muliple occupants who own motor vehicles, there should be secure undercover, with some underground parking provision for this wholly within the site, including long stay and overnight visitor parking via permit. Short stay Visitor Parking on side streets adjacent should have time limit system in place. We know residents parking on streets restricts access to waste & garbage collections.	Parking underground would be preferable, allowing greater amenity and green spaces. No electric vehicle charging in underground areas, due to inherent, well documented fire risks for such vehicles.	I would add a semi-permanent Popup at University of Canberra School of Design and the Built Environment and at other major educational campuses, including TAFE. Additional Student Accommodation within campuses could be an ideal model and alleviate pressure on the surrounding suburbs.	Yes, I'd like to downsize and stay in my current neighbourhood			Encourage people to use the feedback forms and reply to the "whataboutism" type Facebook comments. Placing the Formlink at the beginning of social media posts, rather than the end, might have an uptick in engagement. ðŸ¤” The Document Library with the proposed amendments should be highlighted and each link included in a TL:DR version for social media.
No	Yes		Maybe	Excellent if the prices can remain low for first home buyers. These medium density housing should receive priority in having permits granted. Building restrictions should be more flexible. Maybe current townhouses should be allowed to build extensions even if they are in a body corporate complex.	Yes				Yes	The less setbacks required the better. Front yards are not functional if they aren't fenced off.		100	On street parking should increase in areas where missing middle homes occur.		Yes. The less we restrict, the more we allow creativity.	Yes, I'm looking for an affordable home in an established suburb			I urge more land around the centre of Canberra, such as areas in Symonston, around Mitchell, between Canberra and Queanbeyan, to be developed with middle housing. There are a lot of underdeveloped land in the centre of Canberra.
No	No	They're not suitable home options	No	It's going to drive prices up more	No		.	.	Yes			0	No People have multiple cars per household, more if they have teenagers	It's fine for that		No, I don't want to / I currently live in a detached house			
Yes	No	nervous that you buy a home and then its value decreases because 4 townhouses are crammed in next to you. You invest in a home and then there is no security that investment is protected.	No	this is a disaster waiting. this isn't diversity - this is just letting developers' pocket at the expense of communities and the environment. we'll be left with a compromised environment, traffic issues, noise/light pollution and the developer that profit of it will be long gone.	No	the only ppl this benefits is developers.	this is pathetic. a poor attempt to 'try' and preserve character. This is purely removing red tape to allow developers to profit off every inch of yard.	no. Have you truly considered what it is going to be like for families when children are playing in their backyard and six x 2 storey townhouses are looking down on them? our the noise pollution that comes have up to 12 families instead of 3 on your boundary?	No	this is manipulating setbacks to cram people in and create slums		0	no. 'some visitor parking may occur on local streets' is not a solution. there are already problems with safety impact to street landscaping and trees. quite suburban streets already look like car parks and this is only going to make it worse. all residences should have a minimum of 2 car park OFF street.	it is not a 'pleasant street scape', at all. All housing/unit should be built having a mandatory 2 car space. the congestion on streets is a safety hazard. How do you propose to protect street trees and access when there are cars all over the place. its one thing to create a computer generated landscape but reality is it wont work. drive down streets in crace where you have to navigate not hitting cars on both sides of the street. the reality is if two ppl live in a unit/townhouse/house there will be 2 cars	no this will happen to people. developers will do as they please and the existing residence access to this stupid document of not will have it happen to them.	No, I don't want to / I currently live in a detached house			this is ridiculous - why have zoning areas at all? yet another brain fart that act residences will pay for. If the ACT govt is serious about making housing accessible and affordable you should address issue with delays in approvals and reducing the burden of increase costs associated with mandatory adoption of the national building code. Look at the current housing stock and the added cost and obstacles associated implementing this and the impossible loop holes the govt has introduced. The hypocrisy to introduce this policy and push environmental policy for tree canopy, urban water and solar. What about the cost to the environment from increased noise pollution, light, traffic, urban runoff/recharge. This stupid scheme should come with compulsory

Yes	Yes		Maybe	With the population growing rapidly in Canberra, I think providing flexibility to homeowners to redesign their houses and construct a second home or townhouses would be beneficial for both the homeowners and future tenants. Canberra land size is small compared to other states and therefore spaces should be use efficiently with causing too much impact on the environment as well	Yes		It does covers all aspects	Yes	Yes		60	Yes	Yes	Yes	I already live in this type of home			
Yes	No	They rely on strata and developers to act in accordance with consumer best interest. One is not at all regulated and the other is demonstrably often not acting in consumers best interest.	No	They do not accomodate growing families. The proposed housing is often 1-2 bedroom, which are often on small footprints, or tiny three bedrooms apartments/townhouses to at are absurdly priced. Not a realistic offering for young growing families. All the while actual housing is too expensive or remote.	No				No	They do not require the extra space to be translated into spaces which benefit the communities involved. It just means developers will squeeze an extra dwelling in. It also takes away from public space.	0	No. Parking is a nightmare in most neighbourhoods already and the proposed changes do not account for growing or maturing families.		Growing family considerations and public space considerations. Also additional safe walkways through neighbourhoods. Public waste is also not mentioned.	No, for another reason		See comments about problems with strata and developers.	You have to regulate strata if you are going to push for this type of housing. Developers also must be held accountable for the quality and finish of builds alongside builders to secure consumer outcomes. Otherwise you are just driving a whole generation into housing that will cost them thousands in the long run
Yes	Yes		Maybe	Changes are a positive and necessary step.	Yes		Seems good.	I think so.	Yes		100	Yes - support reduction in car parking requirements.	Seems good. I would encourage additional focus on enforcing parking rules where neighbourhoods have higher densities. Parking on the street is great, need to avoid illegal parking on nature strips, etc.	Looks great.	Yes, I'm looking for an affordable home in an established suburb			
Yes	No		No	I object to destroying existing suburbs in order to satisfy a housing shortage that was caused by all Governments in Australia, yours included. The family block with its own house and yard is the home I grew up with. Seeing the clusters of houses built on top of each other is justified by the lack of housing but it is just a way for developers, etc., to make more money. I have a Town Planning and Engineering qualifications and I can see you are destroying Canberra.	No	The premis that this plan is based on is invalid. The existing suburbs should not be touched for monetary gain.	Again, you are building up to enable more housing on a block destroying the existing suburbs. Suburbs such as Watson do not have roads that can take the present traffic and the housing was never designed for more than a one car family. Things have changed and no Green dream is going to change people wanting their own transport. This increase in housing will drastically increase traffic and parking.	Well when my neighbor built another story I never got an notice until it as completed. As a result we miss the morning sun. I don't trust your plans.			30	You are kidding! It is a mess now, how will families meet these restrictions once the children want their own vehicles. It is no good planning for something that will never happen.	As above.	The plan is designed to get the outcome you want - not what people who live in the areas want.	No, for another reason	As my comments above	Typical Green dream.
Yes	No	Will increase the density of existing suburbs whileThe infrastructure remains the same (roads, schools, parking lots)	No					No. That is another problem with this proposal. My and my neighbours house are of the same style, built same year, same height. I don't want to have a 2 storey townhouse next to me							No, I don't want to / I currently live in a detached house			
Yes	No	I don't have budget	Yes	We need more short stay accommodation														
Yes	No	Risk of buying a detached house that in the future has apartments, triplex, etc next door.	No	It does allow more choice.	No	This encourages developers to build large blocks of apartments which are not suitable for a suburban environment: shading, too much traffic on suburban streets, inadequate onsite parking.	Not well. Such buildings should be allowed on suburban streets.	No, there is nothing that can be done about shading and over looking if a three story or taller building is allowed. Such buildings must not be allowed in suburbs.	No	It is clear the aim is to allow the maximum percentage of the block to be covered by building.	90	No. Consider this scenario: an existing detached house is replaced with two townhouses which are each inhabited by families with driving age children. Suddenly parking for 8 cars has to be found. Our streets will become clogged with parked cars limiting access for emergency vehicles, garbage trucks, etc.	Poorly.	No amount of guidance on good design outcomes will avoid the reduction in amenity, quality of life and convenience suffered by those living in the few remaining detached houses.	No, I don't want to / I currently live in a detached house			If the proposal is implemented it will become virtually impossible for families to buy a detached house as every detached house that comes up for sale will be bought by developers or builders (who have unlimited funds compared to ordinary people) to replace it with townhouses or apartments.
Yes	No	Because Canberra is already too overcrowded, there is no proper traffic management, and the new subdivided houses will be overpriced anyway	No	It is irrelevant, as the ACT Government is going to do it regardless of public opposition. Had governments in Australia started planning for the doubling of the population in Australia between 1970 and 2025 in 1970, this knee-jerk reaction to fixing the issue would not be necessary.	No	Building standards in the ACT are well below satisfactory.	It has not occurred so far, when the ACT Government has inflicted high rise onto residents in Belconnen, why would this next stage be any different?	No, one of my relatives lives in one of the new, sterile, Mc Mansion suburbs in another city. Even for stand-alone large houses, built on tiny blocks, there is little privacy. From my relative's home, I can see into at least two other properties, when no one wants to be able to see into their neighbour's house. There are few trees, which will take years to grow anyway. More and more trees and green space is being lost by the ACT Government's obsession with medium to high density. Where are the studies about the effect of forcing people to live cheek-by-jowl on top of each other? Of course, the psychological, physical and emotional toll of being forced to live like rats is never mentioned or considered by ACT bureaucrats or politicians.	Yes		50	Absolutely not. Public transport is set up to suit the union, not the needs of passengers (note that it is offensive to refer to passengers as customers). People are forced to drive just about anywhere in Canberra, the roads are far too narrow, many allow allow one over-sized abomination four-wheel drive along the carriageway, while the car coming on the other direction has to pull into any space to allow them to pass.	It does not.	No, inflicting medium to high density housing on Australians to fix the lack of social, town and infrastructure planning over the last 40 years is not the answer.	No, I don't want to / I currently live in a detached house			No, the ACT Government is providing this survey to say it has consulted. They have already decided to do it.

No	Yes		No	The proposed changes encourage a greater profit margin for developers, not for residents of this city. Drive through any new suburb and the blocks are already NOT large enough for genuine liveability. Gutters are one gust of wind away from touching and most yards are not large enough for children to play in, yet new suburbs are being built sans ovals so there are less opportunities for children older than 10 to play outside and be encouraged to play sports because their city is too concerned with squeezing as much profit out of an area as possible.	No	You are, again, aiming to reduce easements and restrictions on the amount of a block that can not be developed.	This is an interesting proposal, there should have been height restrictions (that the government didn't roll over for developers on) throughout the entire city. 6-8 Storeys absolute maximum in town centre areas (Woden, Civic, Belconnen, Greenway, Gungahlin, etc.), we should not be trying to compete with Sydney purely based on ill advised attempts at drawing in younger residents to the city. We live in a currently threatened picturesque valley, that does not actually require high rises! Placelogic have gotten away with turning it into their own version of a home brand, discounted, New York. Our city planners should be researching both major and smaller scaled European cities that have been made liveable, walkable, and environmentally conscious.	There is no way to functionally integrate both mid-rise developments and single dwelling properties on the same city block without compromising on either privacy or solar access. If they are built it should be closer to the developmental layout in Kingston where there are streets for single dwelling and streets for mid-rise developments. I implore you to research the effects on privacy, solar access, parking availability, and issues with waste removal on Owen Crescent Lyneham where a huge block of flats was built that blocks out all sun to any properties behind it. As well as Dooring Street in Dickson facing the exact same issues due to large scale building in an inappropriate spot, all due to our government being too blinded by the thought of money from developers to say no!	Yes	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.	0	No. No matter how the government/placelogic/developers skewed that survey it is based maybe upon people's preference and not what they actually do. Drive through, Wright, Dickson, Lyneham, Kingston, Holt, Taylor, or any other suburb where developers were allowed to put visitor parking on the street and you will struggle to actually drive through the street let alone find a park. PARKING SHOULD BE PROVIDED ON THE LAND YOU ARE USING, IF YOU CANNOT FIT BOTH THEN THE BUILDING IS TOO LARGE.	Not at all.	You have yet to address any problems that come with these developments, government housing flats , excess waste and furniture dumped, parking issues, large imposing street frontage (exacerbated by relaxing easement laws), limiting solar access and privacy for neighbours and the street alike.	No, for another reason		I want a liveable home to raise a family in with a yard.	
Yes	No	Does nothing to reduce administrative burden	Maybe	The proposed changes are all about form and design but do nothing to reduce the burden and excessive administrative processes in place. It should be possible to build a "tiny" house in your backyard with a 3 page form and a few attachments and no further DA/BA requirements. Maybe some pre-approved designs could be made available? Same for a small renovation that adds a secondary dwelling by adding to and reconfiguring an existing one. Obviously a pre-sheet and final inspection should be required, but any more than that is unnecessary red tape.	Yes		Very vague, will be exploited to maximise height.	Yes it seems sensible.	Yes	The main problem is that the front set back has been too large for too long and existing dwellings are too far back on blocks to allow for additional dwellings to be added without demolition.	60	Garages onsite will always be filled with junk and people will park on the street. In some of the newer suburbs with skinny streets this will be a nightmare. The older suburbs there may be enough space for on street parking.	Not well, Existing street width and on-street parking capacity should factor into onsite parking requirements.	Too many details to the point where the main goal has been drowned.	No, I don't want to / I currently live in a detached house			Again I will reiterate, your biggest problem is excessive administrative requirements for building in general. There should be a "simplified" BA process for smaller projects, that does not require pages of drawings and forms. This will reduce the costs of housing in general as well as provide for these middle houses.
Yes	Yes		Yes		Yes												I already live in this type of home			Fully support and agree the canopy and character of these suburbs is paramount. I believe my own property is a good example of what can be achieved (although I would need to make some hardscaping and landscaping changes to allow for the parking requirements). Please see my attached submission.
Yes	Yes		No	They seem to encourage more flexibility, which would enable more diversity and choice.														Increasing housing density is far preferable to bulldozing more land for urban sprawl.
Yes	No	I'm not looking to buy or sell	No	I think this is great and consistent with the likes of the Grattan Institute that more density is required outside of CBD's. I do think this survey design isn't great though. Due to the specific nature of your questions, only a person would considerable time would get time to complete it. Hence you will end up overweight developers and old people... both interest groups do not represent the entire community. I hope you encourage feedback from a greater section of society about the broad principles rather than specifics of plan changes, and you weight the surveys results to reflect community proportions.													See my first comment.
Yes	No	I believe the proposal will damage the unique appeal of Canberra as the "bush capital".	No	Extremely poorly.	No	There is not sufficient protection of existing amenity and enjoyment of the bush capital characteristics.	Very poorly.	No.	No	There is not sufficient protection of existing amenity and enjoyment of the bush capital characteristics.		No	Extremely poorly	No. It is too skewed in favour of developers and not residents.	No, I don't want to / I currently live in a detached house			There is not sufficient protection of existing amenity and enjoyment of the bush capital characteristics.
Yes	Yes		No	The proposed changes look acceptable. I appreciate that the reduced planting area is compated by an increased minimum in tree canopy cover. I believe these changes will offer more ways for young people to enter the housing market, and for older people to downsize while maintaining their place-based networks.	Yes		Seems acceptable.	I am not qualified to comment on this.	Yes		100	I am opposed to car proliferation, and live in a one-car household, however I think there might be too few spaces allotted. As it stands, Canberra is a car-centric city, and until there is a more robust rail+bus network, which could take decades, I think the number of spaces in the Draft Plan and the method for which urban spaces are counted might only lead to congested roads.	As above, I am concemed (without evidence or modelling) that the resultant behaviour will be increased numbers of cars parked on verges and in the street.	Yes. I think it is a commendable document.	No, I don't want to / I currently live in a detached house			I run a small business from my shed/workshop. If I were to sell that and remove the need for a detached workshop, then I would consider it.
No	No	Then I will just be crammed in an overpopulated suburb that doesn't have the infrastructure capacity to support a boom in population.	No	This is a bit of a leading question, of course it allows for more diversity and housing choice - but it is a bandaid solution with the potential for unintended consequences on the livability of our city. Australians are obsessed with the idea of owning a house in the suburbs, but in other countries renting is considered normal, living in apartments is normal etc etc	Yes		It seems very loose.	I don't know the answer to this.	Yes	These questions are bias. Yes they provide clear descriptions but I do not agree with them.	20	Relying on street parking is going to have so many ongoing issues - both with safety, with road maintenance, with access to bins, access to footpaths, access to bus stops, road wear and tear etc	Not very. Basement parking was a good idea though.	It adds clear guidance, I'm just not convinced its a good idea	No. for another reason		I do not want to live in a situation where the suburb I am in was not designed for the population it has. I can see the pressure on infrastructure and degradation of green space quality already negatively impacted by urban infill.	People enjoy Canberra as the "bush capital" for its green canopy, it's large blocks, access to nature and overall high standards of living. We risk overpopulating our suburbs with urban infill and then overpopulating our city when we haven't invested in the necessary infrastructure (health system, water/dams, electricity, refuse management etc).
Yes			No	Yes				Maybe not										

Yes	No	Already own our flat. If we had money to buy an investment, it would be another flat (cheaper and less maintenance) but the latest rental law changes make it less attractive (new pet rules, difficulty in terminating bad tenants- must tribunal process now).	No	Having just read up on the topic, I've changed from "not keen" to "grudgingly ok with it". Yes, the proposed changes definitely allow for more medium-density housing, simply by changing the rules.	Yes		As well as can be expected!	I read it - seems ok. When we lived in a suburban family home, we found that the trees were the largest restrictor of solar access. We had both PV (1.4kW only) and solar hot water. Privacy measures seem ok. People on ground floor dwellings will need good security measures. Every population has a percentage of people who like to help themselves to other people's stuff... and the more people within walking distance, the more burglars. You don't want to be the easiest target! Interestingly, in the suburban street we lived in for 20 years, burglary was almost non-existent, whereas in our apartment complex the storage cages are frequently broken in to, and vandalism and dumping happen.	Yes	Seems ok	50	From what I've seen (p62) it looks as good as it can be. People have to realise that when they choose medium-density living, they will be compromising the living standards they would otherwise have in a suburb and existing neighbours "nimbys" will also be affected. Street parking is almost impossible where we live (high density) - all paid and time-limited. It's hard for people from the suburbs to visit us, eg for dinner. We have one car among four drivers. That's the price paid for choosing to live in a flat.	It looks fine, it's a compromise, of course, but it looks as good as it can be.	Yes it does.	No, for another reason		We've chosen a 1br flat (3 of us in it) so we can travel in our retirement, with no maintenance. When we're too old, we might consider somethine with a small garden.	Having read about it, I've become grudgingly accepting of it. There seems to be a demand for it, and blockages to it happening, so this will free up the construction, and the proposals seem to have been thought through quite well. Houses have become expensive because people know it is the only CGT-free investment they can make (and a demand/supply mismatch) so this will help. The statement, "limited land available in the ACT" ignores the fact that people can live in Queanbeyan or Murrumbateman! By the way, why do you let people live homelessly outside shops and in parks and bus shelters? Is it legal? There was 10% unemployment in the early 1980s and people did not do that because it wasn't permitted then. Where are they urinating and defecating? And vomiting when sick? And littering? Can't you just build a
Yes	No	More people jam-packed in already small spaces and puts more pressure on infrastructure.	No	I don't think this is the solution. Higher density housing leads to social problems and puts even more pressure on underdeveloped infrastructure like roads, schools and hospitals.	Yes			Not at all, everyone living on top of each other, nowhere to play/relax/hang washing/garden. Limited parking.	No		10	No, parking is still an issue and it won't go away just because there isn't sufficient parking available. More and more cars are being targeted by thieves as well on the streets.	Not well - unrealistic		No, I don't want to / I currently live in a detached house			
Yes	No	people want a HOUSE with a yard . The ACT is huge. Developer Tuggeranong west of the town centre like it was intended.	No	Allows for diversity, but people want a HOUSE with a yard. The only reason they dont have one is the cost. You have created a market for the MISSING MIDDLE. Its not what people actually WANT.	No	people dont WANT this. They only NEED it because of supply.	Yawn.	No.	No	it just makes neighbours build closer to fences and hence closer to neighbours houses reducing privacy.	0	no	no	no. it is biased and unworkable.	No, for another reason		it would be horrible	id like to but, if you don't have anything good to say....
No	No	Not enough room for dogs in little backyards & I am not eligible for a mortgage	No	I strongly doubt the options will meet the needs of those most in need!	No	The climate, rain run off and tree growing will be hampered, what about bin collection & parking??	The climate, rain run off and tree growing will be hampered	The climate, rain run off and tree growing will be hampered,	Yes		80	NO	It doesn't, especially when you add in bin collection	nothing is more appalling than "cookie cutter" identical housing street by street - this will grow with these designs & ACT will decrease it's unique structures more and more - anyone looked at the current new buildings lately??	No, I don't want to / I currently live in a detached house			be ready for an increase in mental health needs with packing more people together - oh, that's right, there's not enough of that either!
Yes	No	I am content as I am - I do not deny that that the missing middle has a place if implemented properly	Maybe	It adequately covers the range of housing types								Guidelines need to be developed that are not prescriptive but guide for adequate car spaces on the property. Suburbs character is destroyed by not enough car space and too many cars. Many of these houses will become share houses and will have two bedrooms and two cars or three bedrooms and three cars or four beds and four cars. This is the way of Canberra and a guideline that is not prescriptive but alludes to this reality will make sense. 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.		What is missing is traffic assessment and the cumulative total of car movements that may be critical in locations ear shops - particularly if parking is not adequate. If each additional residence provides 4-6 additional car movements per day, and enough consolidation occurs particularly near shops and schools, you will be creating parking and traffic issues that will then have to be remediated by the rate payer not the developer.	No, for another reason		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.	Please make mention to have single level quality housing built for our aging population. They are a massive downsize market who I fear will be priced out by cramming as much as possible with as many levels as possible most of the time. This will be done to maximise profits for sales to families. Comment on urban consolidation using an older suburb like Curtin as an example. Most people accept that urban consolidation is inevitable. Most accept two level building but very few find three level buildings acceptable in a Canberra urban street. Three level buildings are acceptable around shopping centre zones and they should be confined to this. A single shop (the old corner store) that has never been viable is not a shopping centre zone. The suburban shops are a shopping centre zone.
Yes	Yes		Maybe	Proposed changes are very good and hopefully will bring in meaningful improvements to housing availability	Yes				Yes		100	Yes			Yes, I'm looking for an affordable home in an established suburb			https://www.youtube.com/channel/UCEIiJS2XKYeT4KzdsQGfBBw
Yes	No	too costly	Yes	All large blocks say over 900 square metres should be approved for dual occupancy.	No	too confusing need to be made simpler	its ok	All houses should have solar and battery installed	No		50	No more parking required all over the ACT	not enough parking	all houses need to have solar and batteries installed	Yes, I'm looking for an affordable home in an established suburb			
Yes	No	Street infrastructure does not support dense occupancy, Quality of life removing free personal space, on street parking is a hazard. If everyone is now parking on the street you cant even have guests to your own home, Release more land.this is not healthy	No	Sustainability and not growth. If i was to combine 2 or more block it would be to build one property. The shrinking block size and poor workmanship has made building a new home undesirable. 70 per cent of new housing within the existing urban footprint is an unrealistic expectation, only way it would be occurring is that the system fails to improve land releases forcing parents to subdivide or rip down the family home so their children have somewhere to live. bank of mum and dad does not exist in a modern landscape.	No	Sustainability and not growth. 70 per cent of new housing within the existing urban footprint destroying quality of life	Two stories and basement and i can extend level with my garage, that is a change i can support	If a car cannot drive up the side of the home the neighbour is to close, rented in Crace out of desperation and i can tell you. no natural light despite a free-standing home, i could never get the home warm without a huge bill, Building regulating and high density has failed	Yes	This needs to be applied to existing builds, I would love to utilise my property without looing my back yard	100	Driveway must accommodate full length of car without going over foot path, street parking dependant on width streets to accommodate traffic flow	well as long a property lines do not require shared usage, voice of experience it does not work	no if it is to build more homes yes if it is used to improve current block usage	No, for another reason		reduction of privacy and space	this is destroying this town. leave sydney to sydney
Yes	Yes		Yes	I think they are a vast improvement to the former plan, particularly doing away with the absurd requirement to build only a 120sqm house on an RZ2 block. I would like to see the site coverage allowed to increase to at least 50% and do away with the two for one replacement tree policy.	Yes		Increase the site coverage to allow for more dwellings to be built on smaller lots.	No, I think your privacy guidance is over-the-top. WHere older houses were ok to look into neighbour's yards, replacement homes cannot. That does not make sense.	Yes		100	No. Peaolpe have cars and will for ht eforseeable future. EVs need power. You need to have parking off street.	not at all.	Yes	Yes, I'd like to downsize and stay in my current neighbourhood			
No	Yes				Yes						70				Yes, I'm looking for an affordable home in an established suburb			

Yes	Yes		No	No high rises Dual occupancy with green space More single level dwellings	No	Too condensed	No high rises and adequate green space for dense community areas				50	There is a terrible misbalance where denser housing means more occupants and more cars parked on streets	Average	Highest to be level 3 or 4 single level access via lifts	Yes, I'd like to downsize and stay in my current neighbourhood			Please don't condense it like woden. Too many highrises there already and very little to no green spaces between them. Looking ugly
Yes	Yes		No															Can you please stop allowing the building of townhouses that go over 3+ levels. Nobody wants this type of housing. It's not accessible. More supply of this creates more issues for aging, persons with mobility and accessibility issues or anyone who doesn't want to live over four levels.
No	No	Do more land release!	Yes	Do proper houses, not shoe boxes, minimum Size should be 100sqm.	No				No						I already live in this type of home			No good for young families, too small
Yes	No	I finally own my home after a 25 year mortgage. I like the current RZ1 character and charm of Griffith as is.	No	There is no missing middle across the inner south. The census tells us this. Apartments, flats and townhouse far out number single dwellings. There is plenty of diverse housing choice in and across the inner south currently. Single dwelling houses on larger blocks are highly valued and sort after by many Canberran families which allow choice in the many private, catholic and government schools and colleges within the inner south.	No	It does not focus on neighborhood consultation, suburban character, solar access for neighbours, maintaining trees and the tree canopy or appeal rights.	It simply gives builders and developers open slather as there are no rules that must be complied with.	Their will be no trees as the trees will be removed to build mini mansions. There are no block inspections so the trees are simply removed. Solar access will be severely restricted to neighboring homes given the changes to set backs and the bulk and height of the new dwellings. Again, no rules, no inspections, no enforcement, no fines, no confidence, no trees, no sunlight.	No	This is simply removing neighbours privacy, solar access and amenity.	0	Have a drive around Griffith day or night (particularly night) and witness the excessive street and verge parking. Many streets are one way give the parking on both sides of the street. Renascence, Illume, Amaya, etc	Totally insufficient parking.	The entire concept is floored.	No, I don't want to / I currently live in a detached house			What happened to the Eastlake precinct?
No	Yes		No	The proposed changes are an excellent first step to allow more housing diversity and choice, which will flow through into improved housing affordability. The relaxation of site coverage restrictions, maximum dwellings and minimum block area requirements are great and will support the transition to more sustainable, liveable, affordably communities throughout Canberra. The proposed changes could always go further to enable more density, greater maximum density, etc. to really maximise the affect on walkable, liveable, sustainable communities with more affordable housing than these proposed changes suggest.	Yes		Well - but higher building heights and greater scales will also support more efficient use of land, more feasible developments, more customers for local businesses, more walkable and liveable communities, etc.	Solar access is important but should be more important for larger scale developments. Remember - the larger a development the more energy efficient it's likely to be anyway! So first and foremost prioritising larger developments on a given parcel of land should be the priority over 'neighbours amenity' and overshadowing. Why is 'overshadowing' a bad thing anyway - with the effects of climate change beginning to be felt, shadows help to keep buildings cool in Canberra's harsh, and lengthening, summers.	Yes	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.	100	More car parking and more housing development and incompatible with walkable, sustainable, and affordable communities. Therefore and provision of car parking on-site should be kept to a minimum (via parking maximums) and paid parking on key streets in communities. Parking permits on local streets and demand-responsive parking on key streets and side streets can also be employed to ensure the trade-offs/extemalities of parking are incorporated into their price. Bicycle parking should be maximised and proximity to public transport should be referenced in the design guide where applicable.	Car parking can't provide a pleasant landscape outcome - it produces impervious land uses which are unpleasant and damaging to our landscapes.		Yes, I'm looking for an affordable home in an established suburb			Overall, these are great reforms and should be implemented. They provide Canberrans a great first step to see what gentle density looks like, and all the benefits it provides for the long-term. The ambition of the reforms should be even more significant if these really are 'once in a generation' reforms as stated by the government website - minimising/eliminating setbacks, less concern about overshadowing, minimising car parking, maximising scale and height of lots, and maximising site coverage will all enable more feasible developments and therefore more actually built middle middle housing, and lower housing costs, among a plethora of other benefits that I have previously mentioned (environmental sustainability benefits, financial sustainability savings, safety improvements, govt. revenue gains (even more so with
Yes	Yes		Maybe	Perhaps, however not all blocks will be suitable and there needs to be some flexibility with removal of trees. Possibly a requirement to replace trees that need to be removed for a successful re development of the block. Clearly old growth eucalyptus should be ever be removed but introduced species should be allowed to be removed if needed. Some cap or restriction on appeals for objections needs to be considered as well. These appeals can't be ongoing and impede development. A fair and reasonable objection needs to be considered, assessed and ruled on promptly to allow the design to be amended or proceed. The DA process needs to be fast tracked as well. If all of the above is considered then we are well on the way to being able to efficiently redevelop and revitalize our suburbs. The only incentive that private developers have is to make a	Yes		Seems to be an acceptable solution	Yes	Yes		100	Not sure about that. I think people prefer to park vehicles on there block where possible	Unsure	Yes	Yes, I'd like to downsize and stay in my current neighbourhood			Let's make it happen ASAP. It's good to see a Labor Govt adopt a Liberal Govt policy from 30 years ago. We had urban infill under the Carnell Govt. Prices have been pushed up and land availability restricted under the ridiculous core zone policies of the past 30 years. Let's get on with it.
Yes	Yes		No	Build build build. Let's put those empty lawns to work.	Yes				Yes		100	There should be a parking spot for every bedroom in a dwelling, the cost of parking should not be socialized.			I already live in this type of home			
Yes	Yes		Maybe	More developments of townhouses and dual occupancy is crucial. It is the missing piece to making Canberra better. We want Canberra to evolve and be developed	Yes		I think this is good to increase housing, jobs and boost economy in Canberra which over the past couple years has been lacking	Yes	Yes		80	I think this is okay	I think it works well	I think it does	Yes, I'd like to downsize and stay in my current neighbourhood			
No	Yes		No	Very well			I am supportive of the plan as it stands, but think greater emphasis could be placed on increasing housing supply and density without excessive restrictions like this. Having duplexes and terraces should be allowed on all residential streets!	I am supportive of the plan as it stands, but think greater emphasis could be placed on increasing housing supply and density without excessive restrictions like this. Having duplexes and terraces should be allowed on all residential streets!			100	Could go further in allowing for more missing middle homes	Happy with this		Yes, I'm looking for an affordable home in an established suburb			Great to see the government getting out of the way and allowing market forces to increase housing density and supply (while keeping in place common sense resulation)

No	No	I believe these considerations, crush my dreams of owning a big house on a big block of land with a garden in a traditional suburb.	No	I believe this idea is frankly terrible. Canberras charm for so many years has been you can live in a nice suburb with land and have access to city living. If I wanted to live in a high density environment I would pack up and move to Shanghai, Mumbai or New York. I believe there are other options, scrap the old fashioned height restriction on buildings in civic and surrounds. This would allow for the building of tall apartment buildings in the city area. The city area is where high density living belongs. NOT IN THE SUBURBS. This proposal is also opening the doors and begging property mongrels and developers to buy up blocks of land subdivide them and rent properties or sell them for exorbitant prices to make a profit. Whilst this may be challenging, Canberra may have to engage in negotiations with NSW to expand the Territory. If you look at many maior big cities around the	No		Tall buildings belong in city centres and town centres. Not in the Suburbs, get rid of the ancient height limit in civic to enable the development of tall tall 100m plus apartment buildings instead of destroying our peaceful suburbs.	NO	No		10	There will never be enough parking, its just not possible. My street already has a parking problem, imagine adding 30 more houses on the street,NIGHTMARE. The only way to fix the parking problem is... ACTUALLY PROVIDE GOOD PUBLIC TRANSPORT OPTIONS FOR SUBURBAN AREAS. Currently public transport is only beneficial if you live by a rapid line or liehtrail.	It does not do this well.	No	No, I don't want to / I currently live in a detached house			Please don't destroy the city I love.
Yes	Yes		Yes	The plans appear to allow for greater scope in diversity.	Yes		The draft guide appears to manage this aspect well. The only challenge will be that if each development optimises for height, then they all start to look like one another. This undermines the diversity objective.	the other factor is cost. I suspect you can choose any two, but not all three (ie privacy, solar, low cost). Unless the lease variation charges are considered carefully, then trying to achieve viable yields that meet overly high (privacy and solar) standards will be hard to achieve.	Yes	Need also to give sufficient room for pragmatic and sensible design approaches that meet the desired outcomes, however that dont end up in endless ACAT challenges.	90	There is a bit of a chicken and egg here. However if public transport amenity were to impove, then many would be happy to have a lower level of car ownership. I would happily live without my car. Less car spots equals greater density equals greater social amenity and neighbourhood community. Another good outcome.	fine. as above.	a good start indeed.	Yes, for another reason	I have 5 children, who are either in the housing market, or will soon be. It is imperative broader options are available, otherwise they look to cities elsewhere to live. That is Canberras collective loss.		five reforms are a great initiative, if not long overdue' '; They make sense environmentally, socially, economically and in terms of sustainability. Please have the courage to follow these through and not water them down due to pressure from the NIMBY community groups. They have been a handbrake on innovative development for too long. In my experience they are also highly unrepresentative. A particular aspect that has been overlooked is the (sometimes) overly wide verges and nature strips in some of the older suburbs (North, south and west), There are probably many hundreds of Ha of land, that is frequently under-utilised by the adjacent resident, but not looked after by the government. The outcome is often long avenues of dehydrated soil (in
Yes	No	I'm already in a townhouse complex, which are rife in the suburbs. The Body Corporate is bad and the Unit Titles Act isn't enforced, this will become worse with more townhouses, apartments	Maybe	It will be townhouses that no one can afford. Will be great for Strata Managers but no one else.	No	Who will be able to afford to do this		We don't have enough privacy in our current complex, nothing is enforced, how will this be improved	Yes		30				No, I don't want to / I currently live in a detached house			I am eager to get out of a complex, poorly managed, terrible Strata Manager, taken 4 years to get my drainage issues fixed and still not fixed. I wouldn't want more people to live in these terrible developments and situations.
No	No	I want to be able to buy a single dwelling with enough back garden for the kids to enjoy without the risk of someone building a low-rise apartment block or multiple dwellings right next door.	No	I don't think they are necessary. In fact I think they will destroy the very fabric of our suburbs by allowing them to become souless dwellings with no green space around them. I also think the proposed changes will mean dwellings with solar panels will lose sunlight hours due to the possibility of some big construction going up next door.	No		It doesn't. It gives no right to neighbours to a low-rise apartment proposal or a multi-dwelling idea to veto the request.	No - the privacy of neighbours needs to be a far stronger consideration as does solar access.	No		0	No	They don't. The guides are weak on this point and will turn our streets into one lane thoroughfares due to the invetiable street parking of residents and visitors with no access to parking on their site.	NO! As with almost all ACT building initiatives, the developers will build cheaply and poorly.	No, I don't want to / I currently live in a detached house			I am against this initiative in the strongest possible way. I think re-zoning in a blanket approach is wrong. High and middle density housing should continue to be only permitted around each town centre and along the light rail route. I found the hypocracy of the ACT govt laughable - the new suburbs in West Belconnen should have been built or zoned to allow these reforms not most of Canberra.
No	Yes		No	So well. It is so hard for young people to purchase homes in Canberra: the changes will transforming housing accessibility and equality, and contribute to a more vibrant and economically prosperous Canberra	Yes			Yes	Yes	So well. It is so hard for young people to purchase homes in Canberra: the changes will transforming housing accessibility and equality, and contribute to a more vibrant and economically prosperous Canberra	100	Yes	Well	Yes	Yes, I'm looking for an affordable home in an established suburb			It is so hard for young people to purchase homes in Canberra: the changes will transforming housing accessibility and equality, and contribute to a more vibrant and economically prosperous Canberra
Yes	Yes		No	Very well. Particularly in addressing density, removal of land area limits should promote addition development.	Yes		Good but could go further. Understandably change is difficult and slow however emulation of the success in European cities should be considered. I.e., allowance of basements, attic etc in addition to the 2 permitted levels in residential areas. Basements in particular are low "effort" additions that would not change the character of an area but would allow for addition flexible living options!	Yes.	Yes		100	Yes, as a city grows so too does the on street parking. The real solution though is to have a better public transport system.	Adequately provides, though preference would be better public transport.	Good!	Yes, I'm looking for an affordable home in an established suburb			In our situation, it is somewhat unfortunate timing since we are looking to move into a "missing middle" home in the inner North. We may end up buying when prices are highest! Oh well. This initiative should address some of the supply demand issue that others will benefit from in the future so regardless of our immediate circumstances we are 100% in favour for the next generation of home owners.
No	Yes			I think the 2 story limit for RZ1 is too low, and blocks of three story apartments should be allowed like in RZ2 to maximise use of land.	Yes		Increased height should be allowed in order to house more people.		Yes		100	I think the amount of visitor parks should be lowered (e.g. to 1 in 8 units instead of 1 in 4) but shouldn't be 0. I think the amount of parks for each unit in the new plan is about right, and that less parks for two-bedroom units is appropriate.			Yes, I'm looking for an affordable home in an established suburb			

Yes	No		No	Diversity = overcrowding. Maybe target Forrest and Red Hill properties for apartment blocks. Some of us like a bit of privacy without living in other people's pockets.								Definitely not!	If any one bothers to look at Watson, you will see that the narrow streets are clogged with cars because not enough car spaces have been allocated. Have you ever looked at Bunnings car park in Tuggeranong? It is being used by all the units in the area. Take a look at Deakin and Garran. No parking especially for disabled. You will never get cars out of the picture, so how about dealing with the problem another way.		No, I don't want to / I currently live in a detached house			It would be better to concentrate on Social housing built by the Government and owned by the Government- not handing it over to private companies like [REDACTED] to build dog boxes and sell for maximum profit. Families don't want to live in apartment blocks and certainly can't afford to anyway.
No	Yes		Yes	Build baby build	Yes		Build build build	Who gives a [REDACTED]. Build.	Yes	Build	100	Build it.	Build.	Less plan more build.	Yes, for another reason	Build		Yes. Ahem. Build.
No	No	I think unless we address the root of the whole problem being capping negative gearing and abolishing the capital gains tax housing will never be affordable for future generations and continue to be used as an investment which is landbanked	No	I think will be all thinking about the edges and not genuine reform to address the housing crisis and the abhorrent inequality which comes with it, as mentioned above unless we're prepared to abolish capital gains tax and cap negative gearing housing is always going to be utilised as a wealth building tool and a large proporton of Australians are going to be priced out, we also need a bigger investment in public housing stock not just social housing run by NGO's to properly balance it. Because we don't manufacture a lot of the building materials within Australia anymore and rely on imports which often are flimsy dumped products posing safety hazards that is also going to contribute to further difficulties executing housing commitments as the cost of shipping is going to go up with more unstable global tension, requiring more borrowing from	Yes		For the most part it should be okay as an incentive.	I think so.	Yes		70	Depends if street signs go up and people are price gouged on parking, in a place like the ACT where PT isn't as plentiful as other bigger cities it'll force people into an uncomfortable situation corrosive to social cohersion.	Should be fine but parking fee's are going to be were the weak spot is and if they are implemented.	I think since its what the government wants for it's trajectory forward it's going to sell it as being a great initiative for the ACT, although those shortfalls mentioned above I think have the ability to undermine it's implementation.	Yes, I'm looking for an affordable home in an established suburb			A proportion of it needs to be for public housing stock, not just social and community housing run by NGO's. Otherwise it'll be the same asymetrical market problem.
Yes	No	Have more densified suburbs has no appeal	No	Housing choices are only choices when they're affordable. Otherwise it's not a choice at all. Even people who want to live on smaller blocks or live in a townhouse rarely want 2 story units or to share walls with neighbours. We should be offering more housing for single people and couples that still provides a garden for a pet, and accessibility for people (or pets) who can't manage stairs. I'd hardly call squeezing small, shared wall, two story terraces a reasonable housing option for many, especially when the cost of similar residences is upwards of 700k already. This feels more like a plan to charge more rates on the same piece of land, rather than meet the needs of Canberrans.	Yes		I don't think the height and scale transitions are appropriate.	No.	Yes	They show what you consider good.	10			I'm not sure people think it's good to go from 1 neighbour to multiple. It's also unclear why this guidance is considered 'agood'to begin with.	No, I don't want to / I currently live in a detached house			My suburb already has lots of town houses and smaller dwellings. I think there is a demand for housing that isn't a tiny, attached dwelling and a noise complaint nightmare. Let's solve housing affordability by actually investing in public housing. Let's not destroy the feel and experience of older suburbs by making them as awful as places like gungahlin. Wasting the remaining decent blocks with more high density homes that create a sensory nightmare is not the answer.
Yes	No	I want more space and less dense housing. Dual/tripple occupancy, townhouses, appartments are not an appealing situation. Canberra is no longer the bush capital with the concrete jungle of shoe box housing going up	No	They don't help at all. The older suburbs, the likes of Kambah, wanniassa, Richardson are more pleasant to travel through, visit and live in as you have space and land to have a healthy family life	No	Older/larger blocks should not be chopped up to squeeze more in. They are detrimental to a healthy neighbourhood and the loss of green space and tree coverage is a great concern	It doesn't as a new over crowded block is unsightly when you see large blocks with a single dwelling on them	No, too much focus has been placed on solar access when we need more tree coverage	No	Houses and developments are too crowded together	0	No, new developments have too narrow roads, to tightly crammed houses that cause too much congestion. Parking on the minimal current nature strips must be allowed to keep road ways clear	It doesn't	No. Middle housing is a poor idea only focused on trying generate more territory revenue with zero concern for liveable space	No, I don't want to / I currently live in a detached house			Do not go through with this plan. The capital has been destroyed enough as it is
Yes	No	The proposed changes like Var343 for the former Mr Fluffy blocks is only going to create more concrete, less trees on blocks, put pressure on parking because not everyone can use public transport.	No	It might increase diversity but not sure how the proposal helps with encouraging green space with trees lost such as those on former Mr Fluffy blocks that were cleared of all trees when duplexes were built on them. I also don't believe that this proposal will help with affordability given how expensive land is and the cost to build houses is also expensive.	No	There is no quality control now and the duplexes and apartments built now are not in keeping with the areas they are in or of dubious quality.	I doubt reality will happen according to the guide. Knock-down and rebuilds and duplexes being built now in existing suburbs are not in keeping with older houses in the area, they stand out and are too close to neighbours in some instances. I wouldn't want a double storey duplex built next to me where the neighbours can see into my backyards with no privacy.	No, see above comment regarding Mr Fluffy new builds.	Yes		40	No, visitors should not be parking on the streets. It creates hazards for pedestrians, and lowers the accessibility for those with disabilities both residents and visitors. What happens if neighbours have parties etc and take up the whole street? People already complain about workers parking in their streets to avoid having to park in Civic or Woden. This will only the situation worse. What happens if households have more than one car.	It will make for pleasant landscaping but totally impractical in reality.	Yes	I already live in this type of home		No.
Yes	Yes		Yes	The proposed changes to the Territory Plan and draft design guide have strong potential to significantly improve housing diversity and choice, particularly in RZ1 and RZ2 residential zones.	Yes		The draft Missing Middle Housing Design Guide and the proposed amendments to the Territory Plan offer a clear framework for managing transitions in building height and scale, especially between new medium-density housing and existing low-density homes.		Yes		70	Yes	It supports the guide provided well	Yes	Yes, I'm looking for an affordable home in an established suburb			
Yes	No	These homes detract from Canberra's character and the common 1/4 acre blocks. Urban densification is absolutely needed, however it needs to be in the correct places with consideration for traffic and parking. ACTs model of placing 4-5 houses at csac not w	No									Absolutely not. Stop building townhouses at the end of culdesacs and instead consider them on main roads.						

Yes	Yes		No	The missing middle proposal is designed well and allows flexibility of a number of different housing design and build types within good and well thought out parameters. Living in Kingston I really value and appreciate the kind of urban environment and community that having 'ammissing middle'll housing strongly influences.	Yes		It does a good job of allowing increased height to facilitate middle density dwellings without sacrificing the advantages of existing suburbs and their quieter setting.	This does strike a good balance, yes.	Yes			100	In general yes I think the balance is well achieved. Some suburban areas that will be included in these changes have fairly narrow streets and in those cases some more clarity about the need for a greater onus on having private spaces would be welcome.	I think in principle it achieves this aim.	Not being an expert in these areas it seems to me that it does offer good guidance, without being overly prosciptive.	I already live in this type of home			These are a fantastic and very necessary development for Canberra to build more vibrant, inclusive and sustainable suburbs and local communities. Provided it's implemented with care I am optimistic this will lead to a big positive shift in the growth of Canberra as a city.
No	Yes		No	It's extremely important to get this right. Having poorly built dwellings will not improve anyone's quality of living. We need more buildings built with energy efficiency, facing north and built well. Grayson street Hackett could be looked at for quality and a blue print to follow. More dwellings with outdoor space and thoughtful design that blends the two toether is critical.	Yes		Definitely needs to look at benefits for all to use well and live in well, it will take some drastic design and work together to create better environments that work toether with our environment	Creative design , look at overseas examples in Holland and Denmark, even Melbourne has some new spaces for diverse design.	Yes			100	Yes but townhouses with garages are extremely important , the ease of having a garage that you can access your house makes life when older much easier and extremely beneficial.	Need to find many outcomes one size does not fit all sites	I need to reread and take another look	Yes, I'd like to downsize and stay in my current neighbourhood			This sort of housing is sorely needed and lacking in ACT. I would like to live in a townhouse that has an attached garage but that also has character not a spec house or a badly built house. I think the act developed a few types in Belconnen that were very suitable for a sustainable housing development. That same thing will work and is desperately in need. Especially for women over 50, who can't afford a house but living in a unit is not an option. The sanctuary at north Lyneham is also a good start.
No	No	The issue is sustainable growth. The proposed increase in Canberra's population puts too much strain on housing and other infrastructure	No															
Yes	Yes		Yes	- people don't like paying strata fees. In WA there is '' green title' which is basically single house on a block aka the family home but this is also possible for townhouses and villas. Suggest ACT introduce '' green strata title' so people can have a townhouse/villa without strata fees - note: strata fees are nothing more than a lifetime of income for developers and agents and that is not ok - there needs to be better regulation of builds (in looking at properties, I have seen some places that should never have been signed off let alone given an OC)	Yes		N/a	n/a	Yes			70	Needs to be more parking. The ACT markets itself as '' bush capital' but this is executed to that Canberra is nothing more than a run down country town in need of TLC. Better planning, more parking (less parking fees), better builds, better shopping centres (so we don;t need to go to Sydney or online to shop) would make Canberra an attractive place for people to live.	Needs to be more parking	n/a	Yes, I'm looking for an affordable home in an established suburb			Without strata fees
Yes	No	I don't want to live in a crammed in additional house or move back to an apartment. I've just escaped strata!	No		No			No. I'm very worried about loss of privacy. We did what we're "supposed" to do. Couldn't afford a house so we bought an apartment. Lived in apartments through our 30s. Wanted to live somewhere more private, with a yard, so at 40 bought a house, tripled our mortgage and started a family in an established neighbourhood. Now you're saying we just need to accept having townhouses or apartments built next door, or the neighbour building a second house in their backyard to look down over our tiny yard, but that's ok because we can delete our tiny yard to do the same too?	Yes		20	No,there should be more off street parking. Roads in Braddon and Dickson are already difficult to navigate past parked cars, this will make it worse.	What's the point in requiring people to have a pebbly courtyard with a yucca (for "garden") while having their cars turning narrow urban roads into pseudo one-way lanes, or having a sad pittosporum hedge out the front that you can't see past the parked cars anyway.		No, for another reason		i already have to live in a duplex because we can't afford a real house, I do t want to move anywhere smaller and with less outdoor spacewith my partner and child.	For older millennials, in our 40s and finally affording a small house (like our parents bought on one income in the 80s but that's beside the point), now you're telling us we can't even have this for a few years without getting overlooked and overshadowed by a block of units or townhouses? We're supposed to be the bush capital, not the "remove every green thing and stick units everywhere" city.
Yes	Yes		No	For people looking to downsize, the emphasis is single story, separate title.			Couldn't care less about this, the emphasis for me is single story which is important for an aging population.	Guess we will know when we see it, however not confident that the ACT govt would enforce building standards on developers.	No			70	No. Canberra is not suited to reduced parking options.	It doesn't. Why is the ACT govt so obsessed with making parking difficult. Great way to get unrest in the community when arguments over parking start. Get over it we all drive!	No more apartments	Yes, for another reason	Want to downsize but not in my current suburb		Downsizers want single level, separate title, high quality properties located within walking distance of shops, and don't want to pay stamp duty to downsize. If you can't deliver that they will spend the rest of their lives in family homes, preventing families finding suitable properties.
Yes	No		No		No				No			100				No, I don't want to / I currently live in a detached house			
Yes	Yes		Yes															The draft proposed legislation does not refer to the crown lease. Late 2023 saw the introduction of RZ1 changes allowing dual occupancy for blocks larger than 900sqm as long as the crown lease is less than 50 years into the 99 year lease. The absence of a reference to the crown lease in the proposed legislation needs to be addressed.

No	Yes			The proposed changes allow for more choice in housing, choice for housing at the moment is somewhat limited. This seems especially so for first buyers with the only real options being small apartments in city centres. this options appeal to some but not all, what is missing in the market is smaller block sizes in suburbs where residents can enjoy a suburban life style without having to sell their kidneys for a 2 bedroom 1 bathroom detached home far from any reliable public transport. My suburb of Gowrie has some lovely amenities such as nature strips and parks as well as good access to schools and shops. It is a shame that more people are not able to feasibly make use of these that would be much better served by medium density. the ability too live in a terrace or town house in Canbera is not super common due to a lack in supply not demand.	Yes			The design guide does a good job at providing instructions on how to intrusively fit more medium density homes into existing suburbs. the homes in the design guide do not look out of place or an eve sore.	The proposed design guide strikes a good balance between solar access, privacy and density.	Yes			100	The new rules around parking are good as they will allow more people who may not be interested in having a car per person in the house more options. I think in future further reforms to minimum parking requirements may be in order but for now this is a step in the right direction.	The draft give good advice on how to avoid ugly looking car parks on a street scale which would be a major concern for most residents	Generally looks pretty good!	Yes, I'm looking for an affordable home in an established suburb			
Yes	Yes		Yes	Great changes. Such a necessary change. This will allow for more diversity in choice.	Yes		Thoughtfully encourages transition	Yes. If anything, go further.	Yes			100	Seems fine. I'm more interested in bike lanes and public transport than car parking	Cars are naturally unpleasant so it's tough to get the balance	Yes	Yes, I'm looking for an affordable home in an established suburb			Go further! More reforms! Use this to drive other changes to public infrastructure, particularly around public transport.
Yes	No	Will absolutely ruin the beautiful inner north suburbs	No	They will absolutely ruin inner north suburbs with great tree coverage like Aranda to build more, with no road or other facilities to support the growth. Do it in the new suburbs where you can build the supporting facilities for the extra population as you go. Don't try to backfit in old suburbs or you will have issues with services, roads, schools etc and ruin their character that makes canberra a great place to live.	No	This will lead to developers bullying owners into selling, pushing them away	We do not need more buildings in well established areas, you cannot retrofit as services are not ready	The new rules will ruin privacy for neighbours	No	The proposed plans will ruin the privacy		The plan will mean cars will be all over the street, make it dangerous to the community	Not well at all		No, I don't want to / I currently live in a detached house			It is an ill thought proposal- focus on develop the outer suburbs- you will lose my vote next election if go ahead
Yes	No	The missing middle is a farce.	No	It willcreate more problems. Overcrowding of streets and infrustructure. Heat sinks and reduced green spaces.	No	The streets are narrow insufficient parking for residents. Showing of single dwellings by hirise. Reduced greenspaces creating heatsinks in summer. Overloading of existing infrustructure.	It doesn't.	No.	No	To crowded.		No	It doesn't.	Bad policy results in bad outcomes. This is an example of it.	No, I don't want to / I currently live in a detached house			This policy is just a grab for more taxes and charges without providing infrastructure. If implemented it will turn Canberra suburbs into overcrowded slums. There is plenty of space to build more housing. Try spending money on new infrastructure and real parkes and community green spaces. When you ignore community feedback and implement this money grab better prepare for more crime and mental illness in the suburbs. Leave the suburbs alone. Stop this ridiculous spin. Look at what real progressive city's of the world are doing. Not infilling greening. That will produce a happier community and cleaner environment.
Yes	No	Denser housing sacrifices green spaces, adds to congestion, noise and pollution. In addition most of Canberra's new developments are ugly, repetitive, poorly constructed and tedious.	No	They don't! The proposed changes merely squeeze more people into each space with reduced choice. There are already too many apartment blocks (from experience, apartment living is not attractive and corporate fees are too high). There are too few homes and townhouses without stairs for the elderly and handicapped. One suspects that the ACT government is only interested in increasing rates revenue through increased density.	No	Again - reduced garden spaces; increase in multi-level homes, ugly apartment buildings tefucing privacy and increased traffic adding to noise and pollution. Canberra, particularly inner Canberra, should retain historical features, garden city vibes, limi	What does '' appropriate' mean here? It is a subjective term - my version of '' appropriate' is mainly single storey, some two story and very limited building up to five storeys. That is clearly not the intention here.	No - but you will not take any notice of any other views. As usual you have decided and call this scam survey '' consultation'!	Yes	Not sufficient setbacks or verges.	20	No - too little green space! Increase in density generally '' inappropriate'!	More car parking needed under buildings of two stories or more! However, number of potentially multi- storey buildings should be much more limited than in the plan.	Guidance is clear, but not '' good'. Again, '' good' is subjective! To improve design - decrease densification substantially, provide for more underground parking, encourage roof gardens and gardens on walls of buildings	I already live in this type of home			A travesty!
No	No	Going to make existing suburbs look like new suburbs which I don't like the look of hence why I choose not to live there	No	Will definitely make housing more diverse as it gets rid of a lot of restrictions some of which are good and some bad.	No	Still some very confusing requirements as to what is and isn't allowed to happen but I think the changes will result in lower quality developments than currently allowed	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. The side setback will probably occur at any rate due to needing access to easements at the rear of blocks but I don't think requiring it would be that hard to put in the guidelines.	No. There is nowhere near enough protection of peoples right to sunlight as why should a multi-unit complex be allowed to overshadow a southern neighbour as this just makes that block less usable. Stick with the 31 degree angle for multi-unit like single residences have to as this is actually based on allowing winter sunlight in or go back to the old sliding scale where the angle increases the further off direct north a boundary is. If topography allows a taller building to not overshadow a neighbour this can be a discretionary thing shown through shadow diagrams that could be allowed not the current proposed rules.	Yes	Diagrams give good indications of what are possible layouts to consider	100	No. I think the old parking rate requirements should be kept in RZ1 with the new ones for RZ2 probably ok. I don't think many streets can support the extra cars that are going to end up parked there from these changes over time as there simply won't be enough car parks provided in areas far from good public transport.	There is a reduction in the required planting from these provisions so that will make the landscape less pleasant. At least the canopy cover is increasing but could probably go even further as blocks are part of the territory so why not make them meet 30% if that is the overall goal.	I think it does cover everything pretty well.	No, for another reason		Doesn't appeal to me currently as not much cheaper than freestanding with a lot of drawbacks.	I think this is a good idea to have this guide for these types of projects as there is a hole in the planning landscape between single residential and large projects. This doesn't do anything to address a major impediment to more of this style of development being done however which is the lease variation charges to do small developments are a massive proportion of the overall project costs so unless something changes there I think this will have minimal impact really.
Yes	No	I'm looking for a 3 bed home with a small garden- these homes don't have enough outdoor space of their own, and I don't want stairs.	Maybe	Not well. More attention needs to be on homes that are small but still appealing to people who like to garden and have privacy.	Yes			No, more attention is required for spacing between properties.	No		30	Pool the parking spaces, it takes up less room.		Individual gardens are essential, otherwise there's no difference between this and an apartment.	No, I don't want to / I currently live in a detached house			People who downsize more often than not don't want to give up outdoor living. Small gardens and outdoor seating areas are essential. Houses with stairs are not disability or elderly friendly. Ensure homes are constructed with adequate privacy and sound attenuation.
Yes	Yes		No	Fairly well, although I'd be interested to see how community feedback impacts individual projects	Yes		Very well	Probably a little too on the side of neighbours with issues	Yes		100	Parking isn't a right and shouldn't be treated like one			Yes, for another reason	I'd like to upgrade from an apartment to a terrace house with a small garden without that costing two million dollars		

No	No	Because I aspire to more than a tiny modern home with no land that will last me 10 years	No	No well at all	No		Not well at all	Not even close	No			0	No	Not well at all	No	No, I don't want to / I currently live in a detached house			
Yes	No	It depends what actually gets built. This is all lovely in a glossy brochure but reality can be very different, especially with lax enforcement of standards		I am concerned that creating density away from public transport will reinforce Canberra's car dependency.	No	This is a terrible survey. My answer is I don't know.	I don't know.	Probably not.	No				Density needs to be located close to frequent public transport, enabling car-free living. Parking requirements cannot be determined without considering the public transport available.	I don't know.	It needs to include consideration of accessibility to frequent public transport to ensure that this whole project is not just going to reinforce Canberra's car-dependency.	I already live in this type of home			The term Missing Middle is quite misleading as much of this type of housing already exists across Canberra. As someone who has already chosen to live in a townhouse, close to my local shops, with good access to active and public transport, I feel this term renders me invisible.
No	Yes		No	Any step to increase more density in the inner south is fantastic. In particular the inner south needs more townhouses so those of us that cannot afford a home may be able to afford the middle solution. Apartments need to include more liveability in-terms of study spaces for working from home, appropriate balcony sizes for outdoor space. Often apartments are way too small It's unreasonable to expect someone to have a quality of life in that size of a home.	Yes										Yes, I'm looking for an affordable home in an established suburb			
Yes	Yes		Maybe	Overall ok, however carparking requirements seem conflicted, in that atm I need 3, in one area I still need 3, then it says only one per dwelling, thereby 2, for a secondary residence (but not dual occupancy), seems confusing, uncertain. Also, ATM I need a disabled car space, which seems silly for a secondary residence on a single block. Nothing mentioned on m2 of secondary residences here changing from 93m2 to 120m2, or I cant find it. the secondary residence shouldn't have a m2 limitation due to all the other native and solar restrictions on each block. Also overall, an ESA fire assessment for home batteries larger than 30Kw is silly, cars have up to 110kw, some larger, I suggest that be moved to 150kw if the ESA fire authorities' are that concerned, it really comes down to the standard of	Yes		Existing blocks don't have much of a meaningful higher measurement change, could be increased further if a real difference is intended.	I think the solar envelope is too low, in that it doesn't even consider what is next door, including how far back the existing house is from the fence. In this case the height could be increased somewhat. The existing limitation restricts most secondary residences, maybe a provision for this type of housing would be more suitable as its not a major rebuild/new development, it is making good on existing dwelling to an extent.	Yes	Again refer above, for secondary residences, solar fence should be increased in height, particularly if building next door is set back further from boundary already.	90	Yes, for larger, however confused on secondary residences and provision of disabled parking. ATM with a secondary residence, I have 3 including disabled, that seems too high. The new rule contradicts by say 2, which is preferred, Im confused on this aspect. Less car spaces the better, particularly where we have old stvle wide streets.	As above, less parking is preferred, soon we wont all have 2 cars and we may only have one per household due to self driving ubers etc for local trips.	Yes, but I don't think it works overly well for a secondary residence as the height/solar fence limitations are too restrictive to enable it to work in most cases, including parking.	Yes, I'd like to downsize and stay in my current neighbourhood			A few tweaks in regards to secondary residence clarifications would be good.
No	Yes		No	This could be good for increasing diversity but it likely would create more single family housing with less space. However if near town centres this would increase their attractiveness as there are more people using them; thus more business should come and revitalise those communities	Yes		This allows for appropriate transitions between scale but could also allow NIMBYs to still argue with new development in places with large block sizes such as o'malley and red hill	This creates a reasonable balance	Yes			70	Yes because canberra is still quite car centric there seems to be a reasonable amount of car spaces available	Yes it definitely takes into account creating a nicer atmosphere than a normal bland car park.	From a quick look it seems quite clear, but i didn't have time to check if it had actual numerical requirements or not	Yes, I'm looking for an affordable home in an established suburb			
No	No	I want a proper house, not a tiny shoebox	No	Badly	No		Not well	No	No			0	No	Not well	No	No, I don't want to / I currently live in a detached house			
Yes	No	The new homes will be tiny and rubbish with no gardens	No	Not at all. There will be less diversity because only cheap tiny housing will be built.	No		Not well, this plan will be detrimental to Canberra.	No	No			0	No	Poorly	No.	No, I don't want to / I currently live in a detached house			This policy is against everything that makes Canberra a pleasant place to be.
Yes	Yes		No	I think the government should also incentives the churches to build on their unused land. There is heaps of it around.	Yes		Unsure	Solar access is really important.	Yes			80	More parking onsite needed	Unsure		I already live in this type of home			
Yes	No		Yes	I'm pleased with the relaxation of the size limit on the dwellings on rz1 blocks. However, financially, I don't see how owner occupiers will be able to afford to develop their blocks, given construction costs and the limit on having to have a dwelling built prior to subdividing and selling is a constraint. For example, our mortgage is 800 000 on a block valued at 1 300 000. To build a modest second dwelling on our block will be close to 1 000 000 (when you take into account architect fees, DA, services etc). For owner occupiers that means taking on a huge risk or is just not possible. However, if we could submit DA plans for new dwellings and subdivision then we could sell off part of the block and fund one or more builds ourselves. I think that would enable owner occupiers to stay living where they want to but enable the middle missing	Yes														

Yes	Yes		Yes	The changes i see can be varied from existing homeowners building a second smaller more energy efficient home while staying in the area. They can either rent existing home to provide income for retirement. Existing home owners building a second dwelling for family and after family changes can sell and recoup investment without having to sell all as no sub division is not allowed. Given differing dimensions of blocks the second dwelling could be any size and investment if required realised by sale. This gives existing homeowners access to finance that could difficult if no subdivision.			The proposed guidance is no different from existing guidelines. There is emphasis on conformity. Yet there are alternative design styles which are minimalist such as concrete form with internal design to maximise living and lighting (japanese architecture in their crowded cities) yet this style would be considered inappropriate yet would considered innovative and meet small spaces requirements. This then leads to setbacks where space is wasted but if both property owners agree to build on boundary, meeting noise and fire, should be allowed. Accordingly flexibility in alternative and innovative desiens should be allowed.	If there is agreement between existing holders effected regarding solar orientation or privacy then this should be allowed rather than a third party making a decision. For example i have seen some innovative designs where there are roof top outdoor spaces which could be made private thereby allowing properties to have outdoor spaces and privacy. And if both effected parties ie landowners agree should be allowed. Again innovation and alternatives should be encouraged.	Yes	But setbacks can be dismissed if all effected parties agree to dismiss there. So building on boundary is agreed to by the effected parties then the proposed setbacks can be dismissed.	0	This is problem if only one drive way is allowed. Also provision should allowed on the front set back. Again innovative designs could developed to meet atheistics.	Again only one drive way is an issue making circulation the issue and creating hard surfaces. Innovative and alternative approaches such as using front setback would make this less of an issue. Front set backs are rarely used spaces and could be an alternative area for carparking	The design outcomes are the usual standards that have been applied previously. There are many alternative and innovative design approaches particularly coming high density cities in japan that give alternatives that meet privacy living and light requirements. If an alternative approach can be presented to meet requirements and the next door owners agree then they should be allowed. Third parties should not be allowed to interfere.	Yes, I'm looking for an affordable home in an established suburb			The yes should also be for downsizing. The appeal process allows those that are against development for what ever reason make alternative and innovative designs impossible. These appeals then make the process very expensive detering people from undertaking. If the design effects next door they should be the two to agree not someone living in another suburb. Flexibility in approach and reducing appeals from third parties uneffected should avoided. Making solar and batteries mandatory should reduce the need for upgrades to electricity infrastructure as the power is produced and used in the new housing. And if the batteries are connected virtual power station they can help stabilise the suburb power demands. As to tree canopy there should an alternative where trees can purchased and planted in alternative areas
No	No		No	Not well at all	No		Not well	No	No		0	No	Not well	No	No, for another reason		I want a house and garden. Not a shoebox.	
No	No	I want the same opportunity to have a home with a garden and a backyard. This policy will only push housing further from reach by driving up prices.	No	Not at all. This type of policy has driven up prices while driving down lifestyle and housing quality.	No		Not well	No	No		0	No	Not well at all		No, for another reason		I want the opportunity to live in a prooer home and block.	
Yes	No		No	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.	No		Not well at all	Does not ensure privacy, solar access or adequate green space.	No		0	No	Not well	No	No, I don't want to / I currently live in a detached house			This is a terrible idea.
Yes	No	Housing infill like this is bad for established suburbs and communities. I have experienced this in my home state of Adelaide where almost all blocks have been divided. There is little to no garden space or original community feel.	No	Housing infill like this is bad for established suburbs and communities. I have experienced this in my home city of Adelaide where almost all blocks have been divided and developed with cheap housing - and there is now little to no garden space or original community feel across the city. This has also driven up house prices, making even flimsy housing designed to last less than 10-15 years out of reach. I am disgusted this is being considered in Canberra.	No			No. The new guidelines do not do enough to ensure privacy. These changes are disuistine.	No		0	No	Not well at all	No, the entire thing should be scrapped. It will change the face and livibility of Canberra.	No, I don't want to / I currently live in a detached house			I strongly oppose these changes. I've been a lifetime labour voter and work in the public service but it's decisions like this that make me reconsider - people who live here know that Canberra is a very livable city, with larger blocks and lots of gren space but changes like this absolutely destroy that.
Yes	Yes		Yes	Very well in my opinion. Diversity in older suburbs will lift up the ambience and liveability for people. Provided it is advantageous for people who are risking their investments with an outcome of privding housing.	Yes		Well enough I guess.	Yes	Yes		100	Car parks can be moved to street parking ti make more room for living.	Goood	Yes	Yes, I'd like to downsize and stay in my current neighbourhood			
Yes	Yes		No	I think it will provide much greater diversity and necessary increase in medium density housing, but could go even further by allowing up to 3-4 stories in RZ1.	Yes		Too restrictive and overly prescriptive guidance throughout these sections, e.g. step-downs, graduations will entrench the existing height/form, rather than enabling a new form to emerge as density increases.	Too restrictive, the orientation of dwellings on any block should be able to be more flexible to enable more solar access (i.e. set backs and orientation street form should have allowances if orientation of dwelling is changed for solar access).	No	Diagrams do not inlcude multiple dwellings. Could be overly restrictive to townhouse development, should take into consideration verge width and efficient use of site should take precedence	100	Yes, but please also integrate these reforms with transport planning, e.g. we need to enable safer streats for active transport so that on-street parking doesn't get prioritised.	Carports should not have to be set back from front facade. Allow carports in front of a garage (or enable a smaller 'storage' garage with carport) to reduce the likelyhood of residents parking cars in driveways and across verges (which is a common problem seen in areas of Melbourne that have enabled medium density infill).	Overall, from a non-technical perspective its very practical. Suggest each design element have a clearly stated 'objective' that answers the question: what will this do for my street? Please don't use planning jargon, like 'street activation'.	Yes, for another reason	I already live in a townhouse, and love it.		
Yes	Yes		Yes	The proposed changes now address a lot of the concerns and issues related to the recently introduced Territory Plan. The removal of the 120m2 maximum size for the 2nd dwelling is a massive step forward. However, the Lease Variation Changes are still an incredible barrier to development options. These amounts should be reduced significantly to allow for more new construction in the 'Missing Middle'. I am sure the ACT Government has already seen the slow uptake since the beginning the new Territory Plan. If it wants private developers and home owners to complete these 21,000 new homes before 2030, these financial barriers, as well as the administrative barriers, need to be reduced. So please do not raise the cost of sub-division now this is a potential option for RZ1 blocks.	Yes		It is very important to retain the character and feel of exisitng suburbs and areas. I think the new drafts address this point quite clearly whilst still allowing for applicable and relevant construction.	Yes, I think the new rules, now slightly more tolerant, will allow for a wider range of constructions to occur without impinging too significantly on people's privacy or solar access.	Yes	This is always very site specific depending on constraints such as verge size, block location and road traffic.	80	It is good to set minimum parking standards at a lower level. Most new constructions will include more than the minimum as part of their design, but there is no point in setting the mimimum too high, as it does force designs and constructions that might not be the most suitable for a particular block or location.	More than adequate.	Yes, certainly clear enough. Although that is without having submitted applications under the new system!	Yes, I'd like to downsize and stay in my current neighbourhood			Curious to know why there is still a 600m2 block size minimum for Unit Titling in RZ1 zones, but seemingly no proposed block size minimum for sub-dividing RZ1 blocks. Or is this based on the presumption there is a minimum block size for sub-divided blocks of 350m2, so in essence only blocks at are at least 700m2 could even potentially be sub-divided?

Yes	No		No	I'm not sure how this will address the issue if high land and development costs. I also don't like the idea of just handing it over to the market. In theory, I want to see more townhouse and low-rise apartments in established areas (Kingston and Swinger Hill style), but I'd rather see specific areas identified by government for block consolidation and missing middle development (i.e. near shops and transport), with incentives for affordable housing, rather than just leaving it up to developers to do what they want wherever they want. I'm also very concerned at the impact on unimproved land values and thus rates.					Yes			70	I would not reduce onsite parking requirements. It will inevitably lead to a range of parking problems seen in other cities that we have largely avoided to date. Quality of missing middle accommodation and liveability of our suburbs are just as important as the quantity of missing middle housing.						I live now in a detached house but in later years I'd be very attracted to a single level courtyard townhouse with a private garden, so I want to see more options like that in my area. I don't think this policy - to be implemented at the whim of developers - will necessarily provide those options. I think we will see as many units as possible crammed into whatever sites become available for development.
No	Yes		No	I am very impressed with these proposed changes and strongly support it. Living in the "C5" apartment complexes in Campbell (having moved from Victoria) I really appreciate how these apartments allow me to live close to work, green space and the city centre. I think the C5 model is a great one to be learnt from. But the C5 apartments are just apartments - and I can see that in the future a townhouse or unit might better suit my needs (e.g. getting a dog). Having more choice that lets me stay in Campbell would be fantastic.	Yes				Yes			100			Yes - it is an excellent document and very clear.	Yes, I'm looking for an affordable home in an established suburb			
No	Yes		No	As I have always said, knock down all the old 3 and 4 bedroom ACT housing properties on big blocks-that mostly old ladies or single mums are still in, and build 2 new homes or 2 bed duplex on the block. Most of the properties also have old garages that need removing and the blocks are too big for single mums to maintain. There are heaps of properties, north and south suburbs, oxley, higgins and florey to name a few. Its not fair that i have had to wait 7 years on the list for a property because of the above information. I am also a single mum with 1 child and have been waiting for a property that does not exist because your properties are 3 and 4 beds mostly. Im happy to be contacted. I really hope the above facts can help reshape the growth and development of dual	No				Yes			80	No. There needs to be allowance for minimum 4 cars parked at each property. This allows parents car, a car each for the children (based on 2 children) when they turn 16, and a visitor.						
Yes	No	My young adult children are the ones that need accommodation and it needs to be accessible for me to be able to visit	Maybe	I'm sorry I have a disability and reading takes so much energy that I don't have, ME/CFS. What we need in this area is more diverse housing, housing that is wheelchair accessible so that people can visit their children, variety allow for those that want to put an additional structure on their block for a young person or parent, including tiny house accommodation (easy to cover trailer wheels and add a small deck to fit in with the houses in the suburbs.								60	There is never enough parking and it can be dangerous when traveling around some of our streets when cars are parked both sides and also difficult if there are no paths to travel safely along forcing prams, wheelchairs and pedestrians onto streets.	Focus on safety and access. Allow people space to have a small garden		No, I don't want to / I currently live in a detached house			We are the Bush Capital. Could we have a tiny house suburb with cottages, one, two and three bedroom, with a community centre, coffee shop, chapel, playground, dog park, community garden, stand alone places, not having to rely on body corporates and expensive strata. places with bush and plenty of trees. It would also be good if it was wheelchair accessible (paving in Canberra is dreadful,uneven and dangerous). Ramps instead of stairs. community is about old and young coming together, helping each other, working together. Having a space that you can just be without shared walls, steep underground car parks and living on top of each other. A place where people from other suburbs can come and enjoy walks and community.
Yes	No	It is not more appealing to me because there are less and less homes available to me where I can own my own slice of the Australian dream. Where am I to have a barbecue to accommodate a large party or to have a play equipment or a trampoline in my backyar	No		No	no it doesn't because subdivision shouldn't be allowed. There are too many smaller home sites in Canberra, which don't have any outdoor green space and don't provide enough. Adequate space within the home to provide space or storage for the	It doesn't encourage appropriate transition in building height and scale. All it encourages is that people's slice of Australian paradise will be approached upon and overlooked and what you're going to have is concrete corridors, wind corridors that are cold and homes with no natural light where people will become unwell and unhealthy.	no, you don't have the right balance. All of these rules are crap.	Yes			50	no, you haven't got the right balance. All you have to do is take a drive around where occupants are parking on median strips and all you're doing is finding people houses aren't the right internally. They should be 2.7 garages aren't the right height they're very low at 2 m of 2.2 which don't allow high utility vehicles or four-wheel-drive to park or or even people to have places to park there RVs there isn't enough off street parking which doesn't encroach on clear access to the street which doesn't provide safe access for pedestrians.	Like all the other rules. This has been done by somebody who has zero experience.	There's a lot that's missing, but the problem is is the way that you're targeting your questions to actually ask for answers the questions that you're asking a designed around the expected answers that you want in order to go ahead with your rules. Try asking better questions more multiple-choice questions to actually get a better cross-section of society and what they expect for Canberra.	No, I don't want to / I currently live in a detached house			Canberra housing is cutting people like me a single working mother out of the market. What I want is a detached home dwelling on a large block so that I can raise my family have a garden and do what I want to do in my own space where I'm not encroached and looked upon by others and I'm not waving to my neigh in the shower for my kitchen. I don't wanna live out at Tuong. I want clear access to a lot of really good schools clear access to public transport and shopping areas and green spaces and this proposal doesn't provide any of that.
Yes	Yes		Yes	Very well.	Yes		Very well					100						

No	Yes			I believe these changes should allow for more town houses and low-rise options in suburbs that are actually desirable for people to live in. Currently there are very limited options that are fit for purpose as a young person in Canberra, with housing that is large enough to support a family and close to the city/work being far too expensive to be affordable. Houses that are affordable aren't fit for purpose (too small or would require hours of commuting each day), so providing more opportunity to improve this situation is a step in the right direction.	Yes		Well.	Yes.	Yes			100	Yes		More emphasis on the benefits provided by improved feasibility of public transport and small businesses, and an emphasis on a more walkable/rideable suburb would be good.	Yes, I'm looking for an affordable home in an established suburb			Please implement them, otherwise myself (and many other young people who are looking to start families) and my partner will be looking to leave the ACT due to the lack of affordable and fit for purpose housing available. The ACT government needs to choose between whether it wants a future for young people in the Territory, one that can support young people and businesses, or whether it will be held hostage by the older landed gentry who are going to be dead in 20 years anyway.
Yes	Yes		No	As a non-expert, I think these proposed changes will be worthwhile in making housing supply more achievable without increasing urban sprawl. I think that not setting minimum block sizes could be risky. I hope that these changes are accompanied by appropriate sustainability and environmental impact guides and regulator considerations, and wherever possible I support the redevelopment of existing end-of-life or substandard dwellings before any greenfield development occurs.	Yes		Reasonably well. Character and style is important ans should persist, but emphasising too strongly on style alignment with adjacent homes may bolster NIMBYisms and may be impractical if neighbouring homes are also slated for future redevelopment to higher density forms.	I think so - however it will be important that this guidance can also be enforced as a standard (not just a guide) to prevent shortcutting by developers leading to new builds with poor attention to solar access and privacy.	Yes			100	No. I think that 4.2K will calling for guest parking to be on street where possible is not appropriate. I think it should call for providing guest parking onsite at an appropriate ratio to the number of residents (bedrooms) per block. One-car households are not the norm, particularly not in a context where many households are share-houses, due to housing pressure, including small dwellings. The volume of on-street guest parking in my suburb (Dickson) has increased significantly in recent years, as density has increased. This signals there is inadequate parking for residents and guests at dwellings. I used to be able to cycle safely thorugh quiet streets, now there is too much onstreet parking and cars jostling for a turn on 1-way widths that urban cycling is becoming too hazardous. Downing, McGowan, Stockdale and Hope streets are examples.	The landscaping guidance to conceal parking and infrastructure is good.	Generally yes it does. 1. Currently there is no reference to pets. Given cat containment is legislated in the ACT, and will expand to established suburbs, it would be very helpful to include guidance on establishing balconies/courtyards/fencing to a standard that is safe and practical for cat / pet containment, or at least establishing standards that residents can adapt for cat containment without detracting from the curated aesthetic. 2. Section 7.1.C of the design guide encouraging native and endemic plantings can be improved by stating "not" to plant certain exotic species, referencing the Biosecurity Act 2023 (ACT) which took effect 15 May 2025, and the Biosecurity (Pests) Declaration 2025.	Yes, I'm looking for an affordable home in an established suburb			
No	Yes		Yes	It does a good job of allowing for the types of living people want.	Yes		Not sure	seems correct to me	Yes			100	Street parking is an issue for visibility in navigating streets especially if bike lanes are to be introduced.	less cars the better		Yes, I'm looking for an affordable home in an established suburb			
Yes	Yes		Yes	Really well, I think it's quite logical that each block should be assessed as case by case basis rather than a simple square meterine method.	Yes		Pretty good, it's more flexible but still requires assessment of impacts to neighbouring properties etc.	A bit hard to say, privacy is always contentious and owners usually apply double standards to what they can see from their house and what others can see in.	Yes			100	No, I think it's a bit risky to reduce parking onsite, you just need to look at all the new greenfield areas with their tight streets and cars on every single nature strip to see evidence that encouraging public transport simply is not practical.	Hit and miss, on a quiet street it's ok but once density ramps up there will just be cars on every nature strip and it will be a mess.	Yeah it's pretty good with the drawings and scenarios to demonstrate what could be achieved.	Yes, for another reason	Only in a separate titled property, anything strata is terrible		I would like to see less strata and more individual title options, body corporates are a nightmare to live in. Looking at my block I would NOT have a financial incentive to build a secondary dwelling, my outlay would be more than the two properties are worth, having a triplex or 3 properties would probably make a small profit so whilst these policies are good on paper they won't really have huge uptake until either values go up or construction costs go down. I really want to reiterate that I'm pleased with the common sense approach for looking at the block characteristics rather than just its size or zonne.
Yes	No	I don't need a second home, I'm not an asshole.	No	Very well, expectations are clearly set out.	Yes		It's clear what is expected.	Yes. The encouragement of tree planting is helpful.	Yes			90	More properties should have basement parking made mandatory, with exceptions made for properties located on granite deposits and near water tables.	Decent enough when considering the lack of public transport amenities to support lower private vehicle use.	As a layperson, it sets a reasonable standard of what should be followed to achieve sustainable housing.	I already live in this type of home			The ACT govt should be reclaiming any properties that have been unoccupied for longer than ten years and converting them into '' missing middle' public housing.
Yes	No	Cost of RZ1 blocks will increase due to interest for development, making it more difficult for larger families to find a 3-5 bedroom home.	No	It will certainly open up a lot of land for redevelopment, however I don't wholly agree with the principle. The zones were designed to retain neighbourhoods through character, as referenced in your design document, and just adding larger sized buildings to streets because you can, will inherently change the character of those neighbourhoods. RZ2 is near commercial areas as commercial areas have limited trading hours and traffic (both foot and car) will decrease out of those hours - allowing people to return to apartments in a relatively quieter area. Pushing larger buildings into areas that have a similar pattern of movements like school runs or work commutes, put pressure on those communities. The ACT is opening 2 new suburbs near Whitlam, of which the amount of housing hasn't	No	I don't agree with the application process. I belive that the application should be to rezone to a variant i.e RZ1A Single Occupancy, RZ1B Dual Occupancy. There should be opportunity for community feedback before it reaches DA stage of approval.	Asking for feedback on the guides communication level rather than public opinion on the reform isn't really appropriate. Three story buildings don't belong in suburban neighbourhoods. Closer to commercial centres that have little evening traffic is okay. Larger buildings block light and increase traffic on smaller streets. In the UK there are party wall agreements and the 'right to light' legislation, that give home owners rights around what is acceptable development for the property. Perhaps limiting the height to larger 60k zoned streets might be more appropriate? I don't mind townhouse or semi detached buildings in these outlying neighbourhood areas.	Having lived in the UK, which is full of medium density houses, there are common issues around privacy (or lack there of). Countries like the UK have higher standards of privacy law, allowing mediation of neighbour disputes about noise, cameras, windows overlooking gardens. The ACT simply doesn't have the regulations in place to handle the increase of complaints that will come from compacting the population. Currently a neighbour can point a camera at a child's window without any options from parents to legally have this changed.	Yes	I don't think developers should be allowed to change setbacks, and home owners of single occupancy can't.		I think there should be some consideration of parking around schools. Currently it's already difficult to find parking in a scool area during pi k up or drop off times.		If a property has enjoyed uninterrupted natural light through its windows for at least 20 years, it gains a legal "right to light." New developments, extensions, or even tall hedges on neighbouring land that significantly reduce this.	No, for another reason		I don't think the footprint for these homes would be big enough for my family.	Many new builds across all types of housing have faced complaints about poor finishing, shoddy workmanship, and numerous "snags" (minor defects) upon completion. There should be some accountability from the development companies to guarantee workmanship for a longer period.
Yes	Yes		Mavbe	It's okay but not enough, but the main deterrent from these exiting laws is body corporate and strata and these changes don't address that, strata is known to be quite exploitive to unit owners, four comers has done a documentary on it, fix strata and population density together.	No	Strata is still going to be an issue			Yes			60		No, you should consider allowed parking on nature strips or redeveloping nature strips into car parking spaces		Yes, for another reason			

No	Yes														Yes, for another reason	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 while having a bit more space in my own home than in most apartments		Diversifying the housing stock is good. Building medium density housing is particularly good (allows for close community, and the medium density supports nearby businesses/services to operate efficiently). One problem we run into is the assumption that medium or high density housing is only for young/elderly people, and not the families who make up a large part of our population. For example, it seems every apartment in Canberra has 2 (maximum 3) bedrooms. If we created medium/high density housing that was actually designed with families in mind, they would be more likely to stay and not be expelled to the outer suburbs, which are the only developments currently catering to them. I would love to see accomodation for different types of households, especially families, reflected in these reforms. Everyone in the
Yes	No	We have bought and spent a lot of money on a small house to be sustainable. Our house price would be diminished if units were suddenly built across the road. It also changes the character of an entire suburb - you don't see this occuring in Hobart where	No	No. It will diminish green spaces and allow rich property developers to line their pockets with townhouse developments they then sell for a huge profit. It's not going to be first home owners who purchase huge blocks due to price - it will be hose with wealth already built from property. I don't understand why we can't build out further.	No	600m is a tiny block. Again green spaces will be diminished and property developers will come in and take options away from families in inner suburbs who want a backyard for their kids.									No, I don't want to / I currently live in a detached house			
Yes	No	None of your business!	Maybe	None of your business!	No	None of your business!	None of your business!	None of your business!	No	None of your business!		None of your business!	None of your business!	None of your business!	No, for another reason		None of your business!	None of your business!
Yes	Yes		Maybe											The design of neighbourhoods, including streets, safe streets, and active transport, is missing. There is no mention of the people who live in the streets having a say in the design of the streets and common facilities through the concept of community-controlled streets. There are ways this can be done, and I am currently working on implementing this for new developments and existing suburban streets. I have attached a starting document outlining the principles and I will put in a formal proposal later.	No, I don't want to / I currently live in a detached house			
Yes	No	I live in Canberra for the space, not to be crammed next to my neighbours.	No	Go nuts in new suburbs but leave established suburbs unchanged.	No	It will fundamentally change the culture of established suburbs.	It will fundamentally change the culture of established suburbs.	No, leave established suburbs alone.	No		0				No, I don't want to / I currently live in a detached house			Leave established suburbs well enough alone.
Yes	Yes		No	Very well. We have an opportunity for nation-leading reform at a critical time in Australia's housing crisis. It will be important not to overcook the design restrictions and processes - we need to allow for architectural creativity and innovation. Height limits, setbacks and canopy requirements should be the focus, rather than attempting to specify every single design element. If a developer can achieve five dwellings on an existing single detached house site, with none exceeding two stories, all with six metre setbacks and 25% tree coverage, that should be able to be approved.	Yes		It is great. You have selected very appropriate scale and heights that transition from low to medium density. High density should be unlimited and reviewed on a case-by-case basis in line with place strategies e.g. in Gungahlin, Belconnen, Woden, Tuggeranong and Molonglo town centres. For example, a 40 storey mixed use tower in Gungahlin right next to the light rail stop would be absolutely appropriate.	You have the balance right.	Yes	It is important that setbacks remain relatively large compared to other Australian cities, in order to leave room for large street tree plantings for Canberra's urban forest. Articulated setbacks are fine but must not interfere with a tree-lined street.	20	By all means put visitor parking on local streets. However, private car spaces for the dwelling dwellers should not be compromised. A reasonable median is one car space per two or one bedroom dwelling, and two car spaces per three or more bedroom dwelling.	Well.	Yes.	Yes, I'm looking for an affordable home in an established suburb		This is a critical moment during a housing crisis where speed is of the essence. Please progress these reforms swiftly after consultation so that the earliest development applications could be lodged by the end of 2025. The longer we wait, the more the Government will have missed the opportunity to capitalise on the housing crisis and reverse the trend of negative interstate migration into the ACT. People will move here for housing and will create jobs and growth in new areas as they do. The momentum could spark a new golden age for Canberra. But it won't if you take another two or three years to implement this plan, by which time others will have caught on / the housing crisis will be over.
Yes	Yes		No	Very well, in favour							90	Yes '' in favour of less requirements to have onsite car parks	Yes. Ideally we would have less cars but given we do have many cars, street parking seems reasonable. Possibly encouragement of more sense car parking like multistory in large/ dense areas		Yes, I'm looking for an affordable home in an established suburb			
Yes	Yes		Maybe	Fantastic. Very exciting. Means we may be able to do multi-generational housing with my partner's family, which we've always been really excited about but has (until now) been very difficult in practice.	Yes		Seems quite sensible; it will allow for a good transition as you get closer to each set of suburban shops (I think). As someone who wants a bit more vibrancy in our suburbs, while still having a lot of green space and peace and quiet, it seems like a good balance.	I'm not well qualified on this one!	Yes	They're nice diagrams!	100	I would still argue for lower parking minimums, as I think it's a (very significant) cross-subsidy to people who choose (and are able) to drive. But it's a big improvement so I won't complaint too much! It's really important to think about what we want in the future - we should be aiming for a city where more people are able to live better lives with just one car, or none. Less commuting, more activity, better social outcomes, lower emissions. The idea isn't to have cars parking on the street - it's to have fewer cars overall, and a built form that allows more people to walk or cycle.	As above - the lower the parking minimums, the better!	I'm not enough of an expert to comment, but it does seem well put together.	Yes, I'm looking for an affordable home in an established suburb			I noted above the point on multi-generational housing, which is what we'll be looking to explore with my partner's family now that these reforms are coming in. I think this is underemphasised in housing debates. Many people would likely be more interested in living nearer to their family (or friends) if they could do so affordably. These reforms will help make that a reality, and so I'm very thankful to the government for making them happen.
Yes	No	Not fit for even a small family, no outdoors and parks	No		No						10				No, for another reason			

Yes	Yes		Maybe	The changes would allow for more diversity in housing, but should come with mixed use zoning for small businesses to increase suburb sustainability and efficiency.	Yes		Reducing restrictions on building height and scale will increase the types of houses that can be built. This will build on the local character of the area, not reduce it.	The balance is correct, as missing middle housing is a higher priority for the city.	Yes		100	Only a limited provision of car parking spaces on site should be considered. Missing middle housing will increase suburban revenue, which should be used to increase public transportation options (trams & buses). Density will then reduce dependency on cars and in addition, parking requirements.	Houses should be permitted to be built without car parking requirements if in close proximity to public transport. This may allow for more affordable housing options. The changes support a pleasant landscape outcome.	Yes - clear language with effective diagrams	No, for another reason		I live in medium-rise apartments and prefer this to middle housing	A strategy of zone expansions should be produced, linked to population growth. Missing Middle housing is only one part of the puzzle. International Consultation must be carried out. Contact urban planners from high-rated towns and cities such as Riverdale, Toronto or Amsterdam, Netherlands.
Yes	No	The Building Approval Exception process is flawed and supports non compliant buildings with a suitable review process for neighbours.	No	If you mean by diversity you mean accommodation that is not given a 'Certificate of Occupancy' will supply a diverse range of squalid living arrangements. Self contained 'granny' flats that are either building either "Development Approval Exempt" or "Building Approval Exempt" has and will be used to build separate accommodation buildings without neighbour consultation or approval, nor review bu ACT Government Compliance Officers. The existing process circumvents appropriate ACT Govt oversight for use of driveways, street parking and nature strip parking.	No	There is no method of review or objection for building approval exception dwellings by neighbours. Use conditions must be able to be enforced i.e. a 'granny flat' can not be used as a rental property.		Reflection from roofs to neighbours is not considered. High pitched roofs can reflect heat and glare to neighbours property.	No	No enough consideration to existing use by neighbours when building approval exemption dwelling are built to operate as private rental properties.		NO. building approval exception dwellings for rentals do not cater for additional car parking in existing residences with unapproved multiple drive ways and parking on nature strips.	Ther is no such this as a pleasant landscape outcome with cars parking all over the nature street. Drive down Mackennal St, Lyneham and see how plesant that looks !	NO. Add a review process for neighbours and a penalty or re-assessment actions when a building approval exception dwelling is no longer as 'approved' i.e. an additional self contained flat is used for private rental.	No, for another reason		I think it will deliver squalor and poor limited accommodation choices.	Review the existing process for building approval exception to exclude self contained dwelling - existing dwelling to be reappraised.
Yes	No	It is appealing but need to be managed and not by the [REDACTED] crowd. They potentially impact decision as a block of apartments with no parking may spring up next to you	Maybe	It is concerning and impacts where you have chosen to live. Diversity shouldn't come at the expense of those who have sacrificed to live where they live without handouts.	No	It appears deliberately vague and open to interpretation	I think building height needs to be limited to two stories in the suburbs. No one wants people staring into your house from above when you live in the suburbs and not the city	Solar needs to be looked at on a needs basis and if a development impinges on the rights of another landholder compensation for the life of their lease should be paid. That would encourage the developers to do the right thing	No	Concerning that current building separations are not maintained for the suburbs	70	If it is a four bedroom townhouse etc it needs space for at least 2 vehicles and so on 2 bedrooms needs a space and one bedoom needs a designated space. No one wants the road full of vehicles because they don't have a car space	It doesn't, look at Molonglo or Tuggeranong there are no parks anywhere and the streets are full you can hardly drive down them in an evening or the weekend	Guidance needs to be adaptable and reflect the suburb where it is to retain Canberra characters that each suburb has. I would add needs to fit in with the suburb what fits in Kingston probably won't work in Chapman	No, I don't want to / I currently live in a detached house			This has a lot of potential but also potential to be manipulated by some of the large property developers in the Territoey such as [REDACTED] and other builder developers tied to larger known building companies. Current residents need to be consulted on changes to their suburbs as will impact their lives and in many cases pay considerable rates to live where they live for very little in return. When compared to those on the other end of the socio economic ladder
Yes	Yes		No	More off road parking is required in new developments. A 3 bed townhouse may have as many as 4 vehicles. With only 1 or 2 car spaces provided in a new dwelling, there is difficulty finding appropriate parking spaces on streets. Per Arthur Blakeley Way in coombs. View the street parking after 1900 of an evening	Yes		Very well	No comment	Yes	More off road parking is required in new developments. A 3 bed townhouse may have as many as 4 vehicles. With only 1 or 2 car spaces provided in a new dwelling, there is difficulty finding appropriate parking spaces on streets. Per Arthur Blakeley Way in	70	More off road parking is required in new developments. A 3 bed townhouse may have as many as 4 vehicles. With only 1 or 2 car spaces provided in a new dwelling, there is difficulty finding appropriate parking spaces on streets. Per Arthur Blakeley Way in coombs. View the street parking after 1900 of an evening	More off road parking is required in new developments. A 3 bed townhouse may have as many as 4 vehicles. With only 1 or 2 car spaces provided in a new dwelling, there is difficulty finding appropriate parking spaces on streets. Per Arthur Blakeley Way in coombs. View the street parking after 1900 of an evening	More off road parking is required in new developments. A 3 bed townhouse may have as many as 4 vehicles. With only 1 or 2 car spaces provided in a new dwelling, there is difficulty finding appropriate parking spaces on streets. Per Arthur Blakeley Way in coombs. View the street parking after 1900 of an evening	No, for another reason		I own a townhouse and am very comfortable where we are	More off road parking is required in new developments. A 3 bed townhouse may have as many as 4 vehicles. With only 1 or 2 car spaces provided in a new dwelling, there is difficulty finding appropriate parking spaces on streets. Per Arthur Blakeley Way in coombs. View the street parking after 1900 of an evening
Yes	Yes		Maybe	I think the changes will allow for needed diversity in housing and that is a good thing. I'm comfortable that the objective criteria still in place on things like tree cover, setbacks etc will preserve the characteristics of our suburb and that any changes will happen in a modular and fairly slow manner.	Yes		I think the changes proposed but I think two additional changes would be even better: 1) allow a basement in any zone provided it is not visible from the street (or, alternatively) not visible outside the boundaries of the block. I think basements can be useful for adding additional space if people want them and don't see why they should impact the character of the neighbourhood if no one can see that they're there. Height limits, setbacks and overshadowing for external walls of the houses would still apply so no one would end up overshadowed by a huge wall in the backyard of a sloping block with the first option. 2) Within existing height limits for RZ1, allow for habitable attic rooms in the roof cavity. Again, attics are a useful way of using otherwise waste space and even with dormer windows don't add much to the visual bulk of a house provided that they are	Yes, I think these are well specified and will maintain amenity for both existing residents of neighbourhoods and future occupants of the new housing.	Yes		100	I think the options for visitor parking will be fine. I have observed that in streets with at least some cars parked along the sides, the cars act as a traffic calming device, encouraging cars to slow down to appropriate neighbourhood speeds.	I think as long as the road design supports roadside parking (as it does in most older suburbs) then this is a good option. Some suburbs (such as areas of Fadden and Gowrie) definitely does not support roadside parking.	Yes	Yes, I'd like to downsize and stay in my current neighbourhood			
No	Yes		No		Yes				Yes			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	Not well enough	Needs more focus on sustainable construction Size Solar access (explained for people who are unsure- seems a little tokenistic at the moment) Embodied energy Adaptive reuse	Yes, I'm looking for an affordable home in an established suburb			We need more options that reuse existing houses in line with the blue field housing typology. This will help mitigate the divide between positive urban infill and Streetscape preservation (scale, material, datums, forms). The proposed changes may result in community dissatisfaction, poor design outcomes, fragmentation of streetscape and gentrification due to a mismatched peppering of unsympathetic developments already seen throughout the inner north. Yes, missing middle typologies are good and the changes are net positive for climate, affordability, future proofing etc, but I don't believe technical specification controls are enough to mediate between the old dwellings and new constructions. Whilst I appreciate the controls around open space, tree coverage and scale, I believe that these new chanaes may cause a rift in our

Yes	Yes		Yes	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 developement un-economic.	Yes				Yes		100				Yes, I'd like to downsize and stay in my current neighbourhood			great well over-due initiative but government regulatory and tax burden needs to be looked at
Yes	Yes		Yes	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.	Yes		I like it but suggest that adjacent land such as green spaces, nature strips, paths and roads be viewed as integral to building design.	I think so. More interested in solar for people inside and outside their homes rather than power generation.	Yes		90	I think unless there are specifically designed car parking spaces there should be no persistent parking of cars or any other vehicle such as trailers and caravans on public roads. This is my most sensitive topic as local car parking outside of private property already constitutes a visual and road safety issue.	Cars (and other vehicles) have no place in 'unpleasant landscapes'!!	No comment	Yes, I'd like to downsize and stay in my current neighbourhood			Car parking and unofficial appropriation of public land for private purposes are topics that will determine whether I support or object to the Missing Middle housing reform.
No	Yes		No	This plan is positive, but I'd caution these homes need to be available in the inner south - not new suburbs like molonglo valley, or Northside only. There is a massive missing gap for inner south dwellers who need more than a apartment family wise but cannot afford a full detached home. Also, guidelines should be updated to not allow constant townhouses to be built without a ``back' yard. All the townhouses that go up only have a '' front' small courtyard which also serves as the entry, prohibiting use for small children and pets. These are not family friendly designs. Woud be good to see affordable fmaily middle gap options in Narrabundah, Griffith, red hill, Kingston etc, or deakin and curtain. Where people want and need to live for their jobs and kids schooling, in this income and age segment. Speaking as a single (divorced 41 year old mother to primary	No				We need solar and battery connectivity to be mandatory on these homes	Yes			100	Each home needs 2 car parks		See earlier comment on ``back' yards, not just front dual purpose entry courtyards unsuitable for families with kids and pets - these are prolific now and terrible	Yes, I'm looking for an affordable home in an established suburb			
No	Yes		Maybe	I'm a single mum renter, a role over the income threshold for public housing, which means 72% of my income goes to keeping a roof over my head in the rental market. So long term improvements to supply seems like a great idea. However, last year I accepted a lease (had initially signed one for a different property with the same owner, but the owner wished to occupy it due to separation) of a house that had sat vacant for over 18 months due to unfixable roof and mould issues. This was a 'oztrade off'!! of quality of life VS security in a stable address near a great school for my child's education. The unimproved 1970's build, complete with 'raindoor rain'!In several rooms throughout winter is a demolition job - the block is huge. So this will easily fit 3 x 4-5 bedroom townhomes. Long term I can support supply	Yes		No comment. I made the point I wanted to make. I don't have the knowledge or experience for this discussion point.	No comment. I made the point I wanted to make. I don't have the knowledge or experience for this discussion point.	Yes				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.						
Yes	Yes		Yes	I think the changes are positive and well overdue. I think more consideration needs to be given to allowing removal of mature trees on existing blocks though to open up space required to develop. I don't disagree that trees are important in creating shading and street appeal, but priority needs to be given to removing trees to support development, as long as additional trees are replanted as part of the future development. This includes being able to remove verge trees to support better access to blocks. Existing trees were planted in accordance with original plans for the blocks, and possibly trees have grown in areas that weren't planned. Too many developments are block from good design, efficient land use and planning outcomes due to trees needing to be retained.	Yes				Yes		100				Yes, I'd like to downsize and stay in my current neighbourhood			
Yes	Yes		No	Making apartments compulsory is not 'diversity in housing choices'. People want yards and gardens. Public parks are not a replacement for private gardens	No	I can't see any requirement for excellent design or an assurance of appeal mechanisms	Completely dependent on design standards. The Barr govt kowtows to bad builders like [REDACTED] which are an anathema to a wonderful city. (How many MLAs live in flats, by the way?)	Inadequate appeal rights	No	Setbacks are already ignored	10	Absolutely not. Require [REDACTED] et al to provide one car per person, and TWO cars for one bedroom flats (couples). Plus visitor parking.	If you're building seven stories there's no 'unpleasant landscape'!In any case. Just provide enough parking so that the streets aren't congested.	The dud argument that young people need to buy in the inner north is the wrong end of the stick. Make the outer suburbs desirable places and the young will strike out and move there. O'Connor was once an outer suburb!	No, I don't want to / I currently live in a detached house			Incompatible with the elements that make Canberra an amazing place to bring up kids.

No	Yes		No	It goes far but not far enough, ACT Housing hold alot of property on larger blocks in Canberra and do not want to develop because it would mean over the months of redevelopment, they would be under the numbers for that district/suburb. There needs to be reform for this, in particularly the minimum caps on certain areas so these older homes on larger blocks can be developed into tri or even quad occupancy. The current policies in place are not reflective of the low and middle income community that requires this kind of housing. It would mean slowing of lists which are already out of control but allow for more property in the portfolio in the long run. Short term issues for long time gain.	Yes		It goes further. Re classification of dormant business and commercial districts, particularly around Mitchell, Phillip, Greenway, and Fyshwick would allow more development. Especially in Fyshwick where Canberra avenue development could be revitalised by development to residential.	Solar needs regulation against scammers and confidence acts that are plaguing the issue. Coordination with a government regulatory solution, not bottle necking those to only Actew or RED, but giving a full democrassised retail solution supported by the government, like a choosie, where you can viably and with confidence actually research and afford solutions with increase the uptake and infrustructure. Do that first before, then lower income earners, find ways that ACT Housing can update and facilatate solutions for disabled, elderly, single parents, carers, and essential workers to be able to upgrade and subsidise larger bills with solar and battery solutions. Battery solutions is more an issue of access and cost than pannels.	Yes	The best way is by articulating and communicating the aftermath, the scale of the project and timeline, and the rewards to the neighbours of developments that will yeild curb appeal and value increase of there own property.	100	No. GreenSpace needs to be redeveloped in delapidated areas but curb greenspace in busy streets need to be developed into metered parking like in the new developments on cynthea teague cres in greenway. Metered parking and time sensitive parking in peak days and hours affords those in the developments a freedom to have guests, to engage with the community.	It could be developed more. Greenspace is important but there is an issue around available parking for these developments that should be addressed first and greenspace come after. Think of it as function over design.	I have outlined previously what needs to be done for guidence. Design does need to take into accountt the community of private owners around said developments to give the best outcome for the entire community.	Yes, I'm looking for an affordable home in an established suburb			Missing Middle Housing isn't just about private ownership, and private rentals. This plan should be extended and immediately put into action for Community, disabled and ACT Housing. Taking older larger blocks and redeveloping them, less in the portfolio for short term, more to offer in the longer term with more properties in the portfolio.
Yes	No	I already own a home and don't plan to move for a long time. But I am in favour of the changes. They should go further!	Maybe	They're great, and much needed. However car park size should also be adjusted to allow smaller car spots for the second and third parking spot attached to each block.	Yes		Very well	Yes	Yes		100	No, we should not be encouraging multi car homes. If there is a bus or tram stop nearby or planned, each dwelling should need minimum 1 car spot, even if the homes have multiple bedrooms. But minimum parking space size needs to shrink. We don't need giant cars dominating the city, and people will buy cars that fit in their garage, so we should be able to have much smaller parking spaces.	Pretty well		Yes, for another reason	We always thought we could live in a missing middle style home. We ended up buying something different because it didn't exist, but do plan to build a secondary dwelling on the block.		
Yes	Yes		Yes	I believe these changes is a great step towards providing greater housing choices, availability and affordability. Furthermore, this will encourage vacant block of lands to become more economically viable to build on, or change ownership of vacant blocks to owners who are in position to build. There are many vacant blocks of land throughout the suburbs of Canberra that would be better put to use if homes are actually built. These changes will help nudge along this process.	Yes		It appears detail enough.	It appears sufficient.	Yes		100	It appears sufficient.	It appears sufficient.	It appears sufficient.	No, I don't want to / I currently live in a detached house			While it may not change my immediate living arrangements, I can see the huge benefit for fellow Canberreans and fully support these changes, whether they are downsizers, first home buyers, or wanting to live in the suburbs without having to commit to full size block and detached land.
Yes	Yes		No	Very well	Yes		Very well	Yes	No	Setbacks are too restrictive	100	Parking minimums should be removed. Let the market decide.	Parking minimums should be removed. Let the market decide.	Yes	Yes, I'm looking for an affordable home in an established suburb			These reforms news to be implemented in ALL inner city locations such as reid, Ainslie, Forrest, Yarralumla, turner, Braddon. Preserving many of these suburbs as ultra low density hold our city back by decades.
Yes	Yes		Yes	I broadly support the changes.	Yes		Too restrictive	I would prefer a greater focus on housing but it is not terrible	Yes		100	It is an improvement but I think there is still excessive focus on parking	Parking is the least pleasant landscape outcome and wish it was less stressed	It is far too concerned with subjective notions of aesthetics rather than practical (but hard to determine by buyers) features like build quality and energy efficiency.	Yes, I'd like to downsize and stay in my current neighbourhood			Housing is more important than vibes

CABINET

ACT Government
Territory Planning Authority

DRAFT
MAJOR PLAN AMENDMENT to the TERRITORY PLAN 04

Missing Middle Housing Reform

Residential Zones and Subdivision Policy

May 2025

This draft major plan amendment was prepared under division 5.2.3 of the *Planning Act 2023*

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1.0 INTRODUCTION

1.1 Purpose

This document is draft major plan amendment 04 – Missing Middle Housing Reform (DPA-04) to the Territory Plan.

Under section 63 of the *Planning Act 2023* (the Planning Act) the Territory Planning Authority (the Authority) is making DPA-04 available to the public for comment.

Key parts of this document are:

- section 1.3 – what the supporting report contains and how to access it
- section 2 – what the draft major plan amendment (DPA) is applicable to
- section 3 – how the proposal meets the key strategic planning documents
- section 4 – details about the public consultation period and how to make comments
- section 5 – how the Territory Plan will be amended by this DPA
- section 6 - if the proposal has interim effect
- section 7 – consequential amendment to other documents, such as the technical specifications, as a result of this DPA

1.2 Outline of process

A major plan amendment (MPA) is a statutory process under the Planning Act that enables the Territory Plan to be amended. The three types of MPAs are:

- Proponent-initiated
- Authority-initiated
- Minister-initiated

DPA-04 is an authority-initiated MPA.

For more information about the content of the Territory Plan and the major plan amendment processes please refer to the Environment, Planning and Sustainable Development (EPSDD) website.

1.3 Supporting Report

While this document sets out the amendments to the Territory Plan, this document should be read in conjunction with the relevant supporting report.

The supporting report provides further context and background, including outlining:

- the proposal
- why the change proposed by DPA-04 is needed
- how the proposal gives effect to 'key documents' including the ACT Planning Strategy and the District Strategies.

The supporting report for this DPA is available as part of the 'background papers' and along with this document on the EPSDD website.

2.0 APPLICABLE LAND

The subject area for DPA-04 is residential zoned land currently zoned RZ1 Suburban and RZ2 Suburban Core. Some consequential amendments are also proposed to land zoned RZ3 Urban Residential, RZ4 Medium Density Residential and RZ5 High Density Residential as a result of the changes made in RZ1 and RZ2.

The extent and distribution of RZ1 is outlined in Figure 1 and RZ2 in Figure 2.

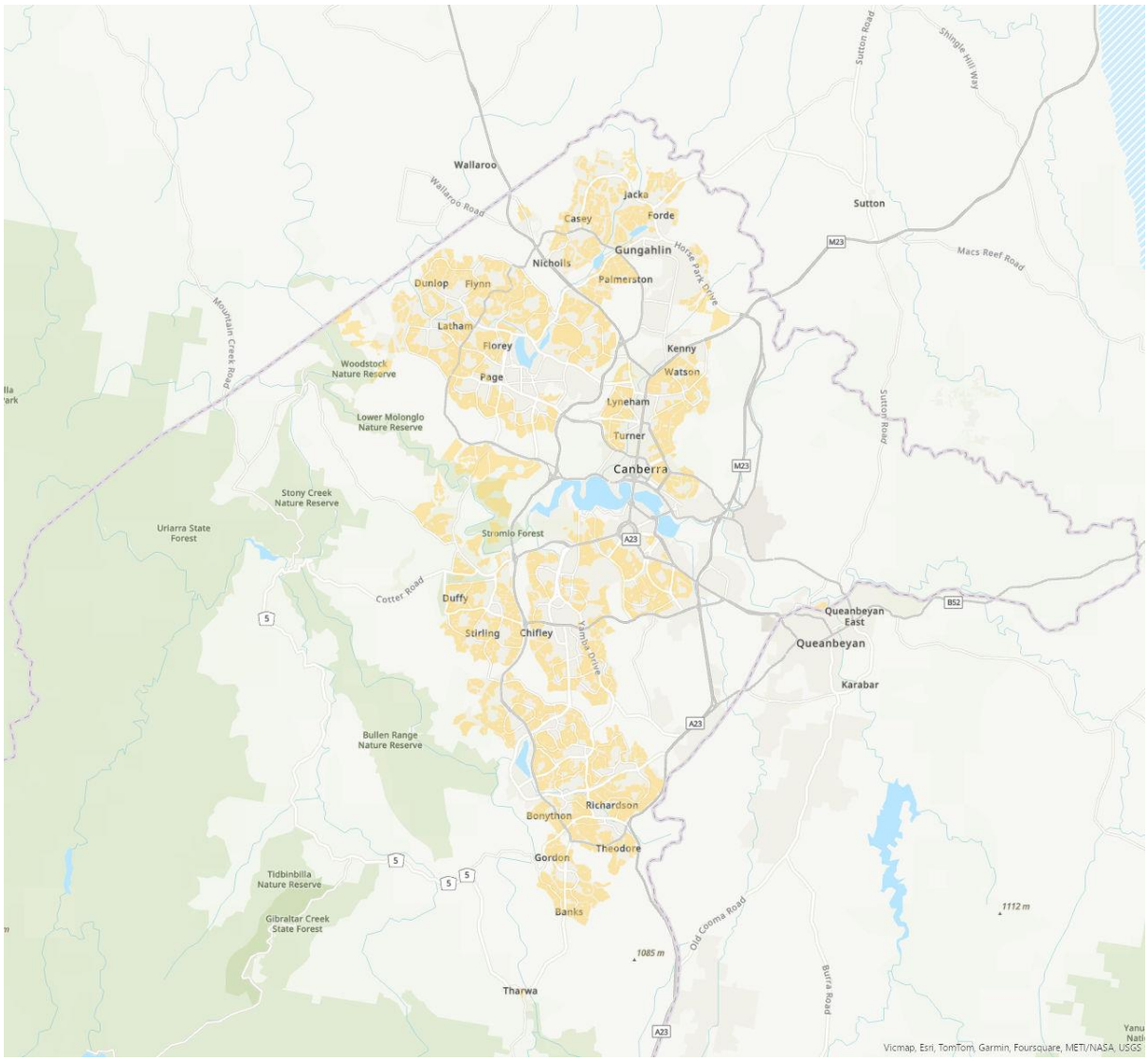

Figure 1 – Current distribution of RZ1 land

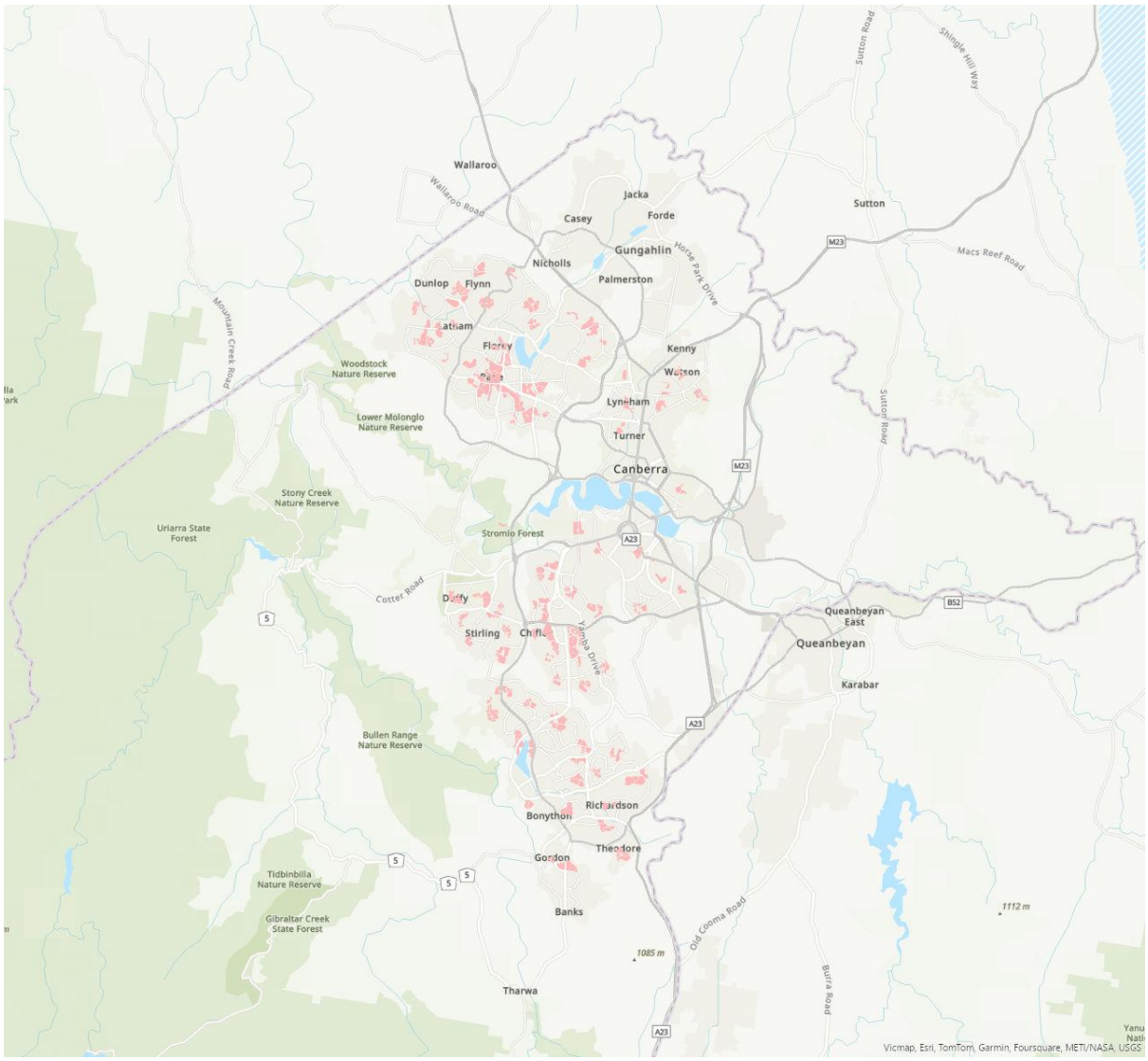

Figure 2 – Current distribution of RZ2 land

For a more detailed site description of the zones, please refer to the relevant supporting report.

3.0 NEED FOR THE DRAFT MAJOR PLAN AMENDMENT

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 ACT Planning Strategy 2018, which sets the high-level and long-term goals for planning in the ACT, aims to accommodate this population growth by delivering 70 per cent of new housing within the existing urban footprint. Ultimately, the Planning Strategy aims to deliver a compact and efficient city. These reforms will directly facilitate achievement of this aim by permitting more 'missing middle' housing within existing RZ1 and RZ2 zoned land.

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 across all districts (excluding East Canberra) to provide greater housing choice, including in districts with lower growth projections.

Most recently, the Minister for Planning's Statement of Planning Priorities directly notes a priority to enable diverse housing choice by delivering missing middle housing in existing residential areas. The Statement of Planning Priorities highlights that the Missing Middle Housing Design Guide (MMHDG), along with amendments to the planning framework (this DPA), as key mechanisms in which this will be delivered.

The draft MMHDG provides best practice design guidance for targeted 'missing middle' residential typologies. For the purpose of these reforms, 'missing middle' is defined as multi-occupancy (dual and tri-occupancy), townhouses, terrace homes and low-rise apartments (up to three storeys). Currently, the planning framework does not widely facilitate the delivery of missing middle housing and often presents barriers to this type of housing. The changes proposed in this DPA have been informed by the best practice design guidance in the draft MMHDG. Together, these amendments and the draft MMHDG enable for high-quality missing middle housing to be delivered in our existing residential areas.

Further detail about how this DPA meets the key strategic policy documents is set out in the supporting report.

4.0 CONSULTATION

Consultation activities have been undertaken during the preparation of the draft Missing Middle Housing Design Guide with key design and industry professionals. This early consultation with local professionals as the reforms have been developed for broader public consultation has helped to test the design guidance and proposed Territory Plan changes to ensure it is promoting achievable and feasible outcomes.

These activities are summarised in the supporting report.
Information about upcoming consultation and next steps are outlined in sections 4.1-4.3 below.

4.1 Consultation with the public

Public consultation on this DPA is occurring concurrently with the draft MMHDG.

Consultation will occur between 20 May 2025 to 22 July 2025. Written submissions will be accepted from 20 May 2025 to 5 August 2025.

More information about consultation, including upcoming activities, is available online https://yoursayconversations.act.gov.au/missing-middle-housing-reforms.

Any comments made as part of the consultation activities outlined on the above webpage will be considered as part of this DPA process.

The EPSDD website also contains information about:

- what information written comments must include.
- how written comments can be submitted.
- the publication of submitted comments on the Authority's website and how personal information is managed.

4.2 Consultation with agencies

In accordance with section 62 of the Planning Act, the Authority must consult with each of the following in relation to this DPA:

- the National Capital Authority
- the Conservator of Flora and Fauna
- the Environment Protection Authority
- the Heritage Council
- each referral entity
- any land custodian or lessee of public unleased or leased land.

Consultation with agencies will occur concurrently with public consultation.

4.3 Following consultation

Following consultation with the public and agencies, the Authority will prepare the consultation report. The Authority will then revise or withdraw the DPA.

Should the DPA not be withdrawn, the consultation report along with the DPA will be given to the Minister for Planning and Sustainable Development who will refer it to the relevant ACT Legislative Assembly Standing Committee to consider whether to conduct an Inquiry.

5.0 DRAFT MAJOR PLAN AMENDMENT 04

This section details how DPA-04 proposes to amend the Territory Plan.

DPA-04 proposes amendments to the Subdivision Policy and the Residential Zones Policy of the Territory Plan. These amendments are required to give effect to the proposal set out in the supporting report. The amendments to the Territory Plan are summarised below and detailed in sections 5.1 to 5.6 of this document.

- 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 the maximum second dwelling size of 120m^2
    - 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
    - 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.

The supporting report also provides further detail about the amendments and why they are needed.

For consequential amendments to the other documents, such as the technical specifications as a result of this DPA, see section 7 of this document.

5.1 Amendments to Part A – Administration and Governance

Substitute the 'Housing Design Guide' section under 'Applicability of design guides' with the following.

Applicability of design guides
Housing Design Guide
Development is required to consider and provide a design response to the Housing Design Guide where the development is a residential or mixed-use development that is: • four or more storeys and provides more than one residential dwelling, The following developments are excluded: • secondary residences • extensions and alterations to multi-unit housing (of no more than 50% increase in floor area).
Missing Middle Housing Design Guide
Development of missing middle housing (as defined in the Missing Middle Housing Design Guide) is required to consider and provide a design response to the Missing Middle Housing Design Guide where the development: • Is three storeys or less and provides more than 1 dwelling on a block. • Is for subdivision or consolidation of currently leased RZ1 and RZ2 blocks associated with a missing middle housing development proposal. *Note*: An assessment only needs to be undertaken against the applicable housing design guide, not both.

5.2 Amendments to the Subdivision Policy – Assessment Outcomes

Substitute assessment outcome 2 in the 'Urban Structure and Natural Systems' heading in the Subdivision Policy with the following.

Assessment outcome – Subdivision	
Urban Structure and Natural Systems	2. 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).

5.3 Amendments to the Subdivision Policy – Assessment Requirements

Delete assessment requirement 6, shown below, of the assessment requirements in the Subdivision Policy.

Control	Assessment requirement
Subdivision of certain	6. Consolidation of suitable blocks (i.e. adjacent blocks with shared boundaries) are permitted for co-housing development.

Control	Assessment requirement
development types	

Substitute assessment requirements 7, 8 and 9 and notes of the assessment requirements in the Subdivision Policy with the following.

Control	Assessment requirement
Subdivision and consolidation – residential blocks generally	7. Subdivision or consolidation is only permitted where each subdivided or consolidated blocks are connected to utility services. 8. 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. Note: For this provision, subdivision does not include a minor boundary adjustment, where no additional blocks are created.
Subdivision and consolidation – RZ2, RZ3, RZ4 and RZ5	9. Subdivision or consolidation is only permitted on RZ2, RZ3, RZ4 and RZ5 blocks where one or more of the following apply: a) a new dwelling is capable of being accommodated on the block in accordance with relevant parts of the Territory Plan b) if one dwelling on the land is lawfully constructed, the proposed development demonstrates that any building on a consequent lease is or can be designed in accordance with relevant parts of the Territory Plan.

Substitute assessment requirement 10 of the assessment requirements in the Subdivision Policy with the following.

Control	Assessment requirement
Consolidation – RZ1	10. This requirement applies to consolidation of blocks in RZ1 which proposes consolidation of: a) A standard block with unleased land. b) One or more standard blocks that are registered or provisionally registered under the *Heritage Act 2004*. 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. 10a. In all other cases, block consolidation in RZ1 is permitted, unless one of the following apply: a) One or more block has been previously consolidated. b) The consolidated block is proposed to contain, or will contain, less than or equal the amount of dwellings on the unconsolidated blocks.

Control	Assessment requirement
	Example for 10a. b) – It is proposed to consolidate three blocks into one. All three original blocks contain one dwelling each. Consolidation of these three blocks would only be permitted if, as part of the consolidation proposal or in the future, four or more dwellings would be contained on the site.

Substitute assessment requirements 11, 12, 13 and 14 of the assessment requirements in the Subdivision Policy with the following.

Control	Assessment requirement
Subdivision – RZ1	11. In RZ1, subdivision under the *Planning Act 2023* to create one or more additional blocks is permitted where each subdivided block contains a lawfully constructed dwelling. 12. In RZ1, subdivision of multi-unit housing under the *Unit Titles Act 2001* is permitted where all dwellings have been lawfully constructed, and one of the following applies: a) On a standard block a minimum of 600m^2. b) On a non-standard block. Note 1: staged development under the *Unit Titles Act 2001* is not permitted for less than five units. Note 2: For this provision, subdivision does not include a minor boundary adjustment, where no additional blocks are created.

5.4 Amendments to the Residential Zones Policy – land use

Substitute the 'Co-housing' row of the Land Use table in the Residential Zones Policy with the following.

Land Use / Development Type	RZ1	RZ2	RZ3	RZ4	RZ5
Co-housing	Y	Y	Y	Y	Y

5.5 Amendments to the Residential Zones Policy – Policy Outcomes

Substitute the Policy Outcomes for 'RZ1 – Suburban Zone' in the Residential Zones Policy with the following.

RZ1 – Suburban Zone
1. Provide for a range of housing choices in a suburban setting which is primarily low density and low rise. 2. Housing development meets changing household and community needs and demonstrates good design outcomes. 3. Provide opportunities for redevelopment by enabling some change to residential density and subdivision pattern.

RZ1 – Suburban Zone

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

Substitute the Policy Outcomes for 'RZ2 – Suburban Core Zone' in the Residential Zones Policy with the following.

RZ2 – Suburban Density Zone

1. Facilitate development or redevelopment of sites that are generally in reasonable proximity to local services and amenities.
2. Achieve a mix of low and medium density housing in a manner that demonstrates good design outcomes.
3. Provide for a range of housing choice that is primarily low rise multi-unit housing or more compact single dwelling housing.
4. Provide opportunities for redevelopment by enabling change, including to residential density and subdivision pattern.

Substitute the Policy Outcomes for 'RZ3 – Urban Residential Zone' in the Residential Zones Policy with the following.

RZ3 –Residential Transition Zone

1. Facilitate urban development or redevelopment to achieve primarily medium density, low-mid rise housing within close proximity to local services and amenities in a manner that demonstrates good design outcomes.
2. Provide for a range of housing choices, which are predominately multi-unit housing of various dwelling types or more compact single dwelling housing.
3. Provide opportunities for redevelopment by enabling change, including to the residential density and the original pattern of subdivision.

Substitute the Policy Outcomes for 'RZ4 – Medium Density Residential Zone' in the Residential Zones Policy with the following.

RZ4 – Urban Residential Zone

1. Facilitate urban development or redevelopment of sites to achieve medium to high density, mid-rise housing in a manner that demonstrates good design outcomes.
2. Provide for a range of housing choices, which are predominately medium to high density multi-unit housing of various dwelling types.
3. Provide opportunities for redevelopment by enabling change, including to residential density and the original pattern of subdivision.

Substitute the Policy Outcomes for 'RZ5 – High Density Residential' in the Residential Zones Policy with the following.

RZ5 – Urban Density Zone

1. Facilitate urban development or redevelopment of sites to achieve high density, medium rise housing in a manner that demonstrates good design outcomes.
2. Provide opportunities for the establishment and maintenance of residential housing that is generally high density.
3. Provide housing in areas with very good access to facilities and services and/or frequent public transport services.
4. Provide for a range of high density and larger scale housing choices of various dwellings types.
5. Provide opportunities for redevelopment by enabling changes, including to the original pattern of subdivision.

5.6 Amendments to the Residential Zones Policy – Assessment Requirements

Delete assessment requirement 1, shown below, of the assessment requirements in the Residential Zones Policy.

Control	Assessment requirement
Distribution of uses - apartments	1. No new apartments are permitted in RZ1.

Delete assessment requirement 4, shown below, of the assessment requirements in the Residential Zones Policy.

Control	Assessment requirement
Secondary residences	4. The minimum block size for a secondary residence is 500m^2.

Delete assessment requirement 6 and the 'co-housing' heading, shown below, of the assessment requirements in the Residential Zones Policy.

Control	Assessment requirement
Co-housing	6. The minimum block size for a co-housing development is 1,050m^2.

Delete assessment requirement 9, shown below, of the assessment requirements in the Residential Zones Policy.

Control	Assessment requirement
Height of buildings – RZ3, RZ4 and RZ5	9.Maximum height of building is: a) RZ3 – 10.5m. b) RZ4 – 12.5m. c) RZ5 – 21.5m

Substitute assessment requirement 10 and 11, and the 'number of storeys – RZ1 and RZ2' heading of the assessment requirements in the Residential Zones Policy with the following.

Control	Assessment requirement
Number of storeys	10. Maximum number of storeys is: a) RZ1 – 2 storeys b) RZ2 – i) for single dwelling housing and secondary residence – 2 storeys ii) for multi-unit housing – 3 storeys c) RZ3 - i) for secondary residence – 2 storeys ii) for single dwelling housing– 3 storeys iii) for multi-unit housing – 4 storeys d) RZ4 – i) for secondary residence – 2 storeys ii) for single dwelling housing– 3 storeys iii) for multi-unit housing – 6 storeys e) RZ5 – i) for secondary residence – 2 storeys ii) for single dwelling housing– 3 storeys iii) for multi-unit housing – 7 storeys

Substitute assessment requirements 12 and 13 of the assessment requirements in the Residential Zones Policy for the following.

Control	Assessment requirement
Site coverage – single dwellings	12 Site coverage for single dwelling housing is a maximum of: a) for blocks that do not have a street frontage or adjacent to an urban open space or the community path systems public open space – 40% of the block area b) for large blocks, unless mentioned in a) – 40% of the block area c) for mid-sized blocks, unless mentioned in a) – 60% of the block area d) for compact blocks, unless mentioned in a) – 70% of the block area Note: For this provision single dwelling housing site coverage includes secondary residence.

Delete assessment requirements 16, 17, 18, 19, 20 and 21, shown below, of the assessment requirements in the Residential Zones Policy for the following.

Control	Assessment requirement
Housing density and minimum block areas –	16. For multi-unit housing in RZ1 (excluding secondary residence developments): a) Minimum block area for more than one dwelling: 800m^2. b) Maximum number of dwellings per standard block: 2.

Control	Assessment requirement
multi-unit housing – RZ1	c) Maximum number of dwellings per non-standard blocks where the crown lease explicitly permits 2 dwellings: 2. Note: this does not apply to block for which the crown lease does not specify the number of dwellings permitted or permits more than 2 dwellings.
Housing density and minimum block areas – multi-unit housing on surrendered residential blocks – RZ1	17. For multi-unit housing on a surrendered residential block in RZ1 (excluding secondary residence developments): a) Minimum block area for more than one dwelling: 700m^2. b) Maximum number of dwellings per block: 2.
Housing density and minimum block areas – supporting housing and community housing – RZ1	18. For supportive housing and community housing in RZ1: a) Minimum block area for more than one dwelling: 600m^2. b) Maximum number of dwellings per block: 1 additional dwelling for every 250m^2 (or part thereof) over the minimum.
Housing density and minimum block areas – multi-unit housing on standard blocks – RZ2	19. For multi-unit housing on a standard block in RZ2 (excluding secondary residence developments): a) Minimum block area for more than one dwelling: 700m^2. b) Maximum number of dwellings per block: 1 additional dwelling for every 250m^2 (or part thereof) over the minimum. 20. For multi-unit adaptable housing on a standard block in RZ2 (excluding secondary residence developments): a) Minimum block area for more than one dwelling: 600m^2. b) Maximum number of dwellings per block: 1 additional dwelling for every 250m^2 (or part thereof) over the minimum and all dwellings are built to be adaptable. 21. Irrespective of the above requirements, for RZ2 blocks with a street frontage less than 20m wide (measured at the property boundary), the maximum number of dwellings per block is 3.

6.0 Interim effect

DPA-04 does not have interim effect as section 64 of the Planning Act does not apply to it. Therefore, the current provisions of the Territory Plan will continue to apply to development applications while the DPA remains in draft form.

More information about interim effect is available the EPSDD website.

7.0 Consequential amendments to other documents

Documents, such as the technical specifications and development controls, are not part of the Territory Plan and cannot be amended as part of this DPA. The amendments in this section will be undertaken to the relevant documents when/if DPA-04 is finalised and commences.

The Authority proposes to consequentially amend the Subdivision Technical Specifications and Residential Zones Technical Specifications to support the proposed amendments to the Subdivision Policy and Residential Zones Policy as part of DPA-04. These consequential amendments are summarised below.

- Subdivision Technical Specifications:
    - Reducing minimum block sizes for RZ1 to RZ4.
    - New RZ1 blocks to be either street facing or front a path or open space
    - Limit the location and size of consolidated RZ1 blocks based on location.
    - Adjusting minimum block size specifications across residential zones.
    - Other wording changes to clarify specifications that are intended to only apply to estate subdivisions.
- Residential Zones Technical Specifications:
    - Set target dwelling densities for different types of multi-unit housing in RZ1
    - Remove minimum dimensions of private open space of single dwelling developments.
    - Reduce the minimum private open space specifications for multi-unit developments in RZ1 and RZ2.
    - Align principal private open space requirements for multi-unit housing developments across all residential zones.
    - Alter building height limitations (in metres) across all residential zones to reflect changes in the Residential Zones Policy and a transition of height across zones.
    - Alter building envelopes by slightly increasing the starting point where measurements are taken.
    - Standardise upper floor level front setbacks with lower floor level front setbacks for single dwelling and multi-unit housing.
    - Reduce side setbacks and increasing rear setbacks for multi-unit housing in RZ1 and RZ2.
    - Increase the angle in which solar building envelopes are calculated for multi-unit housing from 31° to 45°.

- Amend building separation and privacy specifications for multi-unit housing across all residential zones to be more prescriptive on separation between walls with windows and to principal private open spaces.
- Reduce the minimum dwelling floor area of studios and 3+ bedroom dwellings.
- Reduce the minimum dimensions of secondary bedrooms.
- Remove maximum building depth specifications to provide greater flexibility in design outcomes.
- Remove minimum floor to floor height, to rely on the current ceiling height specifications.
- Consolidate storage requirements for multi-unit housing.
- Decrease minimum planting area requirements from multi-unit housing in RZ1 and RZ2.
- Increase minimum tree canopy coverage requirements for tree canopy coverage that applies to multi-unit housing developments in RZ1 and RZ2.
- Remove specification for a minimum of one car space per dwelling to be roofed.
- Adjust parking rates for multi-unit housing across all residential zones.

Separate documents have been prepared showing how the above amendments will be presented in the Residential Zones Technical Specifications and Subdivision Technical Specifications. These documents are also available on the EPSDD website.

Further discussion on the consequential amendments proposed by DPA-04 to the technical specifications are outlined in the supporting report.

General information about these other documents, such as how the technical specifications will be used by the proponent and Authority in determining a development application, can be found on the EPSDD website.

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Appendix 06

ACT Government

Missing Middle Housing Reforms

Draft Plan Amendment 04

Supporting Report

Environment, Planning and Sustainable Development Directorate

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Executive summary

This supporting report was prepared by the Territory Planning Authority (the Authority) to support Draft Major Plan Amendment 04 (DPA-04). DPA-04 proposes to amend the provisions of the Territory Plan that relate to subdivision, consolidation and redevelopment in the residential zones. This supporting report outlines the proposal, the proposed amendments to the Territory Plan and the relevant planning context.

This supporting report outlines a proposal to implement missing middle housing reform into the ACT's planning system.

'Missing middle' is a term used to describe the range of housing options between a detached single dwelling and high-rise apartment buildings. Australian cities, including Canberra, have traditionally provided the former and more recently the latter. This had led to a lack of housing choice, particularly for people who cannot afford or do not desire to live in a traditional home. For this reform proposal, missing middle is defined as multi-occupancy (dual and tri-occupancy), townhouses, terrace homes and low-rise apartments (up to three storeys).

Locally, the ACT Planning Strategy 2018 sets a target to provide 70% of new dwellings within the existing urban footprint. This will allow more people to live closer to services, employment and amenities. To continue to increase housing supply and provide greater choice for an expanding population, the ACT will need to densify existing residential areas. Missing middle housing is the best option as it increases housing choice whilst being compatible with existing residential development, and limits the need for new greenfield development and urban sprawl.

To achieve greater housing choice and supply within existing areas, two key reforms are proposed to the ACT planning system. The first is through DPA-04 which proposes amendments to the subdivision, consolidation and residential redevelopment provisions of the Territory Plan. The second is the introduction of a draft Missing Middle Housing Design Guide (draft MMHDG).

The ACT planning system seeks to deliver high-quality built form outcomes for the residents of Canberra by utilising flexibility to encourage design innovation. The Territory Plan is the key planning policy document that regulates all development in the ACT through zoning and setting requirements and outcomes.

Supporting the Territory Plan in the ACT planning system are the design guides. The design guides provide design guidance for proponents and the Authority in preparing and assessing development applications. As part of the implementation of the missing middle housing reform, the Authority has developed a draft Missing Middle Housing Design Guide (draft MMHDG).

The draft MMHDG, which provides design guidance to achieve best practice design for missing middle housing typologies, has informed the proposed changes proposed in DPA-04. These design-led amendments aim to encourage a diverse range of housing to be built and for high-quality design outcomes to be achieved, particularly in RZ1 and RZ2 residential zones.

In delivering this, DPA-04 proposes amendments to the Subdivision Policy and the Residential Zones Policy of the Territory Plan. Consequential amendments are also proposed to be made to the Subdivision Specifications and the Residential Zones Technical Specifications to provide guidance to proponents and the Authority when assessing development applications.

If approved, DPA-04 would remove barriers to development and redevelopment of missing middle housing, particularly in RZ1 and RZ2 zones. It would support a more flexible and responsive planning system, by providing additional development capacity within our existing suburbs. The changes will also support the

residential zones to respond quickly to population growth and market demand, and to be less reliant on land release in greenfield areas to provide land for new housing.

1. Introduction

Draft Plan Amendment 4 (DPA-04) is an Authority-initiated major plan amendment made under the section 60 of the *Planning Act 2023* (the Act). This supporting report addresses the requirements set out in section 55 the Act.

This supporting report provides background, planning context and supports the DPA for consideration by the public, government agencies and the Legislative Assembly. For context, please read this document in conjunction with DPA-04.

The report (including attachments) meets the requirements of the relevant documentation and accessibility standards, including Web Content Accessibility Guidelines.

1.1 Background to the proposal

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 population, it is anticipated that the ACT will need to provide 30,000 new homes by 2030 and up to 100,000 new homes by 2050.

In the context of greater demand for housing and housing choice, the community has expressed a strong desire for more choice in the way they live, including greater diversity of housing types, lifestyle and transport options to support a wider range of people and households. Currently, new homes in Canberra primarily comprise of low-density, separate housing and high-density apartments which does not align with these expectations. This leaves a gap for 'missing middle' housing, defined in the ACT context as multi-occupancy (dual and tri-occupancy), townhouses, terrace homes and low-rise apartments. Filling the missing middle gap is important to meet the needs of our diverse and growing population.

Consistent with the directives of the ACT Planning Strategy (2018), associated District Strategies (2023) and the Minister for Planning's Statement of Planning Priorities (2024-25), the Authority has initiated DPA-04 which seeks to enable the development of missing middle housing, focusing on the RZ1 and RZ2 Residential Zones. These changes will realise the Government's aims to enable the development of new housing, greater dwelling numbers, improved planning outcomes and other benefits to the community.

1.2 Applicable land

The ACT currently has 17,663.2ha of urban land (zoned community facilities, commercial and/or residential), of which 67.6% is zoned RZ1 (11,933.00Ha) and 9.5% is zoned RZ2 (1,686.90Ha).

DPA-04 proposes to amend the Subdivision Policy and the Residential Zones Policy of the Territory Plan. These amendments will apply to all residential zones (RZ1, RZ2, RZ3, RZ4 and RZ5). However, these primarily target RZ1 and RZ2 zones as the largest residential zones with the most restrictive controls currently presenting barriers to missing middle housing.

The Residential Zones Policy of the Territory Plan (2023) articulates the policy outcomes to be achieved in all and specific residential zones as well as assessment outcomes and assessment requirements when assessing development applications.

All Residential Zones

The residential zones account for over 75% of urban land in the ACT. The policy outcomes for all residential zones in the current Residential Zones Policy are

1. Residential zones are primarily for residential developments but permit other development that complements residential uses and streetscapes.
2. Development should be of a scale and nature that recognises and responds to the zone hierarchy.
3. 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.

Suburban Zone (RZ1)

The RZ1: Suburban Zone accounts for 67.6% of all urban land (11,933.00Ha) and is broadly distributed amongst all nine districts (see Figure 1).

Currently, RZ1 is typified by very low density, predominately single storey development. The current policy outcomes for the RZ1 zone also provide that change, particularly with regard to density and subdivision pattern are limited.

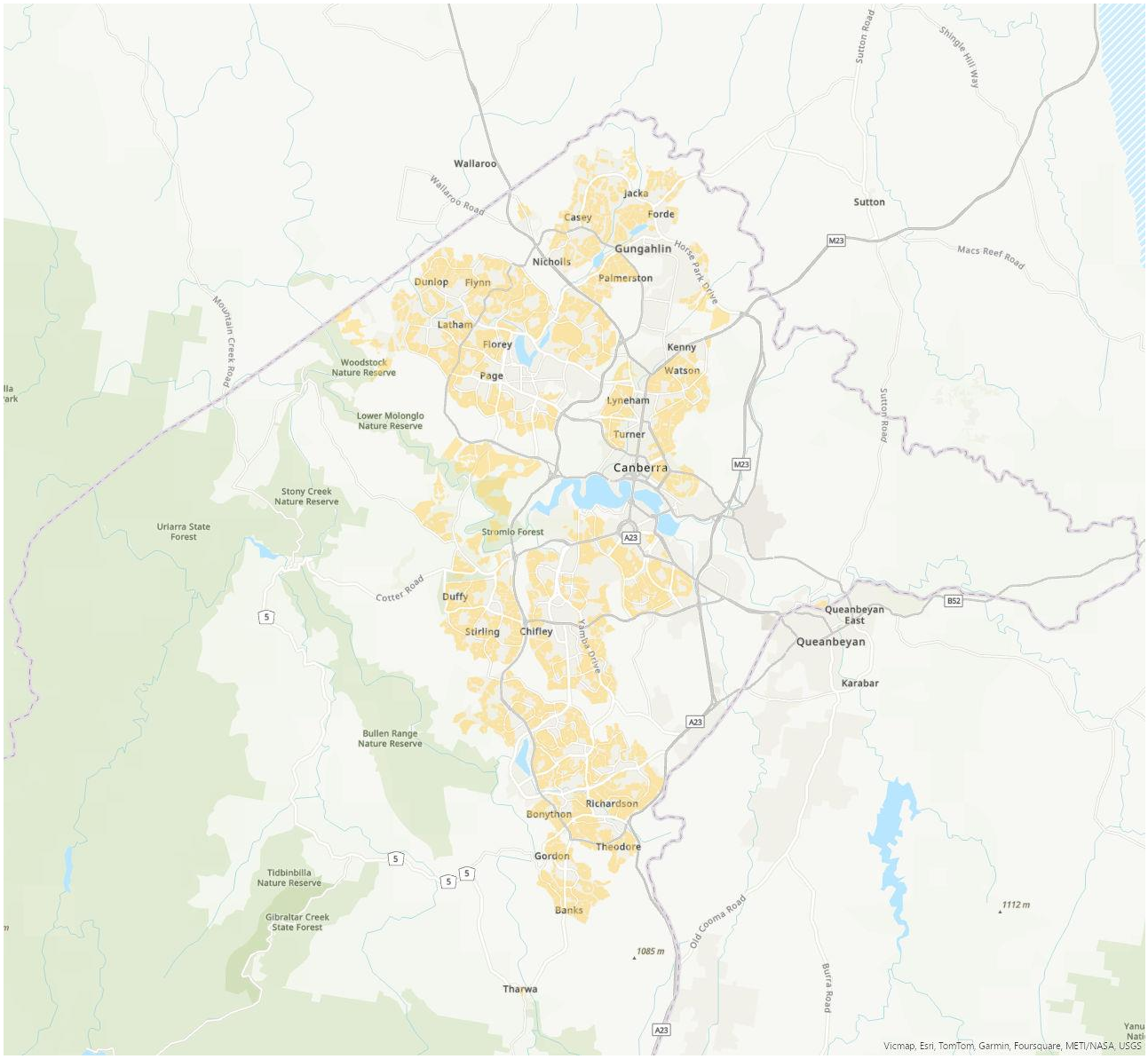

Figure 1: Current distribution of RZ1: Suburban Zone within the ACT

Suburban Core (RZ2)

The RZ2 zone accounts for 9.5% of all urban land and is in seven districts (See Figure 2). Currently there is no land within the districts of Gungahlin or Molonglo zoned RZ2.

Currently, RZ2 is typified largely as an extension of RZ1, primarily made up or low density, low rise developments. This is despite the policy outcomes seeking to deliver a range of housing choice of a mix of low and medium density housing close to local services.

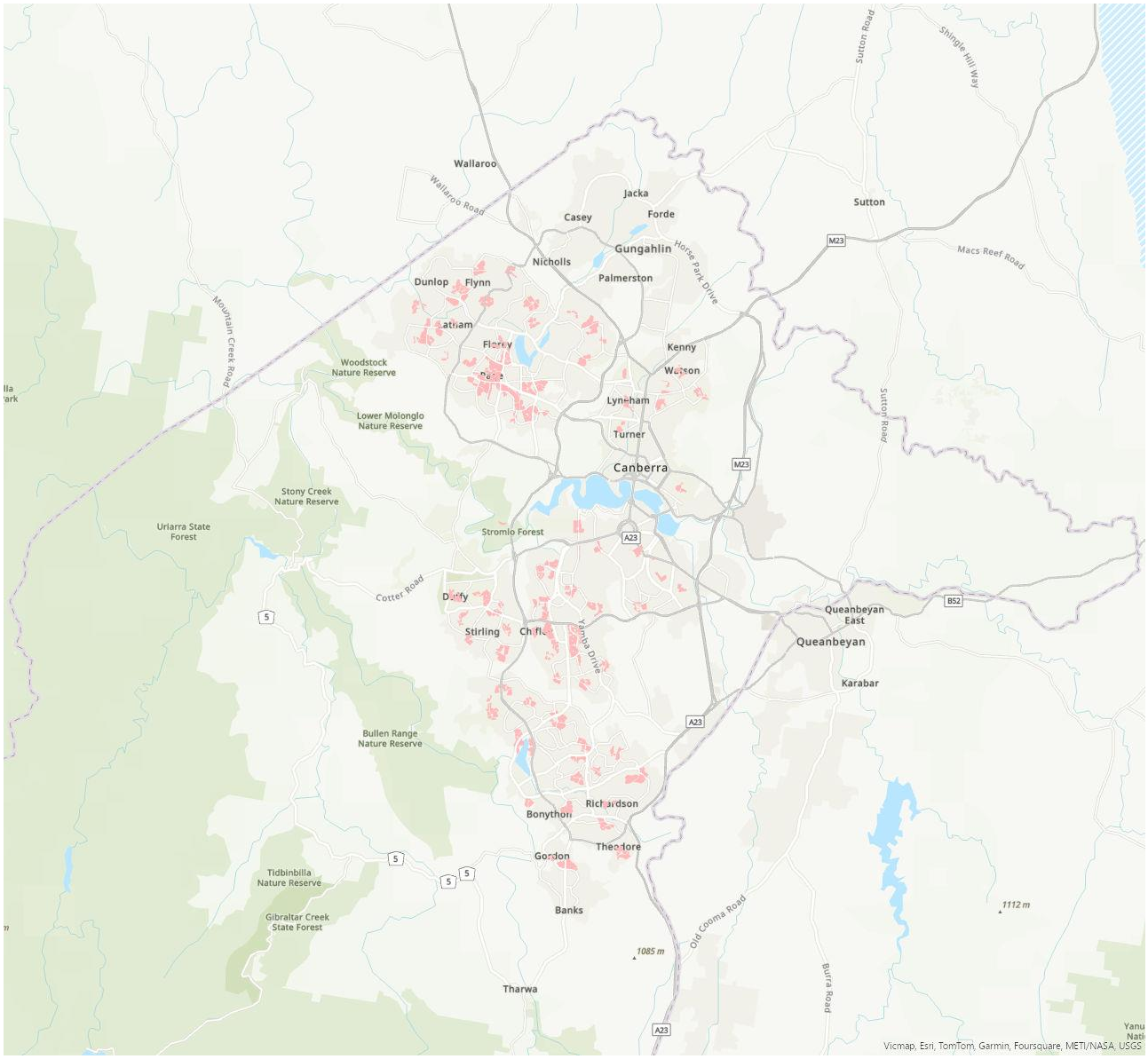

Figure 2: Current distribution of RZ2: Suburban Core Zone within the ACT

2. Proposal

This section of the report includes intent and details of the specific amendments proposed to the Territory Plan and why they are needed. The proposed amendments to the Territory Plan are detailed in the DPA document.

2.1 Need for the proposed amendment

The ACT's population is expected to reach almost 700 000 people by 2050 and to support this population growth up to 100 000 new homes will need to be built. The ACT Planning Strategy sets the aim for 70% of new housing should be built within the existing urban areas to ensure new housing is close to services, employment and public transport.

The Minister's Statement of Planning Priorities also foreshadows a need for more well located missing middle housing and the development of a missing middle design guide to guide this development. In addition, both documents state that the ACT must diversify its housing stock to provide more housing choice from the predominance of detached suburban single dwelling housing.

Underpinning this is the draft Missing Middle Housing Design Guide (MMHDG). The draft MMHDG has been developed as a new addition to the suite of existing design guides, including the Housing Design Guide (HDG), Urban Design Guide (UDG), City Centre Urban Design Guide (CCUDG) and Biodiversity Sensitive Urban Design Guide (BSUDG).

The draft MMHDG aims to clearly communicate what good design outcomes look like for missing middle housing typologies, and advocates for innovative approaches to development. The design guidance has a focus on the human scale of development, how street character and verge trees can be protected, and how denser development considers and mitigates impact on neighbours. The draft MMHDG also aims to support sustainable building practices and efficient land use, and to foster more lively and walkable communities with better access to existing amenities.

DPA-04 proposes several amendments to the Territory Plan and related technical specifications to give effect to the best practice design outcomes envisaged by the draft MMHDG. Together, they will enable well located and designed missing middle housing within the existing residential zones, particularly RZ1 and RZ2.

2.2 Positive and negative impacts of the proposed amendment

The positive and negative impacts of the proposal are outlined below.

Positive impacts

The proposal is anticipated to generate a wide range of direct and indirect benefits for the ACT community, including:

- *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. This helps accommodate a wider range of household sizes, ages, and income levels. and allows for the community to select the 'best fit' housing for their life stage and personal circumstances.
- *Housing availability and affordability* - Missing middle housing provides more affordable living options compared to traditional single dwelling family homes. By increasing the variety of housing typologies closer to existing services, it can serve to increase overall supply and offer alternatives to detached homes.
- *Urban vitality* - Missing middle housing can reinvigorate older neighbourhoods with underutilised land or aging housing stock. By increasing the number of homes in existing suburbs, public spaces and businesses can benefit from increased patronage while preserving the character and scale of the area.

- *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.
- *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.
- *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.

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:

- *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.
- *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.
- *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.
- *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.

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.

2.3 Amendments to the Territory Plan

In addition to the introduction of the draft MMHDG, amendments will be required to the Subdivision Policy and the Residential Zones Policy of the Territory Plan. Supporting changes are also proposed to the technical specifications (see section 3.4 of this document).

Detail of the proposed amendments to the Territory Plan can be found in section 5 of the DPA document. In addition, a summary of amendments required to realise this proposal can be found below.

Residential Zones Policy

Changes to the Residential Zones Policy include:

- 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
- 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
- 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

Importantly, changes to the naming of the residential zones are proposed, to better describe the types of residential development outcomes to be achieved, reflecting the housing typologies likely to be delivered in each zone. These naming changes are set out below.

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

Figure 3 – Existing and proposed naming of residential zones

Subdivision Zones Policy

Changes to the Subdivision Policy include:

- 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.

2.4 Changes required to the technical specifications

The technical specifications are not part of the Territory Plan but are used as guidance by the proponent and the Authority in the preparation and assessment of development applications. The technical specifications describe one way in which the relevant Territory Plan provisions can be met or set out reasonable parameters for more subjective provisions.

As the technical specifications are not part of the Territory Plan, they are not amended by DPA-04.

Despite this, the consequential amendments proposed to the Subdivision Specifications and the Residential Zones Technical Specifications are summarised below and a detailed version of the amendments are provided to view with DPA-04.

Residential Zones Technical Specifications

The proposed changes to the Residential Zones Technical Specifications include:

- Set target dwelling densities for different types of multi-unit housing in RZ1.
- Remove minimum dimensions of private open space of single dwelling developments to rely on minimum proportion specifications.
- Reduce the minimum private open space specifications for multi-unit developments in RZ1 and RZ2 from 40% to 30%.
- Align principal private open space requirements for multi-unit housing developments across all residential zones.
- Alter building height limitations (in metres) across all residential zones to reflect changes in the Residential Zones Policy.
- Alter building envelopes by slightly increasing the starting point where measurements are taken.
- Standardise upper floor level front setbacks with lower floor level front setbacks for single dwelling and multi-unit housing.
- Reduce side setbacks and increasing rear setbacks for multi-unit housing in RZ1 and RZ2.
- Increase the angle in which solar building envelopes are calculated for multi-unit housing from 31^o to 45^o.
- Amend building separation and privacy specifications for multi-unit housing across all residential zones to be more prescriptive on separation between walls with windows and to principal private open spaces.
- Reduce the minimum dwelling floor area of studios (from 40 to 35m^2) and 3+ bedroom dwellings (from 95 to 90m^2).
- Reduce the minimum dimensions of secondary bedrooms (from 3m to 2.7m).
- Remove maximum building depth specifications to provide greater flexibility in design outcomes.
- Consolidate storage requirements for multi-unit housing.
- Decrease minimum planting area requirements from multi-unit housing in RZ1 and RZ2 (from 35% to 30%).
- Increase minimum tree canopy coverage requirements for tree canopy coverage that applies to multi-unit housing developments in RZ1 and RZ2 (from 15% to 20%).
- Remove specification for a minimum of one car space per dwelling to be roofed.

- Adjust parking rates for multi-unit housing to be:
  - In RZ1 and RZ2:
    - One car parking space per dwelling
    - Plus an additional car parking space for every five 2-bedroom dwellings
    - Plus an addition car parking space for every three 3+bedroom dwelling
    - Three motorcycle spaces per 100 car parking spaces.
  - In RZ3, RZ4 and RZ5:
    - One car parking space per dwelling
    - Plus an additional car parking space for every five 2-bedroom dwellings
    - Plus an addition car parking space for every three 3+bedroom dwelling
    - One visitor car parking space per five dwellings.
    - Three motorcycle spaces per 100 car parking spaces.

Subdivision Specifications

The proposed changes to the Subdivision Specification include:

- Reducing minimum block sizes for RZ1 (from 400 to 350m^2), RZ2 (from 350 to 300m^2), RZ3 (from 325 to 275m^2) and RZ4 (from 300 to 250m^2).
- New RZ1 blocks to be either street facing or front a path or open space
- Limit the location and size of consolidated RZ1 blocks, which varies between 2,000m^2, 2,500m^2 and 3,000m^2 based on location.
- Adjusting minimum block size specifications across residential zones to generally increase the proportion of mid-sized and compact blocks that are permitted.
- Other wording changes to clarify specifications that are intended to only apply to estate subdivisions rather than small-scale subdivisions.

3. ACT planning context

This section of the report addresses how this proposal and DPA-04 would give effect to the key documents of the ACT planning system, including the Minister's Statement of Planning Priorities, the ACT Planning Strategy, any relevant district strategy and how it would be consistent or inconsistent with relevant planning outcomes contained in other government strategies and policies.

3.1 Statement of Planning Priorities

The Minister for Planning and Sustainable Development's, 2024-2025 Statement of Planning Priorities serves as a guiding document for the Environment, Planning and Sustainable Development Directorate for the coming period. As one of the fastest growing cities, Canberra is estimated to reach a population of almost 700,000 by 2050. Strategic planning to meet the needs and demands of our growing community is essential to sustain and enhance the city's current quality of life.

The planning priorities focus on delivering diverse housing choices close to shopping centres and travel networks such as public transport and active travel infrastructure, to create a better-connected, accessible, and sustainable city.

This proposal directly responds to key priorities including:

- Enabling diverse housing choices and the missing middle
- Achieving a design focus and implementing the New Planning System

3.2 ACT Planning Strategy

The ACT Planning Strategy 2018 (the Planning Strategy) aims to recognise and incorporate the social, economic and environmental changes occurring in the city. The Planning Strategy reflects and integrates the vision and directions of the community and other ACT Government strategies, particularly housing, transport and climate change.

The proposal directly responds to the identification of this area for 'urban intensification' in the Planning Strategy, which also seeks to deliver 70% of new housing within the existing urban footprint. The proposal aligns with the Planning Strategy in this regard by increasing the flexibility and capacity of existing residential zones to deliver more diverse and efficient housing, in response to community preferences and anticipated demand for housing.

3.3 District Strategies

Introduced in 2023 as part of the ACT's new planning system, district strategies capture the distinctive character of each district and how the city will change and grow over time.

The District Strategies set out the community's views on future planning priorities to help manage growth and change in the district while protecting the things the community values most.

The District Strategies identifies change areas where urban change will occur. Planning for these areas will also be progressed to support the development, including high-quality transport-oriented development on public transport corridors and in close proximity to local amenities, such as centres.

The District Strategies has five big drivers and targets for the district and the proposal is considered against these in

Table 1 of the district strategy (Table 1 below).

Table 1- Big drivers and target of the district strategies

Big driver	Targets
Blue-green network	More nature and retaining water in the city Expand liveable blue-green network connections
Economic access and opportunity across the city	More jobs accessible to home
Strategic movement to support city growth	**Reduce car dependence** **More active transport**
Inclusive centres and communities	**Greater activation of group and local centres** **Improve community wellbeing**
Sustainable neighbourhoods	**Greater housing choice and affordability to meet community needs** **More inclusive and fair communities**

The proposed DPA would effectively respond to the targets articulated, principally for 'Sustainable Neighbourhoods', 'Inclusive Centres and Communities' and 'Strategic Movement to Support City Growth'.

3.4 Other government strategies and policies

The proposal also would respond to the following government strategies.

Canberra's Living Infrastructure Plan: Cooling the City (2019)

The proposal seeks to achieve the targets articulated in the *Living Infrastructure Plan* by ensuring new developments provide sufficient accommodation for canopy trees and other green infrastructure. By ensuring new development can contribute towards the ACT's urban forest, the proposal will serve the aims of the Plan to manage drought, heatwaves and urban heat, while also providing residential amenity and beneficial habitat.

ACT Climate Change Strategy 2019-25

The proposal will effectively contribute towards to the realisation of key priorities including planning for a compact and efficient city to improve access to public transport and active travel options, reduce travel distances and reliance on private car use.

4. Consultation

This section of the report outlines consultation undertaken with the local community and relevant entities who may have an interest in this proposal, and upcoming consultation on DPA-04.

4.1 Consultation on DPA-04

In the development of the missing middle reforms, extensive engagement has occurred with industry for the development of the draft MMHDG including engagement with a dedicated Technical Advisory Group (TAG) and Pool of Practitioners (POP). This has included consultation during the development of the proposed changes to the Territory Plan, which have been informed by the MMHDG.

The draft MMHDG and DPA-04 will be released concurrently for public consultation to ensure the Canberra community is appropriately informed to understand how the good design guidelines reflected in the MMHDG have informed the changes to the Territory Plan.

4.2 Consultation on draft MMHDG

Extensive industry and agency consultation has been undertaken in developing of the draft MMHDG.

External stakeholders

Co-Chaired by ACT Government and the ACT Government Architect, the TAG and POP consists of membership from peak construction industry organisations including ACT Property Council of Australia, Australian Institute of Architects, Australian Institute of Landscape Architects, Building Designers Association of Australia, Green Building Council of Australia, Planning Institute of Australia, Housing Industry Association, and the Master Builders Association of ACT.

Engagement with the groups has occurred in October and December 2024, with additional engagement planned for late-February 2025. This engagement with design and building professionals is assisting in finalising the proposed missing middle housing reform ahead of broad community engagement.

Feedback from the TAG and POP groups suggests a high level of support for the development of the MMHDG and for reform to the planning system to promote more missing middle housing across the ACT. 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.

ACT government agencies

A series of internal consultant-led stakeholder workshops has occurred that included representatives and technical experts from EPSDD, Transport Canberra and City Services, Suburban Land Agency and the ACT Government Architect.

The purpose of the workshops was to assemble the draft MMHDG, test the principles and guidance of the draft MMHDG, proposed planning system reform and to discuss potential assessment pathway options.

EPSDD has engaged closely with ACT Government colleagues with an interest in housing policy, including Treasury, Transport Canberra and City Services and the Suburban Land Agency in the development of the missing middle reforms.

4.3 Next steps

Following consultation, the Authority will consider all comments received on both DPA-04 and the draft MMHDG. The Authority will then consider any amendments to DPA-04 and, unless withdrawn, prepare a consultation report and provide it to the Minister for action and referral to the Legislative Assembly Standing Committee.

5. Conclusion

The missing middle reforms are proposed in response to a demonstrated need for increased housing supply and choice to provide housing for a growing population.

The relative impacts of the DPA were considered and the proposal is consistent with, among other things, the Planning Strategy, the District Strategies and the Minister's Statement of Planning Priorities. This supporting report also discussed potential positive and negative impacts, and outlined that many have already been or will be mitigated by current and future guidance, policy work and processes.

Ultimately, these reforms are key in allowing for a compact and efficient city that caters to the changing needs and demands of the community and makes efficient use of urban land for housing. This will provide the opportunity for more Canberrans to live closer to employment, services and amenities.

ACT Government

ZS1 – Residential Zones Specifications

CONSULTATION VERSION

Proposed amendments related to Draft Major Plan Amendment 04 – Missing Middle Housing Reforms

Amendments are shown in red text

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Residential Zones planning technical specifications

The primary assessment consideration for a development application is the assessment outcomes in the Territory Plan. In demonstrating compliance with the assessment outcomes, consideration may be given to the relevant planning technical specifications which may serve as a benchmark. While all assessment outcomes are to be met, not all outcomes are covered by a specification.

Planning technical specifications are used as a possible solution or to provide guidance for identified aspects of a development proposal. The specifications may also be used as a reference or benchmark in the preparation and assessment of development proposals to demonstrate compliance with the assessment outcomes, and the Territory Plan.

Where a proposed development complies with a relevant provision in the planning technical specifications and the development comprehensively addresses the assessment outcome, further assessment regarding those specific provisions will not be required.

The Territory Planning Authority may consider advice or written support from a referral entity to demonstrate compliance with a relevant assessment outcome. Where endorsement from an entity is noted as a planning specification, entity referral may be required.

Consistent with the Residential Zones Policy, this Residential Zones Specification comprises specifications under seven categories:

- Urban Structure and Site;
- Access and Movement;
- Public Space and Amenity;
- Land Use and Development;
- Built Form and Building Form;
- Sustainability and Environment; and
- Parking, Services and Utilities.

These specifications will primarily be for development within residential zones. However, these specifications may also be used in other circumstances e.g., residential development in a proposed mixed-use development in other zones, or stand-alone residential developments where permissible in other zones.

Urban Structure and Natural Systems

The following specifications provide possible solutions that should be considered in the planning of a proposed development:

Assessment Outcome	**1. Biodiversity connectivity is maintained across the landscape.**
No applicable specification for this assessment outcome. Application must respond to the assessment outcome.	

Assessment Outcome	**2. Loss of native habitat and biodiversity is avoided and/or minimised.**
No applicable specification for this assessment outcome. Application must respond to the assessment outcome.	

Assessment Outcome	**3. The health and functionality of waterways and catchments is maintained, including through application of water sensitive urban design principles.**
No applicable specification for this assessment outcome. Application must respond to the assessment outcome.	

Site and Land Use

The following specifications provide possible solutions that should be considered in the planning of a proposed development:

Assessment Outcome	**4. The functionality and usability of the development is appropriate for its intended purpose/use.**
Specification	
Distribution of non-residential developments in all residential zones	4.1. Development complies with the following: a) No section has more than 2 of the following developments: i) Residential care accommodation. ii) Boarding house. iii) Guest house. iv) Early childhood education and care. v) Community activity centre. vi) Health facility. vii) Social enterprise. viii) Veterinary clinic. b) No section has more than 2 home businesses per ~~section~~ 20 dwellings. c) Guest house is only permitted where the block is adjacent to a commercial zone.
Provisions for development other than single dwelling and multi-unit housing	4.2. Secondary residences and developments that comprise of 1 dwelling comply with the requirements for a single dwelling. Developments that comprise 2 or more dwellings comply with the requirements for multi-unit housing.
Home business	4.3. A home business complies with all of the following:

	a) Not more than three people (including resident workers) are employed at any one time by the home business operating from the lease. b) The area of the lease used for the home business (including storage) is not more than 40m^2. c) Any vehicles at the lease for the purpose of the home business: i) Are parked in the allocated parking spaces for the site; and ii) Do not involve the parking or storage of a commercial vehicle exceeding 5 tonnes tare weight. d) Buildings intended to be used for home business attenuate noise from expected uses to a level that does not unreasonably diminish the residential amenity of dwellings in the vicinity. e) All goods and materials relating to the home business (other than goods or materials kept on the lease) must be kept: i) In buildings or structures that are lawfully on the lease; and ii) In a way that the goods and materials cannot be seen from outside the lease.
Boarding houses	4.4. Boarding houses comply with the following: a) the maximum number of bedrooms in the boarding house is: i) RZ1 – 4. ii) RZ2 – 10. b) If a boarding house is to be occupied by five or more adults, at least one communal living room of at least 16m² with a minimum dimension of 3 metres is provided.
Early childhood education and care	4.5. In multi-storey buildings, early childhood education and care services are to be located on the ground floor level.
Accessible and/or adaptable standards	4.6. The following development types meet *Australian Standard AS4299 Adaptable housing (Class C)*: a) Supportive housing. b) Retirement village. c) Residential care accommodation. For common and/or public spaces, the proposed development meets AS 1428, AS2890, AS4586 as applicable.

Assessment Outcome	**5. The proposed use and scale of development are appropriate to the site and zone.**
Specification	
Minimum floor area – Secondary residence and boarding house	5.1. The minimum gross floor area of a: a) Secondary residence is 40m². b) Boarding house boarding room is: i) For a single occupant - 12m². ii) For 2 or more occupants - 16m².
Dwelling density – multi-unit housing – RZ1	5.3. The target number of dwellings permitted on an RZ1 block is: a) Attached houses – 54 dwellings per hectare (more can be considered if parking is contained within a basement). b) Apartments – 67 dwellings per hectare (more can be considered if parking is contained within a basement). Note: To calculate the maximum number of dwellings: Divide block size (in m^2) by 10,000 and multiply the relevant dwelling per hectare figure above.

Assessment Outcome	6. 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.
No applicable specification for this assessment outcome. Application must respond to the assessment outcome.	

Access and Movement

The following specifications provide possible solutions that should be considered in relation to access, travel modes and movement to and within a proposed development:

Assessment Outcome	7. The functionality and layout of the development is accessible and adaptable, while achieving good connections with the surrounding area. This includes consideration of traffic flow and passive surveillance.
Specification	
Pedestrian access	7.1. For blocks with a boundary to a rear lane, pedestrian access is provided from the main street frontage.

Assessment Outcome	8. The development encourages active travel through safe and convenient access to the active travel network.
No applicable specification for this assessment outcome. Application must respond to the assessment outcome.	

Assessment Outcome	9. Access to, from and within the site permits safe and legible movement while catering for all users (including pedestrians). This includes consideration of vehicle manoeuvrability and access routes.
No applicable specification for this assessment outcome. Application must respond to the assessment outcome.	

Public Space and Amenity

The following specifications provide possible solutions that should be considered in relation to public areas (areas accessible to residents, visitors and community) and amenity outcomes associated with a proposed development:

Assessment Outcome	10. The development (including the design of outdoor spaces) achieves reasonable solar access and microclimate conditions to public areas and streets to support their use by the community.

No applicable specification for this assessment outcome. Application must respond to the assessment outcome.

Assessment Outcome	11. Private open space and communal open space provides sufficient space and facilities for residents and visitors to recreate and relax, as well as providing area for service functions. Spaces are readily accessible for a range of activities.
Specification	
Private open space - single dwellings	11.1. Minimum private open space for single dwellings is: a) For large blocks – i) 60% of the block area. ~~ii) Have a minimum dimension of 6m for an area not less than 10% of the block area.~~ b) For mid-sized blocks – i) 40% of the block area. ~~ii) Have minimum dimensions as follows:~~ • ~~For blocks less than 360m2 – 5m for an area not less than 10% of the block area.~~ • ~~In all other cases – 6m for an area not less than 10% of the block area~~. c) For compact blocks - 30% of the block area. Note: Private open space includes principal private open space.
Private and communal open space - multi-unit housing - RZ1 and R2 zones	11.2. Minimum ~~40~~ 30% of the total site area is allocated to one or more of the following: a) Communal open space ~~that has a minimum dimension of 2.5m~~ meets specification 11.4; and/or b) Principal private open space ~~that has a minimum dimension of 2.5m and is associated with dwellings at the lower floor level~~ meets specification 11.6.
Private and communal open space - multi-unit housing – RZ3, RZ4 and RZ5	11.3. Multi unit housing in RZ3, RZ4 and RZ5 comply with the following: a) Developments for fewer than 20 dwellings that include apartments – no less than 20% of the total site area allocated to communal open space (that have a minimum dimension of 2.5m and are directly accessible from common entries and pathways). b) Developments for fewer than 20 dwellings that do not include apartments – no less than 20% of the total site area is allocated to one or more of the following: i) Communal open space that has a minimum dimension of 2.5m and is directly accessible from common entries and pathways. ii) Private open space that has a minimum dimension of 2.5m and is associated with dwellings at the lower floor level.
Communal open space – all multi-unit housing	11.4. Where provided on a site, communal open space achieves the following: a) Minimum dimension of 5m. b) No less than 3 hours of direct sunlight onto 50% of the minimum communal open space area between the hours of 9am and 3pm on the winter solstice (21 June). Note: Overshadowing from vegetation is not considered when assessing solar access.
Principal private open space – single dwellings	11.5. At least one area of principal private open space on the block complies with all of the following: a) Minimum area and dimensions specified in the table below. b) At ground level.

c) Directly accessible from, and adjacent to, a habitable room other than a bedroom.
d) Screened from adjoining public streets and public open space.
e) Located behind the building line, except where enclosed by a courtyard wall.
f) Is not located to the south, south-east or south-west of the dwelling, unless it achieves not less than 3 hours of direct sunlight onto 50% of the minimum principal private open space area between the hours of 9am and 3pm on the winter solstice (21 June).

Note: Overshadowing from vegetation is not considered when assessing solar access.

Zone	*Block* type	*Dwelling* Size*	Minimum Area	Minimum Dimension
All	Compact	all	16m^2	4m
RZ1 RZ2	Mid sized Large	up to 105m^2	28m^2	4m
	Mid sized Large	105m^2 or greater	36m^2	6m
RZ3 RZ4	Mid sized Large	all	24m^2	4m

* For the purpose of this table, *dwelling* size is defined as the sum of the area of all floors measured to the outside face of externals walls including internal walls between the living areas and *garage* (but excluding the *garage*).

Principal private open space – multi-unit housing

11.6. Each dwelling has at least one area of principal private open space that complies with all of the following:
a) Located on the site.
b) Minimum area and dimensions specified in the table below.
c) Directly accessible from, and adjacent to, a habitable room other than a bedroom.
d) Screened from adjoining public streets and public open space.
e) Is not located to the south, south-east or south-west of the dwelling, unless it achieves one or more of the following:
   i) Not less than 3 hours of direct sunlight onto 50% of the minimum required area between the hours of 9am and 3pm on the winter solstice (21 June).
   ii) Located at an *upper floor level* and overlooks a public street or public open space.

Note: Overshadowing from vegetation is not considered when assessing solar access.

		Dwellings wholly or partially at *Lower floor level*		*Dwellings* located entirely on an *Upper floor level*	
Zone	**Dwelling size**	**Minimum area**	**Minimum dimension**	**Minimum area**	**Minimum dimension**

~~RZ1~~ ~~RZ2~~	~~1 bedroom~~	~~28m²~~	~~5m~~	~~6m² plus 2m² for service functions*~~	~~1.8m~~
	~~2 or 3 bedrooms~~	~~36m²~~	~~6m~~	~~36m²~~	~~2.5m~~
	~~4 or more bedrooms~~	~~45m²~~	~~6m~~	~~45m²*~~	~~2.5m~~
All zones	Studio dwellings	4m²	-	4m²	-
RZ1 **RZ2** **RZ3** **RZ4**	1 or 2 bedrooms	24m²	4m	6m² plus 2m² for service functions*	1.8m
	3 or more bedrooms	36m²	6m	24m²	2.5m
RZ5 and commercial zones		24m²	4m	6m² plus 2m² for service functions*	1.8m

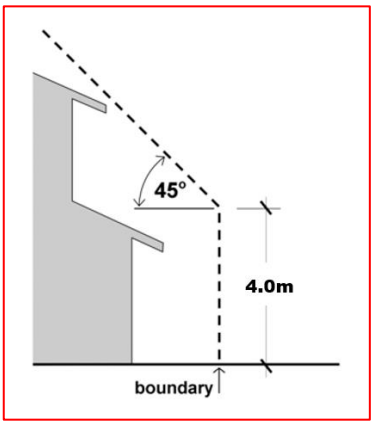
* Service functions include clothes drying and air conditioners and require screening from public areas. Service functions may be provided on a separate balcony to the *principal private open space*.

Assessment Outcome	**12. Reasonable levels of active ground floor interface and passive surveillance to public spaces and streets is achieved.**
No applicable specification for this assessment outcome. Application must respond to the assessment outcome.	

Assessment Outcome	**13. Any advertising or signs are suitable for their context and do not have a detrimental impact on the surrounding area (for instance due to size or light emission).**
Specification	
Signs	13.1. Signs are not permitted in residential zones except if they are associated with: a) A home business. b) A non-residential use permitted in the zone. Permitted signs must meet the following: a) Limited to one per frontage. b) Are no higher than the first storey. c) Setback a minimum of 1200mm from the kerb. d) No larger than 2m² (except for home business where the maximum area is 1m²). e) Are not illuminated. f) Are not commercial-based or for third party advertising.

Built Form and Building Design

The following specifications provide possible solutions that should be considered in relation to building design and built form, including height, bulk and scale of buildings and structures associated with a proposed development:

Assessment Outcome	**14. The height, bulk and scale of the development is appropriate, noting the desired zone policy outcomes and the streetscape. This includes consideration of building envelope and setbacks.**
Specification	
Building height ~~and storeys~~	14.1. Buildings are a maximum of: a) RZ1 ~~and RZ2~~ – 8.5m above datum ground level. b) RZ2: i) Single dwelling housing – 8.5m above datum ground level. ii) Multi-unit housing – 10.5m above datum ground level. c) RZ3~~– 2 storeys:~~ i) Single dwelling housing – 10.5m above datum ground level. ii) Multi-unit housing – 14m above datum ground level. d) RZ4: ~~3 storeys~~ i) Single dwelling housing – 10.5m above datum ground level. ii) Multi-unit housing – 21m above datum ground level. e) RZ5: i) For single dwelling housing: 10.5m above datum ground level. ii) For that part of the building within 50m of the boundaries of blocks in RZ1, RZ2 or RZ3: 14m above datum ground level ~~3 storeys~~. iii) For that part of the building within 40m of the boundaries of blocks in CFZ, PRZ1 or PRZ2: 14m above datum ground level ~~3 storeys~~. iv) For that part of the building within 30m of the boundaries of blocks in RZ4: 17.5m above datum ground level ~~4 storeys~~. v) In all other cases: 24.5m above datum ground level ~~6 storeys~~. Note: There are additional building height and storey provisions in the Territory Plan.
Building envelope	14.2. Buildings are sited wholly within the building envelope formed by planes projected over the subject block at 45° to the horizontal from a height of ~~3.5~~ 4m above each side and rear boundary, except for side or rear boundaries where solar building envelope requirements apply. 

	Encroachments outside the building envelope are permitted for flues, chimneys, antennae, aerials, cooling appliances and heating appliances.
	
	Notes:
	• This specification does not apply to:
	  ○ Single dwellings on compact blocks.
	  ○ Building exceeding 3 storeys in RZ5.
	  ○ Any part of a building that is required to be built to a boundary of the block by a district policy or specification.
	• The reference to a building with more than 3 storeys is a reference to the whole building, not just that part of the building over 3 storeys.
	• For the purposes of this specification, all height measurements are taken from datum ground level.

Front boundary setbacks	14.3. Front setbacks comply with minimum dimensions in tables 1-4. Notes: • Where a block has more than one street frontage, such as corner blocks, and required front setbacks are not specified in the relevant district policy or specification, the secondary street frontage can be nominated by the applicant but must consider the front setback to existing buildings. • Public open space refers to unleased land that is accessible by the public. • On a block with existing buildings the minimum boundary setbacks are determined by existing buildings. • Chamfers may be included in the secondary street frontage, but only if the length of the chamfer is less than the length of the front boundary.

Side and rear setbacks	14.4. Side and rear setbacks comply with minimum dimensions in tables 5-11. For walls within 900mm of a side and rear boundary:
	a) Single dwelling garages and carports on large blocks - maximum length of all walls facing the boundary is 8m.
	b) No windows are permitted within any part of the wall.
	c) Single dwellings on mid sized blocks – wall
	  i) Is no more than 13m in length.
	  ii) Extends no more than 2.5m into the rear zone.
	
	Notes:
	• On a vacant block or a block with no residual buildings the minimum side boundary setbacks are nominated by the applicant or nominated in a district policy.
	• On a block with existing buildings the allocation of side boundary 1 and side boundary 2 must consider the side and rear setbacks of existing buildings or garage/carport.
	• Minimum setback and wall length requirements do not apply to the part of the building that is specified in a district technical specification to be built to the boundary.

Allowable setback encroachments	14.5. Encroachments into the minimum setback are permitted for: a) An eave or roof overhang with a horizontal width of not more than 600mm. b) Fascias, gutters, downpipes, light fittings and sun blinds. c) Landings, steps or ramps, none of which are more than 1m above finished ground level. d) For side and rear setbacks only - rainwater tanks, chimneys, flues, domestic fuel tanks, cooling or heating appliances, electricity and gas meters, aerials, antennae, unroofed pergolas, solar inverters and batteries. Note: noise from appliances must comply with the noise standards.

Tower footprint – RZ5 – apartments.	14.6. The tower element of an apartment building (or mixed use building containing apartments) complies with the following: a) Where the tower is above a podium, the podium is not more than 4 storeys. b) The tower has a maximum 750m^2 floorplate per floor. i) Floor plate includes all internal areas such as dwellings, indoor amenities, elevator cores, storage spaces, stairwells and hallways. ii) Inset or projecting balconies are excluded from the floor plate limit.

Tables 1 - 4 Front Boundary Setbacks

Link back to specification

Table 1: Single dwelling front boundary setbacks – blocks in subdivisions approved originally before 18 October 1993

	Block size	Primary front boundary setback	Exceptions		
			Front boundary setback to secondary street frontage	Front boundary setback to public open space or pedestrian paths wider than 6m at the widest point	Front boundary setbacks to public open space or pedestrian paths of 6m or less at the widest point
~~***Lower floor level***~~ ***Dwelling***	Large	Minimum of 6m Maximum of 8m	4m	4m	1.5m
	Mid-sized		3m		
	Compact				
~~***Upper floor level***~~	~~Large~~	~~6m~~	~~6m~~	~~4m~~	~~1.5m~~
	~~Mid-sized~~		~~3m~~		
	~~Compact~~				
Garage or carport		6m	5.5m	4m	0m

Note: A new subdivision does not reset the date in regard to these tables. It is based on the original block/estate creation.

Table 2: Single dwelling front boundary setbacks –blocks in subdivisions approved on or after 18 October 1993 but before 31 March 2008

	Block size	Primary front boundary setback	Exceptions		
			Front boundary setback to secondary street frontage	Front boundary setback to public open space or pedestrian paths wider than 6m at the widest point	Front boundary setbacks to rear lane, public open space or pedestrian paths of 6m or less at the widest point
~~***Lower floor level***~~ ***Dwelling***	Large	4m	4m	4m	1.5m
	Mid-sized		3m		
	Compact				
~~***Upper floor level***~~	~~Large~~	~~6m~~	~~6m~~	~~4m~~	~~1.5m~~
	~~Mid-sized~~		~~3m~~		
	~~Compact~~				
Garage or carport		5.5m with a minimum of 1.5 m behind the front building line	5.5m	4m	0m

Note: A new subdivision does not reset the date in regard to these tables. It is based on the original block/estate creation.

Table 3: Single dwelling front boundary setbacks – blocks in subdivisions approved on or after 31 March 2008

	Block size	Primary front boundary setback	Exceptions		
			Front boundary setback to secondary street frontage	**Front boundary setback to public open space or pedestrian paths wider than 6m at the widest point**	**Front boundary setbacks to rear lane, public open space or pedestrian paths of 6m or less at the widest point**
~~***Lower floor level***~~ ***Dwelling***	Large	4m	3m	4m	0m
	Mid-sized	4m*	3m	3m	
	Compact	3m	2m	2m	
~~***Upper floor level***~~	~~Large~~	~~6m~~	~~3m~~	~~4m~~	~~0m~~
	~~Mid-sized~~	~~4m*~~		~~3m~~	
	~~Compact~~	~~3m~~			
Garage or carport		5.5m with a minimum of 1.5m behind the front building line except where there is a courtyard wall in the *front zone*		4m	0m

*Articulation elements can extend up to 1m into the front setback. Elements can include verandahs, porches, awnings, shade devices, pergolas and the like (a carport is not considered an articulation element).

Note: A new subdivision does not reset the date in regard to these tables. It is based on the original block/estate creation.

Table 4: Multi-unit housing front boundary setbacks – all residential zones

Floor level	**Primary front boundary setback for blocks in subdivisions approved on or after 18 October 1993**	**Primary front boundary setback for blocks in subdivisions approved before 18 October 1993**	**Exceptions**			
			Corner blocks		**Front boundaries setback to pedestrian paths equal to or less than 6m at their widest point**	**Front boundaries setback to public open space, or pedestrian paths wider than 6m**
			Secondary street frontage - mid-sized blocks	***Secondary street frontage- large blocks***		
~~***Lower floor level***~~ ***Dwelling***	4m	6m	~~3m~~ 2m	~~4m~~ 2m	3m	4m
~~***Upper floor levels***~~	~~6m~~	~~6m~~	~~3m~~	~~6m~~	~~4m~~	~~4m~~
Garage or carport	5.5 m with a minimum of 1.5 m behind the front building line	6m	5.5m	5.5m	4m	4m

Note: A new subdivision does not reset the date in regard to these tables. It is based on the original block/estate creation.

Tables 5 - 11 Side and Rear Setbacks

Link back to specification

Table 5: Single dwelling side and rear setbacks – large blocks

	Minimum side boundary setback within the *primary building zone*	Minimum side boundary setback within the *rear zone*	Minimum rear boundary setback
	Side boundary	**Side boundary**	
Lower floor level* – external wall	1.5m	1.5m	3m
Upper floor level – external wall	3m	6m	6m
Upper floor level – unscreened element	6m	6m	6m
Garage* or carport	0m**	0m**	3m

* Includes basements
**A 0m setback is only permitted on one boundary

Table 6: Single dwelling side and rear setbacks – mid sized blocks in subdivisions approved before 2 October 2009

	Minimum side boundary setback within the *primary building zone*		Minimum side boundary setback within the *rear zone*		Minimum rear boundary setback
	Side boundary 1	**Side boundary 2**	**Side boundary 1**	**Side boundary 2**	
Lower floor level*	3m	>15m frontage 1.5m <15m frontage 0m	3m	1.5m	3m
Upper floor level – external wall	3m	3m	6m	6m	6m
Upper floor level – unscreened element	6m	6m	6m	6m	6m
Garage* or carport	3m	0m	3m	0m	3m

* Includes basements

Table 7: Single dwelling side and rear setbacks – mid sized blocks in subdivisions approved on or after 2 October 2009

	Minimum side boundary setback within the *primary building zone*		Minimum side boundary setback within the *rear zone*		Minimum rear boundary setback
	Side boundary 1	**Side boundary 2**	**Side boundary 1**	**Side boundary 2**	
Lower floor level*	1.5m	0m	3m	0.9m	3m 0m**
Upper floor level – external wall	3m	1.5m 0m**	6m	6m	6m 0m**
Upper floor level – unscreened element	6m	6m	6m	6m	6m

* Includes basements

** Only where specifically permitted under a district policy/specification.

Table 8: Single dwelling side and rear setbacks – compact blocks

	Minimum side boundary setback			Minimum rear boundary setback
	Side boundary 1 or longer side boundary of a corner block	**Side boundary 2**	**Shorter side boundary of a corner block**	
Lower floor level* – *external wall*	0m	0m	3m	3m 0m**
Lower floor level – *unscreened element*	1.5m	1.5m	3m	3m
Upper floor level – *external wall*	0m***	0m***	3m	4m 0m**
Upper floor level – *unscreened element*	1.5m	1.5m	3m	4m
Garage* or carport	0m	0m	0m	3m 0m**

* Includes basements

** Only where specifically permitted under a district policy/specification.

*** Only where the lower floor level is built to the boundary.

Table 9: Multi-unit housing side and rear setbacks – RZ1 and RZ2

RZ1 and RZ2 - Side and Rear Boundary Setbacks			
	Minimum side boundary setback within the *primary building zone*	**Minimum side boundary setback within the *rear zone***	**Minimum rear boundary setback**
Lower floor level – external wall, ~~unscreened element~~* and *basement	~~3m~~ 0m	3m	~~3m~~ 6m
Lower floor level – unscreened element	1m	3m	6m
Upper floor level – external wall	3m	6m	6m
Upper floor level – unscreened element	6m	6m	6m

Table 10: Multi-unit housing side and rear setbacks – RZ3, RZ4 and RZ5

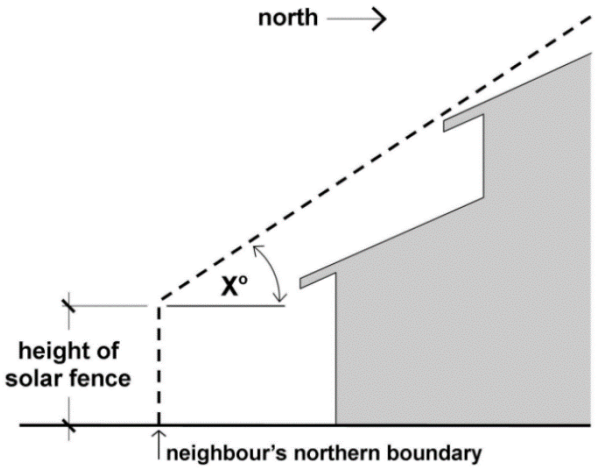
RZ3, RZ4, RZ5 - Side and Rear Boundary Setbacks			
	Minimum side boundary setback within the *primary building zone*	**Minimum side boundary setback within the *rear zone***	**Minimum rear boundary setback**
Lower floor level – external wall and basement	0m^	3m	3m
Lower floor level – unscreened element	1m	3m	3m
~~First~~Upper floor level – external wall	0m^	3m	6m
~~First~~Upper floor level – unscreened element	6m	6m	6m
~~Second upper floor level – external wall~~	~~0m^~~	~~6m~~	~~6m~~
~~Second upper floor level – unscreened element~~	~~6m~~	~~6m~~	~~6m~~

^ Does not apply to that part of a wall with a window of any sort.

Table 11: Multi-unit housing side and rear setbacks – ~~RZ5~~ – buildings over 4 storeys

Side and Rear Boundary Setbacks - buildings with 4 or more storeys		
Parts of buildings	**Minimum side boundary setback**	**Minimum rear boundary setback**
First 4 *storeys - external wall*	3m	3m
First 4 *storeys - unscreened element*	6m	6m
Between 5 and 8 *storeys - external wall*	4.5m	4.5m
Between 5 and 8 *storeys - unscreened element*	6m	6m

9 *storeys* or more - *external wall or unscreened element*	6m	6m

Assessment Outcome	**15. Reasonable solar access to dwellings and private open space within a block and on adjoining residential blocks is achieved. This includes solar access into main living spaces within a dwelling.**
Specification	
Solar building envelope	15.1. Buildings are sited wholly within the solar building envelope formed by planes projected over the subject block at ~~31~~X° to the horizontal from the height of the 'solar fence' on any northern boundary of an adjoining residential block. The height of the solar fence is: a) For single dwellings on large blocks: i) In the primary building zone – 2.4m. ii) All other parts of the boundary – 1.8m. b) For single dwellings on mid-sized and compact blocks: i) In the primary building zone – 3m. ii) All other parts of the boundary – 2.3m. c) For multi-unit housing except for buildings exceeding 3 storeys in RZ5: i) In the primary building zone – 3m. ii) All other parts of the boundary – 2.3m. X° is: a) For single dwelling housing – 31°. b) For multi-unit housing – 45°.  Notes: • This does not apply to those parts of a boundary where the adjacent part of the adjoining residential block comprises only an access driveway (i.e., a "battle-axe handle"). • This does not apply to the part of the building that is specified in a district technical specification to be built to the boundary.
Solar access – multi-unit housing	15.2. The minimum solar access to multi unit dwelling in an apartment, between the hours of 9am and 3pm on the winter solstice (21 June), is: a) The floor or internal wall of a daytime living area of not fewer than 70% of apartments on a site is exposed to not less than 3 hours of direct sunlight.

	b) No more than 15% of apartments on a site receive no direct sunlight. **Daytime living area** means a habitable room other than a bedroom. Note: Overshadowing from vegetation is not considered when assessing solar access.

Assessment Outcome	**16. Reasonable levels of privacy to dwellings and private open space within a block and on adjoining residential blocks is achieved.**
Specification	
Separation between walls and principal private open space – multi-unit housing – RZ1 and RZ2	16.1. ~~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 block or an adjoining block are separated by 1m or more~~ The minimum separation between walls and principal private open space to dwellings on the same block and adjoining blocks is: a) Between two external walls – 3m. b) Between an unscreened element of a non-habitable room and external wall – 3m. c) Between unscreened elements of two non-habitable rooms – 6m. d) Between an unscreened element of a habitable room and an unscreened element of a non-habitable room – 9m. e) Between an unscreened element of a habitable room and an external wall – 9m. f) Between unscreened elements of two habitable rooms – 12m. g) Between an unscreened element and the centre of any other dwelling's minimum principal private open space – 12m.
Separation between walls and principal private open space – multi-unit housing – RZ3, RZ4 and RZ5	16.2. Minimum separation between ~~buildings~~ walls and principal private open space is provided in the table below. Note: this specification is in addition to setback specifications.
~~Privacy – multi-unit housing~~	~~16.3.~~ ~~a) At a viewing height of 1.5m at any point on the extremity of an unscreened element of one dwelling, there is no direct line of sight~~

	External wall to external wall or unscreened element	**Unscreened element to unscreened element**	**Unscreened element to primary window**	**Unscreened element to the centre of any other dwelling's minimum principal private open space**
Up to 4 storeys	3m	6m	12m	12m
5 to 8 storeys	4.5m	9m	12m	12m
9+ storeys	6m	12m	12m	12m

	~~into a primary window of any other dwelling on the same block or an adjacent block. The direct line of sight is a minimum distance of 12m.~~ ~~b) At a viewing height of 1.5m at any point on the extremity of an unscreened element of one dwelling, there is no direct line to more than half of the minimum principal private open space of any other dwelling the same block or an adjacent block. The direct line of sight is a minimum distance of 12m.~~ ~~c) Upper floor windows, upper floor balconies and other upper floor elements that allow for potential privacy impacts to adjoining or nearby properties are set back 6.0m from the relevant boundary or greater.~~

Assessment Outcome	**17. The dwelling mix and the internal size, scale and layout of dwellings in multi-unit housing provide for a comfortable living environment that meets the changing needs of residents. This includes consideration of cross-ventilation and energy efficiency.**
Specification	
Building entries – multi-unit housing	17.1. Common entries to dwellings have all of the following: a) An external sheltered area outside the entrance. b) A direct line of sight between the front door and the public footpath or road. c) Separate access to any non-residential uses, which are clearly distinguishable and secured after hours.
Dwelling mix – multi-unit housing	17.2. For developments with 40 or more dwellings, a combination of studios or 1-bedroom dwellings, 2-bedroom dwellings and dwellings with 3 or more bedrooms are provided at the following rates: a) Studio or 1-bedroom – maximum 40%. b) 2-bedroom – maximum 40%. c) 3 or more bedrooms – minimum 10%.
Minimum dwelling size – multi-unit housing	17.3. Minimum dwelling floor areas are as follows: a) Studio dwellings - ~~40~~ 35m^2. b) One-bedroom dwellings - 50m^2. c) 2-bedroom dwellings - 70m^2. d) Dwellings with 3 or more bedrooms - ~~95~~ 90m^2. e) For all of the above: i) Extra bathrooms add 5m^2. ii) Extra bedrooms add 12m^2. Note: The minimum dwelling floor area excludes balconies and car parking facilities. Storage within dwellings is included in the area calculations.
Minimum widths and area – multi-unit housing	17.4. Minimum widths are as follows: a) Minimum width 3.6m for studio and 1-bedroom dwellings. b) Minimum width 4m for 2-bedroom and 3-bedroom dwellings or more. c) Master bedrooms have a minimum area of 10m^2 and other bedrooms 9m^2 (excluding wardrobe space). d) Bedrooms have a minimum dimension of: i) Master bedrooms – 3m (excluding wardrobe space). ii) All other bedrooms – 2.7m (excluding wardrobe space). e) Living rooms or combined living/dining rooms have a minimum width of: i) ~~3.6m~~3m for studio and 1-bedroom dwellings. ii) ~~4m~~3.6m for 2 and 3-bedroom dwellings. f) Cross-over or cross-through apartments have a minimum internal dimension of 4m.

~~**Maximum building depth – apartments**~~	~~17.5. The maximum depth of a building is 16m.~~
Habitable rooms – multi-unit housing	17.6. For environmental performance, habitable rooms for multi-unit housing: a) Every habitable room must have a window in an external wall with a total minimum glass area of not less than 10% of the floor area of the room. Daylight and air may not be borrowed from other rooms. b) Habitable room depths are: i) Limited to a maximum of 2.5 x the ceiling height; or primary window-head height, whichever is lower; or ii) Where living and dining rooms are combined, limited to a maximum of 3 times the ceiling height or primary window-head height, whichever is lower. This excludes depth occupied by storage space or a kitchen benchtop on the room's farthest wall.
Ceiling heights – multi-unit housing	17.7. Ceiling Heights are as follows: a) Minimum floor to floor height of 3200mm. b) Ceiling heights for: i) A habitable room is a minimum of 2.7m ii) A non-habitable room or kitchen is a minimum of 2.4m. c) A minimum of 2.4 m for upper level of a 2 storey apartment, where the upper level area is less than 50% of the floor.
~~**Internal**~~ **Storage – multi-unit housing**	17.8. In addition to storage within kitchens, bathrooms and bedrooms, the following minimum storage area: a) Studio dwellings - ~~2 m²~~ 4m³. b) One-bedroom dwellings – ~~3 m²~~ 6m³. c) 2-bedroom dwellings - ~~4 m²~~ 8m³. d) Dwellings with 3 or more bedrooms - ~~5 m²~~ 10m³. At least 50% of this storage is required to be located within the dwelling.
~~**External storage – multi-unit housing**~~	~~17.9. For dwellings without an associated garage, an enclosed waterproofed storage area is provided that is all of the following:~~ ~~a) At least 2.1m in height and has at least one 0.6m internal dimension.~~ ~~b) Has an area of at least:~~ ~~i) in RZ1 and RZ2 zones – 4m²~~ ~~ii) in all other zones – 1.5m².~~ ~~c) Accessible externally from the dwelling or is adjacent to a dedicated car space.~~ ~~d) Easily and safely accessible, secure and clearly allocated to specific apartments.~~ ~~e) A functional shape and size to suit various needs, suitable for larger and less frequently used items.~~
~~**Balustrades- multi-unit housing**~~	~~17.10. For balconies that are both:~~ ~~a) Located on the first four storeys.~~ ~~b) Facing public streets or public open space.~~ ~~Balustrades are constructed of obscure glass panels and /or solid panels with a total of all openings or clear glass panels not more than 25% of the surface area of the balustrade.~~ ~~Note: For this specification, obscure glass prevents printed text of 10mm high characters from being read through the glass when positioned 1m from the glass.~~
Units per floor – apartments	17.11. For apartments with 4 or more storeys, no more than 6 apartments on each floor are accessible from a shared circulation space.
Stairwell features – multi-unit housing	17.12. For multi-unit housing with 4 or more storeys, stairwells achieve all of the following:

	a) Are open or visually permeable to facilitate natural surveillance. b) Are accessible and encourage physical activity by providing an attractive alternative to lifts. c) Are located in a position more prominent than lifts.
Natural cross ventilation – apartments	17.13. At least 60% of apartments in the first 9 storeys of a building achieve natural cross ventilation.
Windows in common circulation spaces – apartments	17.14. Minimum glazed area of 10% of the common circulation floor is served by 2 or more sources of natural ventilation and daylight where the floorplate has more than 6 apartments per floorplate
Shading and glare control – multi-unit apartments	17.15. For apartment façades facing from east through to west, glazing greater than 30% of the wall to have external shading to block 30% of sun on the summer solstice (21 December). Note: Performance glazing not considered substitute for shade.

Assessment Outcome	**18. Courtyard walls and fences do not have an adverse impact on the streetscape.**
Specification	
Front fences and walls	18.1. Fences or walls are not permitted forward of the building line except where: a) It has been previously approved under an estate development plan or subdivision design application. b) Is permitted in a relevant district policy. c) Satisfies the courtyard wall provisions below. d) Is exempt under the Planning Act 2023 or Planning (Exempt Development Regulation 2023.
Courtyard walls	18.2. Courtyard walls forward of the building line comply with all the following: a) Total length complies with one of the following: i) Not more than 50% of the width of the block. ii) Not more than 70% where the width of the block at the line of the wall is less than 12m. b) Minimum setback complies with the table below. c) A maximum height of 1.8m above datum ground level. d) Constructed of brick, block, stonework or rendered material, any of which may be combined with timber or metal panels that include openings not less than 25% of the surface area of the panel and clearly distinguishes itself from a panel or timber fence. e) Incorporate shrub planting between the wall and the front boundary. f) Do not obstruct sight lines for vehicles and pedestrians on public paths on driveways in accordance with Australian Standard AS2890.1- Off-Street Parking.

Block type		**Minimum courtyard wall setback**
Single dwelling		50% of the relevant front boundary setback
Multi unit housing	RZ1 and RZ2	2m
	RZ3, RZ4 and RZ5	0.7m

Sustainability and Environment

The following specifications provide possible solutions that should be considered in relation to the sustainability and environmental outcomes associated with a proposed development:

<table>
<tr><th>Assessment Outcome</th><th>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.</th></tr>
<tr><td colspan="2">Specification</td></tr>
<tr><td>Planting area</td><td>19.1. Planting area meets the following minimum area. To be included in planting area, the area must have a minimum dimension of 2.5m.

<table>
<tr><th colspan="2"></th><th>% of block area</th></tr>
<tr><td rowspan="3">Single dwelling</td><td>Large block</td><td>30%</td></tr>
<tr><td>Mid sized block</td><td>20%</td></tr>
<tr><td>Compact block</td><td>15%</td></tr>
<tr><td rowspan="2">Multi unit housing</td><td>RZ1 and RZ2</td><td><s>35</s>30%</td></tr>
<tr><td>RZ3, RZ4 and RZ5</td><td>25%</td></tr>
</table>
Note: Structures, such as retaining walls, are not to be within the 2.5m area.</td></tr>
<tr><td>Tree Planting</td><td>19.2. Provides a minimum level of tree planting in deep soil zones associated with the requirements in Table A, consistent with the following:
a) For compact blocks, at least one small tree.
b) For mid-sized blocks, at least two small trees.
c) For large blocks less than or equal to 800m^2, at least one small tree and one medium tree (or equivalent existing tree/s – see Table B.
d) For large blocks more than 800m^2, at least one medium tree and one large tree (or equivalent existing tree/s – see Table B); and one additional large tree or two additional medium trees for each additional 800m^2 block area (or equivalent existing tree/s – see Table B).

All new trees proposed are in accordance with utilities requirements.
For existing trees on the site, Table B provides tree size equivalents.</td></tr>
</table>

Table A: Tree sizes and associated planting requirements

Tree size	Mature height	Minimum canopy diameter***	Minimum soil surface area dimension	Minimum pot size (litres)*	Minimum soil volume
Small Tree	5-8m	4m	3m	45**	18m^3
Medium Tree	8-12m	6m	5m	75**	42m^3
Large Tree	>12m	8m	7m	75**	85m^3

Notes:
For the purposes of this table, a tree is defined as a woody perennial plant suitable for the Canberra climate. Any new trees cannot be a plant described in schedule 1 of the Pest Plants and Animals (Pest Plants) Declaration 2015 (No 1) or any subsequent declaration made under section 7 of the Pest Plants and Animals Act 2005, unless the tree is included on the ACT tree register.

*Minimum pot size refers to the container size of new trees prior to planting.
**The maximum pot size for small, medium and large *eucalyptus sp*. trees if selected is 45 litres, with maximum height at planting of 2.5m and maximum trunk caliper of 3cm.
***Provided the minimum canopy diameter of the respective tree size can be met, this can be counted as meeting the tree size requirement.

Table B: Tree sizes – equivalents for existing trees

Tree size	Tree sizes - Equivalent
Small Tree	An existing tree of a larger size category can also substitute for a planting requirement for a smaller tree
Medium Tree	2 small existing trees or 1 large existing tree
Large Tree	4 existing small trees or 2 existing medium trees or 1 existing medium tree plus 2 existing small trees

Tree canopy cover – multi-unit housing	19.3. All new and existing trees provide the following minimum canopy over to the block at maturity. All new trees are located in deep soil zones. RZ1 and RZ2: ~~15~~ 20% RZ3, RZ4 and RZ5: 25%
Health of tree – multi-unit housing	19.4. Where one or more existing canopy trees located within the subject block are to be retained as part of development to count towards canopy tree coverage requirements, development applications are supported by a report prepared by a suitably qualified person demonstrating how the development complies with all of the following: a) Shows the tree(s) are in good health and likely to actively grow at the completion of works. b) Details how the tree(s) will be suitably protected during construction works. c) Provides adequate deep soil area to ensure the tree(s) will remain viable. d) Confirms that the tree(s) to be retained are sited appropriately and will not detrimentally impact the development in the future.
Water sensitive urban design – single dwellings	19.5. Option A All new single *dwellings*, *secondary residences* and extensions and alterations (except *extensions* of a size 50% or less of existing gross floor area, or development where no new plumbing is proposed), meet one of the following options: a) On *compact blocks:* i) No minimum water storage requirement. ii) Minimum ★★★ Water Efficiency Labelling and Standards (WELS) rated plumbing fixtures.

	b) On mid-*sized blocks:* i) Minimum on-site water storage of water from roof harvesting is 2,000 litres. ii) 50% or 75m^2 of roof plan area, whichever is the lesser, is connected to the tank. iii) The tank is connected to at least a toilet, laundry cold water and external taps that are attached to the house. The connection will require a pump where it cannot be elevated sufficiently to give adequate pressure. c) On large *blocks* up to 800m^2: i) Minimum on-site water storage of water from roof harvesting is 4,000 litres. ii) 50% or 100m^2 of roof plan area, whichever is the lesser, is connected to the tank. iii) The tank is connected to at least a toilet, laundry cold water and external taps that are attached to the house. The connection will require a pump where it cannot be elevated sufficiently to give adequate pressure. d) On large *blocks* 800m^2 or greater: i) Minimum on site water storage of water from roof harvesting is 5,000 litres ii) 50% or 125m^2 of roof plan area, whichever is the lesser, is connected to the tank iii) The tank is connected to at least a toilet, laundry cold water and external taps that are attached to the house. The connection will require a pump where it cannot be elevated sufficiently to give adequate pressure. <u>Option B:</u> A greywater system capturing all bathroom and laundry greywater and treating it to Class A standard. The treated greywater is connected to all laundry cold water, toilet flushing and all external taps. <u>Option C:</u> Evidence is provided that the development achieves a minimum 40% reduction in mains water consumption compared to an equivalent development constructed in 2003, using the on-line assessment tool or another tool. The 40% target is met without any reliance on landscaping measures to reduce consumption. Note**:** The online Single Residential Waterways Calculator can be found at: https://www.planning.act.gov.au/professionals/regulation-and-responsibilities/responsibilities/water-efficiency.
Water sensitive urban design – all development other than single dwellings or secondary residences	19.6. Development complies with the *ACT Practice Guidelines for Water Sensitive Urban Design Module 2: Designing Successful WSUD Solutions in the ACT*

Assessment Outcome	**20. Urban heat island effects are reduced through limiting impervious surfaces and provision of canopy trees and plants.**

No applicable specification for this assessment outcome. Application must respond to the assessment outcome.

Assessment Outcome	**21. Threats to biodiversity such as noise, light pollution, invasive species incursion or establishment, chemical pollution, or site disturbance are avoided or minimised through good design.**
No applicable specification for this assessment outcome. Application must respond to the assessment outcome.	

Assessment Outcome	**22. Minimise cut and fill to protect natural hydrological function and limit soil erosion and site disturbance.**
Specification	
Minimisation of cut and fill	22.1. The total change in ground level resulting from cut or fill does not exceed 1.5m within 1.5m of a side or rear boundary. This does not include a cut associated with a basement. Note: The change in ground level is the cumulative total of all level changes within 1.5m of the boundary taken from the Datum Ground Level (DGL) to the new Finished Ground Level (FGL).
Site disturbance	22.2. For sites less than 3,000m², the development complies with the Environment Protection Authority requirements regarding construction and land development. For sites 3,000m² or greater, the development prepares an erosion and sediment control plan and obtains endorsed by the ACT Environment Protection Authority.

Assessment Outcome	**23. The development considers and addresses site constraints, including heritage, natural features, topography, infrastructure and utilities.**
No applicable specification for this assessment outcome. Application must respond to the assessment outcome.	

Assessment Outcome	**24. Environmental risks, including noise, bushfire, flooding, contamination, air quality or hazardous materials are appropriately considered for the development on the site.**
Specification	
Noise management and acoustic treatment - dwellings	24.1. a) Where a block is located adjacent to a road carrying or forecast to carry traffic volumes greater than 12,000 vehicles per day: i) Dwellings are designed and constructed to comply with *AS/NZS 3671 - Acoustics – Road Traffic Noise Intrusion Building Siting and Design;* and ii) A noise management plan, prepared by a suitably qualified person, is endorsed by the government department responsible for road transport planning. b) Where a block is identified as being potentially noise affected in a district policy/specification: i) Dwellings are designed and constructed to comply with the relevant sections of *AS/NZS 2107:2000 - Acoustics – Recommended design sound levels and reverberation times for building interiors (the relevant satisfactory recommended interior design sound level);* and

	ii) A noise management plan, prepared by a suitably qualified person, is endorsed by the EPA.
Noise management – community activity centre	24.2. For a community centre, the design is in accordance with a noise management plan, prepared by a suitably qualified person, endorsed by Environment Protection Authority.
Flood risk	24.3. a) Residential and commercial buildings are to be excluded from flood liable areas up to the 1% Annual Exceedance Probability (AEP) Flood. b) Habitable floor levels are to be above the 1% AEP level plus a suitable freeboard (usually 300mm). c) In flood liable areas up to the 0.2% Annual Exceedance Probability (AEP) Flood, large developments and those with more sensitive uses* are to be referred to ESA, TCCS and EPSDD for endorsement. Note: *Sensitive uses include developments such as hospitals, nursing homes, childcare centres, prisons, archives, libraries and emergency response centres.
Stormwater retention and detention	24.4. For development on sites greater than 2,000m² (other than major roads) involving works that have the potential to alter the stormwater regime of the site, a report from a suitably qualified person is provided demonstrating that the development complies with: a) At least one of the following: i) Stormwater retention management measures are provided and achieve all of the following: A. Stormwater storage capacity of 1.4kl per 100m² of the total impervious area of the site is provided specifically to retain and reuse stormwater generated on site as a whole. B. Retained stormwater is used on site. ii) Development captures, stores and uses the first 15mm of rainfall falling on the site; and Note: on-site stormwater retention is defined as the storage and use of stormwater on site. b) Stormwater detention measures are provided and achieve all of the following: i) Capture and direct runoff from the entire site. ii) Stormwater storage capacity of 1kl per 100m² of impervious area is provided to specifically detain stormwater generated on site. iii) The detained stormwater is designed to be released over a period of 6 hours after the storm event. For this specification, on-site stormwater detention is defined as the short-term storage and release downstream of stormwater runoff. Note: Calculating on-site detention can include 50% of the volume of rainwater tanks where stormwater is used on-site.
Stormwater quality	24.5. For development on sites greater than 2,000m² (other than major roads) involving works that have the potential to alter the stormwater regime of the site, a MUSIC model prepared by a suitably qualified person is provided demonstrating the average annual stormwater pollutant export is reduced when compared with an urban catchment of the same area with no water quality management controls for all of the following: a) Gross pollutants by at least 90%. b) Suspended solids by at least 60%. c) Total phosphorous by at least 45%. d) Total nitrogen by at least 40%.

	Notes: • If a tool other than the MUSIC model is used then a report by an independent suitably qualified person must be submitted demonstrating and confirming compliance. • If parameters that are non-compliant are used then a report must also be submitted by an independent suitably qualified person stating how and why the parameters are appropriate.
Site contamination	24.6. Where development is proposed on a site impacted or potentially impacted by contamination, the development and proposed methods of responding to the contamination is endorsed by the ACT Environment Protection Authority.
Hazardous materials	24.7. Where development is proposed on a site impacted by hazardous materials, the development and proposed methods of managing the hazardous materials is endorsed by the ACT Environment Protection Authority.

Parking, Services and Utilities

The following specifications provide possible solutions that should be considered in relation to vehicle parking, access and site servicing (including possible requirements by utility providers) for a proposed development:

Assessment Outcome	**25. The development provides electric vehicle parking and access to charging locations in multi-unit housing.**
Specification	
Electric vehicle ready parking	25.1. At least one EV ready car parking space is provided for each unit in a new multi-unit housing development that is provided with car parking.

Assessment Outcome	**26. The development provides appropriate end-of-trip facilities in multi-unit housing which includes secure bicycle parking.**
Specification	
End of trip facilities – provision of facilities	26.1. This specification applies to: a) New developments. b) Major alterations and/or extensions to existing buildings (if the work affects more than 50% of the gross floor area of the whole of an existing building). c) Changes of use that require approval of a development application but does not apply to a single dwelling, secondary residence or dual occupancy. On-site bicycle parking must meet all of the following: a) Spaces for short and long-stay users are to be in accordance with the relevant rates shown in table 9. b) Bicycle parking facility must be security level a, b or c as set out in *as2890.3. Security levels for long- stay* must also be: i) Securely enclosed and separated from publicly accessible areas, including car parking areas. ii) Protected from the weather.

	iii) Provided on a hard floor surface such as concrete or paving. c) Be clearly visible, well-lit, secure, safe and well ventilated. d) Located: i) Long stay - within one level of the building entrance and no more than 30m from this entrance. ii) Short stay - at-grade and on the main access route to the entrance and not more than 30m from a major entrance or destination. e) Where bicycle parking devices are used: i) Access aisles adjacent to bicycle parking devices must be a minimum width of: • 1.5m for side-by-side bicycle parking; and • 2.0m for multi-tier bicycle parking or bicycle lockers. ii) Access aisles are designed in accordance with *as2890.3.* iii) Not more than 80% of all bicycle parking spaces are to be multi-tier, in accordance with *as2890.3.* iv) Bicycle parking devices must accommodate the bicycle space envelope nominated in *as2890.3.* Net lettable area (NLA) is calculated in one of the following ways: a) In accordance with the NLA definition. b) 85% of a building's gross floor area. Note: Wall-mounted bicycle parking devices located above the bonnet of car parking spaces must not be counted toward the provision of bicycle parking required to meet this specification.

Table 12: End of trip facilities – bicycle provision rates

Land use	Standard rates for end-of-trip facilities	
	Long-stay users (residents, employees, students)	**Short-stay users (customers, patrons, visitors)**
Community activity centre	1 space per 1500 seats or 1 space per 1500m^2 NLA	1 space per 15 seats or 1 space per 15m^2 NLA
Early childhood education and care	1 space per 600m^2 NLA	1 space per 65m^2 NLA
Health facility	1 space per 4 practitioners or 1 space per 1500m^2 NLA	1 space per 2 practitioners or 1 space per 75m^2 NLA
Multi-unit housing, including *Attached house*	1 space per one or two bedroom dwelling, 2 spaces per three or more bedroom dwelling with a car parking space AND 1 space per bedroom for dwellings not allocated a car parking space/	1 space per 10 dwellings
Residential care accommodation	1 space per 2000m^2 NLA	1 space per 1000m^2 NLA
Supportive housing	1 space per dwelling	1 space per 10 dwellings
Veterinary clinic	1 space per 300m^2 NLA	1 space per 300m^2 NLA

End of trip facilities – design requirements of facilities	26.2. This specification applies to: a) New developments. b) Major alterations and/or extensions to existing buildings (if the work affects more than 50% of the gross floor area of the whole of an existing building). c) Changes of use that require approval of a development application but does not apply to a single dwelling or secondary residence. The access path to end-of-trip facilities provides a minimum unobstructed width of: a) 1.5m where the number of bicycle movements is less than 30 per hour in peak periods. b) 2.5m where the number of bicycle movements is 30 or more per hour in peak periods. c) The access path to end-of-trip facilities must also be in accordance with *as2890.3*. d) Ramp gradients must not exceed 1:12 where they are to be ridden by a bicycle rider accessing end-of-trip facilities, in accordance with *as2890.3*. e) Bicycle parking facility users must not be required to walk up or down vehicular ramps to access bicycle parking.

Assessment Outcome	**27. Vehicle and bicycle parking sufficiently caters for the development while minimising visual impacts from the street or public space. This includes consideration of parking location, dimensions and number of spaces provided.**
Specification	
Number of car parking spaces	27.1. Parking spaces are provided at the following rate: a) Single dwellings – at least 2 car parking spaces are provided on site, unless the development is a single bedroom dwelling on a compact block, in which case at least 1 car parking space is provided. b) Secondary residence – at least 1 parking space is provided in addition to that required for the primary residence. c) Multi unit housing - Parking rates and location for the provision of parking are in tables 12 and 13. d) Co-housing - car parking spaces are provided in a single combined parking area screened from public view. e) Developments with 40 or more dwellings, at least one short stay parking space and associated access is provided for delivery trucks such as furniture delivery and removalist vans.
Accessible car parking spaces	27.2. Parking spaces for people with disabilities in public car parks of more than 10 spaces comprise a minimum of 3% (rounded up to the nearest whole number) of the total number of parking spaces required for the development. Note: Other legislation may require different rates
Location of car parking spaces	27.3. Car parking spaces are provided to meet the following: a) Are not located in the front zone; except on: i) Compact blocks. ii) Any part of a driveway in tandem with another car parking space that is located behind the front building line. ~~b) One car space per dwelling is roofed.~~ c) Can be in tandem only where they belong to the same dwelling. d) Do not encroach property boundaries. e) For multi-unit housing:

	i) No closer than 1.5m from windows or doors to habitable rooms of dwellings that are not associated with the parking space. ii) Located within 50m of the dwelling it serves or common entry point for visitor parking.
Safety	27.4. Verge crossings and Internal driveways are designed to be safely used by both pedestrians, cyclists and vehicles, such as through the use of vehicle speed reduction measures.
Basement carparking	27.5. For basement car parking: ~~a) In RZ1 and RZ2, where the block is less than 30 m wide as measured at the street frontage on standard blocks, ramps accessing basement car parking are not located within 50% of the minimum front setbacks.~~ b) The maximum total width of an entry and/or exit facing the street is 8m. c) For developments containing 10 or more dwellings with approaches to basements containing car parking that is less than 6m wide, the development includes sufficient areas for vehicles to wait to allow for an entering or leaving vehicle to pass or at least one waiting area and traffic signals.
Garage and carport openings	27.6. The maximum total width of garage door openings and external width of carports facing a street is 50% of the total length of the building façade facing that street. This does not apply to frontages to rear lanes.
Dimensions of car parking spaces - single dwelling	27.7. Dimensions* of car parking spaces are not less than the following: a) Single roofed space - 6m x 3m. b) Double roofed space - 6m x 5.5m. c) Single unroofed space - 5.5m x 3m. d) Multiple unroofed spaces side by side - 5.5m x 2.6m. e) Parallel parking spaces - 6.7m x 2.3m. f) 2.1m minimum clearance to any overhead structure. *Dimensions for roofed spaces are internal dimensions
Access for car parking spaces – single dwelling	27.8. Access for car parking spaces, driveways and vehicle manoeuvring areas meets relevant requirements in AS 2890.1, the Australian Standard for Parking Facilities, such as manoeuvring to and from and within the development, sightlines and gradients.
Dimensions and access for car parking spaces – multi-unit housing	27.9. Dimensions of car parking spaces, layout and vehicle manoeuvring meet: a) AS 2890.1:2004, the Australian Standard for Parking Facilities, Part 1: Off-street Car Parking including manoeuvring to and from and within the development, sightlines and gradients. The B99 vehicle template shall be used for all multi-unit housing developments. b) Australian Standard AS/NZS 2890.6:2009 Parking Facilities – Part 6: Off-street parking for people with disabilities.
Verge crossings	27.10. Verge crossings comply with the following: a) A single verge crossing per block is provided. b) No additional verge crossings are permitted. c) redundant driveway verge crossings are removed, and the verge and kerb restored. d) Changes to driveway verge crossings are endorsed by Transport Canberra and City Services.
Internal driveways – multi-unit housing	27.11. Internal driveways comply with all of the following: a) Are set back 1m from: i) External block boundaries. ii) External walls of building on the site. b) Windows to habitable rooms and exterior doors within 1.5 of an internal driveway have at least one of the following:

	i) An intervening fence or wall not less than 1.5m high. ii) For windows, a sill height not less than 1.5m above the driveway. c) Provide internal radius of at least 4m at changes in direction and intersections. d) Driveways that serve 4 or more car parking spaces provide turning spaces on the block to allow vehicles to leave in a forward direction. e) Driveways that serve more than 10 car parking spaces and connect to a public road are not less than 5m wide for not less than the first 7m of its length measured from the relevant block boundary.

Table 13: Parking provision rates for residential zones

Link back to specification

Development	Zone	Parking provision rates for residential zones
Apartment Attached house Detached house Dual occupancy Supportive Housing	RZ1 RZ2	**Resident:** • 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 ~~• One parking space per single bedroom dwelling; and~~ ~~• A minimum average provision of 1.5 spaces per two bedroom dwelling, provided that each two bedroom dwelling is allocated a minimum of one parking space and a maximum of two parking spaces; or~~ ~~• Two parking spaces per two bedroom dwelling; and~~ ~~• Two parking spaces for each dwelling with three or more bedrooms; plus~~ ~~**Visitor:** One visitor space per four dwellings or part thereof where a complex comprises four or more dwellings. A portion of short stay visitor parking is to be provided outside boom gates / roller doors. Accessible Visitor car parking is to compromise a minimum of 3% (rounded up) of the total number of required visitor parking spaces~~ **Motorcycles and motor scooters** - three dedicated spaces per 100 car parking spaces are required, with a minimum provision of one space for carparks with a minimum of 30 car parking spaces. These spaces are to be provided in addition to the number of car parking spaces required above. Provision of motorcycle parking spaces should comply with AS 2890 (both part 1 - Off-street and part 5 - On-street) Note: to clarify, the minimum average provision is across the development. Individual dwellings are not to be allocated 1.5 spaces.
	RZ3 RZ4 RZ5	**Resident:** • 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 ~~• One parking space per single bedroom dwelling; and~~ ~~• A minimum average provision of 1.5 spaces per two bedroom dwelling, provided that each two bedroom dwelling is allocated a minimum of one parking space and a maximum of two parking spaces; or~~ ~~• Two parking spaces per two bedroom dwelling; and~~ ~~• Two parking spaces for each dwelling with three or more bedrooms; plus~~ ~~**Visitor:** One visitor space per four dwellings or part thereof where a complex comprises four or more dwellings. A portion of short stay visitor parking is to be provided outside boom gates / roller doors. Accessible Visitor car parking is to compromise a minimum of 3% (rounded up) of the total number of required visitor parking spaces~~ **Visitor:** One visitor space per ~~four~~ five dwellings or part thereof where a complex comprises four or more dwellings. A portion of short stay visitor parking is to be provided outside boom gates / roller doors. Accessible Visitor car parking is to compromise a minimum of 3% (rounded up) of the total number of required visitor parking spaces **Motorcycles and motor scooters**: Three dedicated spaces per 100 car parking spaces are required, with a minimum provision of one space for carparks with a minimum of 30 car parking spaces. These spaces are to be provided in addition to the number of car

Development	Zone	Parking provision rates for residential zones
		parking spaces required above. Provision of motorcycle parking spaces should comply with AS 2890 (both part 1 - Off-street and part 5 - On-street)
Boarding house	All RZs	**Employee:** 0.5 spaces / employee; plus **Resident:** 0.5 spaces / bedroom
Co-housing	All RZs	0.5 spaces / bedroom; plus 0.25 visitor spaces per bedroom.
Community activity centre	All RZs	4 spaces / 100m^2 GFA
Early childhood education and care	All RZs	**Employee**: 1 space / centre plus 2 spaces per 15 child care places; plus **Visitor:** 2 spaces: < 30 child care places and 1 additional space for every 30 additional child care places or part thereof; plus **Drop-off**: 1 pick-up/set-down bay per 10 child care places
Guest house	All RZs	**Employee**: 0.5 spaces/employee; plus **Guest**: 1 space/guestroom
Health facility	All RZs	4 spaces / practitioner
Home business	All RZs	Subject to individual assessment
Parkland	All RZs	Subject to individual assessment
Residential care accommodation	All RZs	0.25 spaces / bed or accommodation unit for visitor parking; plus 1 space / staff residential unit plus 1 space / non-resident peak shift employee
Retirement village	All RZs	1 space / self-care unit; plus 0.5 spaces / hostel or nursing home unit or bed plus 1 space / staff residential unit plus 0.5 spaces/non-resident peak shift employee Note: the above rates for include visitor car parking requirements.

Table 14: Parking locational requirements

Location or use	Long stay parking*	Short stay / Visitor parking*	Operational parking**
Residential use	On-site	On-site or within 100m	On-site
Early childhood education and care	On-site or adjacent	On-site or within 100m	On-site
Residential care accommodation	On-site	On-site or within 100m	On-site
All other uses excluding those listed above.	On-site or within 200 metres	On-site or within 100m	On-site

Note

*Where referred to, distances are actual **walking** distance, not radius or direct line distance.

**Operational parking is for vehicles used directly as part of the operation within the development.

Assessment Outcome	28. Waste is appropriately managed on site without having a detrimental impact on residents and the surrounding area.
Specification	
Waste facilities – multi-unit housing	28.1. Developments that propose post occupancy waste management facilities achieve endorsement from Transport Canberra and City Services (TCCS).

Assessment Outcome	29. The site is appropriately serviced in terms of infrastructure and utility services and any associated amenity impacts are minimised.
Specification	
Servicing and infrastructure	29.1. Proposed development can be sufficiently serviced in terms of infrastructure and utility services. Endorsement is achieved from relevant utility providers (electricity, water, gas, sewerage and stormwater) to confirm that the location and nature of earthworks, utility connections, proposed buildings, pavements and landscape features comply with utility standards, access provisions and asset clearance zones.
Battery storage	29.2. Where development includes a battery over 30kW, the development is endorsed by the Emergency Services Agency.

ACT Government

SS1 – Subdivision Specifications

CONSULTATION VERSION

Proposed amendments related to Draft Major Plan Amendment 04 – Missing Middle Housing Reforms

Amendments are shown in red text

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Subdivision technical specifications

The primary assessment consideration for a development application is the assessment outcomes in the Territory Plan. In demonstrating compliance with the assessment outcomes, consideration may be given to the relevant planning technical specifications. While all assessment outcomes are to be met, not all outcomes are covered by a specification.

Planning technical specifications are used as a possible solution or to provide guidance for identified aspects of a development proposal. The specifications may also be used as a reference or benchmark in the preparation and assessment of development proposals to demonstrate compliance with the assessment outcomes, and the Territory Plan.

Where a proposed development complies with a relevant provision in the planning technical specifications and the development comprehensively addresses the assessment outcome, further assessment regarding those specific provisions will not be required.

The Territory Planning Authority may consider advice or written support from a referral entity to demonstrate compliance with a relevant assessment outcome. Where endorsement from an entity is noted as a planning specification, entity referral may be required.

Consistent with the Subdivision Policy, this Subdivision Specification comprises specifications under eight categories:

- Country and Place;
- Urban Structure and Site;
- Access and Movement;
- Public Space and Amenity;
- Land Use and Development;
- Built Form and Building Form;
- Sustainability and Environment; and
- Parking, Services and Utilities.

These specifications will primarily be for subdividing land and for development of new subdivisions. Some of these specifications may be referred to in other circumstances, e.g., larger developments and developments that may require significant infrastructure.

Other planning technical specifications may be referred to as required, for example, to consider the requirements for proposed zones and development permitted in it.

Country and Place

The following specifications provide possible solutions that should be considered in the planning of a proposed development:

Assessment Outcome	**1. The subdivision design considers and responds appropriately to cultural significance and history or heritage.**
No applicable specification for this assessment outcome. Application must respond to the assessment outcome.	

Urban Structure and Natural Systems

The following specifications provide possible solutions that should be considered in the planning of a proposed development:

Assessment Outcome	**2. 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).**
Specification	
Subdivision Design Application – New residential block configuration	2.1. For blocks created through a subdivision design application, new residential blocks comply with all of the following: a) Minimum block depth: i) For compact blocks: 17m. ii) For mid-sized blocks: 25m. iii) For large blocks: 28m. b) Minimum block width: i) For compact blocks: 6m. ii) For mid-sized blocks: 10m. iii) For large blocks: 14m. c) For compact blocks: slope is no greater than 10%. Note: Slope means the slope of land, expressed as a percentage, calculated using the difference in datum ground level from the highest to lowest points on the proposed block boundary and the horizontal distance between those points.
Currently leased blocks – Residential block configuration	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 Notes: • Minimum areas exclude any battle axe handle i.e., an access handle is not measured as part of the minimum area compliance.

	• Unit titling of blocks can rely on the above table however the table is not intended to address unit titling of individual units/dwellings.
Blocks in industrial zones	2.3. The slope across the frontage or length of the block does not exceed 10%.
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.
Currently leased blocks – scale and location of consolidated RZ1 blocks	2.5. Consolidation of currently leased RZ1 blocks that: a) Create an end of section block is limited to a consolidated area of 3,000m^2. b) Are adjacent to an urban open space or the community path systems is limited to a consolidated area of 2,500m^2. c) Consolidation of other RZ1 blocks* is limited to a consolidated block area of 2,000m^2. * Other RZ1 blocks includes mid-section blocks.

Assessment Outcome	**3. The proposed scale and range of uses in the subdivision are appropriate to the context and consistent with the Territory Plan Map, where applicable. This includes consideration of a range of block sizes to promote housing diversity and choice, and to meet a range of housing needs.**
Specification	
Subdivision Design Application – Land use zoning	3.1. New land use zones proposed in a subdivision design application comply with all of the following: a) Is in accordance with the Territory Plan Map under the future urban area overlay. b) Is compatible with the land use zoning adjacent to the subdivision. c) Proposed land use zoning generally intensifies in density closer to: i) Public transport routes and stops. ii) Commercial centres, particularly with community services and facilities. d) Lower density zoning is generally segregated from higher densities zoning. e) Creates a clear and logical configuration of zones and response to centres, services and connecting road and active travel networks.
Subdivision Design Application – Residential zoned blocks	3.2. Residential zoned blocks proposed in a subdivision design application for single dwelling housing comply with the following: a) RZ1 contains: i) No more than ~~10~~ 15% compact blocks. ii) No more than ~~30~~ 40% mid-size blocks. b) RZ2 contains: i) No more than ~~15~~ 20% compact blocks. ii) No more than ~~40~~ 50% mid-size blocks. c) RZ3~~, RZ4~~ contains: i) At least ~~25~~ 30% compact blocks. ii) At least ~~50~~ 60% mid-sized blocks. d) RZ4, RZ5 contains: i) At least ~~30~~ 40% compact blocks. ii) At least ~~60~~ 70% mid-sized blocks.

Assessment Outcome	4. Biodiversity connectivity is maintained across the landscape.
No applicable specification for this assessment outcome. Application must respond to the assessment outcome.	

Assessment Outcome	5. Loss of native habitat and biodiversity is avoided and/or minimised.
No applicable specification for this assessment outcome. Application must respond to the assessment outcome.	

Assessment Outcome	6. The health and functionality of waterways and catchments is maintained, including through application of water sensitive urban design principles.
No applicable specification for this assessment outcome. Application must respond to the assessment outcome.	

Assessment Outcome	7. The subdivision is designed in a way to minimise the need for ongoing site-specific provisions (such as front or side boundary setbacks) to apply to blocks.
Specification	
Subdivision Design Application – Ongoing provisions	7.1. Ongoing provisions: a) Blocks to which ongoing provisions apply, are nominated on a planning control plan, with no more than 30% of the blocks within the subdivision subject to ongoing provisions. b) For blocks intended to accommodate single dwelling development, each ongoing provision must apply to at least 10% of the blocks within the estate. All ongoing provisions are to be in accordance with the *Planning Act 2023*.

Site and Land Use

The following specifications provide possible solutions that should be considered in the planning of a proposed development:

Assessment Outcome	8. The functionality and usability of the subdivision is appropriate for its intended purpose/use. This includes limiting future adverse impacts between permissible land uses and on surrounding areas.
No applicable specification for this assessment outcome. Application must respond to the assessment outcome.	

Access and Movement

The following specifications provide possible solutions that should be considered in relation to access, travel modes and movement to and within a proposed development:

Assessment Outcome	**9. Road hierarchy, layout and design (including entry and egress points) enables the distribution of traffic in a legible, convenient and safe manner. This includes providing a high level of internal accessibility for pedestrians, cyclists and public transport.**
Specification	
Subdivision Design Application – Road hierarchy	9.1. The proposed road hierarchy, layout and design is endorsed by Transport Canberra and City Services (TCCS).
Subdivision Design Application – Street network	9.2. The street network within a subdivision complies with all of the following: a) Maximum driving distance between any dwelling and specified roads complies with the following: i) Minor or major collector street or higher order road: 700m. ii) Arterial road: 1200m. b) No more than three turning movements at intersections are required in order to travel from any dwelling to the nearest collector street or arterial road. c) For blocks with a front boundary less than 8m, no direct vehicular access is provided to either of the following: i) A major collector road. ii) Any minor collector road or access street that is adjacent to an address street boundary with a bearing between 70° and 120°. d) Intersection spacing is endorsed by Transport Canberra and City Services (TCCS).

Assessment Outcome	**10. Clear and high quality movement corridors enable effective external connections for local vehicle, pedestrian and cycle movements, while minimising through traffic from external areas (other than for pedestrians, cyclists and public transport) and 'rat runs'.**
Subdivision Design Application – Shared paths	10.1. The following applies to shared paths: a) Shared paths are provided in the following locations: i) The entire frontage of any block used or proposed to be used for one or more of the following: A. Schools. B. Shops. C. Community facilities. ii) The entire frontage of any block adjacent to an existing or proposed bus stop. iii) The entire frontage of any block used or proposed to be used for multi-unit housing containing 10 or more dwellings. iv) On both sides of endorsed bus routes. b) Shared paths are connected to one or more of the following: i) Any existing or proposed shared path networks. ii) Open space networks. iii) Community facilities such as educational establishments and local activity centres.

	iv) Public transport routes and bus stops.

Assessment Outcome	11. The use of rear lane accessways, cul-de-sac roadways and battle-axe blocks are minimised.
Specification	
Subdivision Design Application – Cul-de-sac blocks	11.1. No more than 15 per cent of blocks in a subdivision have vehicular access to cul-de-sac.
Subdivision Design Application – Rear lanes	11.2. Rear lanes are only permitted where the block has an alternate street frontage.

Public Space and Amenity

The following specifications provide possible solutions that should be considered in relation to public areas (areas accessible to residents, visitors and community) and amenity outcomes associated with a proposed development:

Assessment Outcome	12. The subdivision design achieves reasonable solar access and microclimate conditions for individual blocks to enable the design of sustainable buildings, and to public areas and streets to support their use by the community.
No applicable specification for this assessment outcome. Application must respond to the assessment outcome.	

Assessment Outcome	13. Public spaces provided within a subdivision accommodates a range of uses, users and activities. This includes consideration of recreational opportunities, including facilities for pedestrians and cyclists
Specification	
Subdivision Design Application – Recreation uses	13.1. The following applies: a) The development comprises of public spaces consistent with Table 1. b) Recreation spaces meet the following: i) Local neighbourhood parks have an area not less than 0.5ha. ii) Central neighbourhood parks have an area of at least 1ha. iii) Blocks for residential use satisfy at least one of the following: A. Not more than 300m from at least one of the following: • A local neighbourhood park. • Town park or a pedestrian parkland containing. Recreational facilities such as picnic and barbeque areas and playgrounds. B. Not more than 500m from at least one of the following: • A central neighbourhood park. • Neighbourhood oval. • District park. • District sportsground.

Table 1 – Public spaces

PUBLIC SPACE TYPE	PRIMARY FUNCTIONS	MANAGEMENT INTENTIONS
Town park	***Located in a town centre*** A meeting place park, formal in character. With irrigated grass, paving, art, and street furniture. May have shrub or flower beds, pavilions and water features. May be associated with play facilities, lakes or ponds.	Managed to a high standard for intensive use with capacity to host special events.
District parks	***Recreational facilities*** Extensive, informal park or series of spaces, 4 -10 Ha Serving population catchment area of 25 - 50,000 minimum people. With grass and trees and a diversity of recreation facilities to cater for informal recreation for all age groups such as picnics, barbecues, adventure playgrounds and skateboard parks. May have natural or cultural heritage conservation or habitat creation purposes. May be associated with waterways, wetlands, lakes and ponds.	Managed to a high standard for intensive use with capacity to hold large gatherings.
District sportsgrounds	***Sportsground complex*** Training and competition venue for organised nominated sports at all levels, 8 ha minimum. Serving population catchment area of 25 - 50,000 minimum people. May be associated with high schools. With irrigated grass, public parking, training lights and a pavilion that includes change rooms, toilets and kiosk.	Managed to a high standard for intensive sports training and events. May be enclosed and leased.
***Neighbourhood ovals**	***Recreational or sporting activities*** (Not applicable to commercial and industrial *estates*) Ovals used for sporting purposes and recreational space for local residents. Generally located adjacent to primary schools and/or local shopping centres with shared or separate parking. Neighbourhood ovals are an integral part of surrounding parkland when not in use for sporting purposes. The area is irrigated and will require sufficient space for related amenities (small pavilion/toilet block and training lights).	Moderate intensity management with seasonal variability.

Assessment Outcome	14. Public spaces provide opportunities to link existing or proposed areas of open space and/or providing for shared use of public facilities by adjoining communities.
No applicable specification for this assessment outcome. Application must respond to the assessment outcome.	

Sustainability and Environment

The following specifications provide possible solutions that should be considered in relation to the sustainability and environmental outcomes associated with a proposed development:

Assessment Outcome	15. Urban heat island effects are reduced, stormwater run-off is minimised and ecosystem services are maintained through provision of planting area and canopy trees, limiting impervious surfaces, selection of building materials and design of outdoor spaces. This includes consideration of water sensitive urban design measures.
Specification	
Permeability – sites greater than 2000m²	15.1. For development on sites greater than 2,000m² involving works that have the potential to alter the stormwater regime of the site; or development within existing urban areas which increases impervious area by 100m², development achieves the following permeability: a) For new greenfield subdivision that is primarily residential use, all of the following: i) For each site in PRZ1: 50% of the site. ii) For each street: 20% of the street. iii) For each surface car park: 10% of the car park. iv) For the total area of all streets: 30% of the total area. v) For the total area of all PRZ1 and streets within the subdivision: 40% of the total area. b) For all other subdivision: i) 20% of the total site area. ii) 50% of the verge surface of each street.
Landscaping – tree canopy cover	15.2. Subdivisions, where a subdivision design application is required, meets the following requirements: a) New greenfield subdivision that is primarily residential use, Tree canopy cover at maturity is: i) For each PRZ1 block: 25% of the block. ii) For each street: 20% of the street. iii) For each surface car park: 30% of the car park. iv) For the total area of all streets: 30% of the total area. v) For the total area of all PRZ1 and streets within the estate: 35% of the total area. b) For all other subdivision, street tree canopy cover will, at maturity, shade not less than 30% of all footpaths and surrounding paths at noon on the summer solstice. c) Trees proposed to be planted are at least semi-mature stock (1.5m height) and have a minimum mature height of 4m. d) All new trees proposed are in accordance with utilities requirements.

Subdivision Design Application – Reducing urban heat (cool paving)	15.3. At least 75% of the non-exempt paved surface area is one or more of the following types of cool paving: a) Paving with light-coloured aggregates, pigments and binders (e.g. Fly ash, slag, chip, sand seals and reflective synthetic binders). This includes standard concrete that is uncoloured and has no exposed aggregate. b) High emittance and high albedo cement and asphalt (e.g. Slag and white cement). c) Resin-based concrete using natural clear-coloured tree resins in place of cement to bind the aggregate. d) Light-coloured coatings (e.g. Cementitious coating and elastomeric coating), infrared reflective coatings, high white coatings, or colour changing coatings. e) Thermochromic materials (intelligent coatings developed with nanotechnology that can applied to enhance the thermal and optical properties of pavements and reduced glare effect on pedestrians). f) Permeable paving (including porous asphalt cement, pervious Portland cement concrete, block pavements, reinforced grass pavements and vegetated pavements), providing it is installed on a subgrade with the capacity for infiltration or temporary storage of water below the pavement. The following areas of paved surface are exempt: a) Shaded areas. Shading is to be measured either at noon on the summer solstice (21 December). Shade may be provided by structures or vegetation (e.g. Eaves, shade sail and tree canopy). b) Road pavement. c) Areas where the municipal infrastructure standards, national construction code or other engineering standards preclude the use of these materials. d) Areas where heritage requirements preclude the use of these materials. e) Areas where it is demonstrated that undesirable glare or reflected heat would cause unavoidable negative impacts in the particular context. f) Areas that require particular surfaces to meet sporting needs (e.g. synthetic tennis courts and athletics tracks).
Subdivision Design Application – Protection from heat	15.4. 50% of public playgrounds and 50% of public seating are fully shaded in summer. Shading is to be measured either at noon on the summer solstice or assuming the sun is directly overhead. Shading may be provided by built and/or green infrastructure (e.g. shade structure, tree canopy).

Assessment Outcome	**16. Deep soil zones are provided on site to support healthy tree growth and provide adequate room for canopy trees.**
No applicable specification for this assessment outcome. Application must respond to the assessment outcome.	

Assessment Outcome	**17. Threats to biodiversity such as noise, light pollution, invasive species incursion or establishment, chemical pollution, or site disturbance are avoided or minimised through good design.**
No applicable specification for this assessment outcome. Application must respond to the assessment outcome.	

Assessment Outcome	**18. Minimise cut and fill to protect natural hydrological function and limit soil erosion and site disturbance.**

Specification	
Site disturbance	18.1. For sites less than 3,000m², the development complies with the Environment Protection Authority requirements regarding construction and land development. For sites 3,000m² or greater, the development prepares an erosion and sediment control plan and obtains endorsed by the ACT Environment Protection Authority.

Assessment Outcome	**19. The subdivision design considers, addresses and mitigates site constraints and environmental risks including existing natural features, topography, bushfire, flooding, contamination, air quality or hazardous materials.**
Specification	
Bushfire prone area	19.1. All development in the bushfire prone area (identified by the Emergency Services Authority) to comply with the ACT Bushfire Management Standards.
Flood risk	19.2. The following applies: a) Residential and commercial buildings are to be excluded from flood liable areas up to the 1% Annual Exceedance Probability (AEP) Flood. b) Habitable floor levels are to be above the 1% AEP level plus a suitable freeboard (usually 300mm). c) In flood liable areas up to the 0.2% Annual Exceedance Probability (AEP) Flood, large developments and those with more sensitive uses* are to be referred to ESA, TCCS and EPSDD for endorsement. Note: *Sensitive uses include developments such as hospitals, nursing homes, childcare centres, prisons, archives, libraries and emergency response centres.
Stormwater retention and detention	19.3. For development on sites greater than 2,000m² (other than major roads) involving works that have the potential to alter the stormwater regime of the site, a report from a suitably qualified person is provided demonstrating that the development complies with: a) At least one of the following: i) Stormwater retention management measures are provided and achieve all of the following: A. Stormwater storage capacity of 1.4kl per 100m² of the total impervious area of the site is provided specifically to retain and reuse stormwater generated on site as a whole. B. Retained stormwater is used on site. ii) Development captures, stores and uses the first 15mm of rainfall falling on the site; and Note: on-site stormwater retention is defined as the storage and use of stormwater on site. b) Stormwater detention measures are provided and achieve all of the following: i) Capture and direct runoff from the entire site. ii) Stormwater storage capacity of 1kl per 100m² of impervious area is provided to specifically detain stormwater generated on site. iii) The detained stormwater is designed to be released over a period of 6 hours after the storm event. For this specification, on-site stormwater detention is defined as the short-term storage and release downstream of stormwater runoff. Note: calculating on-site detention can include 50% of the volume of rainwater tanks where stormwater is used on-site.

Site contamination	19.4. Where development is proposed on a site impacted or potentially impacted by contamination, the development and proposed methods of responding to the contamination is endorsed by the ACT Environment Protection Authority.
Hazardous materials	19.5. Where development is proposed on a site impacted by hazardous materials, the development and proposed methods of managing the hazardous materials is endorsed by the ACT Environment Protection Authority.

Assessment Outcome	**20. Existing and significant vegetation is preserved where reasonable, and new landscaping responds to and integrates with preserved features where possible.**
There is no applicable specification for this assessment outcome. Application must respond to the assessment outcome.	

Assessment Outcome	**21. Residents are provided a reasonable level of protection from known sources of noise, odour and light pollution.**
No applicable specification for this assessment outcome. Application must respond to the assessment outcome.	

Parking, Services and Utilities

The following specifications provide possible solutions that should be considered in relation to vehicle parking, access and site servicing (including possible requirements by utility providers) for a proposed development:

Assessment Outcome	**22. Appropriate vehicle and bicycle parking is provided to meet the needs of users that is safe and convenient for users and pedestrians.**
Specification	
Subdivision Design Application – On-street parking	22.1. Dimensions of designated on-street car spaces comply with Australian Standard AS 2890.5 Parking – on street.

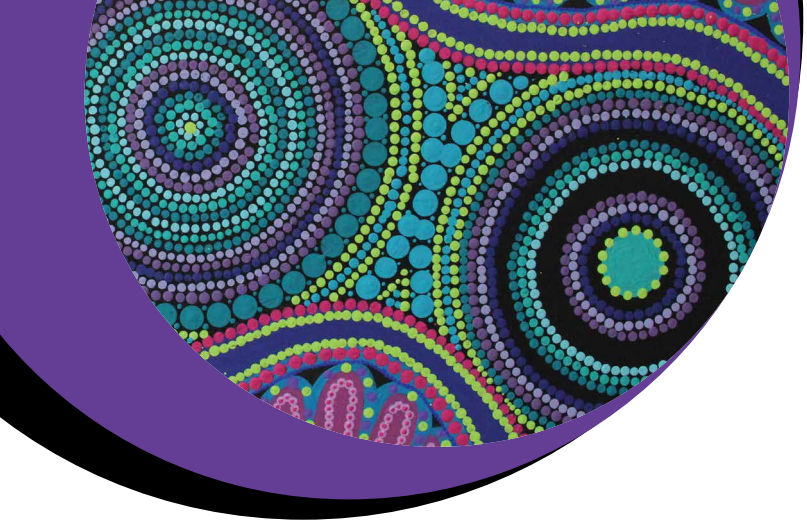
Assessment Outcome	**23. Waste is appropriately managed within the subdivision without having a detrimental impact on the surrounding area.**
No applicable specification for this assessment outcome. Application must respond to the assessment outcome.	

Assessment Outcome	**24. The site is appropriately serviced in terms of infrastructure and utility services and the noise and visual amenity impact of these are minimised.**
Specification	

Battery storage	24.1. Where development includes a battery over 30kW, the development is endorsed by the Emergency Services Agency.

ACT Government

ACT Missing Middle Housing Design Guide



Acknowledgment of Country

Yuma
Dhawura Nguna Dhawura Ngunnawal
Yanggu ngalawiri dhunimanyin Ngunnawalwari dhawurawari
Nginggada Dindi yindumaralidjinyin
Dhawura Ngunnawal yindumaralidjinyin

Hello,
This is Ngunnawal Country
Today we are meeting on Ngunnawal country
We always respect Elders, male and female
We always respect Ngunnawal Country

The ACT Government acknowledges the Ngunnawal people as traditional custodians of the ACT and recognises 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 city and this region.

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Australian Capital Territory, Canberra 2024.

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Vision for Canberra

To be a sustainable, competitive and equitable city that respects Canberra's unique legacy as a city in the landscape and the National Capital, while being responsive to the future and resilient to change.

Haig Townhouses, Turner ACT. Architect: DNA Architects

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Part One: Introduction and purpose

The nation's housing affordability crisis is complex, stemming from various factors across the breadth of the national economy. The planning system has a critical role in responding by enabling the delivery of new housing supply in a way that safeguards the character and liveability of the city. With a range of ambitious housing targets being set nation-wide, the ACT is aiming to enable 30,000 new homes by 2030. The ACT's Planning Strategy 2018 aims to deliver 70% of new housing growth in existing urban areas, with District Strategies identifying key areas for growth.

The vision of the ACT Planning Strategy (2018) is to be a sustainable, competitive and equitable city that respects Canberra as a city in the landscape and the National Capital, while being responsive to the future and resilient to change. 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.

The ACT has limited land available for new suburban development and therefore, new suburbs cannot be relied upon alone to cater for the growing population. Urban infill involves building new homes on existing residential blocks rather than expanding into undeveloped areas, known as greenfield development. Urban infill is preferred because it makes better use of land and resources, reduces urban sprawl, and helps protect natural areas and farmland.

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.

WHY THE NEED FOR MISSING MIDDLE HOUSING?

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 neighborhoods and provide more affordable housing choices. By adding missing middle housing, communities can enjoy more diverse and vibrant neighborhoods, better access to amenities, and improved overall housing outcomes.

Residential intensification is a means to provide for housing growth and choice, while ensuring that our land is used efficiently. This is because traditional housing often doesn't meet the diverse needs of the population in our growing cities. Modern lifestyles require homes to be safe, comfortable, and adaptable. Unlike previous generations, our needs for multi-functional and flexible living spaces have evolved.

Missing middle housing—such as multi-occupancy, duplexes, townhouses, terraces, and small apartment buildings—can address this by offering housing options that fill the gap between single-family homes and high-rise apartments. Embracing a variety of housing types recognises a cultural shift from traditional models, allowing cost savings to be invested in quality materials and innovative designs.

As urban areas continue to grow and population increases, using land efficiently within our cities becomes only more important. Missing middle housing provides denser living without the bulk of large apartment complexes, reducing sprawl and preserving open spaces. These housing types cater to various life stages and income levels, as well as multi-generational living, offering more flexibility and choice for different living arrangements.

They also promote walkable neighbourhoods by increasing residential living within existing communities, enhancing local amenity, and fostering vibrant, connected communities. In addition, higher-density housing supports sustainable communities by reducing resource use and improving public transportation.

Tip: These design guides, by their nature, use planning language. See the definitions in the glossary in the appendices.

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KEY FACTORS IN DEVELOPING MISSING MIDDLE

Understanding the unique opportunities, challenges and other key factors affecting the delivery of missing middle housing is key to developing the design guides. Some of these factors include:

DEVELOPMENT FEASIBILITY VERSUS HOUSING AFFORDABILITY

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.

LEGACY OF BLOCK PATTERN AND STRUCTURE

Over time cities evolve, creating different housing types and structures. The Griffin Plan created large city blocks, while newer areas have smaller ones. By understanding and using these different block sizes, we can create housing that fits well in each area. This means we can develop missing middle housing that respects the unique character of different neighborhoods.

BLOCK CONSOLIDATION CHALLENGES

Creating missing middle housing may require the consolidation of multiple blocks. While this may open opportunities, it can also be complex and costly. Adjusting regulations to allow for missing middle housing on single blocks and targeting areas of consolidated ownership or larger sites can overcome this. Block consolidation can unlock significant opportunities for creating diverse, well-designed, efficient and and affordable housing options that may not be possible on individual blocks.

UPDATING PLANNING CONTROLS

Existing planning controls can make missing middle projects difficult. The ACT Government is exploring updates to planning controls, such as car parking requirements, block sizes and consolidation, and setbacks, to better support missing middle. By modernising zoning codes and standards, we can make it easier to build missing middle housing. These updates will make it easier to develop diverse housing options that meet the needs of our growing communities.

STREAMLINING PLANNING APPLICATION PROCESSES

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.

DISTRICT STRATEGIES

The ACT’s District Strategies offer place-specific approaches to development and densification, aligning with the desired future character of each district. By incorporating strategies that enable missing middle housing, we can ensure that growth is balanced with the protection of local character and amenity. Strategies to deliver missing middle housing must consider these to support sustainable, community-focused development.

INVESTING IN INFRASTRUCTURE

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.

ENHANCING AMENITY IMPACTS

Renewing suburban areas for missing middle housing can enhance community amenity by carefully considering factors like driveway placement and street tree preservation. By addressing these elements, we can ensure that the implementation of missing middle housing is both successful and sustainable, contributing positively to the overall urban environment.

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MISSING MIDDLE HOUSING IN THE ACT

Canberra is one of Australia's fastest growing cities. With an ageing population and an increase in non-traditional family structures, there is a pressing need for diverse and adaptable housing options. To make sure Canberra continues to be a great place to live, work and enjoy, we must plan for this growth now.

The ACT's population is currently around 470,000 people. But by 2050, our population is expected to reach almost 700,000 people. Our growing population means we will need to build 30,000 new homes by 2030 and up to 100,000 new homes by 2050.

Not only do we need more homes in the ACT, but also more housing choice. Right now, homes in Canberra lean towards low-density, separate homes and high-density apartments. This leaves a gap for medium-density homes, like townhouses and terrace houses. This gap is often called the 'missing middle.' Filling this missing middle gap is important to meet the needs of our diverse population.

The ACT has only a limited amount of available land left for new suburbs. This means we cannot rely on new suburbs alone to fit our growing population. In the ACT, we have set a target for 70% of Canberra's future development to be within existing suburbs. This is called infill development. Infill development is important because it can limit urban expansion and create more housing options closer to existing shops, transport, schools and services.

The ACT Government recognises the need for 'missing middle' housing - multi- occupancy, townhouses, terraces and low-rise apartments - to meet the future growth and housing demands of this city.

Missing middle homes can be an attractive option for many Canberrans. This includes older people who are looking to downsize, young families, smaller households and even first-home buyers. They can also be a more affordable, accessible and flexible housing choice for people.

The development of this type of housing options, however, requires careful consideration of zoning rules and design guidelines to ensure high-quality, sustainable, and affordable housing that respects Canberra's garden city character.

The current planning system inhibits the development of some missing middle housing in existing residential areas, limiting housing choices and flexibility.

This guide will be instrumental in informing potential changes to zoning rules and planning controls, and in delivering diverse, affordable, and sustainable housing options for Canberra's evolving community.

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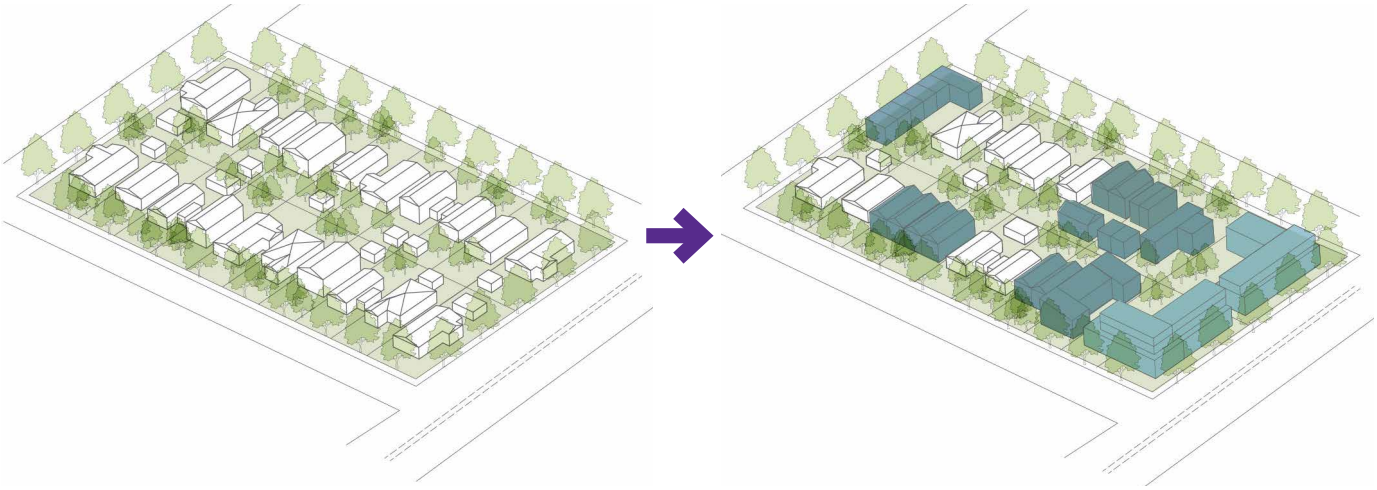

Figure 1: This figure illustrates the concept of missing middle infill development in an existing suburb over time.

WHY THE NEED FOR DESIGN GUIDES

The ACT Government is addressing housing needs through the Missing Middle Housing Design Guide, which aims to increase the availability of diverse and affordable housing options and choice.

This guide encourages the development of housing types like multi-occupancies, townhouses, terraces and low-rise apartment buildings that fit seamlessly into existing neighborhoods. By promoting these more moderately priced housing options in existing suburbs, the government is working to ease the pressure on the housing market, making it easier for families to find suitable homes. The guidelines also support sustainable and efficient land use, fostering more lively and walkable communities with better access to existing amenities.

AIM OF THE DESIGN GUIDELINES

Design guides help proponents interpret and apply the Territory Plan's assessment outcomes when proposing development across Canberra. The design guides and design evaluation processes are critical in supporting the design and assessment processes, particularly those planning provisions that are less prescriptive and leave more room for interpretation and innovation.

This Missing Middle Housing Design Guide adds to the suite of existing ACT Design Guides.

The reasoning for the design guides, which support the Territory Plan are outlined below:

Community benefit and value

Guiding best practice design can lead to social, environmental and economic benefits to the community, government and private business. Social benefits include supporting people's quality of life and overall health and wellbeing. Environmental benefits encompass the protection and enhancement of environmental assets and the inclusion of sustainable design features and travel. Economic benefits include reduced infrastructure and delivery costs as a result of efficient land-use patterns through greater density near activity centres, employment areas and active travel.

Greater clarity and flexibility in process

Design guides can provide greater clarity, flexibility and consistency for the community, authority officers and industry. In supporting the Territory Plan, they help people interpret statutory policy, and guide proponents and statutory officers (including development assessment staff, courts and tribunals) within an outcomes-based planning system paradigm; clear writing is supported by images and graphics. These guides give all stakeholders the confidence to fully participate in the planning and development process.

Responsive to contemporary challenges

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. By encouraging development to be designed in a responsive manner and of a high-quality, the guides contribute to improvements in community health and wellbeing.

High-quality and place-based outcomes

An outcomes focused planning system puts the focus on achieving high quality design outcomes. The design guides support the Territory Plan to ensure the planning system adequately considers design quality and development appropriateness, leading to improved design quality and overall planning and design outcomes. These outcomes can enable more distinctive places that have strong community identities.

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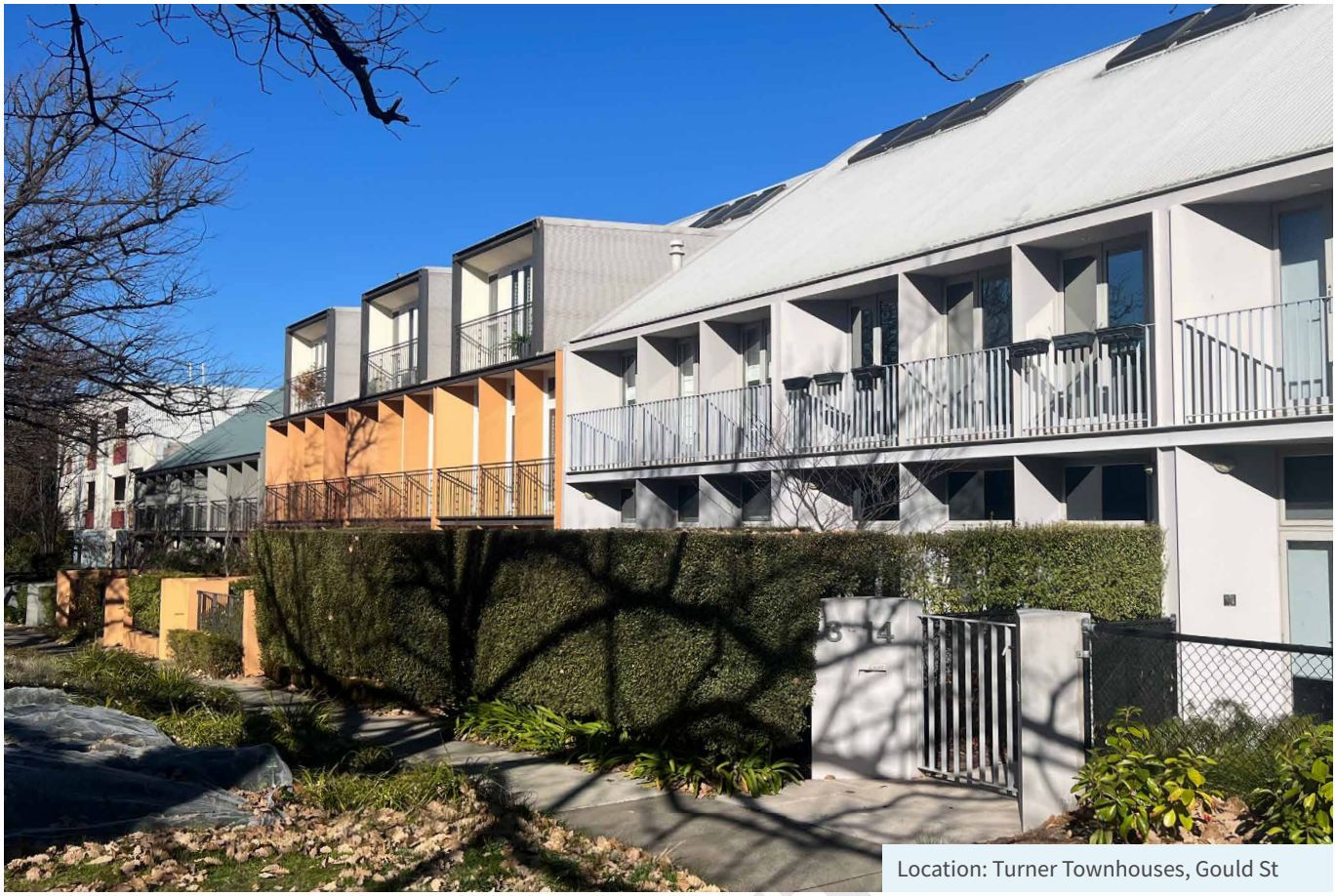

Location: Turner Townhouses, Gould St

WHAT IS GOOD DESIGN?

Good design is not just about how a place looks, but how it works and makes people feel. It fosters better environments that enhance public value and support individual and community well-being. Achieving good design involves a thoughtful process that considers the specific context, including neighbourhood dynamics, street characteristics, and site features.

As we look to increasing density within urban areas, we must recognise the responsibility that comes with transforming communities and the important role good design plays in the future character and functionality of our neighbourhoods. Good design also contributes to affordability and prioritises liveability and the natural environment, utilising existing site features and taking a conscientious approach to resource use.

- **Context and character -** Buildings define the quality of our neighbourhoods, shaping perception and functionality. Well-designed structures should integrate with their surroundings, reflecting local culture and history in architectural styles, creating a sense of identity and enhancing usability and diversity.
- **Access, movement and place –** Prioritising pedestrian movement and reducing the reliance on vehicles will create more accessible neighbourhoods, encourage active transportation and foster community interaction.
- **Built form and scale -** Buildings and streets should be designed to address the street and consider the human experience, creating inviting and comfortable environments.
- **Materials and building quality -** Quality materials are crucial for functionality and sustainability. They should be durable and visually appealing, minimising environmental impacts and enhancing integration with surroundings.
- **Public realm amenity -** The public realm should prioritise user needs, fostering walkable, inviting spaces, while promoting social connections and diverse activities through enhancing urban character.
- **Safety and security -** Design should incorporate elements that enhance safety through visibility and well-lit spaces, using principles like Crime Prevention Through Environmental Design (CPTED) to protect vulnerable groups.
- **Sustainability -** Urban ecosystems are vital for healthy communities. Developments should adopt sustainable practices and incorporate green spaces and sustainable materials to optimise resources and energy efficiency.

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Good buildings exhibit qualities like those that we appreciate in good people: they are polite and well mannered, contribute to the community, are good neighbours and it's a pleasure to spend time in their company.

As our city grows in maturity and population, social performance characteristics are a measure of the qualities of this place and this community.

Good design ensures that enduring strength and resilience attributes are 'baked into' the city fabric.

- Catherine Townsend, ACT Government Architect

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MISSING MIDDLE DESIGN PRINCIPLES

To support the development of missing middle housing in the ACT, the following overarching design principles have been developed to support and encourage high-quality housing and comfortable environments for the community.

Principle one:

Respond to neighbourhood context and character to create a sense of identity and reflect local styles.

Principle two:

Contribute to healthy and safe communities through well designed streets and communal spaces.

Principle three:

Encourage sustainable design practices that optimise resource and energy efficiencies and minimise impact on the natural environment.

Principle four:

Support housing diversity and community needs by providing a mix of different housing typologies.

HOW TO USE THIS DESIGN GUIDE

WHO IS THIS DESIGN GUIDE FOR?

This design guide is intended for both small and large-scale developers, design industry professionals, government officials, institutions, community advocates and generally anyone involved or interested in the planning, design and delivery of built environment projects in Canberra.

The Missing Middle Housing Design Guide has been prepared to:

- Assist first time small-scale developers wanting to expand and build multiple homes on their block if size permits.
- Assist developers, planners, urban designers, architects, building designers, landscape architects, builders and other professionals when designing and preparing Development Applications (DAs) for missing middle housing.
- Assist government planning professionals with preparing development controls and assessing development applications for missing middle housing.
- Inform the community of what is required to achieve good design and planning practice for missing middle housing.

Missing middle housing includes:

- **Multiple occupancy housing** where two or three dwellings are located on an existing block of land. These can be side-by-side, one behind the other, or located on corner blocks.
- **Townhouse** developments typically consisting of four or more dwellings which may be attached, detached or a combination of the two. Depending on the number of townhouses, there are many possible arrangements, though often as single or two storey dwellings sited perpendicular to the street.
- **Terrace** development typically consisting of four or more attached dwellings with shared side walls which have a continuous frontage to the street.
- **Low-rise apartments** are residential buildings made up of two or more residential apartments, up to three storeys. Typically, dwellings are single level, which have shared access and circulation.

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WHAT BUILDING TYPOLOGIES DOES THIS DESIGN GUIDE APPLY TO?

MISSING MIDDLE DEVELOPMENT PROCESS

Below is a step-by-step guide for property owners in the ACT who want to develop their existing property into missing middle housing in Residential Zone 1 and 2 (RZ1 and RZ2). This document provides guidance related to steps 1 to 4 below.

1. Understand missing middle housing

- → Learn that missing middle housing includes options like multi occupancy, townhouses, terraces, and low rise apartment buildings.
- → These housing types and typologies are designed to be more affordable and to fit well within existing neighborhoods.

2. Assess your property

- → Evaluate your property to determine its suitability for missing middle housing development.
- → Check the size, shape, and current use of your land to see if it can accommodate additional housing units.

3. Research zoning and regulations

- → Review local zoning laws and regulations for Residential Zone 1 and 2 (RZ1, RZ2) to ensure your proposal is permissible.
- → Understand any restrictions or requirements that may apply to your proposed development.

4. Develop a concept plan

- → Hire an architect or designer to help create a concept plan that fits neighborhood character and meets local regulations.
- → Design homes that are affordable, sustainable, accessible, appeal to future dwellers and use modern methods of construction.
- → Engage a qualified energy assessor to embed energy efficiency into the design process.

5. Secure financing

- → Explore different financing options such as home equity loans, personal savings, or small business loans.
- → Prepare a detailed budget that includes all costs, from design and planning to construction and marketing.

6. Obtain necessary approvals

- → Submit your development application to the ACT Planning and Land Authority for assessment.
- → Ensure you get all the necessary permits and approvals before starting construction.

7. Hire contractors

- → Find builders and contractors to carry out construction work.
- → Get multiple quotes and check references to ensure you hire reliable professionals.
- → Consider modern methods of construction, including prefabricated, modular building technology and building with sustainable materials.

8. Monitor construction

- → Hire a construction manager or prepare to monitor the construction with regular site visits, to ensure the work is progressing on schedule and within your budget
- → Address any issues that arise promptly to avoid delays

9. Complete the project

- → Conduct final inspections to ensure everything meets the required standards and regulations.
- → Address any final touch-ups or issues before handing over the homes to future dwellers.

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HOW IS THIS DESIGN GUIDE STRUCTURED?

The Missing Middle Housing Design Guide is organised in four parts as outlined below.

The more technical nature design guidance can be found in PART THREE: DESIGN GUIDELINES which is structured according to the design themes as outlined on the opposite page. The design themes relating to County and Place, and Urban Structure and Natural Systems, as represented in the other ACT design guides is not included in this guide, as these assessment outcomes do not apply to missing middle housing.

PART ONE: INTRODUCTION AND PURPOSE

Sets the scene and provides an overview of the purpose and structure of the guidelines. It provides and understanding of what good design is and how the design guide can achieve this, as well as providing an understanding on who this design guide is for, how to use the guide and how the design guide connects back to the existing Territory Plan.

PART TWO: CHARACTER AND SITE

Describes the process of preparing a thoughtful context analysis of the neighbourhoods, streetscape and site scales to set the foundation and understanding for which missing middle housing options are recommended and how you can make best use of the site. This section also describes the different building types and typologies, and identifies specific characteristics and guidance on where they differ from the general design guidance.

PART THREE: DESIGN GUIDELINES

Provides best practice design guidance for missing middle housing based on the founding design principles and organised in the following themes - Site and Land Use, Access and Movement, Public Space and Amenity, Built Form and Building Design, Sustainability and Environment. These theme chapters provide a direct link and connection back to the Territory Plan and assessment outcomes.

PART FOUR: APPENDICES AND CHECKLIST

Includes tools to support the design guidance and development process including missing middle housing development checklist, built form control metrics, document references, and a glossary.

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DESIGN PRINCIPLES

Four overarching design principles have been developed to guide the overall intent and encourage high quality missing middle housing development outcomes and support community integration.

Principle one:

Respond to neighbourhood context and character to create sense of identity and reflect local styles.

Principle two:

Contribute to healthy and safe communities through well designed streets and communal spaces.

Principle three:

Encourage sustainable design practices that optimise resource and energy efficiencies and minimise impacts on the natural environment.

Principle four:

Support housing diversity and community needs by providing a mix of different housing typologies.

DESIGN THEMES

General design guidelines have been organised around seven key themes that align with the assessment outcomes of the Territory Plan and provide clear reference to support the development application.

Country and Place

*Refer to **Housing Design Guide***

Urban Structure and Natural Systems

*Refer to **Housing Design Guide***

Site and Land Use

Understanding your site
Land uses
Building envelope
Typologies

Access and Movement

Site access and connectivity
Resident and visitor parking
Integrated Services

Public Space and Amenity

Communal open space
Private open space and balconies
Landscaping

Built Form and Building Design

Scale and building form
Orientation and street interface
Diverse housing choices
Storage

Sustainability and Environment

Building design performance
Natural resource management
Climate change resilience

DESIGN ELEMENTS

Within the design themes, guidelines for specific design elements has been identified and should be addressed except where more specific outcomes have been identified per typology.

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HOW DOES THIS GUIDE RELATE TO OTHER DESIGN GUIDES?

The Missing Middle Housing Design Guide is complementary to other ACT Design Guides.

Design guides help proponents consider how their developments can achieve better designed buildings and shared spaces that benefit the community. This system is focused on delivering best practice outcomes.

ACT Design Guides require proponents to think about the design of buildings and spaces, and their impact on the environment and community. It also gives the assessment team more information about a proposal. This ensures that the new development is beneficial to the community and that it is innovative in its design.

There may be some instances where proposals will a proponent them to consider multiple guides together.

There are development thresholds for when a proponent will need to consider the design guides and provide a response:

The triggers for when the **Missing Middle Housing Design Guide** (MMHDG) is used:

- Development of missing middle housing (as defined in this guide) is required to consider and provide a design response to the Missing Middle Housing Design Guide where the development:
  - Provides more than 1 dwelling on a block.
  - Is for subdivision or consolidation of currently leased RZ1 and RZ2 blocks associated with a missing middle housing development proposal.

The triggers for when the **Housing Design Guide** (HDG) is used if the below criteria is met:

- Development is required to consider and provide a design response to the Housing Design Guide where the development is a residential or mixed-use development that provides more than one residential dwelling, excluding any of the following:
  - Secondary residences.
  - Extensions and alterations to multi-unit housing (of no more than 50% increase in floor area).
  - Development of missing middle housing (as defined in the Missing Middle Housing Design Guide).

The triggers for when the **Urban Design Guide** (UDG) is used if one of the below criteria is met:

- it is precinct scale with a site area greater than one hectare;
- the combined development gross floor area exceeds 10,000m^2;
- comprises more than 1,000m^2 of public or common space; or
- required to seek advice from the National Capital Design Review Panel.

The **Biodiversity Sensitive Urban Design Guide** does not apply to single dwelling housing or secondary residences. It also does not apply on developments where the increase in impermeable surfaces is 500m^2 or less.

Developers will still need to meet their minimum requirements in the Territory Plan.

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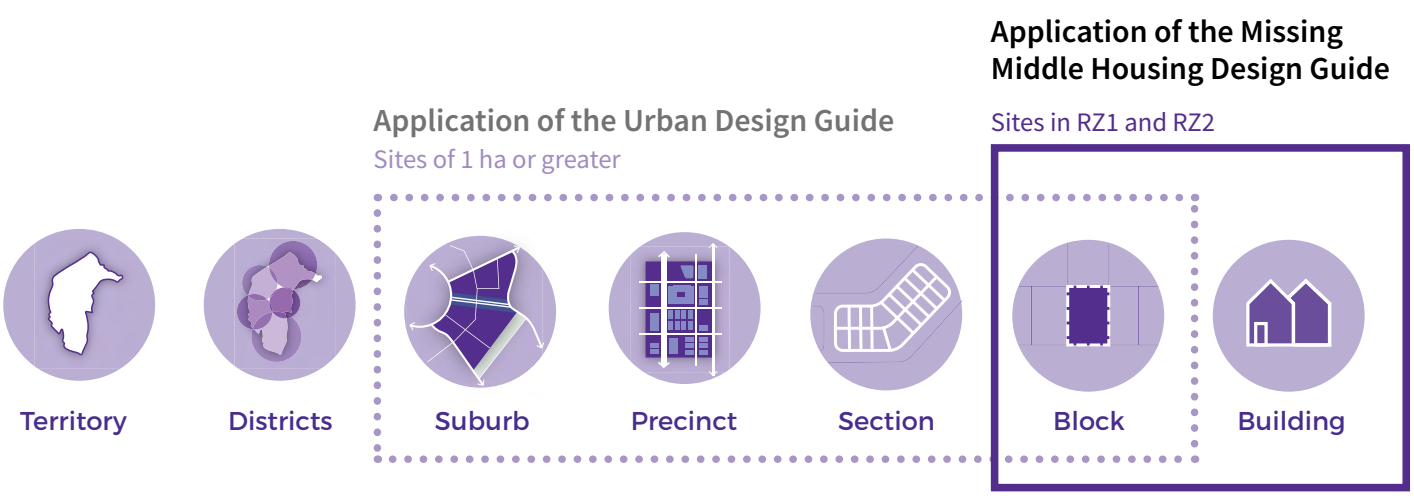

Illustrations in this guide

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

ACT PLANNING PROCESS

The ACT population is increasingly growing. With more people living and working in the ACT, a clear and easy to use planning system is required so we can accommodate future growth without compromising the valued characteristics of the city. The ACT Planning System now promotes better outcomes for development, the environment and, most importantly, Canberrans.

HOW THESE DESIGN GUIDES RELATE TO THE TERRITORY PLAN

A modern planning system is fundamental to the city's vision of a liveable and sustainable city. The planning system focuses on delivering high-quality built outcomes for the residents of Canberra, with embedded flexibility to encourage innovation. The long-term goals for Canberra have changed in the past 15 years, reflecting the significance of coping with climate change, providing critical infrastructure for our expanding population, and increasing housing choice and accessibility.

The ACT planning system introduced design guides to help the interpretation and application of the Territory Plan's assessment outcomes. The assessment outcomes specify ways that the desired policy outcomes for districts and zones in the ACT can be met. The design guides demonstrate ways the assessment outcomes can be met and provide general best practice design guidance.

DEVELOPMENT APPLICATION PROCESS

The Missing Middle Housing Design Guide provides consistent planning and design guidance for missing middle residential dwelling within the ACT. The design guide aims to provide best practice for various forms of missing middle housing and can be used as tool for government to use to assess these housing types and typologies.

Those developing should consider the Territory Plan assessment outcomes when preparing plans and DA documentation, including for pre-DA matters. To help with this process, developers should consider the Missing Middle Housing Design Guide at the very beginning of the design process, to allow flexibility in addressing key recommendations from the guide.

When preparing any plans and documentation, developers must demonstrate their approach and how they have addressed the relevant elements of the Design Guide where required.

BUILDING APPROVALS

Most building projects in the ACT involving new builds, alterations, additions and demolition require building approval (BA).

You'll need development approval (DA) before you get BA.

You must have a BA in place to ensure your proposed building work complies with relevant building laws and regulations and the National Construction Code (NCC, also known as the building code).

To ensure that a Territory waste collection service can be provided, the BA must comply with the Development Control Code for Best Practice Waste Management in the ACT 2019 or its successor.

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TERRITORY PLAN ASSESSMENT OUTCOMES

The Territory Plan outlines assessment outcomes for proposed development that align to each of the key chapters in this document. Proponents must address these assessment outcomes and provide clear plans and documentation to support how these have been achieved through the development application. The design guides provide clear guidance to support the proponent in delivering great design that achieves the 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.

Technical planning specifications provide measurable and quantitative guidance, and if met, will be taken to achieve the stated assessment outcome. Note, not all assessment outcomes are covered by a design guide and/or a technical planning specification.

The following pages refer to assessment outcomes specific to the Missing Middle Housing Design Guide.

Please also refer to associated documentation required by the design response at the development application stage. This includes any relevant tables that provide further details of assessment outcomes supported across multiple design elements which may need to be considered in providing a response.

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TERRITORY PLAN ASSESSMENT OUTCOMES

TERRITORY PLAN ASSESSMENT OUTCOMES	
SITE AND LAND USE	
SITE AND LAND USE	The functionality and usability of the development is appropriate for its intended purpose/use.
	The proposed use and scale of development are appropriate to the site and zone.
	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.
ACCESS AND MOVEMENT	
ACCESS AND MOVEMENT	The functionality and layout of the development is accessible and adaptable, while achieving good connections with the surrounding area. This includes consideration of passive surveillance.
	The development encourages active travel through safe and convenient access to the active travel network.
	Access to, from and within the site permits safe and legible movement while catering for all users (including pedestrians). This includes consideration of vehicle manoeuvrability and access routes.
PUBLIC SPACE AND AMENITY	
PUBLIC SPACE AND AMENITY	The development achieves reasonable solar access and microclimate conditions to public areas and streets to support their use by the community.
	Private open space and communal open space provides sufficient space and facilities for residents and visitors to recreate and relax, as well as providing area for service functions. Spaces are readily accessible for a range of activities.
	Reasonable levels of active ground floor interface and passive surveillance to public spaces and streets is achieved.
	Any advertising or signs are suitable for their context and do not have a detrimental impact on the surrounding area (for instance due to size or light emission).
BUILT FORM AND BUILDING DESIGN	
BUILDING DESIGN AND BUILT FORM	The height, bulk and scale of the development is appropriate, noting the desired zone policy outcomes and the streetscape. This includes consideration of building envelope and setbacks.
	Reasonable solar access to dwellings and private open space within a block and on adjoining residential blocks is achieved. This includes solar access into main living spaces within a dwelling.
	Reasonable levels of privacy to dwellings and private open space within a block and on adjoining residential blocks is achieved.
	The dwelling mix and the internal size, scale and layout of dwellings in multi-unit housing provide for a comfortable living environment that meets the changing needs of residents.
	Courtyard walls and fences do not have an adverse impact on the streetscape.

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TERRITORY PLAN ASSESSMENT OUTCOMES	
SUSTAINABILITY AND ENVIRONMENT	
SUSTAINABILITY AND ENVIRONMENT	Sufficient planting area, canopy trees, deep soil planting zones and water sensitive urban design measures are provided to enhance living infrastructure, support healthy tree growth and minimise stormwater runoff.
	Urban heat island effects are reduced through limiting impervious surfaces and provision of canopy trees and plants.
	Threats to biodiversity such as noise, light pollution, invasive species incursion or establishment, chemical pollution, or site disturbance are avoided or minimised through good design.
	Minimise cut and fill to protect natural hydrological function and limit soil erosion and site disturbance.
	The development considers and addresses site characteristics, including heritage, natural features, topography, infrastructure and utilities.
	Environmental risks, including noise, bushfire, flooding, contamination, air quality or hazardous materials are appropriately considered for the development on the site.
PARKING, SERVICES AND UTILITIES	
ACCESS AND MOVEMENT	The development provides electric vehicle parking and access to charging locations in multi-unit housing.
	The development provides appropriate end-of-trip facilities in multi-unit housing which includes secure bicycle parking.
BUILT FORM AND BUILDING DESIGN	Vehicle and bicycle parking sufficiently caters for the development while minimising visual impacts from the street or public space. This includes consideration of parking dimensions, the number of spaces provided.
SUSTAINABILITY AND ENVIRONMENT	Waste is appropriately managed on site without having a detrimental impact on residents and the surrounding area.
	The site is appropriately serviced in terms of infrastructure and utility services and any associated amenity impacts are minimised.

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Throsby Court, Narrabundah, ACT. Photo: Will Neill.

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Part Two: Character and site

PLACE-BASED DESIGN THINKING

Canberra is made up of many different places and districts, each with its own combination of people, culture, built form, landscaping and natural features. The distinct character of each district helps to define it, and helps planners and developers create places that are memorable, with distinct identities and functions. Good design focuses on these aspects, noting that the way a place makes people feel is significantly more important than merely how it looks.

What is place-based design?

A placed-based approach to design builds upon a place's character to create places 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, recognising that solutions that work in one place, may not work in another.

Place-based design recognises current values and patterns while enabling change, as envisaged by the planning reform, to create a compact, sustainable, affordable, vibrant and equitable city.

Why is public space important?

Public space and amenity plays a crucial role in achieving successful urban outcomes. The design guides specifically call out public space as a key element for consideration. Well designed public spaces provides places for interaction and activity, including culture, entertainment, sport and recreation.

Street interface contributes to a significant percentage of public space and the role and function of the street is important in creating urban life and vitality. Street interface comes in many typologies and takes on a variety of functions such as movement, commerce, events, servicing and socialising. Built form also plays a fundamental role in defining the character and quality of streets by forming the edges that define these public spaces, shaping places for pedestrians and creating an urban environment.

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Holmes Crescent, Campbell

URBAN CHARACTER

Canberra has a distinct urban character that is uniquely connected to Country. The 'bush capital' identity is a fusion of sweeping native landscapes with garden city geometry. Historically, urban form has been nestled into Country, sometimes very sensitively, providing opportunities for connection, recreation and wellbeing whilst maintaining and preserving the bush landscape. Canberra's dry, continental climate creates an arid, wild bush setting that has defined much of the city and particularly the suburbs. The bush setting makes Canberra a sought-after place to live.

The well known name 'bush capital' has new meaning as we explore opportunities for connecting to Country and to better understand and be informed by indigenous culture and practices which care for Country. As Canberra becomes more densely populated and compact, in keeping with the growth strategy to limit urban sprawl, there is an opportunity to continue this connection with the landscape, creating a city like no other.

Our ability to weave new development into preserved and regenerated landscapes will define Canberra's urban future and enable the bush capital to evolve in a sustainable way. There are a number of defining characteristics which make Canberra's residential neighbourhoods so special. These characteristics can inform the design of future neighbourhoods including missing middle projects. These include:

Landscape Presence

Making landscape a priority is central to maintaining Canberra's urban character. No matter how small the project, there is always space for the smallest gesture of native landscaping contributing to the overall biodiversity of the city.

Some of Canberra's leading examples of middle scale residential development in suburban settings have a modest architecture which blends with the landscape, providing a backdrop to the natural landscape, rather than looking out of place. In this way the landscape is front of stage, the architecture humble and receding.

Bush Preservation and Regeneration

The quality and success of rich bio-diverse landscapes includes both preservation and regeneration. New development may require the removal of some existing landscapes but can promote regeneration through new native landscapes.

Modesty of Scale

Canberra's residential urban form has maintained a modesty of scale for many decades. Recent growth has seen an increase in the scale of larger buildings, however medium scale development is peppered throughout the Canberra landscape, particularly in the inner north and inner south. The certain modesty of scale perpetuates through the existing middle scale housing supply, demonstrating how density and continuity can be achieved with limited budgets.

Palette and Place

Architectural design can connect to place through materials and colours. In Canberra's unique setting, infill buildings should reflect the character of their surroundings by incorporating local materials, textures, and colours that resonate with the existing context including the natural landscape. Sensitive material and color choices can strengthen connections to Country, honouring cultural narratives and environmental significance while harmonising with the city's distinct bushland context.

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Sense of Openness

Canberra's residential neighbourhoods maintain a sense of openness that is achieved through undefined boundaries and open landscapes that blur with public space. Canberra streetscapes are traditionally defined by open and inviting gardens which are not gated or defined by dominant courtyard walls. This heightens the sense of a bush capital and city closely connected to the landscape.

Tree-lined streets

The design of many Canberra streets celebrates their distinctive bushland character by integrating native vegetation and preserving Canberra's connection to its natural landscape. In many of the older areas the streets are celebrated with exotic tree lined streets.

Native streetscapes can incorporate locally endemic plant species, ensuring resilience to the climate and enhancing biodiversity. Thoughtful planning maintains open vistas, natural corridors and the interplay between urban development and the surrounding environment.

Streets should act as extensions of the bush, fostering a sense of place while reflecting the cultural and ecological significance of the land.

By prioritising soft landscaping, permeable surfaces, and low-impact materials, Canberra's native streets can uphold the city's identity as a bush capital.

Photo 1: A sense of openness, modesty of scale and large canopy planting that is distinctly Canberra. Throsby Court, Narrabundah, ACT. Photo: Will Neill

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Changing character over time

Although Canberra as a city has a unique character and feel, the characteristic elements are not the same across all areas, suburbs and streets. Different periods of urban expansion brought with it different urban paradigms and architectural styles. We can interpret the unique local character and consider a design that respectfully and harmoniously contributes to the experience of a street. This approach is essential when designing missing middle housing that meets the contemporary needs of our population.

The illustrations below show street elevations typical of some of the characteristic areas found in Canberra.

Early suburban sub-division

Suburban expansion

New suburban growth areas

UNDERSTANDING YOUR SITE

Understanding your site is the first step in identifying your development potential and typology.

The city presents a diverse array of site conditions that could potentially support the development of missing middle housing. The following list outlines key characteristics to consider when evaluating the development or redevelopment of existing suburban blocks for this purpose.

SITE CONDITIONS

i. Block consolidation - Consolidation of multiple blocks enables greater development opportunities, including when individual blocks may not be large enough, efficiently shaped or have appropriate public realm frontages or access.

ii. Limited block depth or width - Smaller dimensions encourage compact development.

iii. Inefficient block shape - Encourages irregular site layouts and lower-scale development.

iv. Battle-axe blocks - Promote typologies that have flexible access requirements and do not need to relate to the public realm.

v. Corner sites - Have a prominence that enables a greater level of densification than front or rear blocks as they have two street interfaces and may provide the opportunity for 'marker buildings.

vi. Open space interface - Can provide a high level of amenity for both residents and park visitors.

vii. Transport corridors - Tend to be wider than normal streets and enable access to the rest of the city, making densification highly appropriate on interfaces with them.

viii. Laneway access - Driveways and servicing may be located away from the primary frontage, enabling greater density due to a higher level of amenity and access.

ix. Pedestrian connections - Between streets and open space can provide an additional public amenity.

x. Easements - Are common at the rear of blocks in ACT and it is important that access to these is preserved when densification is proposed.

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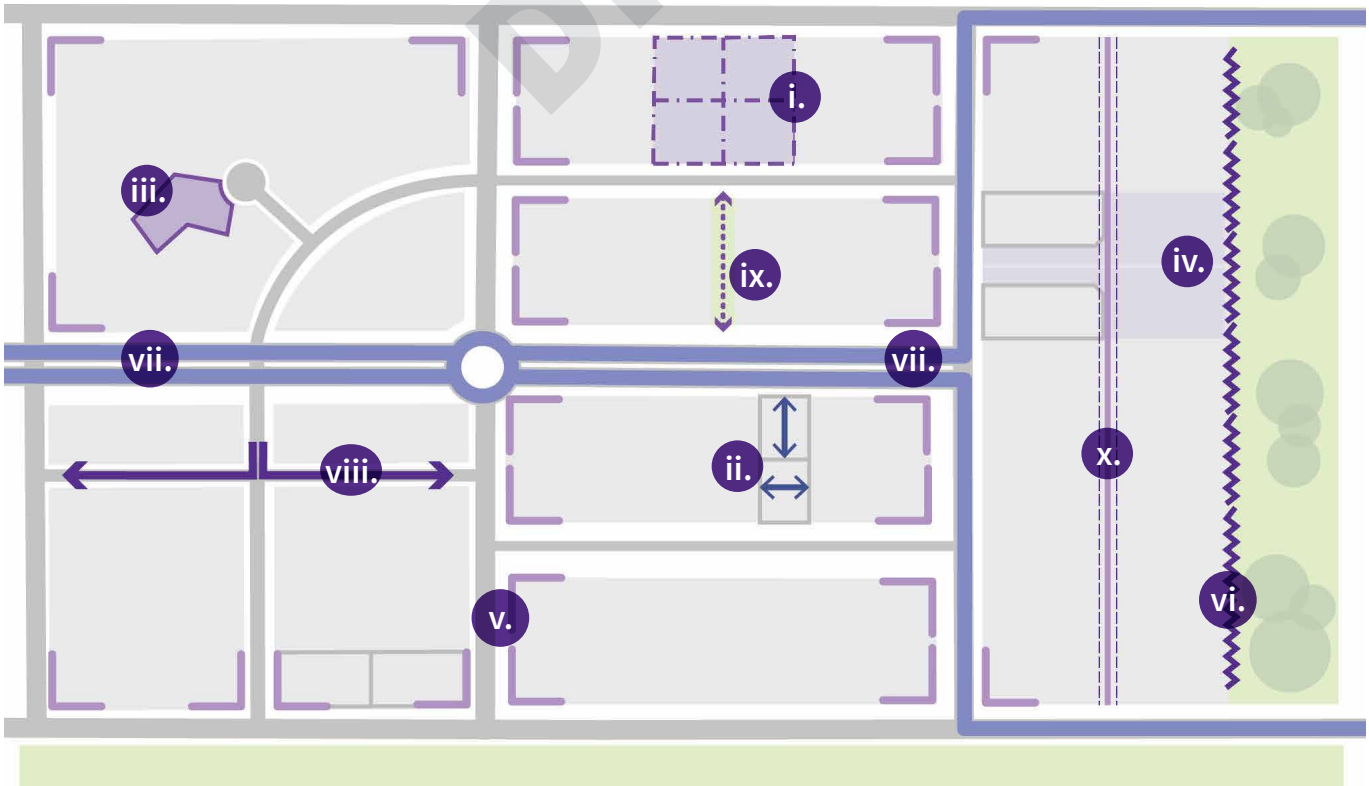

Figure 2: This figure illustrates a plan view of a fictional urban section with common site conditions that are found in Canberra. These should be identified and considered when planning your site development.

Site scenario matrix

The matrix table below shows various typology scenarios based on different site conditions. The aim is to give a general overview of how site conditions might help determine the appropriate typology for the site.

Note that this is non-exclusive table and actual site conditions and typology feasibility may vary. Further testing and refinement of block sizes is required.

Typology	Block size		Site conditions	
	RZ1	RZ2		
Secondary Dwelling (no unit titling)	No minimum block size		i. Block consolidation ii. Limited block depth or width ii. Irregular shaped blocks iii. Battle-axe blocks iv. Corner sites	vi. Open space interface vii. Transport corridors viii. Laneway access ix. Pedestrian connection x. Easements
Dual Occupancy	>600 sqm	>550 sqm	i. Block consolidation ii. Limited block depth or width ii. Irregular shaped blocks iii. Battle-axe blocks iv. Corner sites	vi. Open space interface vii. Transport corridors viii. Laneway access ix. Pedestrian connection x. Easements
Tri Occupancy	>700 sqm		i. Block consolidation ii. Limited block depth or width ii. Irregular shaped blocks iii. Battle-axe blocks iv. Corner sites	vi. Open space interface vii. Transport corridors viii. Laneway access ix. Pedestrian connection x. Easements
Townhouse	>800 sqm		i. Block consolidation ii. Limited block depth or width ii. Irregular shaped blocks iii. Battle-axe blocks iv. Corner sites	vi. Open space interface vii. Transport corridors viii. Laneway access ix. Pedestrian connection x. Easements
Terrace	>800 sqm		i. Block consolidation ii. Limited block depth or width ii. Irregular shaped blocks iii. Battle-axe blocks iv. Corner sites	vi. Open space interface vii. Transport corridors viii. Laneway access ix. Pedestrian connection x. Easements
Apartment	>1200 sqm		i. Block consolidation ii. Limited block depth or width ii. Irregular shaped blocks iii. Battle-axe blocks iv. Corner sites	vi. Open space interface vii. Transport corridors viii. Laneway access ix. Pedestrian connection x. Easements

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Aranda Townhouses,
Aranda ACT.

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Part Three: Design Guidelines

This section provides detailed guidance for all missing middle dwellings and should be considered in the design process.

SITE AND LAND USE

The proposed use and scale of development needs to be appropriate to the character of an area, site and zone.

The planning, design and delivery of the urban environment, public space and built form should be informed by the direction for the city and planning outcomes that respond to the city form, character, landscape setting, climate and amenity. The design response must focus on place-led outcomes that are guided by the Territory's overarching principles and objectives.

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DESIGN ELEMENTS

3.1 TYPOLOGIES

3.1A Siting

3.1B Multi-occupancy

3.1C Townhouses

3.1D Terrace houses

3.1E Low-rise apartments

3.2 UNDERSTANDING YOUR SITE

3.2A Site conditions

3.2B Slope and topograpy

3.2C Water drainage

3.2D Tree retention

3.2E Prevailing winds and cross ventilation

3.3 LAND USES

3.3A Residential use

3.3B Non-residential uses

3.3C Block consolidation and sub-division

3.4 BUILDING ENVELOPE

3.4A Height and transitions

3.4B Orientation and outlook

3.4C Overshadowing

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3

Location: Hope Street Housing, OWA Architects and MDC Architects. Photo: Robert Frith

DESIGN ELEMENT:

3.1 BUILDING TYPOLOGIES

Different locations and site conditions require different building responses. Appropriately identifying your site conditions is an important step in determining the appropriate building type.

The typical building types for Canberra's missing middle housing are outlined on the following pages, described as typologies. Some larger sites might have a mix of multiple typologies. (See Understanding Your Site in Part 2 of this document). All together the typologies will deliver more housing choice and appropriate living options for the city as the population increases.

DESIGN GUIDANCE

3.1A SITING

i. Identify site size, site-specific conditions (see 3.2A), utilities, tree retention and other site constraints such as topography and solar access.

ii. Identify the relevant front, side and rear setbacks.

iii. Siting primary garden area and deep soil areas.

iv. Orient the primary outlook to the front and rear of the block where possible to avoid poor-amenity primary outlooks to side boundaries.

v. Ensure that primary outlooks do not compromise the privacy of neighbouring properties by considering sufficient setbacks and building separation.

vi. Ensure that the front setback allows for safe pedestrian access and visibility for vehicles entering and exiting the property as well as easy access to services such as waste collection and utilities.

vii. Analyse and respond to the site orientation, solar access and prevailing wind conditions by allowing solar access to dwellings (particularly in living areas) and open spaces and considering mitigating cold winds and catching warm breezes (3.2E).

viii. Determine requirement and location of private open spaces, communal open spaces and tree canopy cover. On larger development sites and corner blocks, consider creating a "courtyard type" to give spatial definition to the communal open space that is defined and separated from the street.

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Photo 2: Apartment typology with separate pedestrian and vehicle access from the street. The ground level is slightly elevated from the street to increase the privacy of residents.

Typology illustrations

The typology layout diagrams illustrated on the following pages are for diagrammatic purposes only. While they illustrate a range of potential site configurations, further refinement would be required in relation to access, car parking and site coverage requirements..

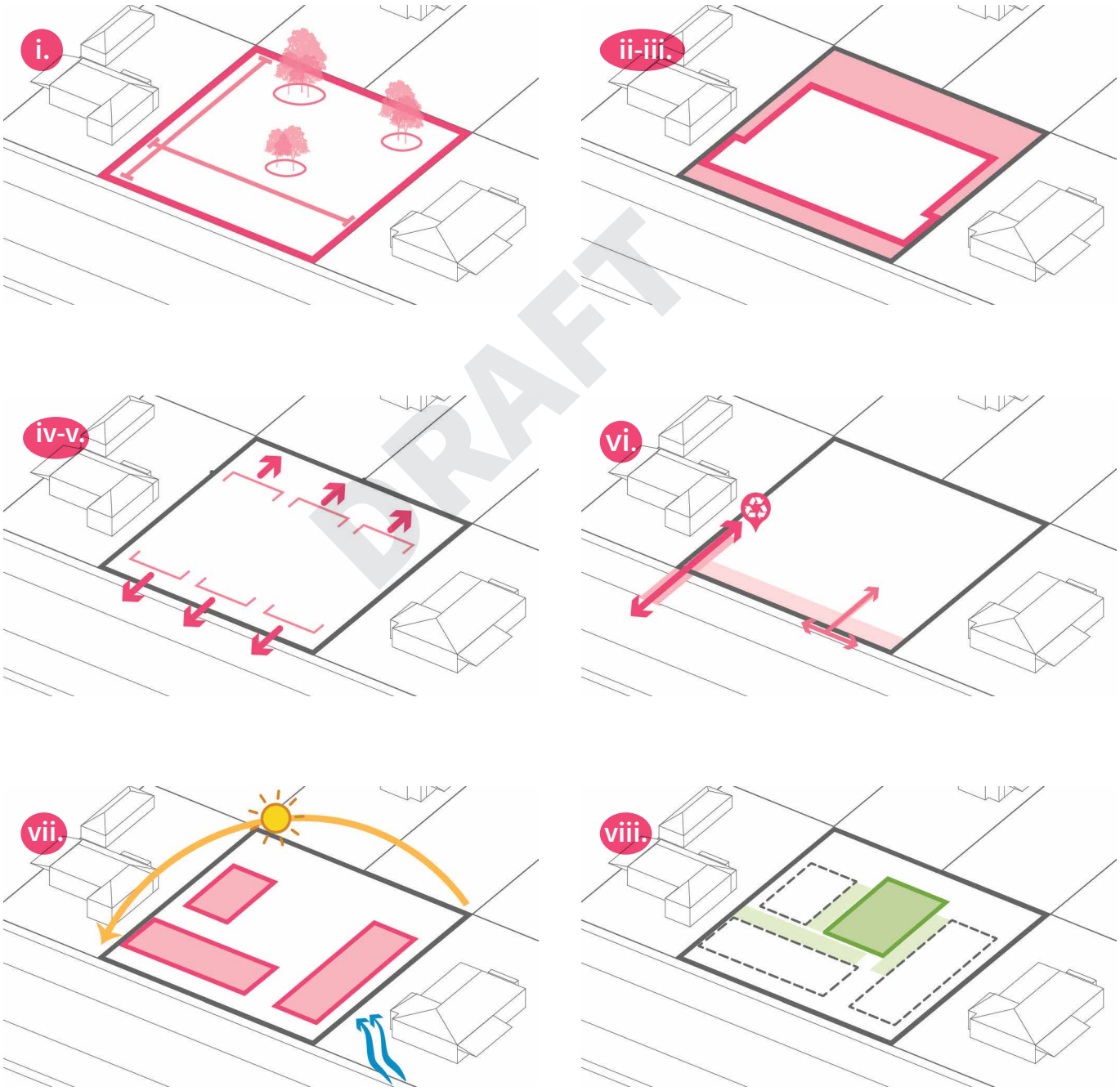

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Figure 3: The above shows a step-by-step process for siting, corresponding to the elements in 3.4A.

3.1B MULTI-OCCUPANCY

Multiple occupancy housing is where two (dual occupancy) or three (tri-occupancy) dwellings are located on a single block of land. These can be side-by-side, one behind the other, or located on corner blocks.

Figure 4: Typical 2 storey dual occupancy on a corner block

Other names:

Two dwellings: semi-detached, duplex, dual-occupancy.

Three dwellings: semi-detached, triplex, tri-occupancy.

Key characteristics

Height:

1-2 storeys

Open Space Provision:

Typically, private yards, with some common landscaping if there is a shared driveway.

Parking arrangement:

Individual car parking associated with each dwelling.

Where to use

Multi-occupancy housing developments are especially appropriate in a low-density areas where the retention of single-family dwelling character is important.

Block characteristics: Dual occupancy is typically suited to mid-section blocks and single corner blocks without block consolidation. Tri occupancy is typically suitable on larger single corner blocks or with the amalgamation of two smaller blocks.

Block size: >600 sqm (dual occupancy), >800 sqm (tri-occupancy)

Zone: RZ1 and RZ2

Benefits

- → Opportunity to sensitively increase dwellings density
- → Can offer more relatively 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.
- → Increased population density in established areas can enhance vibrancy, and support local businesses and services.

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Built examples of multi-occupancy dwellings

Photo 5: A dwelling with a strong relationship to the street, including a second level with glazing integrated into the roof.

Photo 6: A high quality productive garden is integrated into the landscaping and is accessible from the buildings.

Photo 3: Articulation provides visual interest and glazing creates surveillance of the streetscape.

Photo 7: Dwellings fronting public open space have low fences, access and an adjoining private open space.

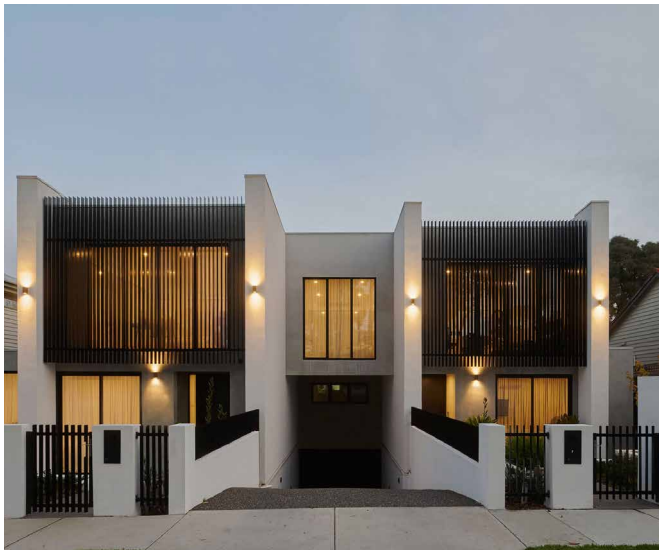

Photo 4: Parking access is sensitive to the topography and recessed from the street.

Photo 8: The ground level interface creates visibility to the streetscape and a relationship between both dwellings.

Typical layouts for multi-occupancy dwellings

There are a range of alternative siting layouts for the multi-occupancy housing 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 multi-occupancy housing 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-SECTION BLOCK

Dual Occupancy

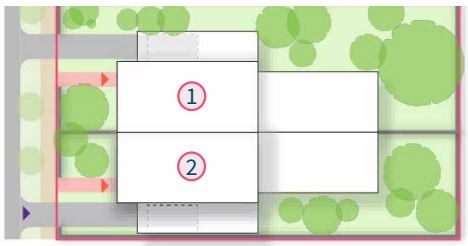

Figure 5: Attached dual occupancy with parking access from primary road creates clear address to street and generous rear gardens.

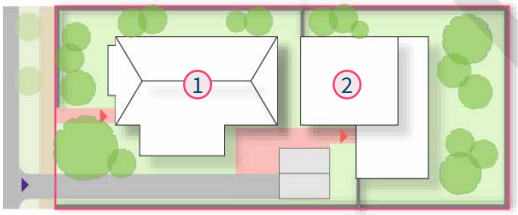

Figure 6: Detached dual occupancy with consolidated parking access from primary road. Buildings placed to allow for generous private open spaces.

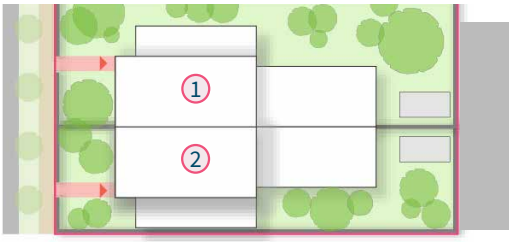

Figure 7: Attached dual occupancy with parking access from rear laneway creates good active frontage to the street.

Tri- Occupancy

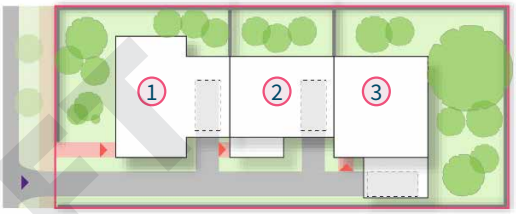

Figure 8: Attached tri-occupancy with parking access from primary road with parking within the building. Dwellings are placed to maximise private open space.

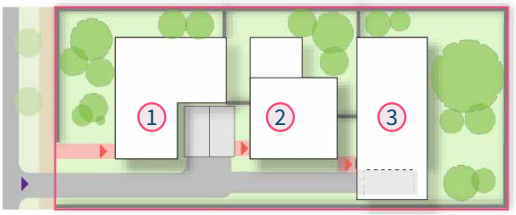

Figure 9: Detached tri-occupancy with parking access from primary road. The free-standing buildings allows daylight from multiple sides and generous private open spaces.

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CORNER BLOCK

Dual Occupancy

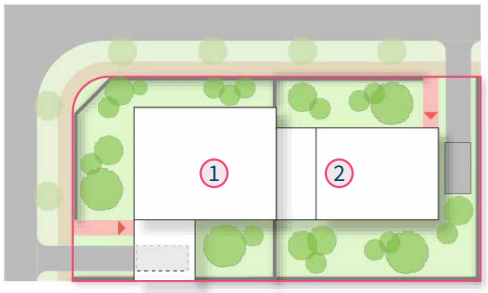

Figure 10: Attached dual occupancy on corner block with individual car parking access. Buildings are placed to allow for both front and rear gardens and good street frontages.

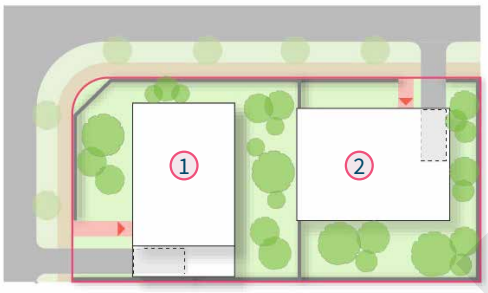

Figure 11: Detached dual occupancy on corner block with individual access. The free-standing buildings allows daylight from multiple sides and generous private open spaces.

Tri- Occupancy

Figure 12:Attached tri-occupancy on corner block with individual parking access. Buildings are places to allow front and rear gardens and good street frontages.

Figure 13:Detached tri-occupancy on corner block with two parking access locations. The buildings are places to provide a centrally located shared open space and smaller private gardens.

IRREGULAR BLOCKS

Figure 14:Dual-occupancy on a ‘battle-axe’ block with frontage to a public open space. The buildings are positions to allow for front gardens and direct access to the public open space. This supports the activation and passive surveillance to the public open space.

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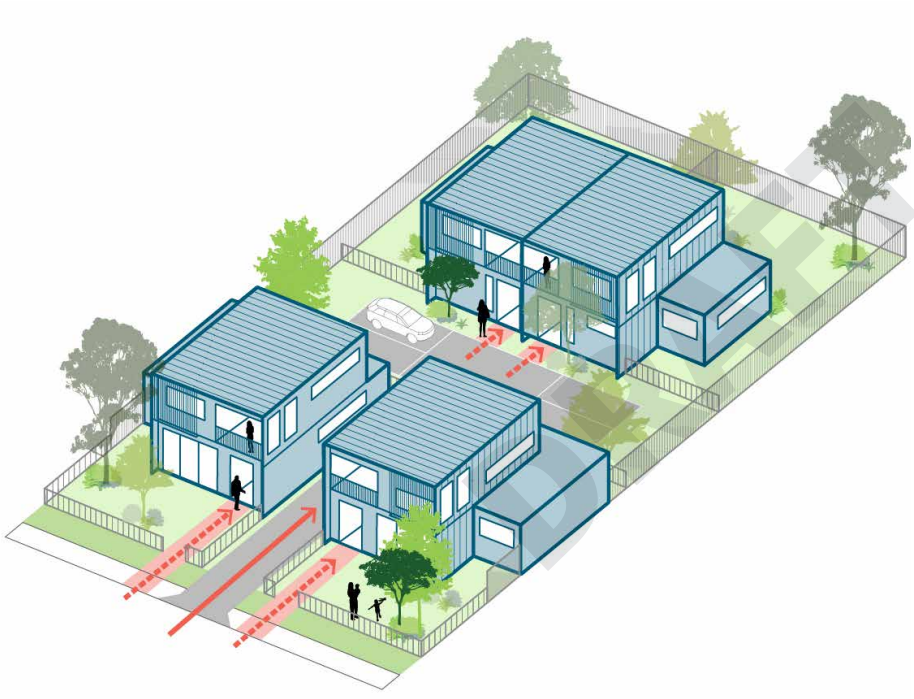
3.1C TOWNHOUSES

Townhouse developments typically consist of four or more dwellings which may be attached, detached or a combination of the two. Depending on the number of townhouses, there are many possible arrangements, though often as single or two storey dwellings sited perpendicular to the street.



Other names:
Villas, cluster homes, grouped housing, courtyard homes.

Key characteristics

Height:
1 and/or 2 storeys. On large sites up to 3 storeys.

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

Parking arrangement:
Co-located together above or under ground, or associated with individual dwellings.

Figure 15:Typical 2 storey townhouses.

Where to use

Townhouses are especially appropriate in low-scale areas where small building volumes are appropriate and existing built form character is to be retained.

Block Characteristics: Typically suited to large mid-section blocks, irregular shaped blocks and consolidated blocks (2-3 consolidated blocks)

Block size: >800 sqm

Zone: RZ1 and RZ2

Benefits

- → Providing higher density living while maintaining characteristics of single-family dwellings with amenity such as private front or rear gardens.
- → Can offer more relatively 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 townhouses

Photo 9: Integrated landscaping can enhance communal and circulation spaces for townhouse developments.

Photo 10:A range of heights and materials ensure the townhouses complement the streetscape.

Photo 11:Permeable fencing, gates and architectural variation mean that the townhouses complement the open space.

Photo 12:Louvres, screening and fencing maintain the privacy of the dwellings while ensuring a level of visibility.

Photo 13:Effective placement of windows create a strong relationship to the adjacent park.

Photo 14:A simple use of articulation and materiality creates visual interest.

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

Figure 16:Small block with shared parking in the centre of the site maximises private open spaces .

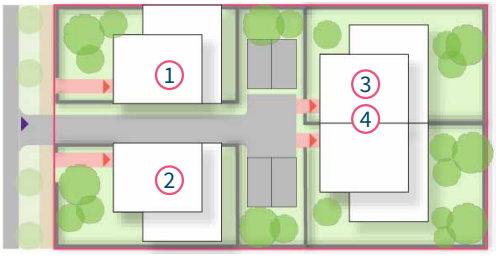


Figure 17:Large block with shared parking in the centre of the site maximises private open spaces.

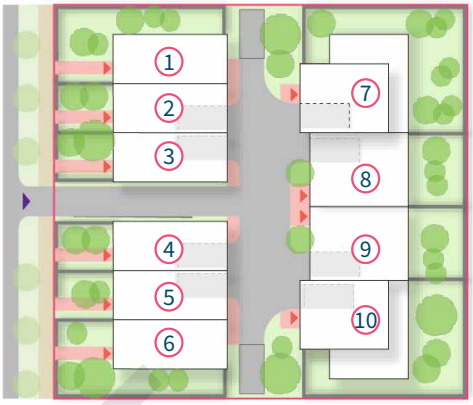


Figure 18:Consolidated blocks with individual parking in the centre of the site. This means that buildings emphasise the streetscape while allowing for garaging.

Shared parking to the side

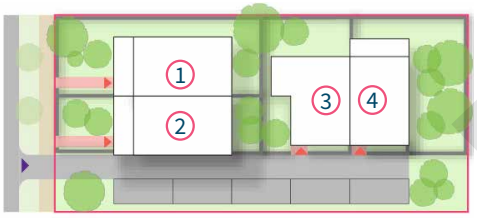


Figure 19:Site with shared parking along side boundary. Buildings emphasise the streetscape and private open space is maximised.

Shared parking to the rear

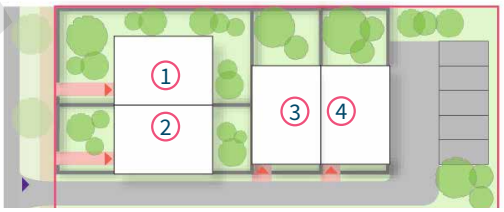


Figure 20:Site with shared parking to the rear of the site. This means that parking does not dominate the streetscape.

Shared Parking in basement

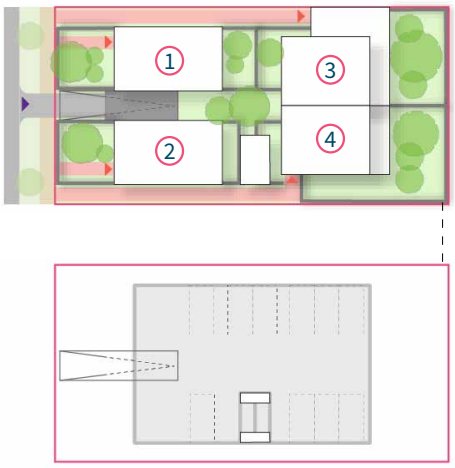


Figure 21:Small block with shared parking in basement. This minimises any negative effects associated with surface-level car parking and access.

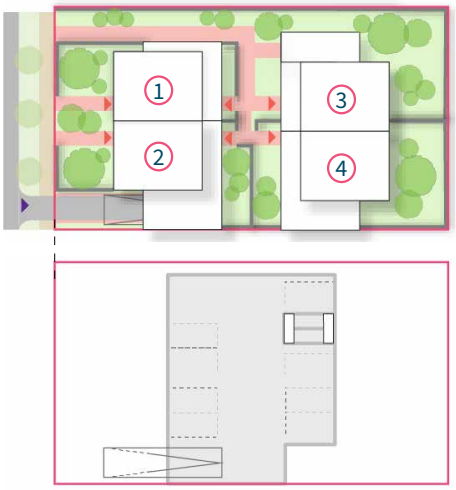


Figure 22:Large block with shared parking in basement. This minimises negative effects from with surface-level car parking and access.

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CORNER-BLOCK

Shared parking to the side

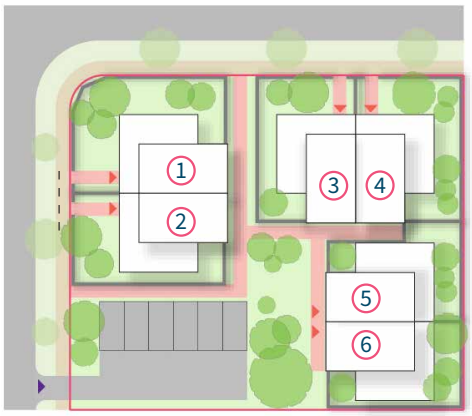

Figure 23: Corner site with shared parking along side boundary and central green space. This enhances the prominence of the street corner and the feasibility of a communal space.

Shared Parking in basement

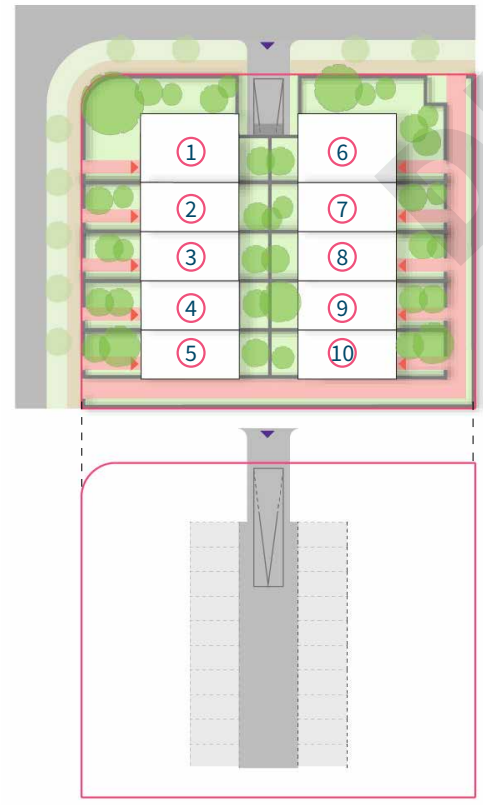

Figure 24: Consolidated blocks corner block with shared parking in basement (or half basement to create a split-level townhouses). This provides a high level of internal amenity while reducing the prominence of parking.

IRREGULAR BLOCKS

Figure 25: Three consolidated blocks along a pedestrian connection between a street and a cul-de-sac. Provides 10 townhouses and shared parking area on three existing blocks, with a high level of open space.

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3.1D TERRACE HOUSES

Townhouse developments typically consist of four or more attached dwellings sharing side walls which have a continuous frontage to the street .

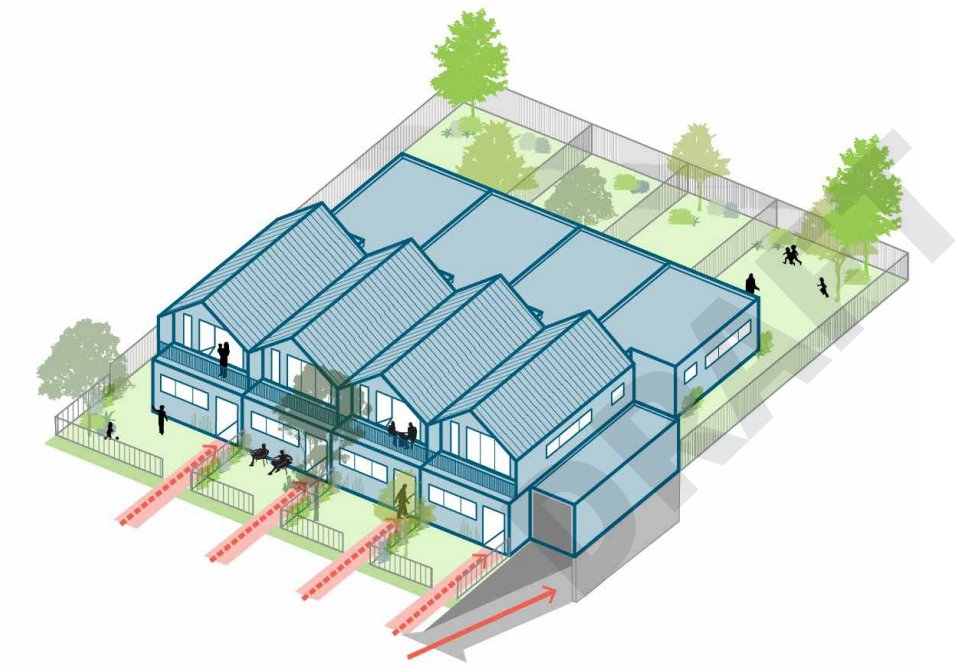

Figure 26:Typical 2 storey terrace houses.

Other names:

Row houses

Key characteristics

Height:

2 storeys. On large sites up to 3 storeys.

Open Space Provision:

Typically, private yards, with some common landscaping in larger development or around a shared driveway.

Parking arrangement:

Co-located together above or under ground, or individual rear access from laneway. Front parking access is generally to be avoided as it creates inactive frontages and many vehicular cross-overs

Where to use

Terraces are especially appropriate on residential streets with slightly higher vehicular traffic volume as they provide a large part of the dwelling that is acoustically separated and oriented towards the rear garden compared to other types. They are also appropriate where fronting onto open space where rear access can be provided.

Block Characteristics: Typically suited to wider mid-section blocks with wide frontages or consolidated sites of two or more blocks wider than 25m. They are also appropriate where fronting onto open space and pedestrian connections where rear access can be provided.

Block size: >800 sqm with frontage >25m

Zone: RZ1 and RZ2

Benefits

- → A classic typology that offer many benefits for street activation and neighbourliness.
- → Offers clear separation between ground floor living and upper level bedrooms.
- → Clear separation between front garden and rear garden
- → Can offer more relatively 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 terrace houses

Photo 15: Terrace houses with a good quality ground floor interface can contribute to the safety and vitality of streets.

Photo 16: Architectural articulation and varied materiality can help to avoid a repetitive frontage.

Photo 17: Balconies activate the streetscape and a consistent architectural language creates a integrated built form.

Photo 18: The use of fencing creates a clear differentiation between public and private space.

Photo 19: Using the roof form as an additional storey maximises internal amenity while minimising height and visual bulk.

Photo 20: Landscaping in the front yard helps to soften the built form and benefits the streetscape.

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

MID-BLOCK INDIVIDUAL PARKING

Front loaded terraces with parking in front

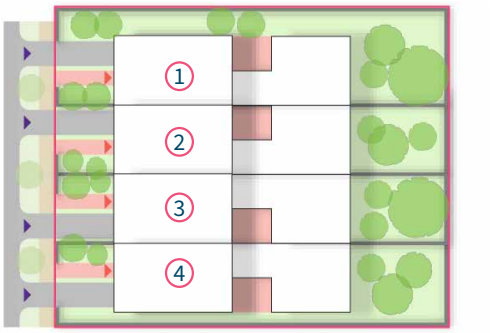

Figure 27: Terraces with individual parking from street. Individual parking from street can be appropriate on terraces with wide street frontages where dominance of garages on the frontage can be avoided. The site layout creates high amenity backyards for all dwellings.

Rear loaded terraces

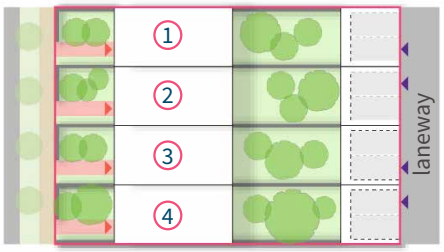

Figure 28: Terraces with individual car parking in laneway. This ensures a high quality street front with private backyards.

MID-BLOCK SHARED PARKING

Front loaded terraces with parking it the rear

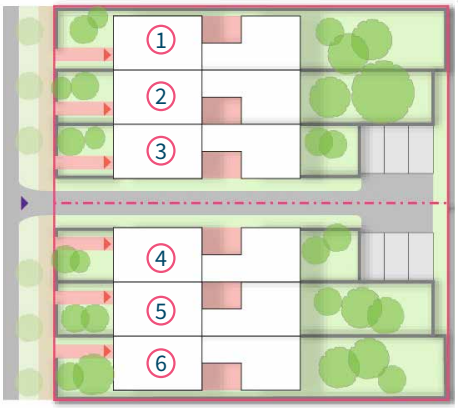

Figure 29: Terraces with shared access to consolidated parking area at the rear maximises the quality and size of private of open space for each dwelling.

Terraces with basement parking

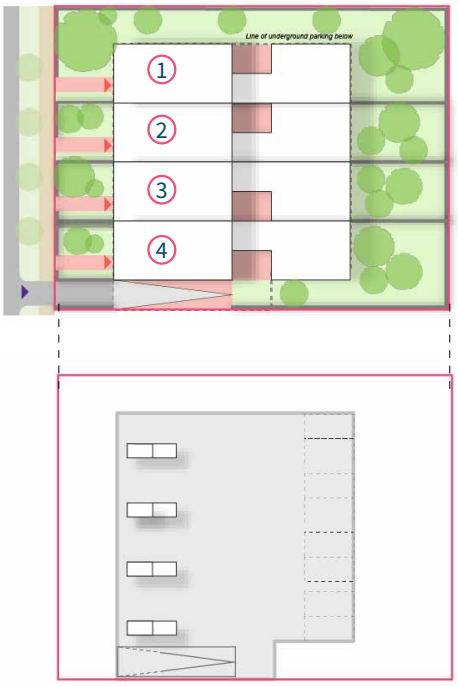

Figure 30: Terraces with underground parking from primary street. Minimises the negative impact of parking on each dwelling and on the streetscape.

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IRREGULAR BLOCKS

Figure 31: Nine townhouses provided on three consolidated blocks along a pedestrian connection. The terraces have direct access to the pedestrian connection. Vehicular access is provided between the street and the cul-de-sac. The townhouses activate the connection and add to the movement network of the neighbourhood.

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3.1E LOW-RISE APARTMENTS

Low-rise apartments are residential buildings made up of two or more apartments in up to three storey development. Typically, dwellings are single level with horizontal property boundary and have shared access, circulation and communal open space.

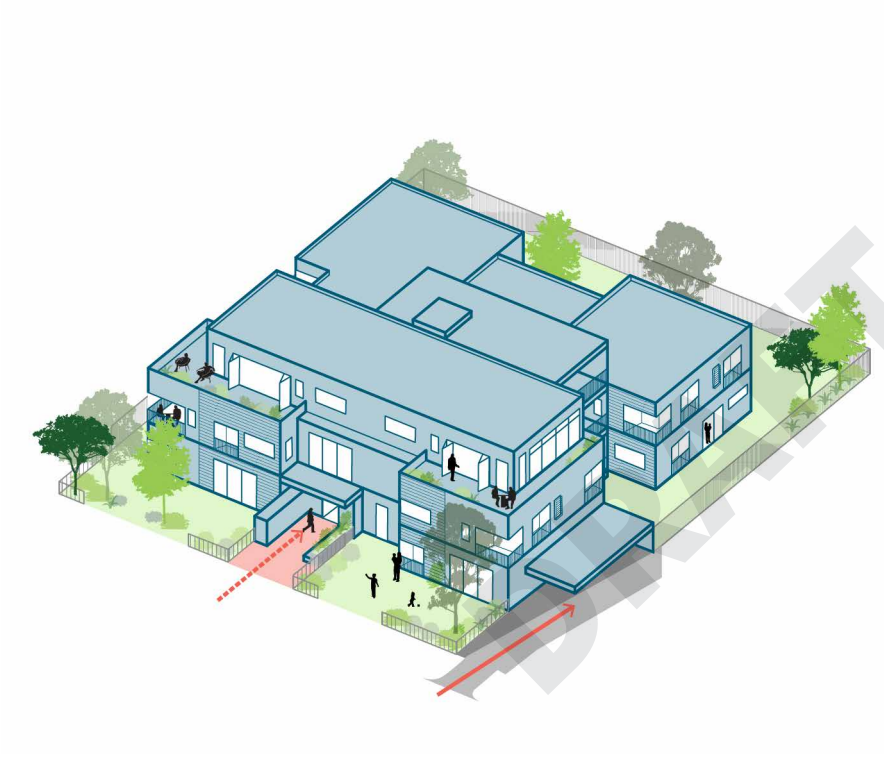

Figure 32:A typical 3 storey low-rise apartment building.

Other names:
Apartments, manor house, triplex, tri-occupancy, quad-housing, quadruplex.

Key characteristics

Height:
2 storeys. On large sites up to 3 storeys.

Open Space Provision:
Typically, private courtyards for ground floor apartments and balconies for upper floor levels. Large sites may also include common open space areas and facilities.

Parking arrangement:
Co-located parking areas above ground or in basement.

Where to use

Low-rise apartment buildings are especially appropriate where higher residential density is a priority, Such as near smaller town centres, open space, community facilities and public transport.

Block Characteristics: Typically suited to large and consolidated sites of two or more blocks. This type is especially appropriate for mid-section and consolidated blocks on section ends. Three storeys may be appropriate on wider blocks (>25m) where stepped transition of building height is achievable or where adjoining development is constructed or permitted for greater than two storeys.

Block size: 1200 sqm and above

Zone: RZ1 and RZ2

Benefits

- → These developments can be designed to provide significantly higher dwelling density with high level of shared amenity and convenience.
- → This typology is especially attractive for people who want to live with less maintenance and more shared amenity.
- → Can offer more relatively 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, such as ‘down sizers’ within the same neighbourhood.

Built examples of low-rise apartment buildings

Photo 21: The use of an upper level setback minimises the visual bulk associated with the height of the building.

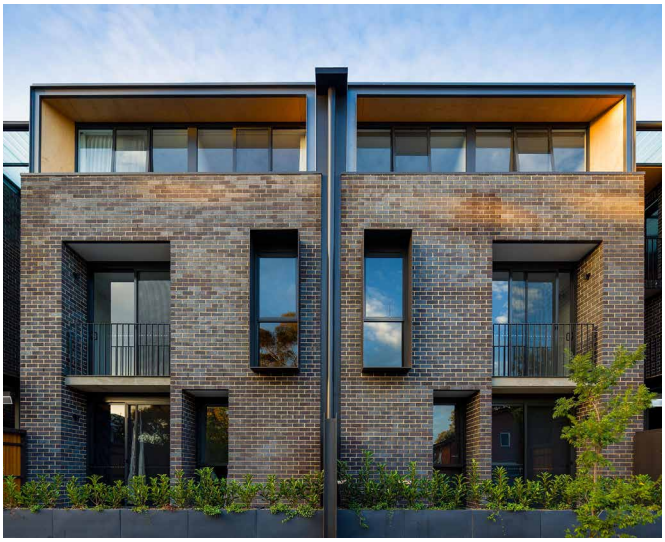

Photo 22: Balconies and glazing provide surveillance of the street at all levels.

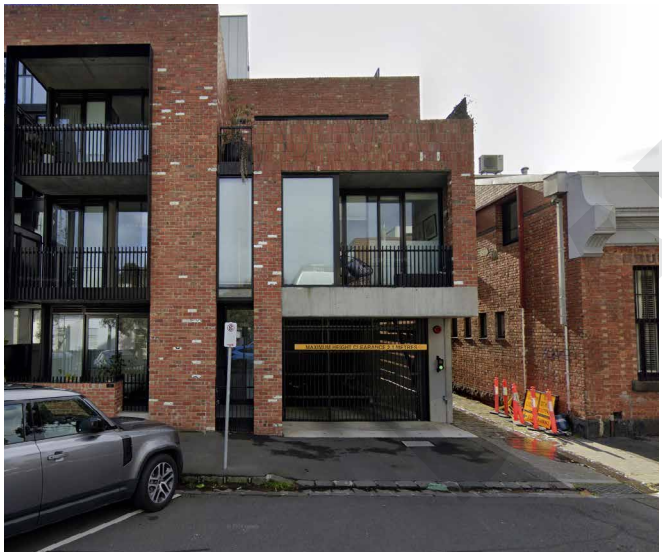

Photo 23: Parking access is recessed from the enclosing built form, minimising its visual impact.

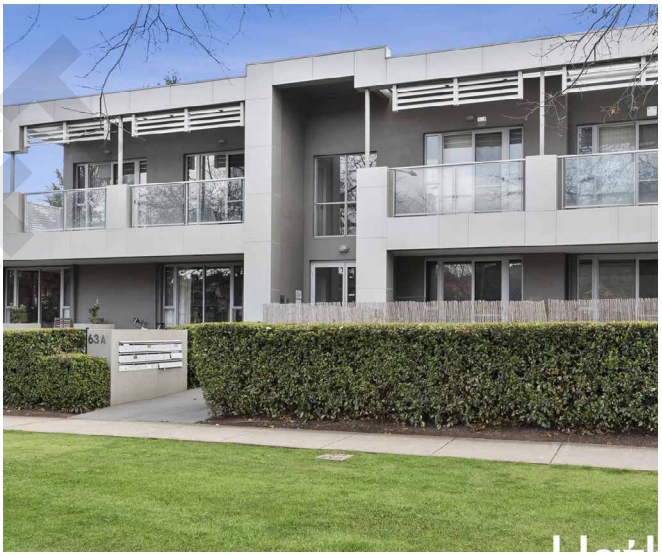

Photo 24: Landscaping and built form architectural provide a clearly identifiable building entrance.

Photo 25: A stepped transition to the street provides a usable balcony for the ground floor dwellings.

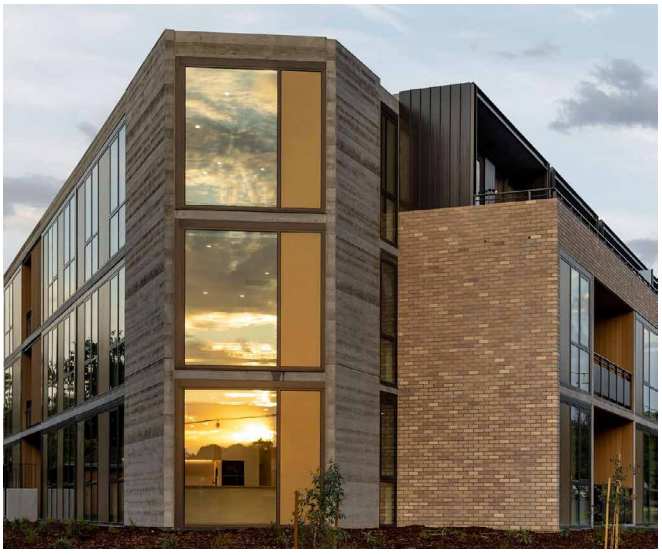

Photo 26: The positioning of the development on the street corner allows for a greater height and prominence.

Typical layouts for low-rise apartment buildings

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 low-rise apartment buildings 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

MID BLOCK

Apartment with shared underground parking

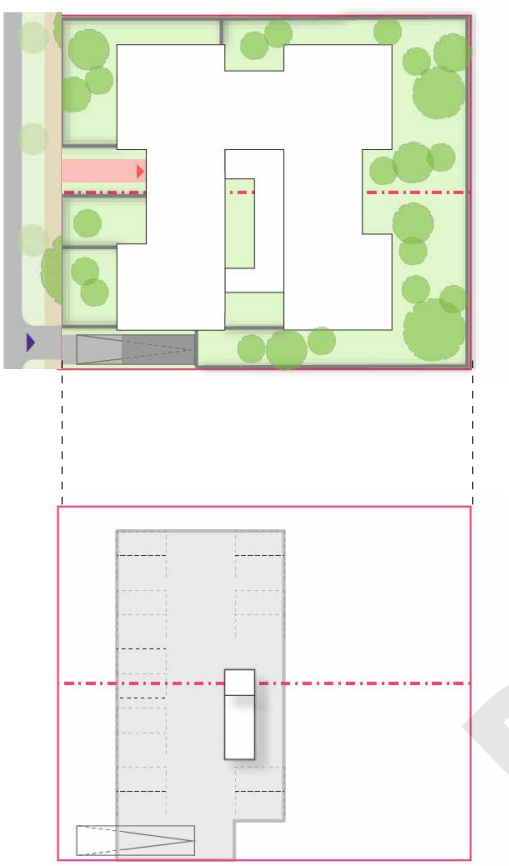

Figure 33: Apartments on consolidated block with shared basement parking from street. This layout maximises ground-level open space.

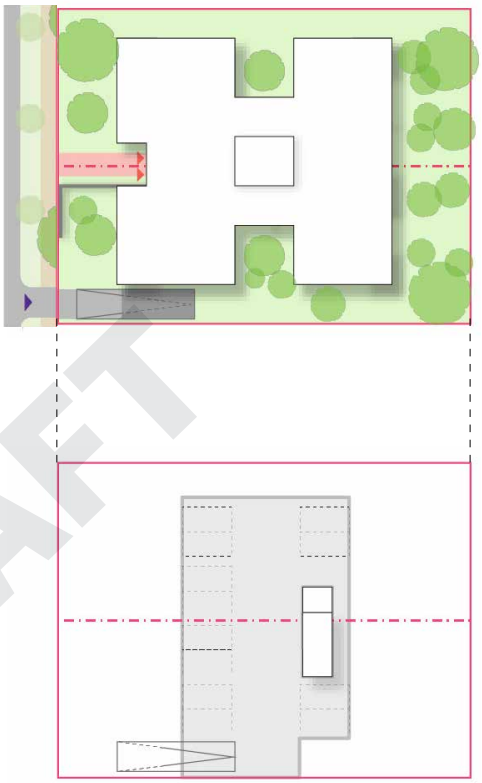

Figure 34: Apartments on consolidated block with shared basement parking from street. This layout maximises the opportunities for outlook and solar access for apartments.

Apartment with single lane access to shared parking

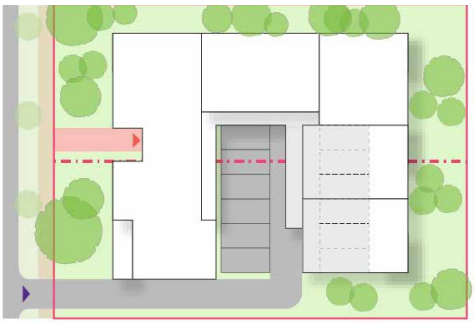

Figure 35: Apartments on consolidated block with shared parking in central courtyard accessed from the street. This maximises the efficiency and cost of car parking.

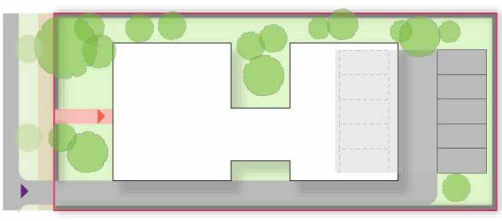

Figure 36: Apartments on single block with shared parking to the rear accessed from the street, ensuring a strong relationship to the street.

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CORNER BLOCK

Apartment buildings with co-located parking

Figure 37: Apartment on large corner site with shared parking to side boundary. This maintains the prominence of the street corner.

Manor House with two parking entries

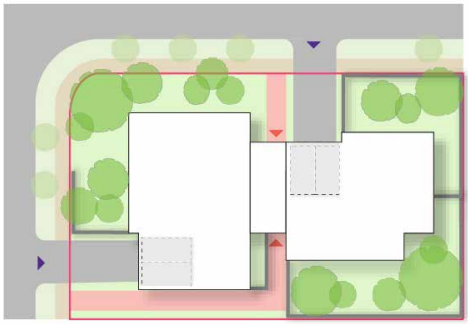

Figure 38: Small corner block with individual car parking from street. This creates a high level of internal amenity and a suburban character.

IRREGULAR BLOCKS

Apartment buildings with shared basement parking

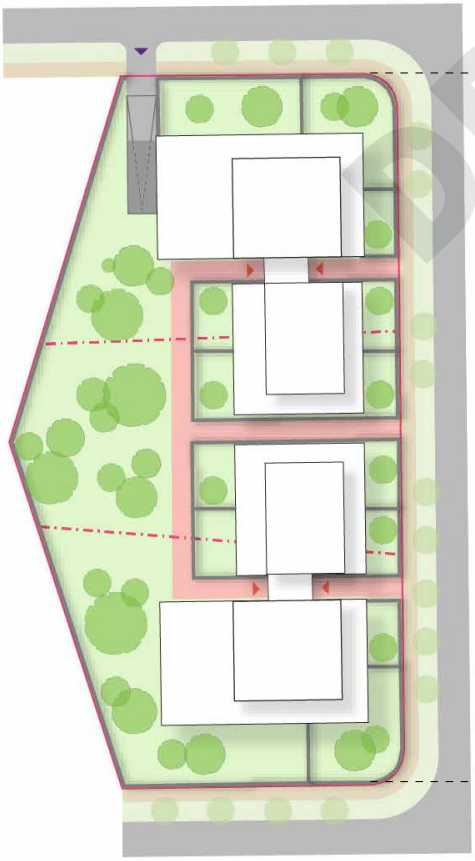

Figure 39: Apartment on three consolidated lots at a block end with rear communal open space and basement parking. This creates a large communal space with a high level of amenity.

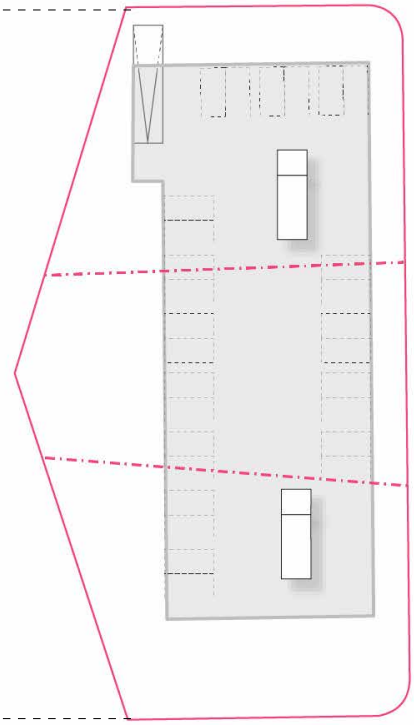

Figure 40: Indicative basement of apartment building on the figure 7.

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DESIGN ELEMENT:

3.2 UNDERSTANDING YOUR SITE

Understanding your site is the first step in identifying development potential and exploring feasibility.

Site conditions and other environmental characteristics, such as slope and topography, water drainage, tree retention and winds, provide key opportunities and constraints for potential development sites. Understanding and integrating these at an early stage ensures that design concepts are responsive to them.

DESIGN GUIDANCE

3.2A SITE CONDITIONS

i. Identify site-specific conditions that should be considered in your development such as: block depth and width, corner site, laneway access, pedestrian connection, open space, battle-axe blocks or easements.

ii. Block depth and width: Ensure the appropriate typology and yield is utilised for the size and scale of your site.

iii. Corner sites: Take advantage of dual frontage by creating visually appealing façades on both street fronts and assess suitability for a higher density outcome.

iv. Laneway access: Utilise laneways for servicing, such as waste collection, deliveries and car parking access to reduce congestion on main streets, and assess suitability for a higher density outcome.

v. Integrate pedestrian connections into the overall design using landscaping and architectural responses and treatment to enhance the appearance and pedestrian experience.

vi. Design buildings fronting open space to be active and engaging. Create visual connection with windows, terraces, balconies and gardens.

vii. Ensure access drive ways to rear blocks, such as battle-axe blocks, are wide enough to accommodate emergency vehicles, construction machinery and provide safe entry and exit.

viii. Easements at rear and side of blocks should be identified early so site layouts can be designed to enable access for maintenance.

Note:

→ Read 3.2A Site Conditions in conjunction with the site conditions and associated scenarios identified in Part 2: Understanding Your Site of the Missing Middle Housing Design Guide.

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3.2B SLOPE AND TOPOGRAPY

i. Assess slope stability by conducting a thorough geo-technical survey to understand soil stability and slope conditions. Consider the need for specialised engineering solutions on steep slopes (typically more than 15%)

ii. Minimise disturbance by designing the layout to follow natural contours of the land as much as possible to minimise grading and earthworks.

iii. Aim to balance cut and fill operations to minimise the need for importing or exporting soil, and to reduce costs and environmental impact.

iv. For steep sites, consider terracing to create level building platforms. Where significant cut and fill is necessary, use retaining walls or other stabilisation methods to ensure slope stability and prevent erosion.

v. Ensure that driveways and access paths are designed with appropriate gradients to ensure safe and convenient access and circulation (typically less than 10%).

For guidance on siting and layout:

→ Refer to 3.1 Typologies of the Missing Middle Housing Design Guide.

For information on character:

→ Refer to Part 2: Urban Character of the Missing Middle Housing Design Guide.

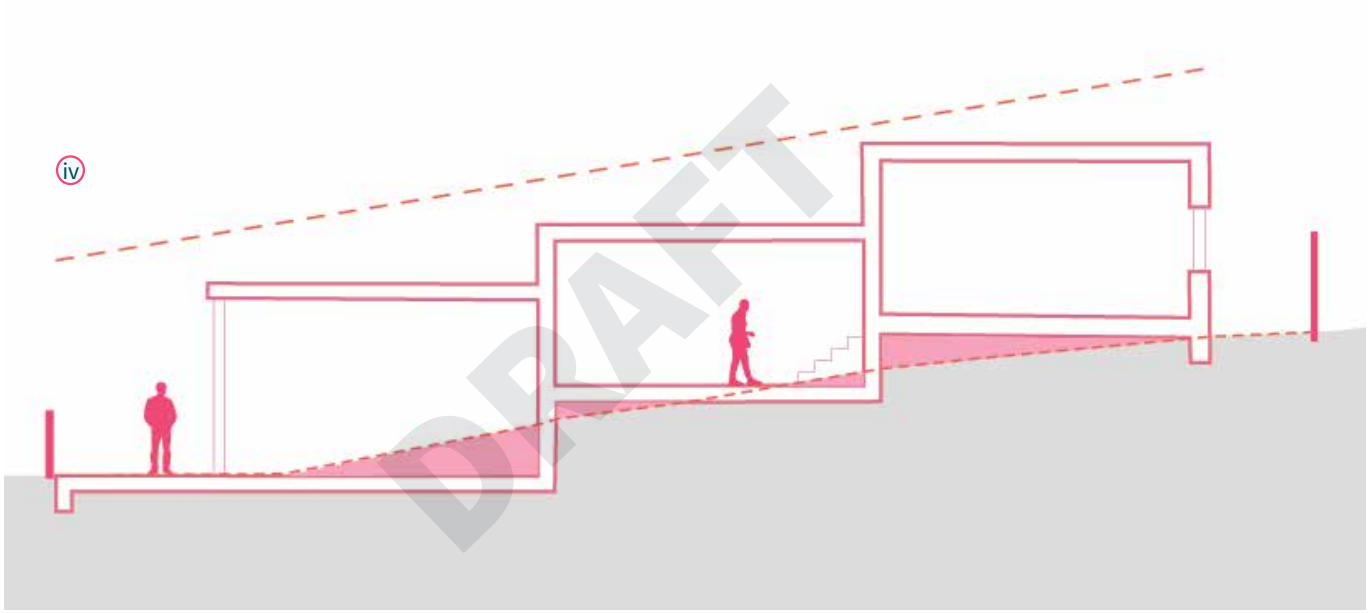

Figure 41: A stepped /terraced approach to development, along with balanced cut and fill, ensures that cost and environmental impact are minimised.

Photo 27: Working with the natural contours of the land by positioning development at the front of the site with parking to the rear minimises grading and earthworks.

Photo 28: Terraced development creates an attractive form that is sensitive to the topography on steep sites, and can help to maintain a consistent relationship to the public realm.

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3.2C WATER DRAINAGE

i. Consider preserving the natural drainage pattern and integrating them into the site design to manage stormwater effectively.

ii. Consider allocating space for stormwater management such as green infrastructure, retention systems, and permeable pavements to manage runoff and reduce flooding risks.

iii. Encourage the use of rainwater harvesting systems to reduce the demand for central water supplies and manage rainfall surge events.

Why this is important:

Effective water drainage planning is vital to prevent flooding and erosion. Understanding natural drainage patterns and incorporating sustainable drainage systems ensures that stormwater is managed efficiently, protecting both the development and the surrounding environment.

Photo 30: Rainwater harvesting systems should be designed into developments to maximise their efficiency and appearance.

Photo 29: Permeable paving combined with green infrastructure, such as rain gardens, can help to manage runoff (reducing pollution) and reduce the risks associated with flooding and rainfall surge events.

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3.2D TREE RETENTION

i. Conduct a tree survey to identify significant trees and vegetation that should be preserved on the site, including verge trees, consistent with the relevant ACT tree protection provisions.

ii. Incorporate trees into the design by integrating existing trees into the site layout as focal points in public spaces, streetscapes and private gardens.

iii. Establish buffer zones in accordance with arborist advice around retained trees to protect their root systems during construction. Avoid heavy machinery and storage of material within these zones.

iv. Develop and implement tree protection plans that include measures such as fencing, mulching and regular monitoring to ensure the health of retained trees during and after construction.

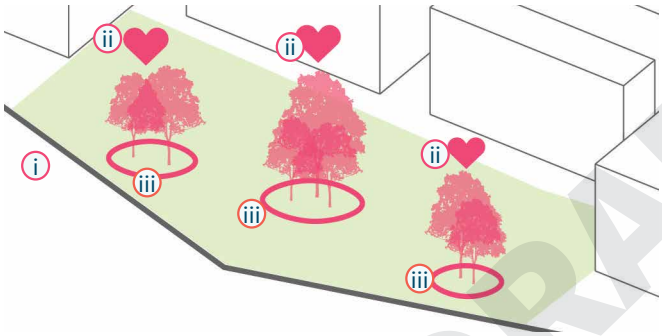

Figure 42: Tree retention ensures that significant trees are preserved during construction and provide focal points for the completed development.

Why this is important:

Preserving existing trees not only enhances the aesthetic appeal of a development but also provides environmental benefits such as improved air quality and reduced urban heat island effects. Understanding which trees to retain and how to protect them during construction is key to maintaining the ecological balance of the site and a leafy neighbourhood character.

Photo 31: A retained tree can help to provide a focal point for the access-way, as well as reducing the urban heat island effect.

3.2E WINDS AND NATURAL CROSS VENTILATION

i. Capture prevailing summer breezes through the building form to create more sustainable and comfortable living environments.

ii. Locate and position communal and private open spaces to be protected from downdrafts and the wind tunnel effect during winter.

iii. Include balconies and operable windows that can capture prevailing winds where possible.

iv. Consider the size and shape of the built form to capture or block prevailing winds depending on the season.

v. Ensure building separation is adequate to capture prevailing summer breezes and enable natural cross-ventilation to dwellings.

vi. Consider the orientation and spacing of buildings on site to avoid creating wind tunnels.

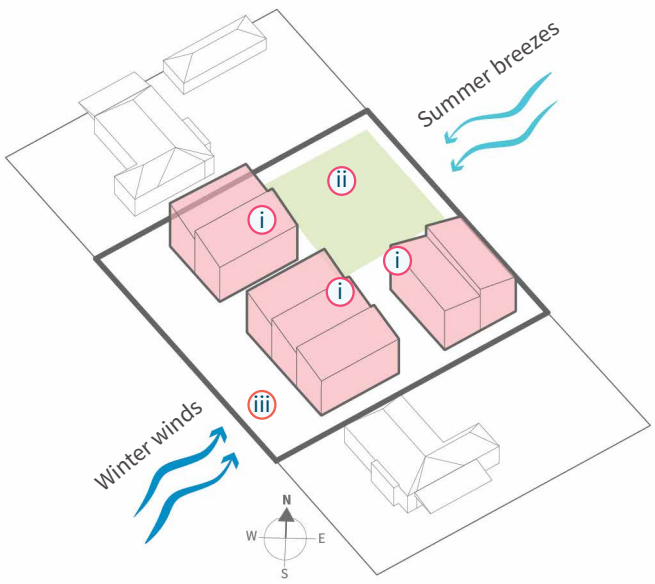

Figure 43: Designing for the dominant winds ensures that private open spaces and communal areas are sheltered during winter and experience gentle breezes during summer.

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DESIGN ELEMENT:

3.3 LAND USES

Land uses encompass a variety of housing types, from single-family homes to multi-storey apartment buildings, each contributing to the diverse fabric of our city.

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.

DESIGN GUIDANCE

3.3A RESIDENTIAL USES

i. To improve diversity in housing choice, provide a greater range of housing types such as multiple occupancy, townhouses, terraces and low rise apartments, as well as providing a varying of dwelling sizes and innovative spatial configurations across a development.

ii. Provide for a greater range of housing types such as community housing (affordable rental) and build-to-rent development to assist in addressing housing affordability.

For further guidance on 3.3A Residential uses:

→ Refer to 3.1 Typologies of the Missing Middle Housing Design Guide.

Photo 33:A mix of residential typologies and configurations are shown in the images above.

Photo 32:A mix of residential types, sizes and configurations provides a rich built environment with housing choice to suit a variety of housing preferences, life stages and household sizes across the community.

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3.3B NON-RESIDENTIAL USES

i. When planning controls permit, consider integrating a variety of non-residential uses, such as micro-retail or a cafe), which promote functionality and liveability of the suburb into the building design, or allowing for the future adaptation of such uses.

ii. Appropriate non-residential uses may include:
   - residential care accommodation
   - boarding house
   - guest house
   - early childhood education and care
   - community activity centre
   - health facility
   - guest house (adjacent to a commercial zone)
   - micro-retail or café space
   - co-working spaces
   - home businesses

iii. Ensure that non-residential uses are appropriate to future residential density and do not hinder the development of nearby sites.

iv. Consider the transport needs of non-residential uses and identify the required capacity for parking, public transport access and cycling/micro-mobility to avoid traffic congestion.

v. Consider the contextual and surrounding demand for non-residential uses and social infrastructure in the design process and provide for the existing and future community's needs.

Photo 34:Generous ground floor ceiling heights allow for flexible uses such as micro-retail or a cafe.

Photo 35:Communal buildings can provide a range of uses for events, co-working and home businesses.

Exemplar:
A pop-up cafe started out of a suburban house in Lawson has become a permanent community hub. The lack of hospitality venues in the suburb became particularly noticeable during COVID-19 lockdowns and led to the establishment of SV Coffee & Bakery by a local barista out of their own home. Today, the extensive front yard space has been retrofitted with a permanent cafe structure and outdoor seating that provides activation and vibrancy to the streetscape. The success of this intiative shows the potential for non-residential uses to enrich suburban areas around Canberra.

Photo 36:SV Coffee & Bakery, Lawson, ACT.

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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.

ii. Consider the number of dwellings suitable for the consolidated block, referring to zoning specifications for dwellings and block sizes.

iii. Consider and ensure that block consolidation aligns with the area's broader strategic planning goals, such as increasing density or creating larger development parcels.

iv. Assess the capacity of existing infrastructure (roads, utilities, services) to support the increased development potential resulting from block consolidation.

v. Ensure that the design of new development on consolidated blocks integrates harmoniously with the existing neighbourhood character and scale.

vi. Ensure that all dwellings meet the minimum size requirement, consistent with residential zoning specifications.

vii. Ensure efficient and safe access for vehicles and pedestrians to the consolidated block.

viii. Consider providing pedestrian cross-section links and connections on consolidated blocks fronting two streets to increase permeability and access.

For further guidance on 3.3C(vii):

→ Refer to 3.4B Orientation and outlook and 4.1C Cross block links of the Missing Middle Housing Design Guide.

Why this is important:

Strategic block consolidation and subdivision can optimise land use potential, increase development viability, and support the creation of more fit-for-purpose buildings in a neighbourhood. Understanding the implications of these processes, including compliance with zoning regulations and infrastructure capacity, ensures that the development is feasible, practical and sustainable.

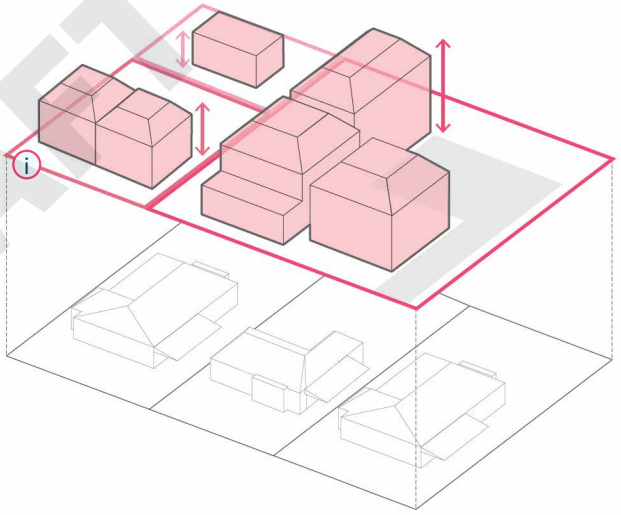

Figure 44: Considered block consolidation can deliver high quality outcomes such as efficient land use, density, pedestrian and vehicle access, and increased on-site amenity, while achieving a greater yield.

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Subdivision:

i. Ensure that the subdivision complies with local planning regulations, zoning requirements, and minimum block standards.

ii. Consider the number of dwellings suitable for each subdivided block, referring to zoning specifications for dwellings and block sizes.

iii. Ensure that all dwellings on subdivided blocks can reasonably meet the minimum dwelling size requirements, consistent with residential zoning specifications.

iv. Design the subdivision layout to maximise the efficient use of land, providing well-proportioned blocks that are functional and marketable.

v. Plan for safe and convenient access to each block, including the design of internal roads, driveways and pedestrian pathways.

vi. Ensure that all subdivided blocks have access to necessary utilities and services, such as water, sewer, electricity and telecommunications.

vii. Design the subdivision with flexibility in mind, allowing for potential future changes or expansions in response to evolving community needs.

Tip:

Block subdivision and unit titling are two distinct methods of dividing property in the ACT, each serving different purposes and offering unique benefits.

Block Subdivision involves dividing a larger parcel of land into smaller, individual blocks, each with its own title. This process is typically used for creating separate, standalone properties such as houses or commercial buildings. Each block owner has full ownership and control over their parcel of land, including any structures on it. This method is ideal for developments where individual ownership and autonomy are desired.

Unit titling, on the other hand, is a system of property ownership commonly used for multi-unit developments like apartments, townhouses, or commercial complexes. Under this system, individual units or “blocks” within a building or complex are owned separately, while common areas such as gardens, driveways, and recreational facilities are collectively owned by all unit owners through a body corporate. Unit titling allows for shared maintenance responsibilities and communal decision-making, making it suitable for high-density living and mixed-use developments.

In summary, block subdivision is best for creating independent properties with individual ownership, while unit titling is designed for shared ownership of common areas within a multi-unit development.

Exemplar:

1 De Burgh St is a 9-unit townhouse development on a corner site. Its design takes advantage of the irregular block shape and emphasises its prominent corner location through locating the built form along the street frontage and vehicle access to the side. It is also features underground parking, which enables a large courtyard area for communal use. This is an example of a highly efficient and responsive site layout that produces a great outcome for both residents and neighbours.

Photo 37:1 De Burgh Street, Lyneham, ACT.

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DESIGN ELEMENT:

3.4 BUILDING ENVELOPE

The building envelope is crucial in suburban development as it defines the physical limits of a structure, ensuring it fits harmoniously within its context and surroundings.

Appropriate height and transition in building form maintains neighbourhood character and prevents abrupt changes in scale and streescape. Thoughtful orientation and outlook maximises access to natural light and views, enhancing livability. Addressing overshadowing protects sunlight access for neighboring properties, promoting a balanced and pleasant environment.

DESIGN GUIDANCE

3.4A HEIGHT AND TRANSITIONS

i. Adhere to zoning height regulations to ensure the building fits within the planned character of the area.

ii. Design building massing to transition smoothly with the scale and height of neighbouring properties, avoiding abrupt changes, with consideration for permissible building heights and desired urban density.

iii. Use step-down design or graduated heights to reduce the visual impact of larger buildings on smaller adjacent properties.

iv. Break up the bulk of the building with architectural features, such as balconies, recesses, material changes and varied roof lines, to create visual interest and reduce perceived mass.

v. Exceeding established heights or street datums should be justified by demonstrating a positive contribution to the street experience.

vi. Respond architecturally in form, scale and detail to important urban interfaces, such as street corners or park frontages.

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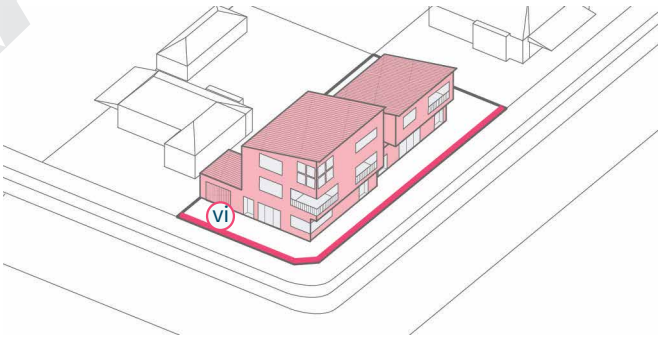

Figure 46: Corner sites have dual public realm (street) interfaces with the opportunity for greater variation in scale due to their prominence.

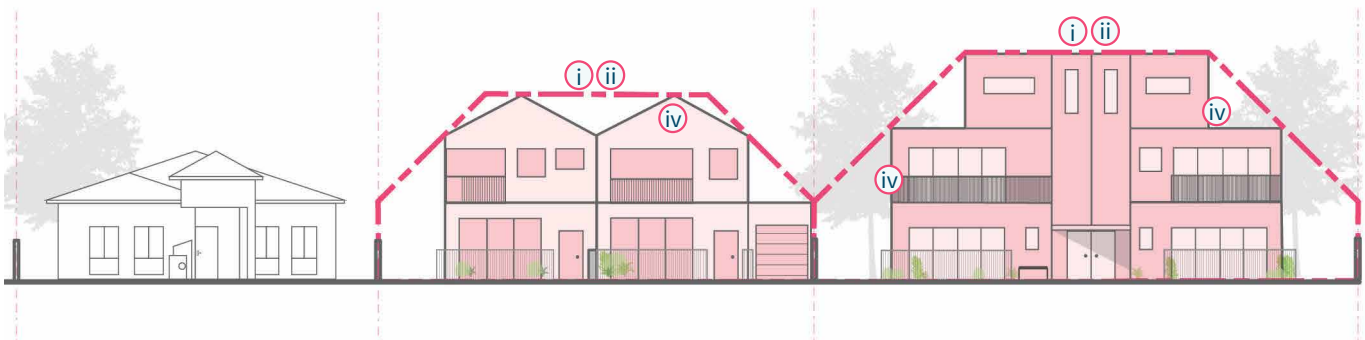

Figure 45: Larger block widths and depths enable a greater building envelope while maintaining a consistent neighbourhood feel and character.

3.4B ORIENTATION AND OUTLOOK

i. Orient primary outlook and provide visual connections to street frontages, rear gardens, public spaces and pedestrian cross-block connections, to provide passive surveillance and engaging building edges to minimise the impact on neighbouring sites and properties.

ii. Avoid overlooking to and from neighbour's private open spaces.

iii. Orient balconies and habitable spaces to minimise direct overlooking into adjacent buildings.

iv. Orient floor plates away from adjacent development sites and buildings, and to maximise views.

v. Orient and site buildings to maximise long views from dwellings and new private open spaces.

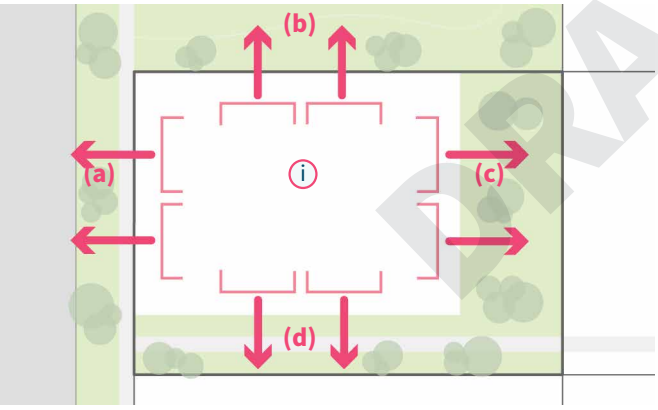

Figure 47: Orientating primary outlooks over (a) street frontages, (b) public spaces, (c) rear gardens and (d) pedestrian cross-block connections, minimises the potential impact of overlooking and maximises internal amenity.

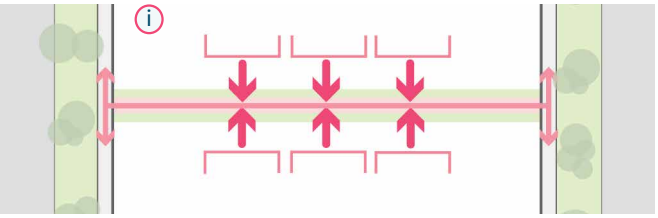

Figure 48: Orientating primary outlooks over pedestrian cross-block connections ensures that internal blocks are integrated into the wider urban form.

3.4C OVERSHADOWING

i. Minimise overshadowing of primary open spaces and primary habitable rooms on adjacent properties on the southern boundary. Adhere to local zoning requirements to ensure appropriate building heights and setbacks provide adequate solar access for adjoining development.

ii. Minimise overshadowing to adjacent public open space.

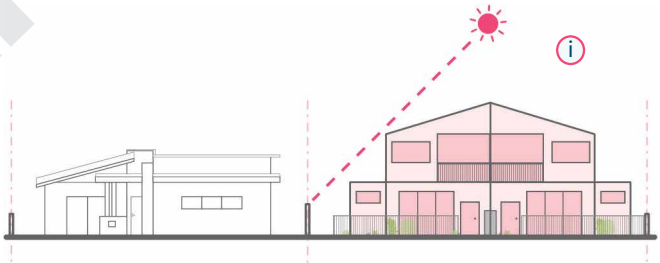

Figure 49: Adhering to setbacks ensures that the risk of overshadowing is minimised.

For further guidance:

→ On 3.4B Orientation and outlook refer to 5.2C Privacy and outlook of the Missing Middle Design

→ On 3.4C Overshadowing, refer to 6.2A Setbacks and separation of the Missing Middle Design

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ACCESS AND MOVEMENT

Streets are important places for people to come together and interact.

The interface between buildings and the public space must allow for appropriate levels of movement and activity that meet the demands and needs of all ages and abilities. Streets must be adaptable and responsive to future changes in society, climate and technology, while unlocking efficiencies in using and managing resources. New housing should allow residents to easily connect with their surrounding community and environment, while providing pedestrian permeability from within the site, to the street and the broader precinct.

DESIGN ELEMENTS

Refer to the relevant themes of the Missing Middle Housing Design Guide as listed below for guidance around Access and Movement.

4.1 SITE ACCESS AND CONNECTIVITY

4.1A Vehicle access, driveways and laneways

4.1B Safe pedestrian and cycle access

4.1C Cross-block links

4.2 RESIDENT AND VISITOR CAR PARKING

4.2A Off-street and surface car parking

4.2B Garages and carports

4.2C Basement and sleeved podium car parking

4.3 INTEGRATED SERVICES

4.3A Waste collection, loading and delivery areas

4.3B Ground floor services and infrastructure

4.3C External storage and bulky items

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4

Haig Townhouses,
Canberra. DNA architects

DESIGN ELEMENT:

4.1 SITE ACCESS AND CONNECTIVITY

Visible, legible and accessible entrances can provide a sense of address and promote activation at street level. Prioritising pedestrian, micro-mobility and considered parking provisions supports active travel and improves convenience for the community.

Effective access and connectivity ensure that a site is well-integrated with its surrounding infrastructure, enhancing its accessibility for pedestrians, cyclists and vehicles. Prioritising pedestrian and micro-mobility access and car parking makes it easy and convenient to choose active mobility options to move around the city.

DESIGN GUIDANCE

4.1A VEHICLE ACCESS, DRIVEWAYS AND LANEWAYS

i. Consolidate driveways, where possible, within the property boundary to reduce the impact of driveways on the street frontage.

ii. Minimise length of driveway to reduce dominance of cars in the development and provide additional opportunity for open space and landscaping.

iii. Incorporate deep soil planting zones and greenery along driveways and laneways to increase visual amenity and usability in addition to any required space for street waste collection.

iv. Provide permeable surfaces for driveways and car parking areas where possible and reduce impermeable surfaces such as concrete and tarmac.

v. Locate vehicle entrances clear of busy pedestrian crossings and paths.

vi. Design driveways and laneways as shared spaces with pedestrian and cycle priority through elements such as paved surfaces and traffic calming elements.

vii. Consider the location of driveways to maximise green verges and on-street car parking. Typically allow for one on-street car parking space to be available in front of each development.

viii. Locate vehicle access points and surface car parking spaces away from habitable rooms to prevent headlight glare into dwellings.

ix. Ensure doorways or services located adjacent to driveways have adequate and safe spatial provisions to reduce pedestrian and vehicular conflicts.

x. Consider the relationship between building to driveway. Apply strategies to reduce visual impact and improve dwelling amenity and outlook.

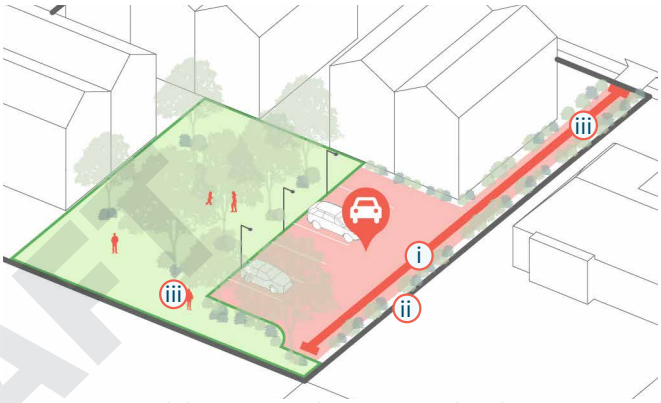

Figure 50: Consolidating car parking areas within the development reduces the number of vehicle crossovers to the street and provides more on-site open space.

Photo 38: Permeable paving for driveways can effectively manage stormwater, reduce runoff, filter pollutants, mitigate urban heat island and enhance aesthetics.

Note:
Works outside the site boundary are subject to TCCS standards and assessment.

Additional guidance:

→ For information on typology-specific driveway outcomes, see 3.1 Typologies of the Missing Middle Housing Design Guide.

→ For design strategies on the built form and its relationship to the driveway, see 6.2D Ground Floor Edge Conditions of the Missing Middle Housing Design Guide.

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4.1B SAFE PEDESTRIAN AND CYCLE ACCESS

i. Provide clearly marked pedestrian entrances separated from vehicles and cycle access to ensure clear sight lines and safe pedestrian circulation.

ii. Ensure common circulation areas are well lit, accessible and easy to identify from building entries.

iii. Provide accessible and generously sized footpaths to entrances to allow for pedestrians, prams, wheelchairs and mobility scooters to pass each other.

iv. Provide secure and under-cover parking for bicycles, prams, and mobility scooters adjacent to dwelling entrances and/or streets where possible to make it easy and convenient to use active transport.

v. Allow for the provision of electric bike charging in secure undercover bike parking areas.

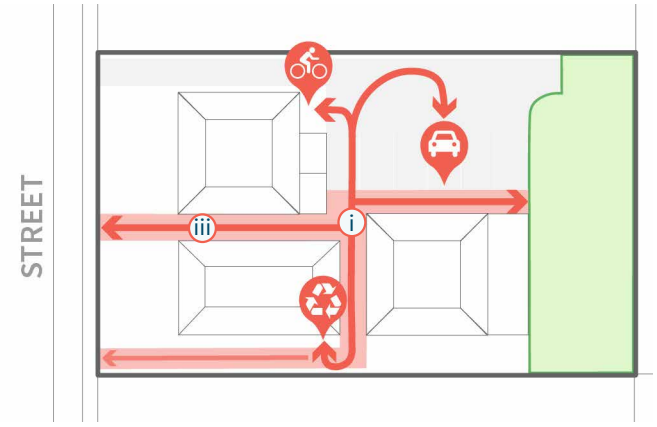

Figure 52: The pedestrian layout should allow for legible and safe movement between dwellings, on-site amenities and the street.

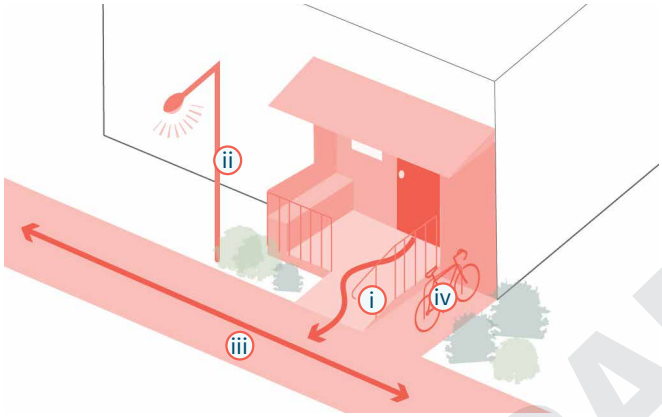

Figure 51: Common circulation areas should be well-lit and legible from building entries.

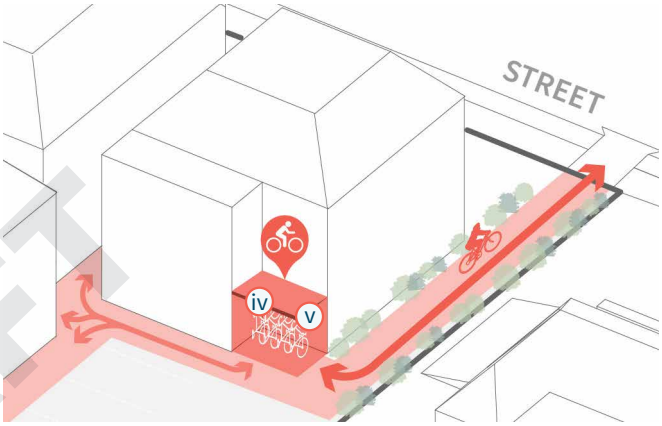

Figure 53: Bicycle storage and charging should be placed in secure locations accessible from dwellings, on-site amenities and the street.

4.1C CROSS-BLOCK LINKS

i. Incorporate cross-section links where possible to increase pedestrian permeability and amenity on sites fronting multiple streets.

ii. Provide dwelling entries along pedestrian links where entries cannot be located on the street.

iii. Include appropriately sized and articulated front courtyards along pedestrian links where possible to accommodate landscaping. (See 6.2D Ground Floor Edge Conditions).

Why is this important:
Cross-block links can enhance connectivity and safety, promote walkability and reduce traffic congestion. They create more direct routes for pedestrians and cyclists, improving access to local amenities, parks and public transport, ultimately contributing to a safer and more sustainable urban environment.

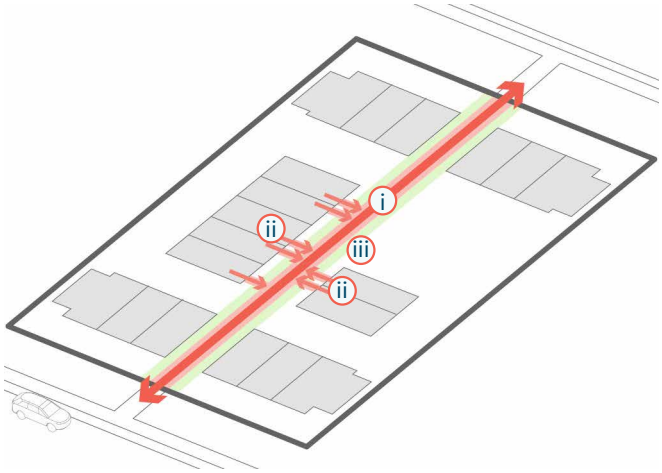

Figure 54: Cross-block links can provide additional permeability, access to amenity and link rear dwellings to the public realm.

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DESIGN ELEMENT:

4.2 RESIDENT AND VISITOR CAR PARKING

Integrating car parking sensitively into new development is critical to ensure lively streets are established with space for people and planting. Clever location of car parking can improve overall dwelling amenity while maintaining convenience.

Adequate and well-planned parking solutions are essential for meeting the needs of both residents and visitors. When increasing density, and maintaining parking requirements, this can limit the ability to provide appropriate landscaping. Good car parking and garage outcomes cleverly considers a design that is discreet and does not dominate street frontages where possible. This will improve the overall dwelling amenity while still ensuring convenience and high-quality streets.

DESIGN GUIDANCE

4.2A OFF-STREET AND SURFACE CAR PARKING

i. Locate car parking and car parking entrances away from the primary street frontage to reduce visual impact.

ii. Reduce driveway length and consolidate or cluster car parking areas to allow for additional landscaping and other uses.

iii. Locate car parking entry via laneway where possible to reduce conflict with the street and create a safer pedestrian environment.

iv. Incorporate medium and large canopy trees or shading structures around surface car parking areas to reduce urban heat island effect and to add visual amenity.

v. Car parking spaces should incorporate semipermeable materials and plantings. Low-level landscaping should be used on two to three sides to soften, screen and reduce visual dominance.

vi. Construct all footpaths, car parks and non-service vehicle driveways from permeable surface materials where possible.

vii. Consider the terminating views from vehicular driveways. The use of permeable or flared fencing, appropriate setbacks for garages to allow for pause and pavement treatments to distinguish the pedestrian environment will provide clear visual endpoints, reduce clutter and create a more visually appealing environment.

viii. Locate guest car parking on street where possible along low-use residential streets.

ix. Implement appropriate lighting and passive surveillance to achieve Crime Prevention Through Environmental Design (CPTED) principles.

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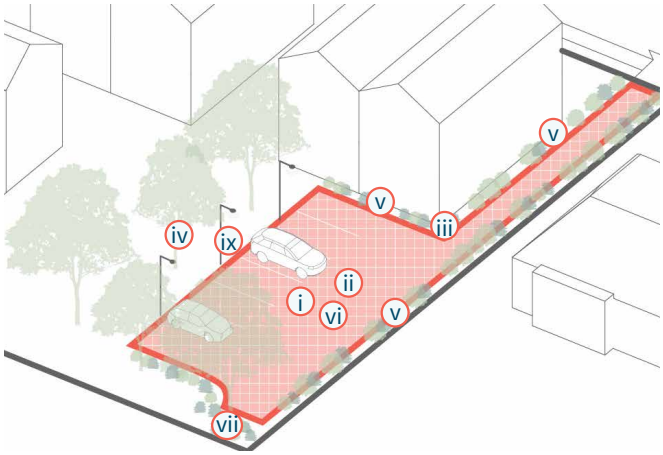

Figure 55: Consolidated car parking minimises the negative impacts on the street and creates an identifiable zone for vehicular movement.

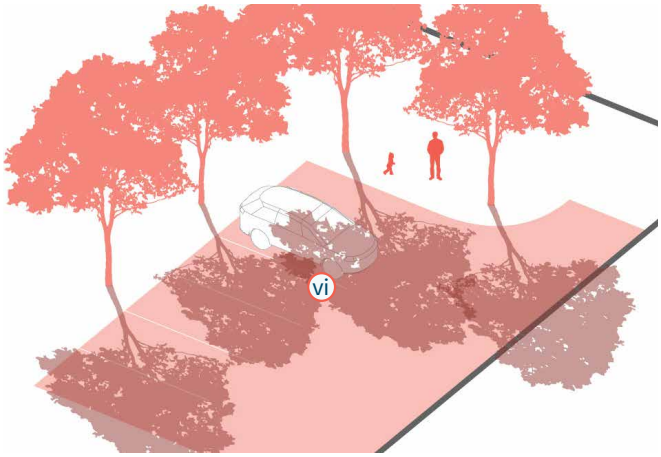

Figure 56: Canopy trees can provide shade and beautification for car parking, reducing the urban heat island effect and making them more pleasant environments.

4.2B GARAGES AND CARPORTS

i. Consolidate car parking garages where possible in multi-unit developments to minimise garage frontage on façades.

ii. Garages and carports should be setback from the front façade and predominant building line to reduce visibility from the street create an attractive street frontage to the public streetscape.

iii. Locate garages and carports away from frontages where possible to create more engaging streets.

iv. Design individual garages with access to natural light and ventilation to prioritise future adaptability for conversion into habitable spaces.

v. Consider the future conversion of garages and carports into habitable spaces or garden areas.

vi. Include step-free access from attached garages to the associated dwelling to enable universal accessibility.

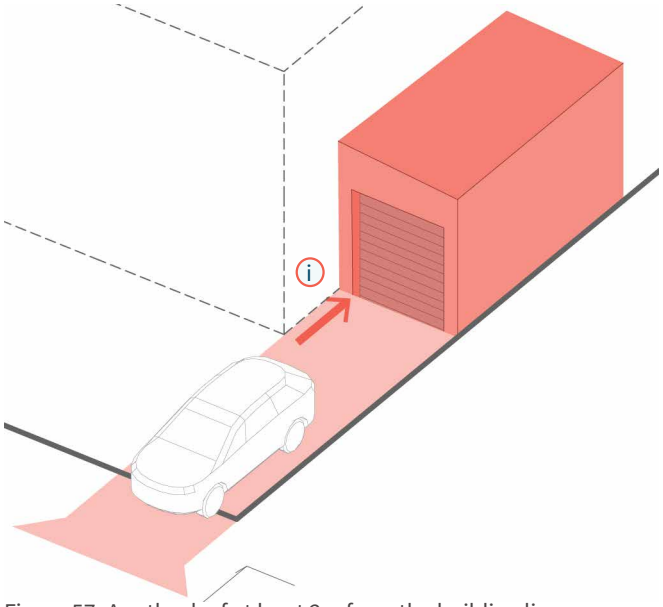

Figure 57: A setback of at least 2m from the building line ensures that garaging does not detract from the streetscapes.

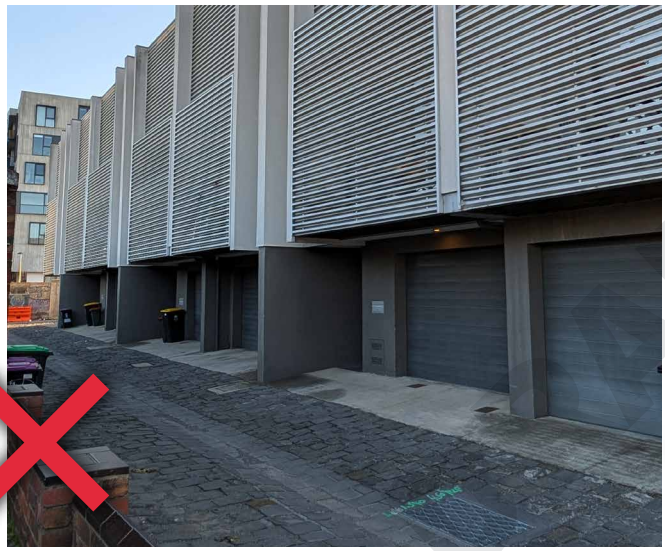

Photo 39: Garages without natural light and landscaping creates an unattractive and hostile urban environment which does not encourage other uses.

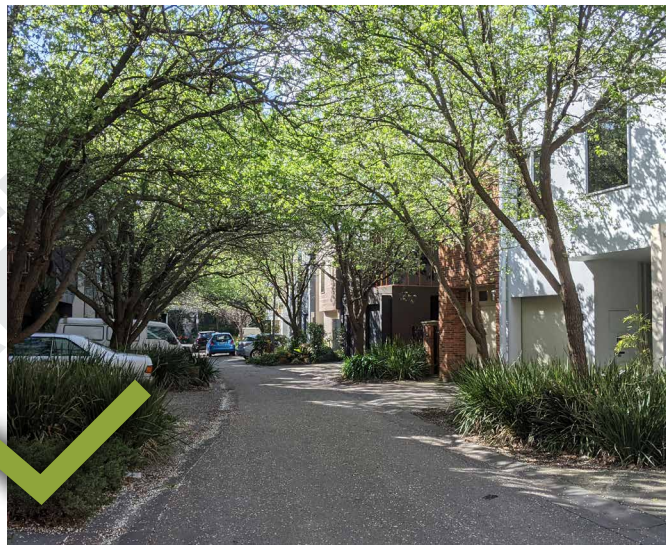

Photo 40:An internal driveway in larger townhouse development and associated parking that includes a combination of canopy trees and low-level landscaping to soften and naturally shade the environment.

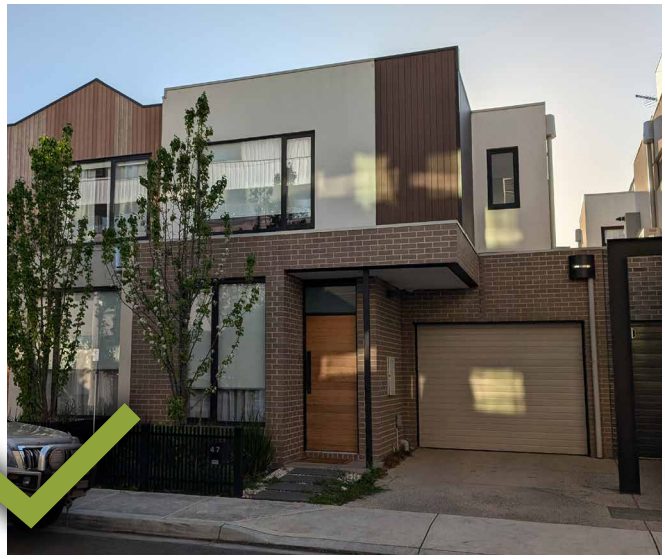

Photo 41:Setting individual garages back from the front building line reduces the visual dominance of garage doors and prioritise integrating dwellings to maintain a cohesive streetscape.

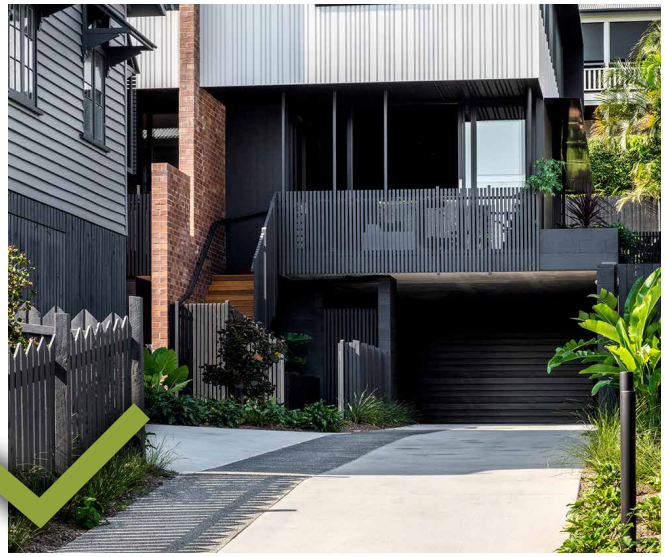

Photo 42:A shared garage between each townhouse resident has been integrated into the secondary facade of one dwelling to reduce the number of driveway crossovers and hard stand to allow for additional landscaping to soften edges.

4.2C BASEMENT AND SLEEVED PODIUM CAR PARKING

i. Consolidate vehicle entries/exits and servicing areas to avoid back-of-house character of streets.

ii. Position basements under the building footprint to maximise the potential for deep soil planting.

iii. Where basement parking is utilised, ensure adequate and dispersed provision of deep soil planting space to support adequate tree canopy cover.

iv. Design car parking entrances and exits that prioritise pedestrian and cycle safety. This may include using clear markings, continuous path surfaces signaling pedestrian priority and reduced vehicle speeds.

v. Provide natural cross ventilation to basement and sub-basement car parking areas, where possible.

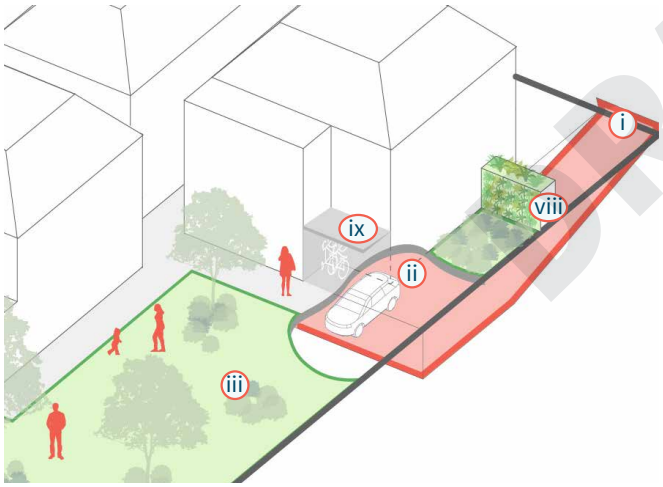

Figure 58: The placement of parking under the building footprint can provide space for more valuable land uses and deep soil planting. Effectively placed screening can reduce the visibility of vehicle entrances from both inside and outside the site.

vi. Integrate ventilation grills or screening devices for car parking openings into the façade and landscape design to minimise impacts to façades.

vii. Locate living areas at ground level to streets where sleeved basements and half-underground basements are provided to allow for passive surveillance and street activation.

viii. Provide planting along the façade of car parking where sleeving is not possible to create a green interface. Consider integrating cross ventilation as an additional priority.

ix. Provide sufficient space in garages for bicycle parking for all members of a household.

x. Avoid right-hand turns into car parking entries where possible to promote pedestrian safety.

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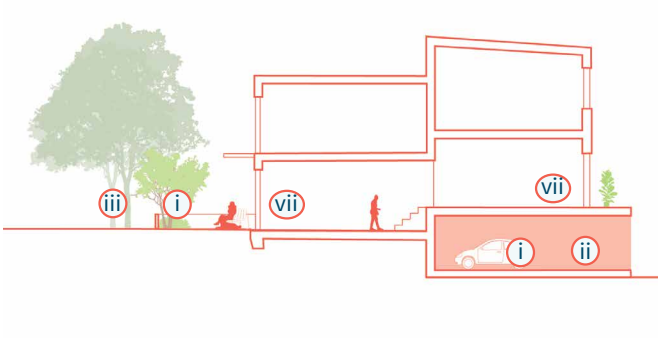

Figure 59: Sleeved parking predominately contained within the building line enables alternate uses above as well as maximising deep soil planting space.

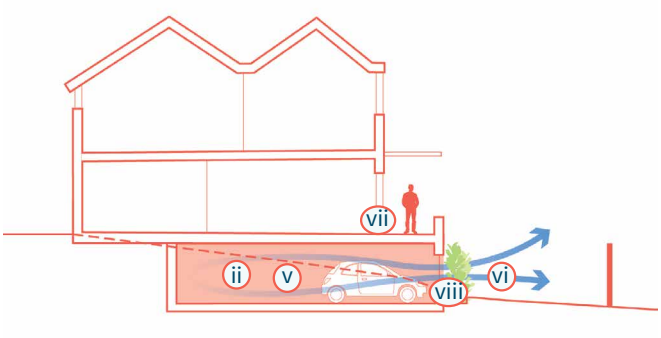

Figure 60: For basement and sub-basement car parking, using landscape screening at openings facilitates natural cross ventilation.

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Photo 43:A sleeved driveway leading to a shared underground car parking area for the townhouse tenants.

DESIGN ELEMENT:

4.3 INTEGRATED SERVICES

Services and infrastructure are important elements to making our dwellings safe and habitable. Strategically integrate services to reduce negative impacts on public, private and communal space.

Strategically integrating services, utilities and back of house functions to promote accessibility and efficiency while reducing the impact on open space and street appeal. This helps provide a more consistent and pedestrian-friendly environment while contributing to great places and streets for people.

DESIGN GUIDANCE

4.3A WASTE COLLECTION, LOADING AND DELIVERY AREAS

i. Provide appropriate space for all bin types including recycling, general and garden waste in line with local authority guidelines. These areas should be located discreetly away from the front of the development or, if possible, consolidated in the basement car park to reduce their spatial footprint and impact to the street.

ii. Ensure there is adequate access for waste collection services. Access waste collection via rear lane as an alternative solution if possible.

iii. Integrate bin enclosures into the dwelling design and located away from habitable room windows.

iv. Ensure internal communal waste and recycling rooms are well ventilated, pest proof and in convenient and accessible locations.

v. Provide structures to screen waste collection, loading and servicing areas and integrate them into the overall building design.

vi. Locate servicing areas on large developments, such as waste collection, loading areas and delivery areas, to the rear of buildings, away from primary frontages and pedestrian streets, to reduce the impact to on-street amenity.

vii. Waste travel paths and gradients need to be accessible, including where site and driveways exceeded accessible gradients.

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Photo 45: Accessibly placing bins in a screened location away from sensitive uses means that waste disposal is convenient and minimises potential negative impacts.

Photo 46: Not providing dedicated and screened bin storage can result in visual clutter and poor outcomes.

4.3B GROUND FLOOR SERVICES AND INFRASTRUCTURE

i. Co-locate building services on the least active portions of the façade as discreetly as possible. This could be at the rear of the building, near loading and waste collection points or within the basement when appropriate.

ii. Where services infrastructure must be located to address the street (e.g. fire hydrant boosters), avoid consolidating these elements to reduce their impact to the street and aesthetic quality of the building.

iii. Reduce the impact to the building façade by locating services infrastructure such as substations in laneways, within buildings or when appropriate in basements.

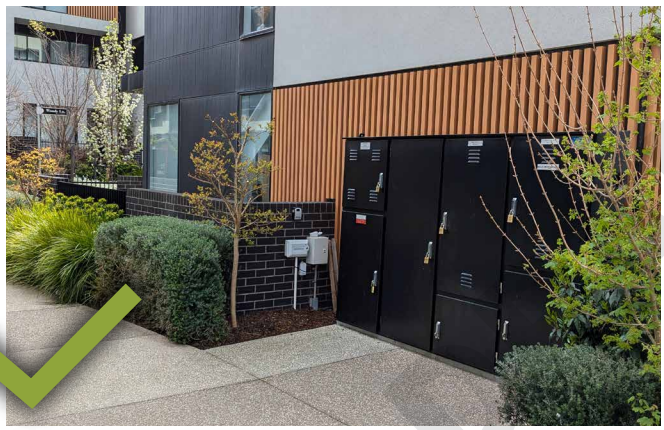

Photo 47: Co-locating infrastructure elements on the least active facade away from the street can be an efficient design outcome as this minimises negative impacts on the public realm.

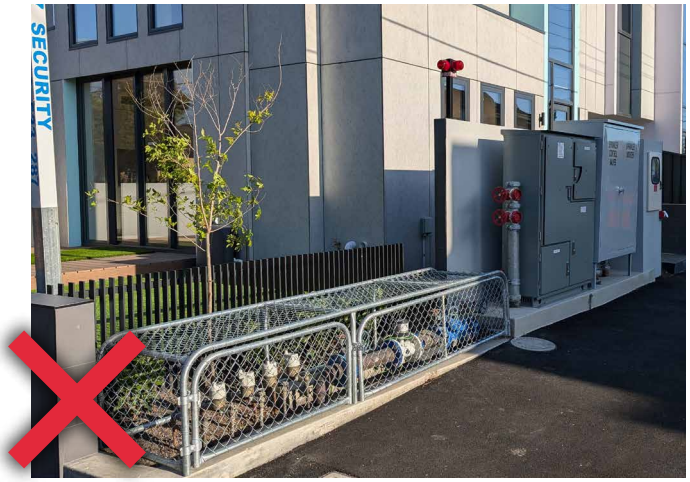

Photo 48: Consolidating services infrastructure to the street without any landscaping or architectural screening reduces the visual amenity and can be dangerous to the general public.

4.3C EXTERNAL STORAGE AND BULKY ITEMS

i. Provide enclosures within garages or adjacent to allocated car parking spaces for additional storage of larger items where possible.

ii. Allow for a convenient storage location outside of the main dwelling for bulky items and less frequently used equipment; this location should accommodate items of various shapes and sizes and be weatherproof, secure and allocated to specific dwellings.

iii. Provide visual screening to storage enclosures for improved security and functionality.

iv. Consider adding extra length to garage and car park areas to provide flexibility to residents for the storage of items.

v. Provide private storage of garden tools that is easily accessible from the garden area for dwellings with courtyards or lawns.

vi. If communal storage rooms are provided, these areas should be accessible from common circulation spaces of the building.

Additional guidance:

→ For more information on providing internal storage space, see 6.4A Within dwelling of the Missing Middle Housing Design Guide.

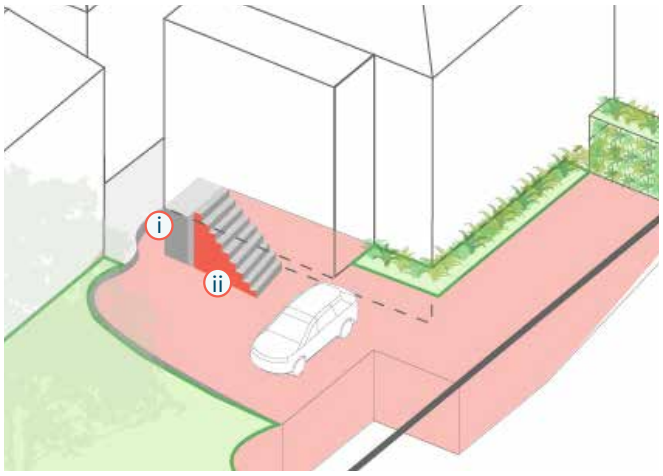

Figure 61: Under-utilised spaces that can be enclosed and covered, such as under staircases, can be used efficiently for the storage of bulky items.

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PUBLIC SPACE AND AMENITY

Public spaces and open spaces are key drivers of livability and amenity. They should reflect the desires and needs of its users by creating welcoming, sociable, walkable environments.

Open spaces foster a sense of community, encourage social interaction, and provide residents with accessible areas for relaxation and physical activity. Private open spaces can cater to diverse lifestyle needs and balance privacy and communal interaction. These spaces contribute to mental well-being and create vibrant, cohesive neighbourhoods where people want to live.

DESIGN ELEMENTS

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5.1 COMMUNAL OPEN SPACE

5.1A Use, size and location

5.1B Integrated landscaping

5.2 PRIVATE OPEN SPACE AND BALCONIES

5.2A Principal private open space

5.2B Public realm interface and passive surveillance

5.2C Privacy and outlook

Location: Dockside Kingston, Kingston Foreshore ACT. Design: Stewart Architecture

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DESIGN ELEMENT:

5.1 COMMUNAL OPEN SPACE

Generous and high quality communal open spaces boost the amenity and liveability for missing middle living with shared spaces.

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. Considered design choices and endemic planting species in communal spaces also strengthen connection to Country. In addition, they increase amenity and attract a diverse range of residents, contributing to a more inclusive and vibrant community.

DESIGN GUIDANCE

5.1A USE, SIZE AND LOCATION

i. Complement the dwelling's private open spaces with shared communal spaces designed to provide high levels of amenity for residents of all ages and abilities such as courtyards, roof tops, lawns and gardens.

ii. Provide for activities in the communal open spaces that facilitate social interaction between residents such as veggie patches, herb gardens, exercise areas, spa or communal kitchen/entertaining areas.

iii. Locate communal open space where it is directly accessible from common entries and pathways and has a high degree of visual connection.

Tip:
Communal spaces boost the amenity, diversity, inclusivity and liveability of higher density urban living. They promote social interactions by creating shared spaces where residents can get to know each other.

iv. Design communal spaces that are versatile and usable throughout the year by incorporating both enclosed spaces that capture winter sun and protect from wind, and open, breezy spaces that cater to active uses in summer.

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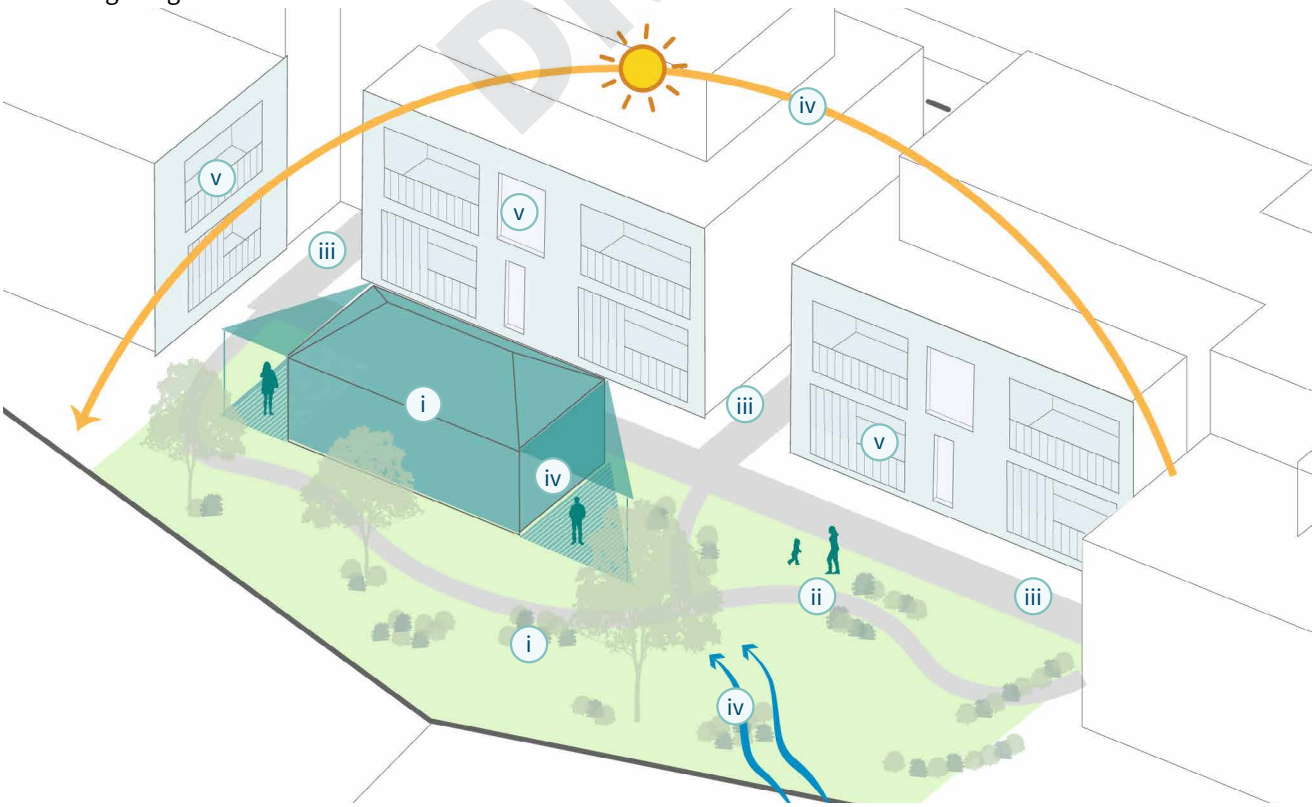

Figure 62: Communal spaces should be accessible and visible throughout the development, ensuring they are safe and usable for all residents. They should also a range of spaces for different uses and seasons, including both indoor and outdoor spaces.

v. Consider the retention of privacy for private dwellings facing communal open spaces. Mitigate privacy through planting, setbacks, level changes and window positioning when necessary.

vi. Consider providing pet-friendly communal spaces on site.

vii. Where appropriate and feasible, incorporate rooftop gardens to enhance green spaces, improve the aesthetics of dwellings and support the physical and mental health of residents. Consider factors such as structural capacity, exposure to weather elements, accessibility and resident needs.

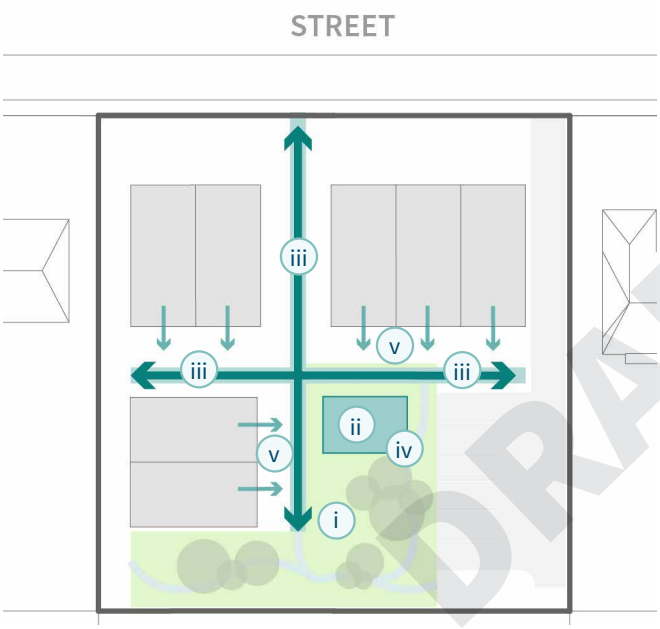

Figure 63: Locating communal open space that is easily accessible for all dwellings ensures shared enjoyment and privacy.

5.1B INTEGRATED LANDSCAPING

i. Integrate landscaping and planting within communal open spaces to enhance comfort, animate and soften the space, while also reducing the urban heat island effect.

ii. Locate mature and large canopy trees in communal open spaces in the front and rear garden of the block for easier maintenance and to allow residents to enjoy the benefits of shade and connection to nature that may not be possible in private spaces.

iii. Use landscaping to provide privacy and amenity between communal and private areas.

iv. Use communal areas for environmental opportunities such as urban agriculture, habitat biodiversity, improved water cycle and reducing stormwater runoff.

Photo 49: Elements such as playground facilities, seating, shade and amenity grassland can help to create vibrant communal open spaces that are used year-round.

Photo 50: Framing communal space with built form and private open spaces ensures that it is well-used and surveilled.

Photo 51: A mix of planting, including community gardens, can help to soften the environment while providing activity and amenity for residents.

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DESIGN ELEMENT:

5.2 PRIVATE OPEN SPACE AND BALCONIES

Private open spaces and balconies connect people to the landscape and natural surroundings, offering significant benefits to enhance quality of life and personal well-being.

Private open spaces provide a personal retreat for relaxation, outdoor dining, and gardening, allowing individuals to enjoy fresh air and nature from the comfort of their homes. They offer a sense of privacy and ownership, contributing to mental health and stress reduction. Outdoor living is generally desirable, and can attract a diverse mix of residents and increase overall liveability.

DESIGN GUIDANCE

5.2A PRINCIPAL PRIVATE OPEN SPACE

i. Locate principal private open space and balconies adjacent to the living room, dining room or kitchen to extend the living space.

ii. Orientate private open spaces and balconies north, east or west, where possible, to maximise solar access.

iii. Provide private open spaces that are proportional to the size of the dwelling and intended use.

iv. Ensure that a reasonable portion of private open space is covered to offer protection from the elements.

v. Orient private open spaces and balconies so that their longer side runs along the building's façade or is open to the sky, optimising daylight access to adjacent rooms.

Additional guidance:

→ For more information, see 7.2A Solar access, shading and thermal performance of the Missing Middle Housing Design Guide.

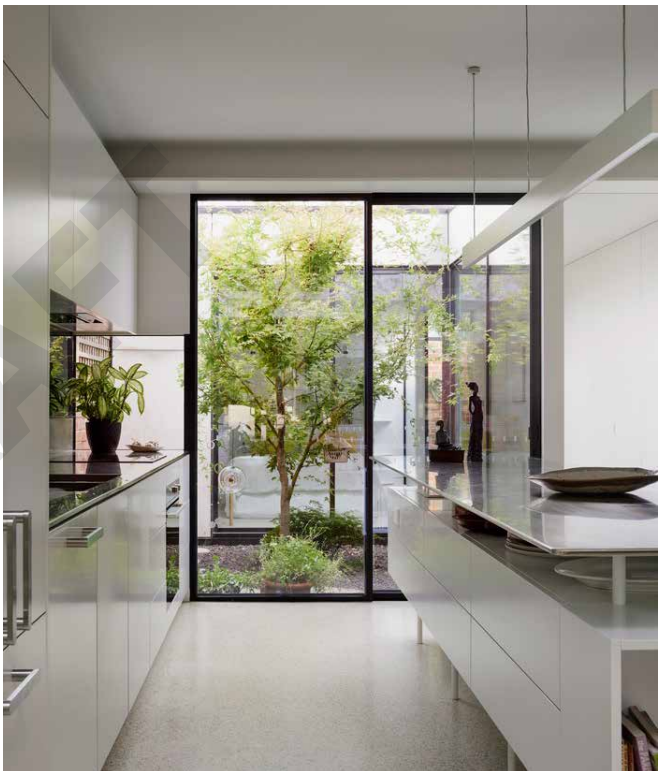
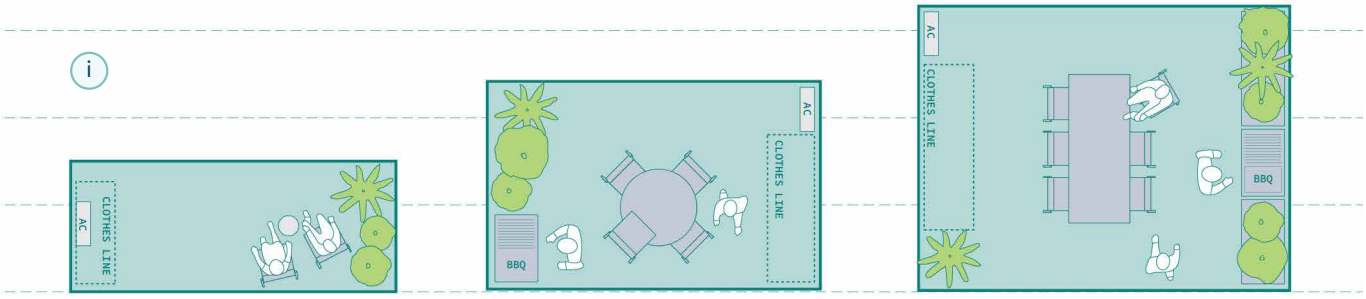


Photo 52: Extending private open space from the kitchen and living areas in private internal open spaces allows fresh air, light and landscaping within the confines of the home.



Small: Studio and 1-bedroom dwellings should allow space for two people to sit comfortably.

Medium: 2-bedroom dwellings should allow for a 4-person table, BBQ, clothes drying area and planting.

Large: 3 + bedroom dwellings should allow for a 6-person table, lounge, BBQ, clothes drying area and planting.

Figure 64:Private open spaces should allow for a level of amenity proportionate to the size of the dwelling they are for.

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Photo 53: Covered balconies can ensure a comfortable level of access to sunlight while limiting the exposure of open spaces to the elements and filtering privacy.

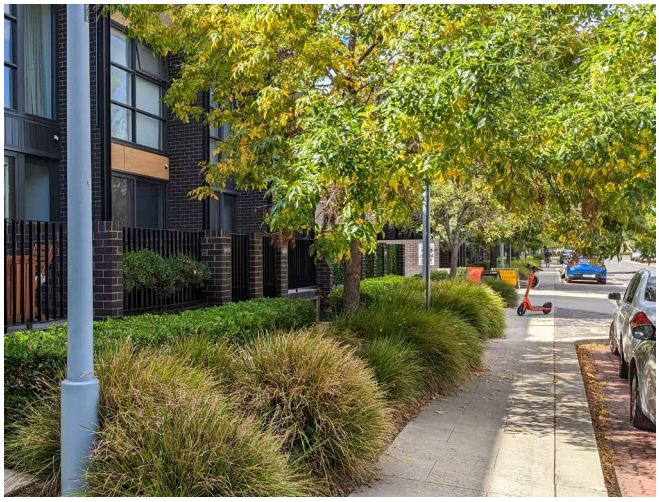

Photo 54: Fencing, planted areas, gates and slightly elevated ground floor level helps to balance privacy and street activation.

5.2B PUBLIC REALM INTERFACE AND PASSIVE SURVEILLANCE

i. Maximise street activation and passive surveillance through the design of ground-floor dwellings (see 6.2D Ground Floor Edge Conditions).

ii. Design balconies to address and engage with the streets and the public space to contribute to the broader sense of activation and passive surveillance of public spaces.

iii. Create clear transitions between public and private open spaces through fencing, planting, paths and gates.

iv. Incorporate a slight change in level (e.g. step up or ramping) between the street and private front terraces to enable surveillance, while enhancing privacy for ground-level dwellings and maintaining accessibility.

v. Establish a street frontage setback that contributes to the intended character and amenity of the street or public open space.

vi. Provide semi-transparent fencing to courtyards and terraces that are within the front setback to allow for passive surveillance and engagement with the street.

vii. Front setback depths should consider the retention and support of healthy verge trees.

viii. Where possible, use front setback areas to incorporate deep soil planting zones that allows for large canopy, long-lived shade trees providing privacy for ground and upper floor residents and enhancing the street's green amenity.

ix. Provide a secondary open space for utilitarian uses, such as clothes drying, in dwellings where the front garden is the primary private open space to avoid cluttering the front garden to the street.

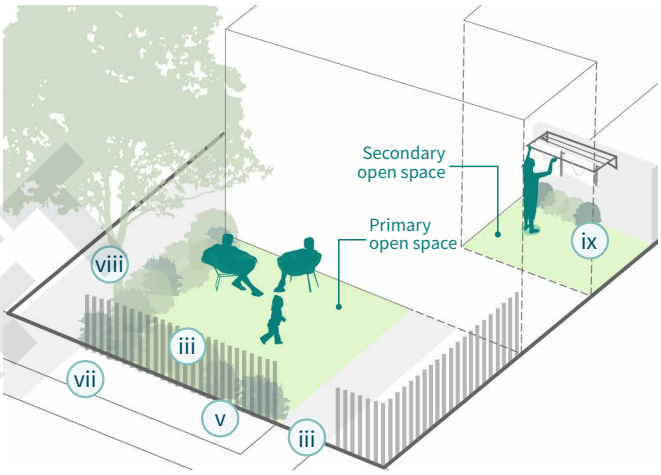

Figure 65: A secondary open space provides significant utility value while allowing for the full enjoyment of the primary front garden open space.

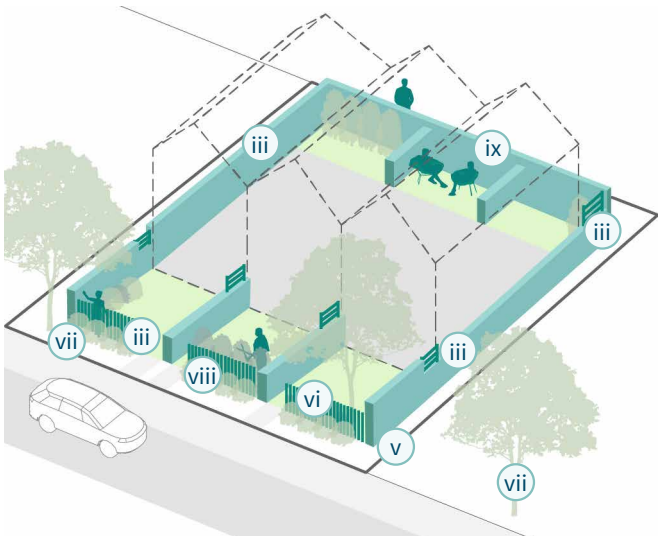

Figure 66: A range of fence heights between front, back, side and internal boundaries allow for a connection to the public realm and a strong sense of privacy for residents.

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5.2C PRIVACY AND OUTLOOK

i. Elevate private open space such as terraces or balconies above street level to enable passive surveillance and connection to the street, without compromising privacy.

ii. Provide variation in size and position of private open space and balconies to minimise overlooking and create diverse dwelling design.

iii. Orient private open space to the street and rear garden to improve outlook and minimise the impact on neighbouring properties and avoid overlooking neighbouring private open spaces where possible.

iv. Position buildings to capture desirable views of natural features, such as lakes, peaks, ranges and landmarks to enhance residents' outlook and connection to the context.

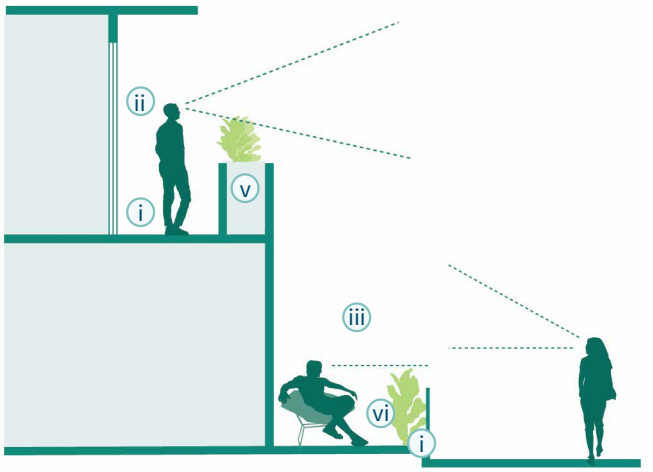
v. Consider incorporating planter boxes into balconies. Design to provide private planting and natural planted screening when possible.

vi. Use low height screening with visual permeability that balances privacy and passive surveillance towards front garden.

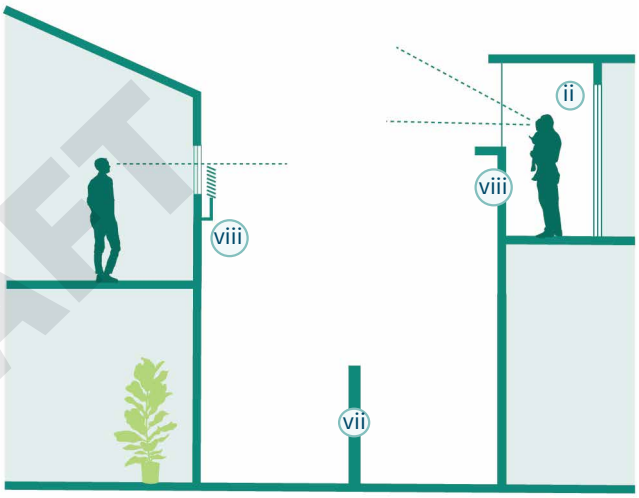
vii. Use rear fences to balance privacy and solar amenity between neighboring properties and within the development.

viii. Use architectural elements such as vertical screens, louvers, battens and opaque finishes on balcony balustrades improves privacy by redirecting or reducing views.

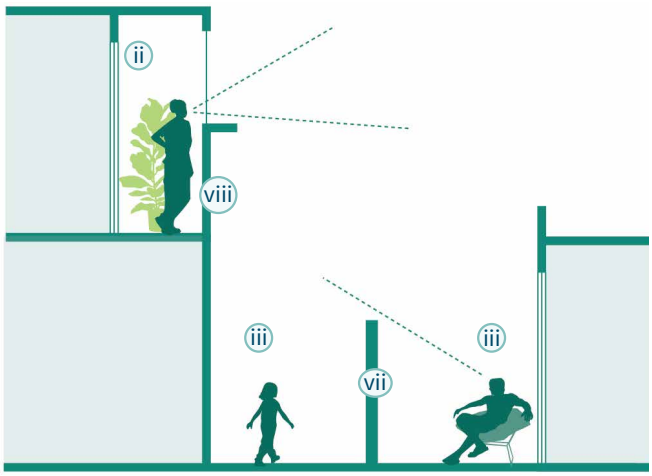
Photo 55: Planting can be highly effective at maintaining a level of privacy to dwellings facing communal areas. However, this needs to be balanced to maintain passive surveillance.



Planting and landscaping are excellent natural privacy screens at the ground level and, where possible, on balconies.



Carefully locating private open space and balconies that are positioned differently to neighbouring dwellings will redirect views and reduce overlooking. If required, external architectural screens can be useful for additional privacy.



High rear fences must consider balancing privacy without overshadowing neighbouring or own private open space.

Figure 67: Intelligent planter box placement ensures that adjoining open spaces and balconies facing the public realm can retain an appropriate level of privacy.

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Location: Deakin, ACT. Design: Stewart Architecture

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BUILT FORM AND BUILDING DESIGN

Design high quality housing to meet the needs of residents and catering for diversity in housing choice.

High-quality housing should be designed to meet the growing needs of residents, while catering for a diversity in housing choice, living arrangements, stages of life and working life. Higher density living increases amenity for residents by enhancing liveability and access to open space, transport opportunities and activity. Attractive and well-designed buildings bolster and strengthen a sense of community and ownership that has a positive impact on the broader streetscape and precinct.

DESIGN ELEMENTS

6.1 SCALE AND BUILDING FORM

6.1A Building heights and scale

6.1B Building visual form and appearance

6.2 ORIENTATION AND STREET INTERFACE

6.2A Setbacks and separation

6.2B Building entries

6.2C Building to street interface

6.2D Ground floor edge conditions

6.3 DIVERSE HOUSING CHOICE AND OCCUPANT AMENITY

6.3A Housing mix

6.3B Size and layout

6.3C Housing accessibility

6.3D Ceiling heights

6.4 STORAGE

6.4A Within dwellings

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Tarakan Street, Victoria.
Design: NH Architecture

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DESIGN ELEMENT:

6.1 SCALE AND BUILDING FORM

The proposed use and scale of development should be appropriate to the local character and site context.

Through increasing housing densities, buildings should remain flexible and include high amenity spaces for residents and their changing needs. Building scale refers to the size and proportion of the buildings, while form pertains to the shape, structure and overall architectural expression. Maintaining a sense of place and ensuring that new developments integrate seamlessly with the existing urban fabric is important to create street continuity and continuous experiences with consistent street patterns.

DESIGN GUIDANCE

6.1A BUILDING HEIGHT AND SCALE

i. Ensure scale responds to the existing context and desired character of the street and locality, including natural landforms and existing built form.

ii. Respect the rhythm of the streetscape through built form scale and texture by referencing datums, floor-to-floor heights, setbacks and massing of adjacent built form outcomes.

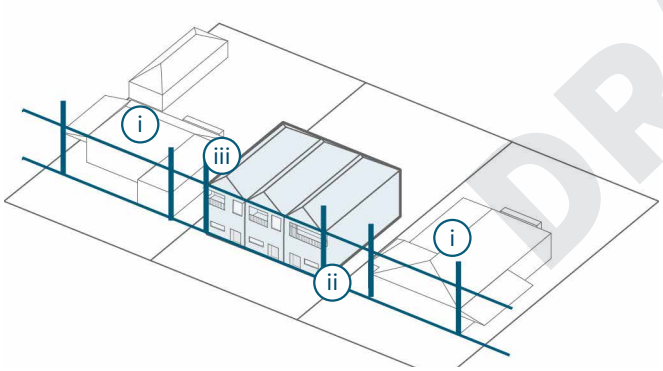

Figure 68: New development should retain the prominent building form and rhythm in the street with regards to height, levels and setbacks to ensure new development responds and fit within the local context.

iii. Consider enhancing articulation by breaking the building down to help blend larger new developments into any existing finer grain streetscapes. This can be achieved using recesses, stepping back, changes to materials and texture, to break down the apparent scale of new development.

iv. Consider the size and placement of windows and glazing that allows for adequate daylight and solar access for dwellings, neighbouring dwellings and open spaces (public or private), while capturing key views from dwellings and common spaces.

v. Consider and respect neighbour's privacy to avoid overlooking with appropriate building height, setbacks and siting.

vi. Accommodate all building programs including rooftop communal space, lift overrun, plant and articulated roof forms within the permissible building height limit outlined in residential zoning specification.

vii. Consider using attic and roof spaces as an affordable opportunity to maximise usable space, providing options for additional living areas, storage, or functional lofts

Additional guidance:

→ For more information, see 3.4 Building Envelope of the Missing Middle Housing Design Guide.

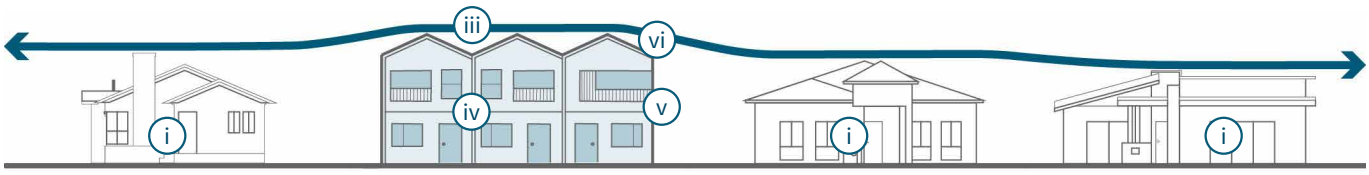

Figure 69: New development can propose an increased height while retaining the prominent building form and rhythm .

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6.1B BUILDING FORM AND VISUAL APPEARANCE

Form and roof design

i. Design roof forms that are simple, uncluttered and visually appealing, that integrate well into the building design and respond positively to the streetscape.

ii. Design roof lines to allow for natural light entry through skylights or dormer windows without compromising energy efficiency.

iii. Define the top of the building by setting back upper levels behind the front building façade or expressing the shadow of an overhanging roof. A different treatment here also provides interest and variation.

iv. Select roof profiles that reduce the perceived mass of the buildings.

v. Utilise repeated patterns and rhythms in major building elements such as roof forms, material variations and rebates or projections in the façade line to create visual interest and reduce overall built form bulk and scale.

vi. Incorporate appropriate insulation and ventilation to improve thermal performance, particularly given Canberra's seasonal temperature extremes.

Photo 56: Simple pitched roof forms provide visual interest and reduce the perceived mass of the dwellings.

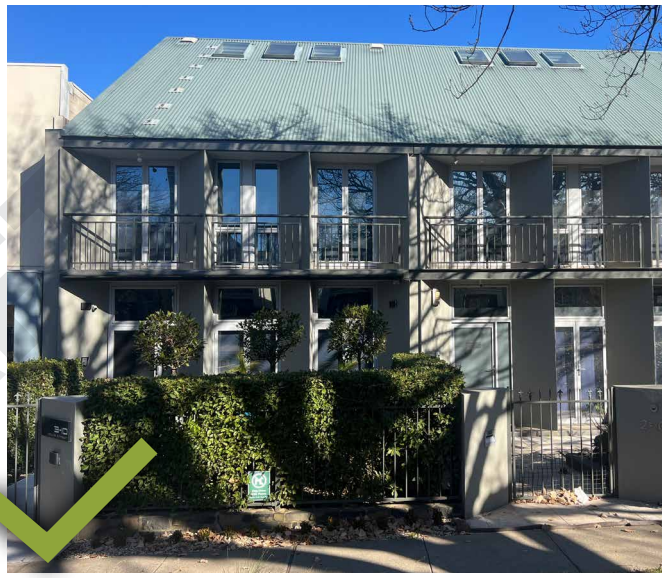

Photo 57: Simple saddle roof form. The skylights indicate a usable attic space in the roof.

Photo 58: Repeated patterns and rhythms reflected in the built form and materials used reduce dwelling bulk and scale.

Photo 59: Articulation in roof form at the second floor. The upper level setback and modulation in form reduce the visual bulk of the third floor.

Materials, textures and finishings

i. Consider the immediate context and built form when selecting materials to add to the identity and local character of the place. This can be achieved by referencing local materials, colours and/or finishes.

ii. Provide variations in materials, colours and key elements, such as doors, windows and balconies, to provide scale, proportion and articulation which responds to the local character of the area.

iii. Choose robust, durable and low maintenance materials to ensure longevity of the finish, reduce ongoing maintenance costs and provide a high-quality design outcome.

iv. Use colour to provide accent and texture changes for visual interest of the building.

v. Use double glazing or high-performance laminated glass to improve thermal performance of the building envelope without compromising outlook and access to natural light.

Photo 60: The use of simple materials such as brick and details such as black finishes and trimmings creates visual interest.

Photo 61: The excessive use of materials of a similar colour does not provide a quality visual outcome. Instead, the facade is too busy and dominates the streetscape.

Photo 62: The contrast of timber and white brick helps to differentiate the levels of the building and is consistent with the use of setbacks and articulation.

Photo 63: The excessive use of materials and a lack of clear setbacks and articulation fail to successfully define the building.

Building façade and articulation

i. Provide building depth to optimise cross-ventilation, daylight access, building separation, landscaping and views. For more information, see 7.2B Natural cross ventilation of the Missing Middle Housing Design Guide.

ii. Consider the aesthetic balance, proportions, shadow play and glazing ratio and facade depths to create a harmonious facade expression.

iii. Articulate street walls and podiums on long, wide street frontages to create finer-grain massing and modulation of the built form.

iv. Integrate or screen services and utilities so as not to dominate the façade design or roof silhouette. Ensure adequate air flow is maintained to services.

v. Articulate built form to respond to and indicate important building elements such as pedestrian entries and corners.

vi. Consider locating balconies and common circulation on frontages that can activate the streetscape.

vii. Establish and maintain horizontal and vertical datum lines in elements such as glazing and door set-outs, façade articulations and material patterning.

Photo 64: The contrast of materials provides a clean facade that helps define the building massing.

Photo 65: The excessive use of upper level setbacks and a single material makes the facade appear messy from the street.

Photo 66: The contrast of brick, glazing and metal is considered with regards to the massing and street interface.

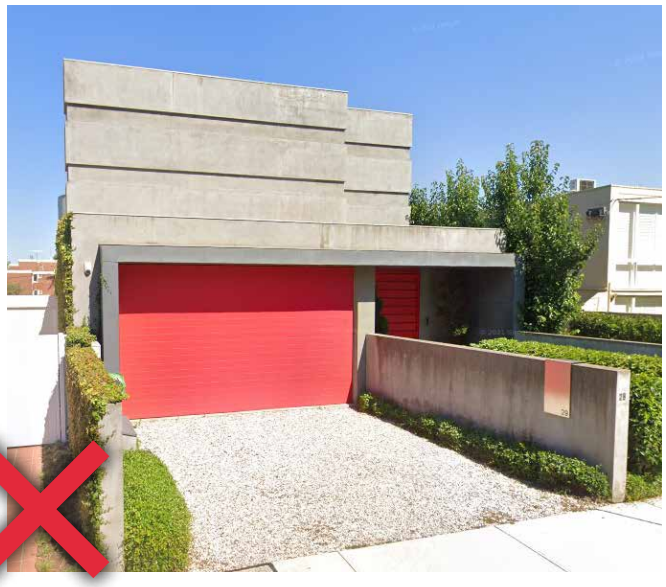

Photo 67: No windows provided in the facade which is mainly taken up by the garage door. Allowing no passive surveillance and street activation.

DESIGN ELEMENT:

6.2 ORIENTATION AND STREET INTERFACE

The orientation of a site or building, it's length of street frontage, shape and size all determine the layout of a development.

Houses should engage with the street through architectural elements, balconies and building openings to create an active and vibrant street edge. A well-designed street interface enhances the urban experience by promoting walkability, safety and social interactions for the broader community.

DESIGN GUIDANCE

6.2A SETBACKS AND SEPARATION

Front and street setbacks

i. Ensure that the 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.

ii. Front setbacks should maintain relative consistency where it positively contributes to the streetscape.

iii. On streets with large predominant front setbacks, articulate new buildings front setback to create a harmonious transition with adjacent buildings, using techniques such as stepped setbacks, articulated facades, and landscaping.

iv. Consider upper storey setbacks to ensure appropriate frontage to the street and to reduce the visual intensity of taller buildings.

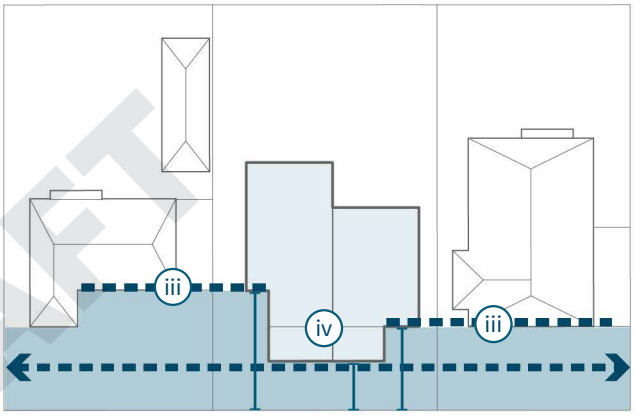

Figure 70:Where neighbouring sites have different setbacks from each other, development should be offset to allow for a good relationship to both.

Additional guidance:

→ For more information on maximising solar access and daylight in setback areas, see 7.2A Solar access, shading and thermal performance of the Missing Middle Housing Design Guide.

Figure 71: Missing middle development integrating into and becoming part of the streetscape.

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Side setbacks

i. Upper floor built form should be setback from the side boundary of adjacent neighbouring properties.

ii. Incorporate smaller courtyards, light wells and steps in building lines along the side setback to improve solar access and daylight amenity into the building.

iii. Use side setback zones to create courtyards for utility facilities such as water storage tanks, AC units and clothes drying.

iv. Side setbacks zones can be used for planting and smaller gardens that can improve the amenity and outlook from interior rooms.

v. Use side setbacks to provide access for maintenance of easements.

Rear setbacks

i. Both ground floor and upper level built form should be setback from the rear boundary towards neighbouring properties.

ii. Provide large consolidated garden areas and planted zones in the rear setback area including large canopy trees where possible.

iii. The visual and spatial amenity of rear setback areas should be high quality as this can be the primary outlook for residents facing away from the street.

iv. The rear setback can be a good location for communal garden areas for all residents in any multi-dwelling development.

Related planning strategies and tools:

i. Refer to Planning specifications ZS1 - 14.3 and 14.4 providing minimum front boundary, side and rear setbacks.

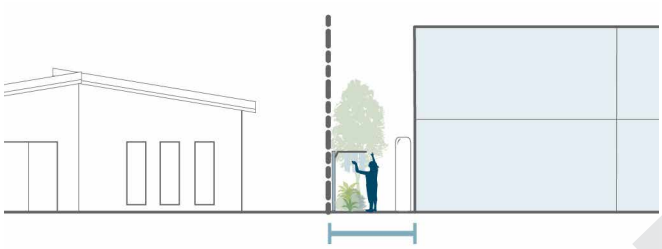

Figure 72: Side setback: 1-storey built form within the front building zone should be constructed up to the building line and upper floors should be setback.

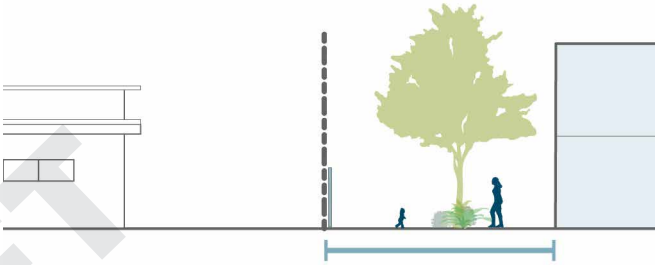

Figure 73: Rear setback: 1-storey built form outside of the front building zone should be setback appropriately from the rear boundary.

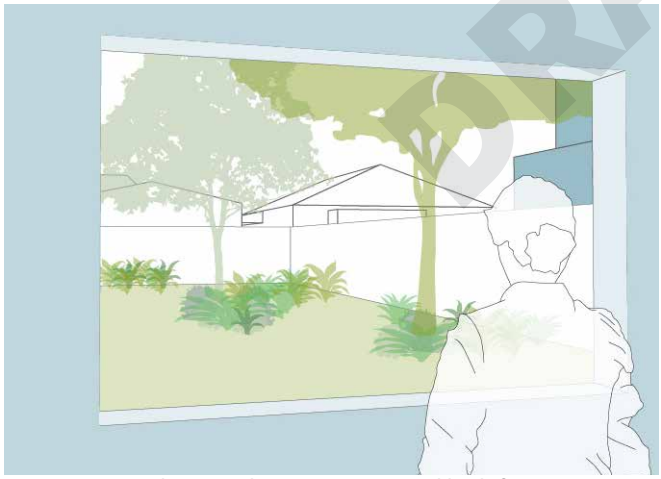

Figure 74: Visualisation showing anticipated built form massing to a side neighbour as viewed from an existing rear window.

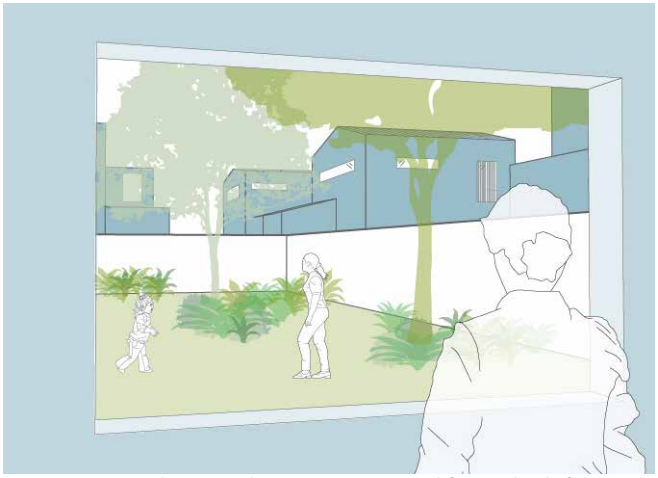

Figure 75: Visualisation showing anticipated future built form massing to rear neighbours as viewed from an existing rear window.

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Building separation

i. Building separation between dwellings within a site should consider privacy, solar access and uses of rooms within the dwelling.

ii. Where appropriate and possible, building separation and setbacks may need to be increased to maximise solar access, avoid unreasonable overshadowing of private open space and overlooking of neighbouring properties.

iii. Where sufficient separation between dwellings as demonstrated below cannot be achieved, additional privacy mitigating devices such as deep window reveals, louvres, fences or dense planting should be considered. Alternatively, consider offsetting window locations between neighbouring buildings to avoid direct sight lines into primary or private living spaces.

iv. Building separation distances should ensure solar access and views to the sky.

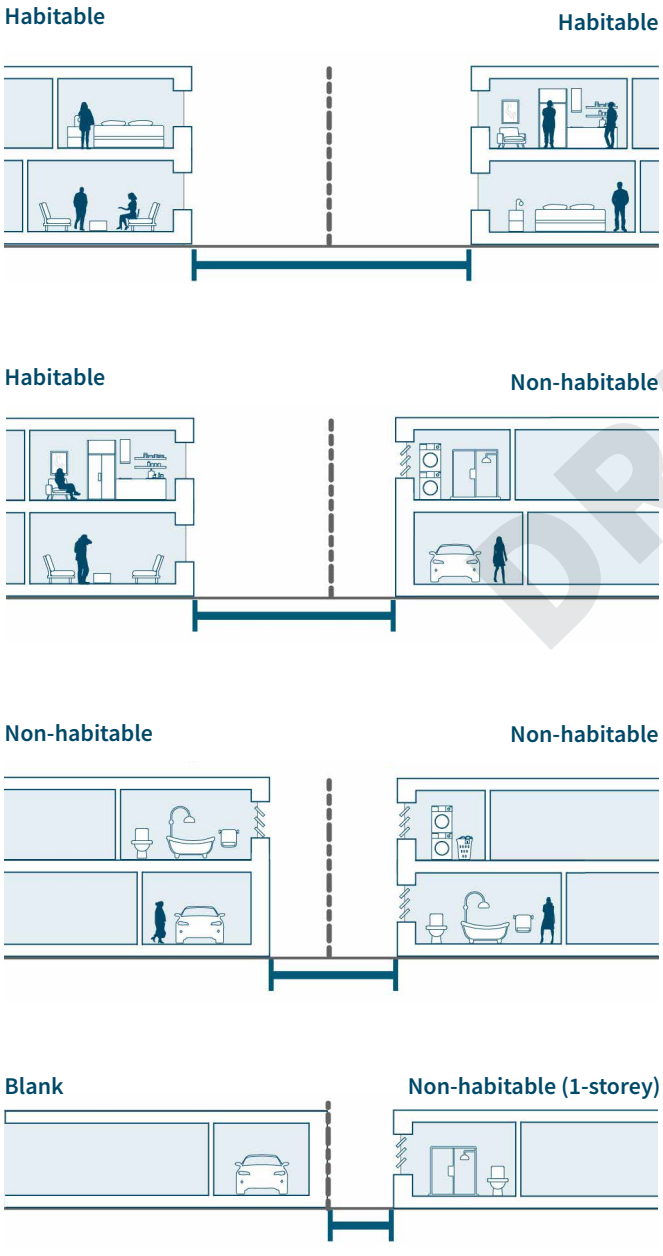

Figure 76: Indicative building separation distances between habitable and non-habitable rooms at single and multi-storeys.

Additional guidance:

→ For more information, see 5.2C Privacy and outlook of the Missing Middle Housing Design Guide.

Tip:

The greatest separation between dwellings should be proportional to the internal uses. In particular, habitable rooms require the largest building separation compared to non-habitable rooms.

Habitable rooms refer to spaces used as living rooms and primary bedrooms.

Non-habitable rooms refer to spaces used as bathrooms, laundry and garages.

Related planning strategies and tools:

→ Refer to Planning specifications ZS1 - 16 providing minimum separation between buildings.

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6.2B BUILDING ENTRIES

i. Locate and design entrances to create building identity, distinguish between individual residences, and create visual interest for pedestrians.

ii. Consider the use of architectural detail and landscape treatment to emphasise primary entrances and to provide punctuation in the overall streetscape treatment.

iii. Provide clearly identifiable building entries to the street and communal spaces with architectural treatment of awnings for weather protection and defining private vs public realm.

iv. Provide a clear sense of address through clearly defined building entries, including at least one step free entrance, that are easily visible and identifiable from the street.

v. Have clearly defined and separate access for both pedestrians and vehicles to prioritise pedestrians and safety within the site.

vi. Provide visual connections from the street into ground floor so entries are safe, comfortable and user friendly.

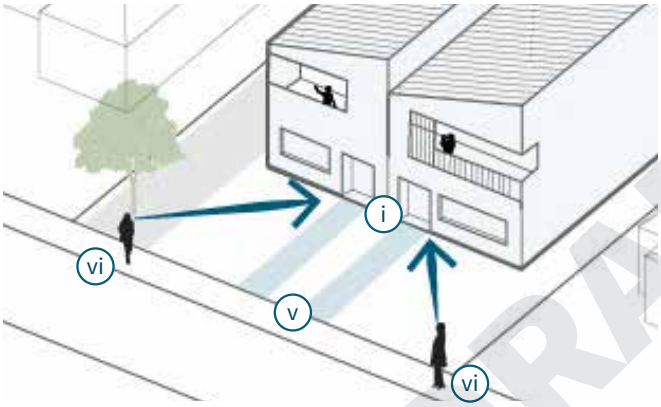

Figure 77: Main doors should be visible from the street, provide direct access from the public realm and contribute to street activation.

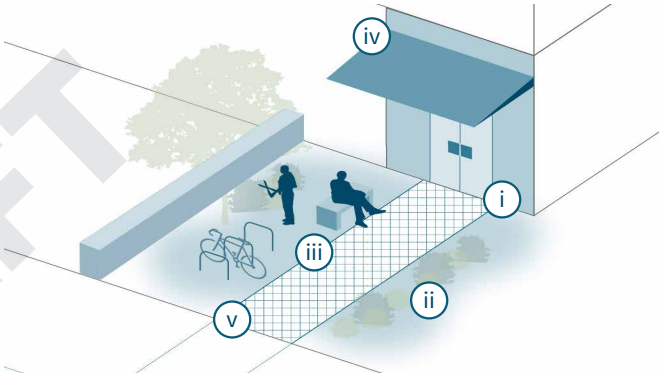

Figure 78: Apartment entrances should provide articulation, landscaping and amenity, ensuring a welcoming experience for residents and visitors.

Exemplar:
The dwelling maintains a strong building identity with a planted fence creating visual interest and clearly defined separation to the public realm.

Turner, ACT.

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6.2C BUILDING TO STREET INTERFACE

i. Detail ground floor setbacks with high-quality materials and urban furniture to create visual interest and positively contribute to the public space.

ii. Ensure new front setbacks maintain and enhance existing patterns of landscaping within the street. This can include landscape in the front yard and landscape between properties.

iii. Use front setback areas to incorporate a deep soil planting zones that allows for large, long-lived shade trees that provide privacy for ground floor residents and contribute to the green amenity of the street.

iv. Consider secondary upper-level building setbacks and separation to reinforce the desired streetscape and building scale for the public space.

v. Maximise street activation and passive surveillance through active street frontages and the design of ground floor dwellings.

vi. Create permeable edges at the ground level to improve passive surveillance of the streets and public areas while creating a more inviting and activated frontage.

vii. Provide a legible transition from public space to private spaces.

viii. Include public amenity, landscaping and active uses on street frontages to animate street life and soften interface with new development.

ix. Consider the use of architectural detail and landscape treatment to emphasise primary entrances and to provide punctuation in the overall streetscape treatment. This is especially important for internal driveways and entrances to residential units.

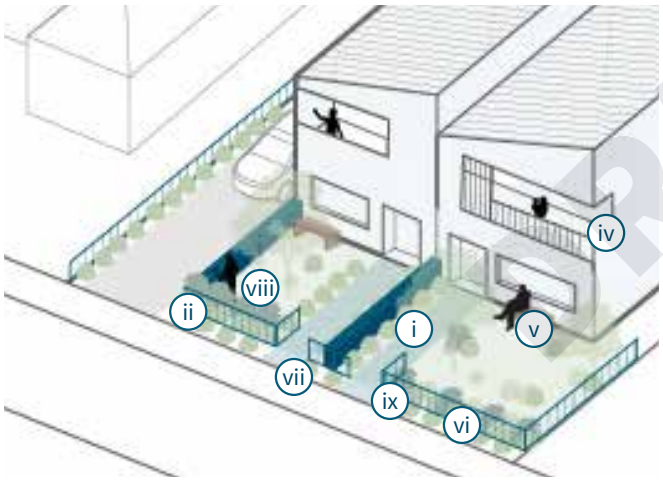

Figure 79:Front garden interface with driveway

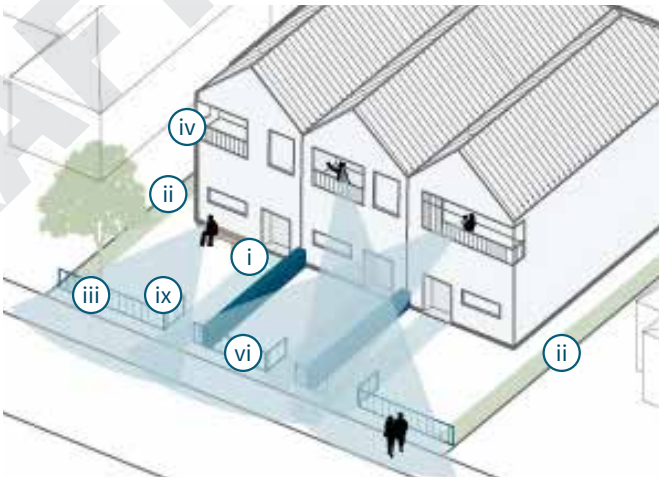

Figure 80:Passive surveillance

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Photo 68:A building to open space creating a highly legible transition where the street is surveilled while residential privacy is maintained. Image: Social and affordable housing, Tarakan Street, VIC. NH Architects.

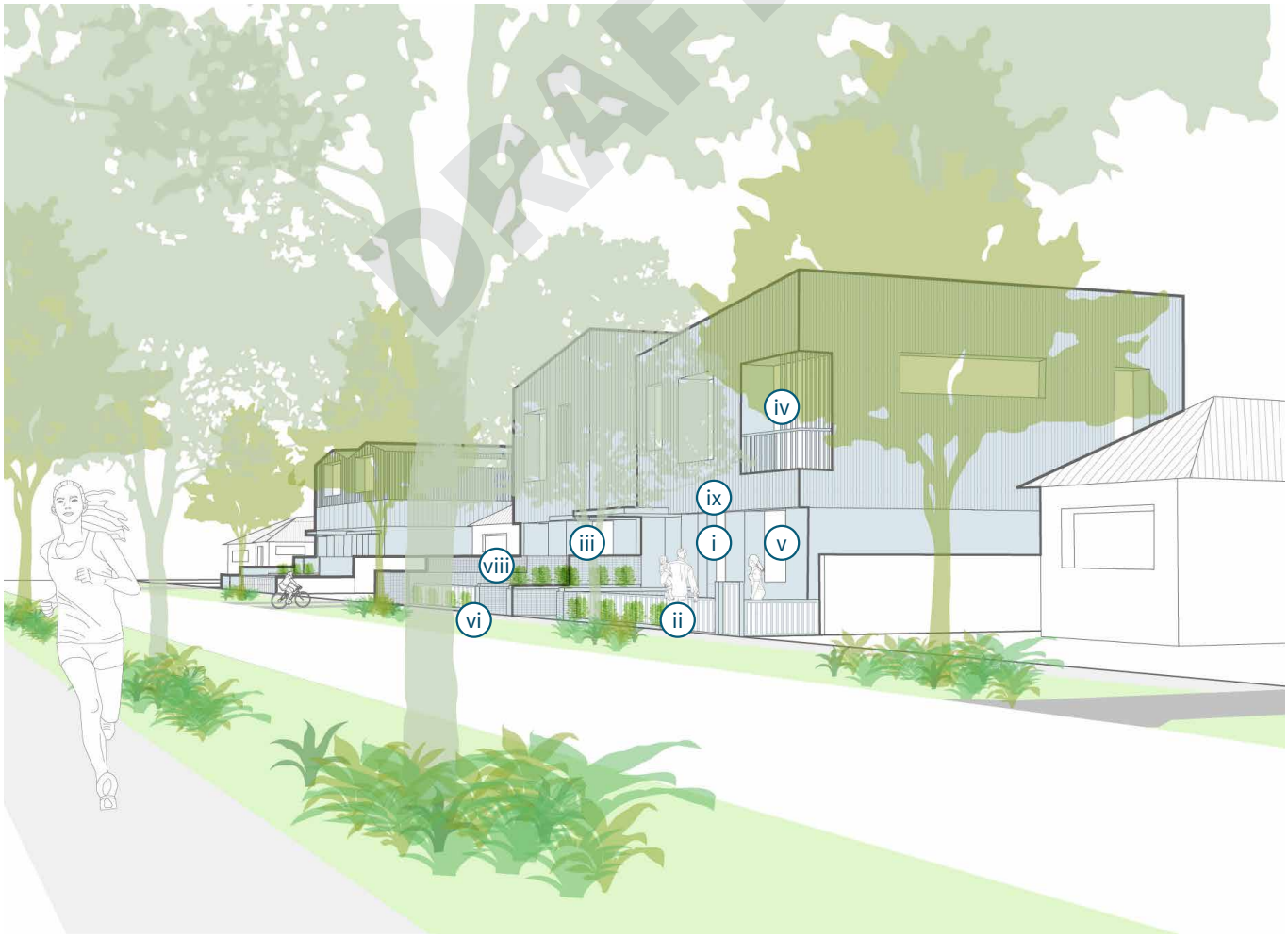

Figure 81: A typical Canberra street that has seen the development of missing middle housing. . Providing a balance between passive surveillance onto the street and privacy into the dwelling contributes to a positive public realm. Consider how to layer the front garden to improve legibility and create a more activated frontage to the street.

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6.2D GROUND FLOOR EDGE CONDITIONS

Primary street frontages

i. Provide at-grade front-facing courtyard/garden in building front setback with planting to balance passive surveillance of the street,and privacy of the ground floor residences.

ii. Incorporate deep planting zones that allows for large, long-lived shade trees that provide privacy for ground floor residents and contribute to the green amenity of the street.

iii. Use low height screening with more permeability on front-facing courtyards and balcony balustrades.

iv. Additional elements such as verandas, awnings and columns can provide additional and subtle privacy.

v. Prevent extensively large front setbacks that lose the connection between dwelling and street.

Narrow front setbacks (laneway or driveway)

i. For ground floor residential units facing an internal laneway or driveway, provide narrow front-facing courtyards, elevated above the street, to maintain a sense of privacy for ground floor residences.

ii. Provide individual private entries to ground floor units that ensure rhythm to the street edge and interact with the street where appropriate.

iii. Provide landscaping closer to the street to ensure that deep soil planting zones are achievable.

iv. Use higher window sills and glazing to enable outlook while retaining good levels of privacy.

v. Provide a narrow planted zone along building façade to allow for screening plants to filter privacy and buffer connection between driveway/path and interior of the dwelling.

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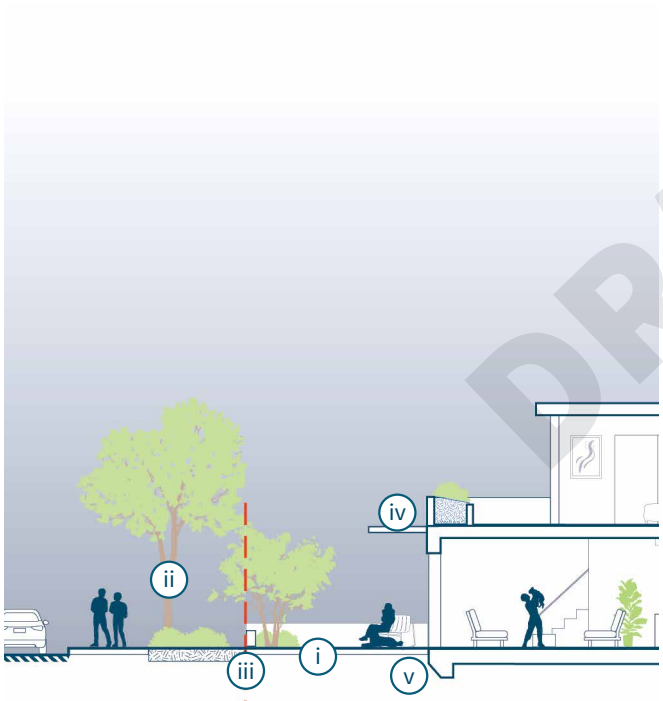

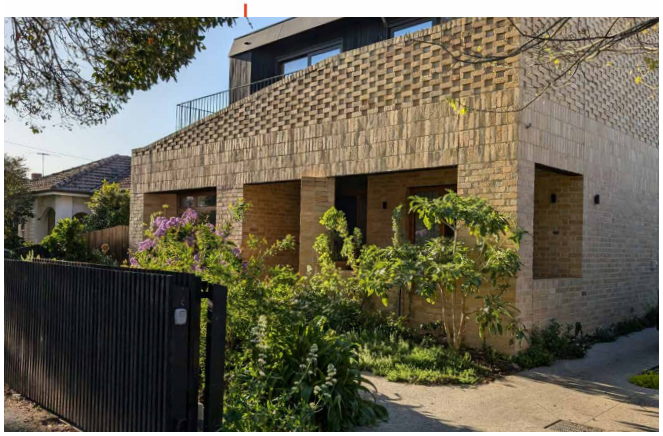

Figure 82: Front garden setback with veranda and planted garden area improve privacy and avoid overlooking from the street.

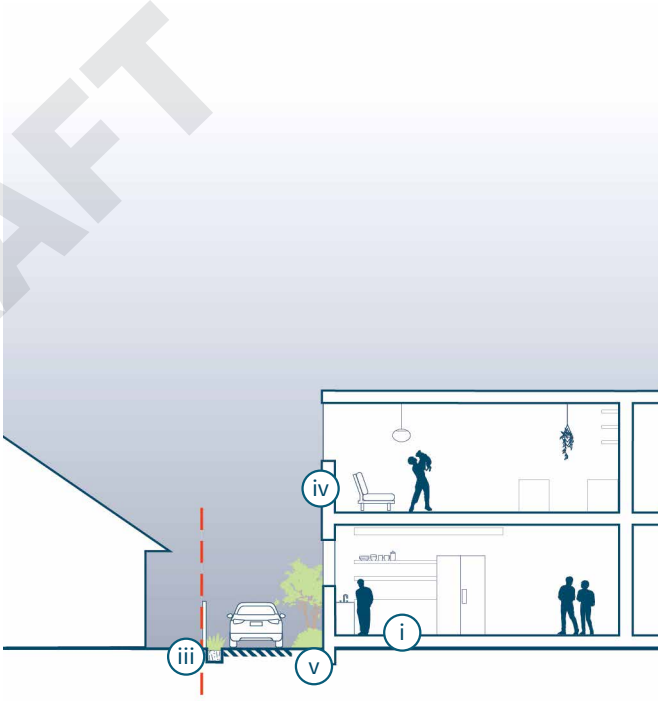

Figure 83: Narrow front setback with planted area in front of glazed windows and high window sills to mitigate privacy risk on ground floor level.

Public open space

i. Provide planted garden area along public open spaces to provide activation, passive surveillance and the grading of slopes to and from public and private space interfaces.

ii. Provide planted areas in front of the garden fence towards the public open space to soften the transition of built form and green open space.

iii. Connect habitable rooms to the open space-facing garden to ensure activity, passive surveillance to the open space.

iv. Consider raising the ground floor level facing the public open space to mitigate privacy risk and overlooking into private open spaces. Ensure level changes remain accessible for people with special mobility needs.

Private courtyard

i. Consider using taller fences around private courtyards that are half permeable to balance privacy and allow airflow. Consider providing additional privacy at the base of fences through planting.

ii. Floor to ceiling height glass doors and windows are appropriate to private courtyard spaces where overlooking from other properties is not an issue.

iii. Private courtyards should provide deep soil planting zones for tree planting where possible. Provide raised planters where deep soil areas are not possible.

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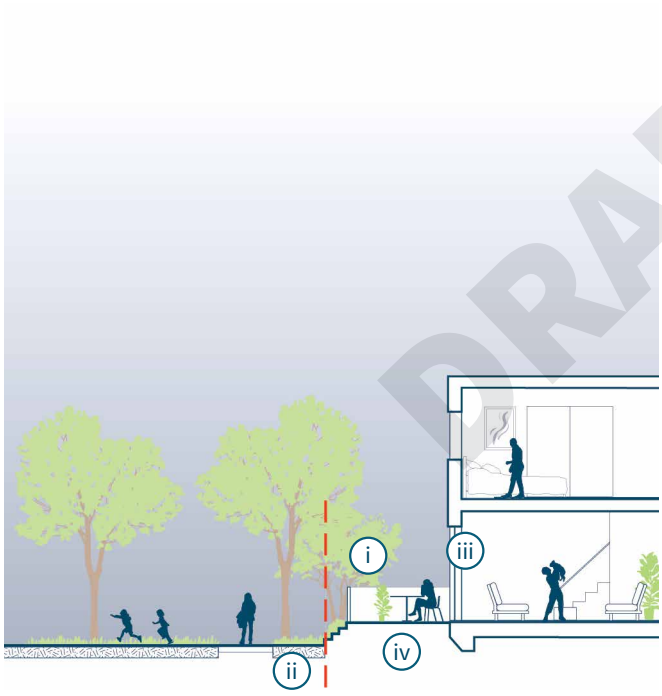

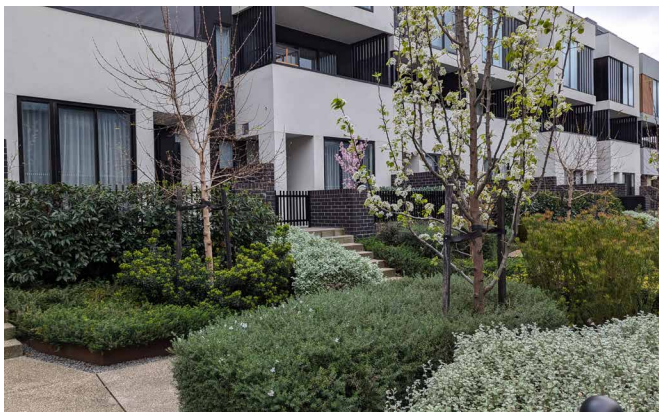

Figure 84: Raised front setback entry to public open space with planting in front of the fence minimises overlooking into private spaces.

Figure 85: When private courtyards are located along the side or rear of the dwelling, higher fencing can improve privacy and allow for floor to ceiling operable doors.

DESIGN ELEMENT:

6.3 DIVERSE HOUSING CHOICE AND OCCUPANT AMENITY

A range of sizes and types of housing encourages mixed neighbourhoods and diverse living opportunities that consider social and affordable demand and the needs of different life stages and socioeconomic groups.

Providing diverse housing choices is paramount to fostering inclusive, resilient and vibrant communities. Balancing community needs with appropriate housing options is essential in creating communities that are socially and economically balanced, where individuals and families can find suitable and affordable homes at different stages of their lives. A mix of housing typologies will enhance social cohesion and foster a sense of community.

DESIGN GUIDANCE

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.

ii. Include dual occupancy and/or attached housing for developments in a low-density context. These developments can be designed to mediate between low-density detached housing and medium-density apartment buildings.

iii. Use different types of housing to create articulation and a mixture of scale in building forms. Use the spaces between different buildings or housing types to provide private or communal open space and landscape areas.

iv. Design for flexible configurations to support diverse household types and stages of life including single person households, families, multi-generational families and group households.

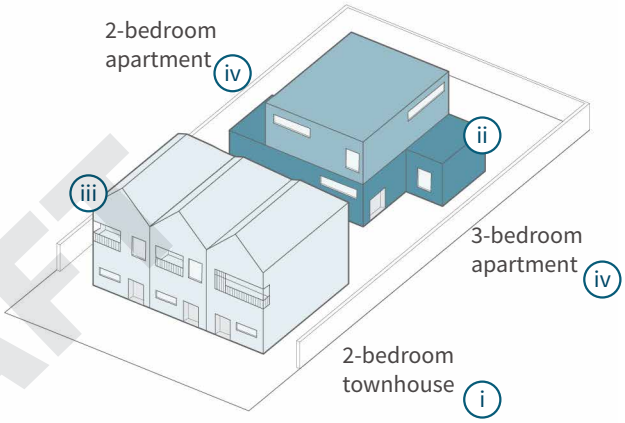

Figure 86: Developments should provide an appropriate mix of typologies and dwelling sizes to support a diverse range of households.

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Additional guidance:

→ For information on the different housing typologies, see 3.4 Typologies of the Missing Middle Housing Design Guide.

Exemplar:
Cohaus is a modern co-living community comprising diverse living options including a two-storey terrace building and three-storey apartment building centred around a communal shared courtyard.

Auckland, New Zealand. Architect: Westergaard Gill Architecture. Photograph: Adam Luxton

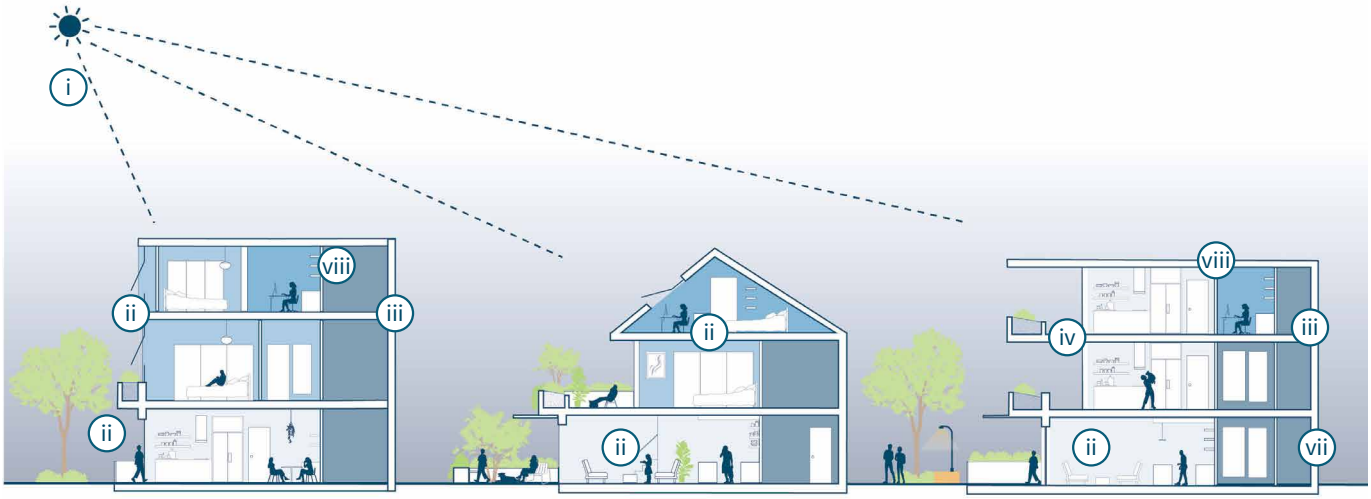

Figure 87: Varying internal sizes and layouts across different missing middle housing typologies designed to cater to the needs of all residents as in 6.3B Size and layout below.

6.3B SIZE AND LAYOUT

i. Prioritise north-facing dwellings and actively minimise south-facing dwellings.

ii. Locate all living areas and bedrooms on the external perimeter of the building. (Also see 7.2D)

iii. Minimise and combine circulation space with study nooks and storage areas to efficiently use internal spaces.

iv. Design flexible interiors that can accommodate changing household needs, such as spaces that transition between living, working, and sleeping areas.

v. Utilise roof space as an attic, ancillary to the floor below that provides an additional flexible space.

vi. Include provisions for future modifications, such as non-load bearing walls or convertible layouts, to adapt to residents' evolving lifestyles

vii. Consider innovative options which allows garaging to provide additional high-quality living space where residents do not require car ownership.

Additional guidance: Low-rise apartments

viii. Include a range of dwellings sizes in all new apartment buildings, ranging from studio apartments to larger family homes, to encourage a diverse mix of residents.

ix. Design floor plates so dwelling types are mixed throughout the apartment development. This will mean dwelling types can also enjoy the best outlook and view while some larger apartments can be more affordable due to a less premium location.

x. Prioritise larger apartments on the ground floor or roof level where there is the potential for more open space.

Additional guidance: Family-sized apartments

xi. Consider locating family-sizes apartments adjacent to potential shared open space and play space.

xii. Consider grouping family-friendly dwellings together to encourage social interaction and sense of community between families and children.

xiii. Provide bedrooms that allow for a range of configurations including bunk beds, space for study desks and play space.

xiv. Consider additional storage spaces within the dwelling for storing larger items such as prams, scooters and toys. Provide the opportunity to converting storage areas to a study in the future.

xv. Provide for generous floor space in living areas for play activities.

xvi. Consider generous and social circulation areas for residents that facilitates social interaction.

Related planning strategies and tools:

- → LHA Livable Housing Design Guidelines
- → NSW Healthy Higher Density Living for Families with Children
- → National Construction Code

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6.3C HOUSING ACCESSIBILITY

i. Design new developments to be accessible to people of all ages and abilities, to promote inclusivity and attract more diverse residents.

ii. Apply Liveable Housing Australia (LHA) Universal Design principles to a LHA Silver standard in 100% of dwellings.

iii. Provide generous clearances in corridors, kitchens, laundries and bathrooms and make provision for grab rails and stair adaptation to ensure varying levels of accessibility.

Tip:
Liveable Housing Australia (LHA) provides guidance on detailed measures to ensure varying levels of accessibility. LHA Silver is a set standard for new housing in the ACT.

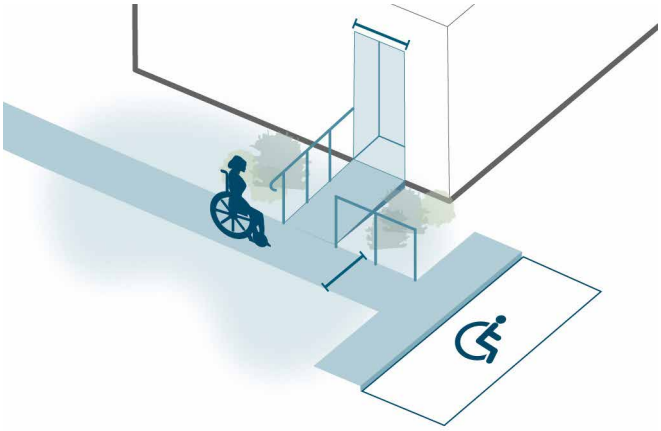

Figure 88: Universal design includes the use of grab rails, ramps and flat entrances to dwellings and communal facilities and access to amenities and accessible carparks.

Related planning strategies and tools:
→ Municipal Infrastructure Design Standards (MIS)

6.3D CEILING HEIGHTS

i. Design ceiling heights to have good access to daylight and natural cross ventilation.

ii. In lower-level apartments, consider greater height than the required minimum to allow for better access to daylight and natural cross ventilation.

iii. Design ceiling heights to allow for sufficient daylight penetration into the room. Where room depth exceeds ceiling height by 2.5 times, increases in ceiling height and window height can increase daylight access.

iv. Allow for ceiling heights that are proportional to room size. Smaller rooms can feel more spacious with higher ceilings.

v. Provide sufficient ceiling heights that create high quality spatial experiences and enable flexibility of use.

vi. Where reductions in ceiling heights are required to accommodate services such as drainage and mechanical ventilation, ensure steps are localised and relate to internal planning considerations.

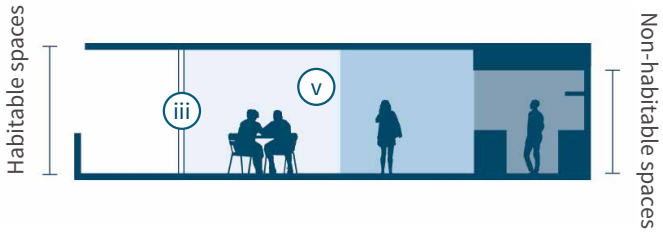

Figure 89: Determine ceiling heights in consideration of the depth and function of the space

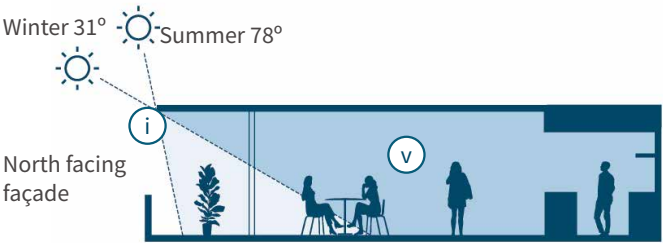

Figure 90: Design apartments with appropriate ceiling heights to ensure good access to daylight

Why this is important:

Higher ceilings can indirectly improve airflow, allowing hot air to rise and enhancing thermal comfort. Ceiling height impacts on ventilation and plays a supporting role.

Additional guidance:
→ For information on the different housing typologies, see 7.2 Natural cross ventilation of the Missing Middle Housing Design Guide.

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Tip:

Utilise the opportunity to create moments of higher ceiling heights in key spaces throughout the dwelling. This will increase the feeling of generosity in the space and increase the daylight.

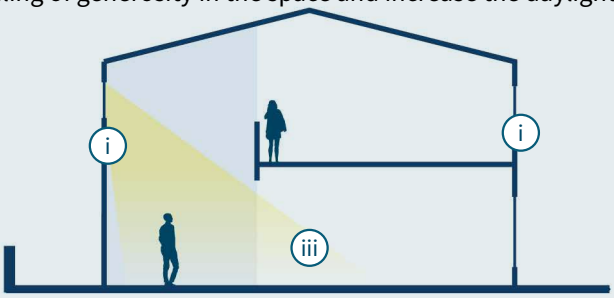

Figure 91: High placement of windows in double-height spaces can provide daylight deep into the building, and provide outlook from the upper level but privacy at the lower level.

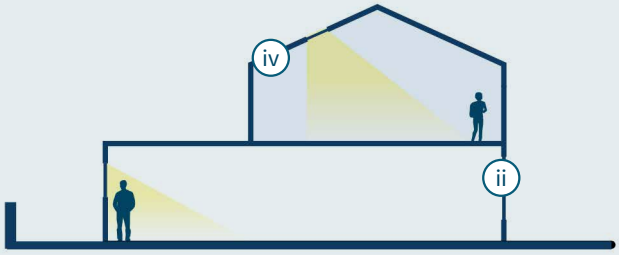

Figure 92: Skylight in cathedral ceilings can provide good daylight conditions when outlook from upper levels are compromised.

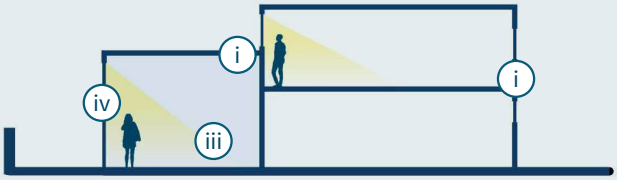

Figure 93: Introducing floor-to-ceiling windows with an increased ceiling height to the living space can provide daylight deep into the building while retaining outlook from upper levels.

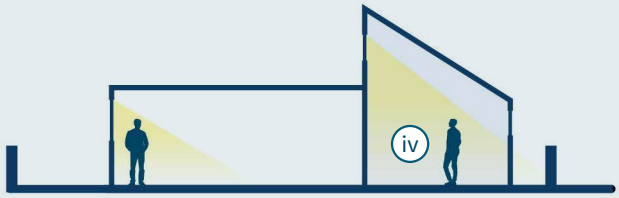

Figure 94: Raked ceilings with windows can provide spaciousness, daylight and sky views in spaces with confined outlook.

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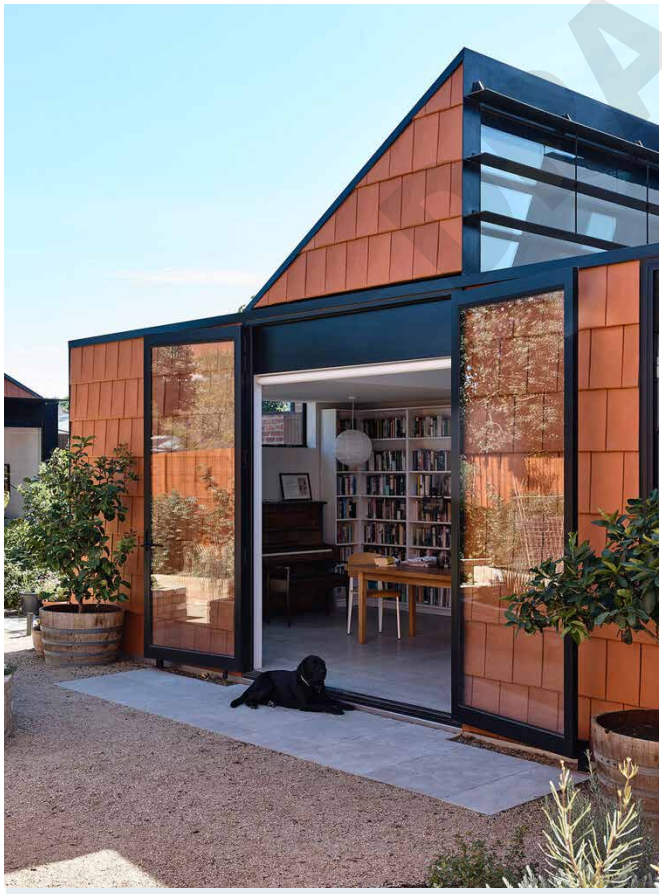
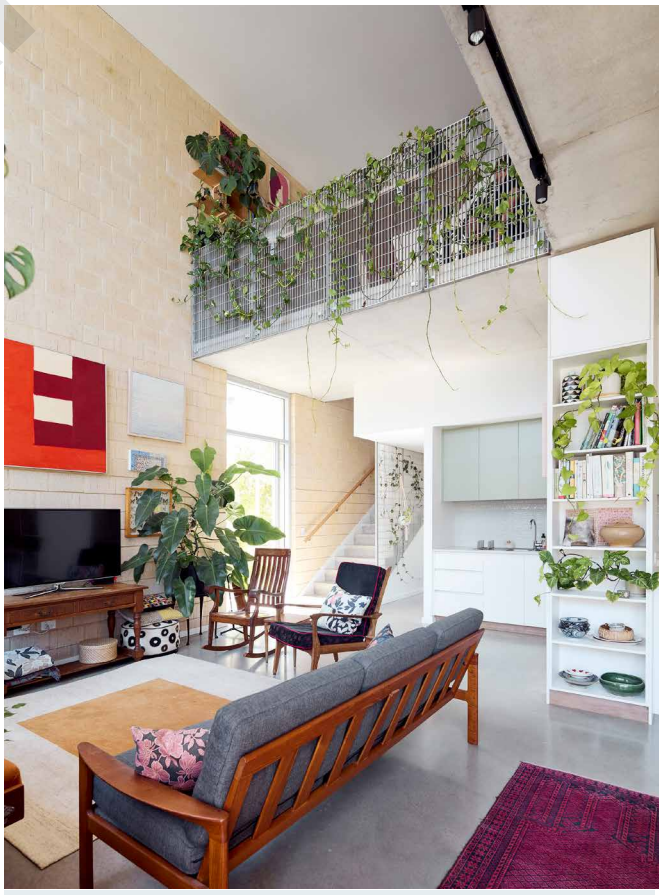


Exemplar: Austin Maynard, Terracotta house

You can draw additional daylight into a space with a saw-tooth roof.



Exemplar: Double height space

You can increase the spaciousness of a dwelling from a double-height ceiling to the living room and the opportunity for a mezzanine level..

DESIGN ELEMENT:

6.4 STORAGE

It is important to provide adequate and generous storage areas to maximise usability of living spaces in higher density living environments.

Storage should be provided proportionately to the size of the dwelling and should be for both small and large items. Storage should be provided both internally within the dwellings, as well as externally within the garage or common car parking areas for multi-unit dwellings. Storage provides convenience and allows residents to live more comfortably.

DESIGN GUIDANCE

6.4A WITHIN DWELLINGS

i. Provide wardrobes, linen and broom cupboards as essential elements of liveable housing at practical sizes for all dwelling types.

ii. Provide appropriate storage for household goods in kitchens and laundries.

iii. Use the height of rooms for elevated storage above wardrobes for such things as blankets, suitcases and seasonal items. This minimises floor area impact of practical storage.

iv. Consider at least 50% of dedicated storage space to be located within the dwelling, accessed from either circulation or living areas.

v. Any storage located on balconies, or in courtyards / rear gardens, is additional to the minimum private open space and should be integrated into the design of the building, be weather-proof and screened from view from the street.

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Additional guidance:

→ For information on storage outside the dwelling, see 4.3C External storage and bulky items of the Missing Middle Housing Design Guide.

Why this is important:

Convenient storage is often one of the main challenges to overcome in the perceived desirability of apartment living. Adequate storage for activity-based equipment such as bicycles, golf clubs or kayaks encourages active lifestyles and improves resident wellbeing .

Related planning strategies and tools:

→ Refer to Planning specifications ZS1 - 17.8 providing minimum storage areas where within a dwelling.

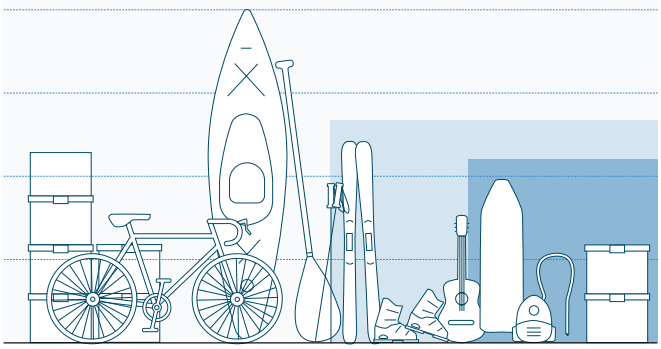

Figure 95: Suitable storage should be provided to meet the needs of residents and increase to reflect the size of the apartment.

Location: Ann St Garden Villas, Southport, Gold Coast. Design by Anna O'Gorman. Photography by Christopher Frederick Jones.

SUSTAINABILITY AND ENVIRONMENT

Create healthy and sustainable communities that are resilient, adaptable and minimise resource consumption.

Existing and new development should be designed to respond to Canberra's climate and integrate sustainable building technologies. Buildings should be designed for a long lifespan to spread their embodied energy over a longer time, and be adaptable, consume less energy, produce less waste and manage water responsibly. Modernising and re-purposing existing assets to achieve better environmental outcomes should be a priority.

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DESIGN GUIDANCE

7.1 TREES, LANDSCAPING AND NATURAL FEATURES

7.1A Planting areas

7.1B Tree planting and tree canopy

7.1C Plant selection

7.1D Integrated green infrastructure

7.1E Reduced hardstand

7.2 BUILDING DESIGN PERFORMANCE

7.2A Solar access, shading and thermal performance

7.2B Natural cross ventilation

7.2C Noise and acoustic comfort

7.2D Air tightness of building envelope

7.2E Embodied carbon

7.3 NATURAL RESOURCE CAPTURE AND MANAGEMENT

7.3A Water sensitive urban design

7.3B Electrification

7.4 CLIMATE CHANGE RESILIENCE

7.4A Flood resilience

7.4B Urban heat island

7.4C Robust, low maintenance materials and planting

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7

St Georges Grove Townhouses.
Design: Fieldwork Architecture

DESIGN ELEMENT:

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.

DESIGN GUIDANCE

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.

ii. Planting areas should be free of structures such as retention walls to provide intentional planting areas.

iii. Locate larger consolidated planting areas in the front and rear garden setback, avoiding areas requiring easement maintenance. Narrower planting areas can be provided in the side setback.

iv. Consider the location of planting areas and the location of trees and planting to contribute visual amenity and shade to the built form.

v. Provide vegetated buffers and swales where appropriate between pedestrian and vehicle movement to boost greenery and improve sustainability outcomes and pedestrian safety.

vi. Access requirements for persons with a disability should be considered when designing communal open space planting areas in multi-dwelling developments.

vii. Planting areas exclude any areas under the roof or with impermeable surfaces such as driveways, decks and protruding balconies.

Why is this important:
Deep soil planting areas are designated portions of land within a development that is free from any built structures, such as buildings, basements, or impermeable surfaces. These areas are specifically reserved for the growth of large canopy trees and vegetation, allowing their roots to penetrate deeply into the soil. Deep soil planting areas are crucial for maintaining healthy ecosystems, as they support robust tree growth, enhance stormwater infiltration, reduce urban heat island effects, and contribute to overall biodiversity. By providing ample space for root systems, deep soil planting areas ensure that trees and plants can thrive, offering long-term environmental benefits and improving the quality of urban living spaces.

Figure 96: Deep soil planting is most viable in the front and rear yards and verges and ensures healthier trees.

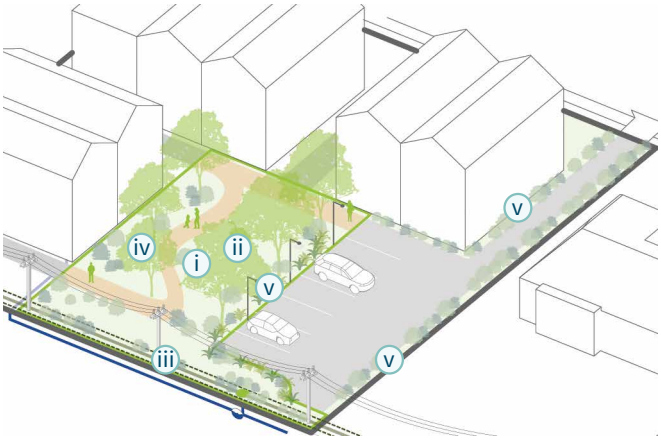

Figure 97: Landscaping should maximise planting areas and tree canopy while avoiding areas required for hardscaping and easement maintenance.

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7.1B TREE PLANTING AND TREE CANOPY

i. At a minimum, provide tree planting in deep soil planting zones associated with the requirements of the zone technical specification and block size.

ii. Ensure deep soil planting zones provide the minimum soil volumes for different tree sizes at maturity to support the growth of healthy trees.

iii. Planted trees should provide a minimum of the block area for canopy cover at maturity in multi-unit housing developments, as specific in the zoning specifications.

iv. Place trees where they can grow to a large size while minimising conflict with other infrastructure, both underground and overhead.

v. Retained existing mature trees on a block can contribute towards canopy tree coverage requirements according to the tree size requirements of the zone specification.

vi. Demonstration that retained existing trees are in good health, are protected during construction works and are appropriately sited in deep soil planting areas should be prepared by an appropriately qualified person.

vii. All trees / shrubs proposed within the block boundary must be set back adequately so that they won't encroach beyond the boundary and create obstruction for the pedestrian network.

Why is this important:
Tree canopy cover is the spread of shading on the ground formed from the leaves, branches and crowns of trees. Tree canopy cover in urban environments supports community health and wellbeing, provides positive visual amenity, reduces urban heat islands, reduces storm water runoff, provides habitats and enhances air quality. Retaining existing trees, planting new trees (with considered species selection and placement) and ongoing care to improving tree health can all contribute to enhancing tree canopies and shade cover. Increasing tree canopy cover can take some time as newer, smaller trees establish themselves on a site.

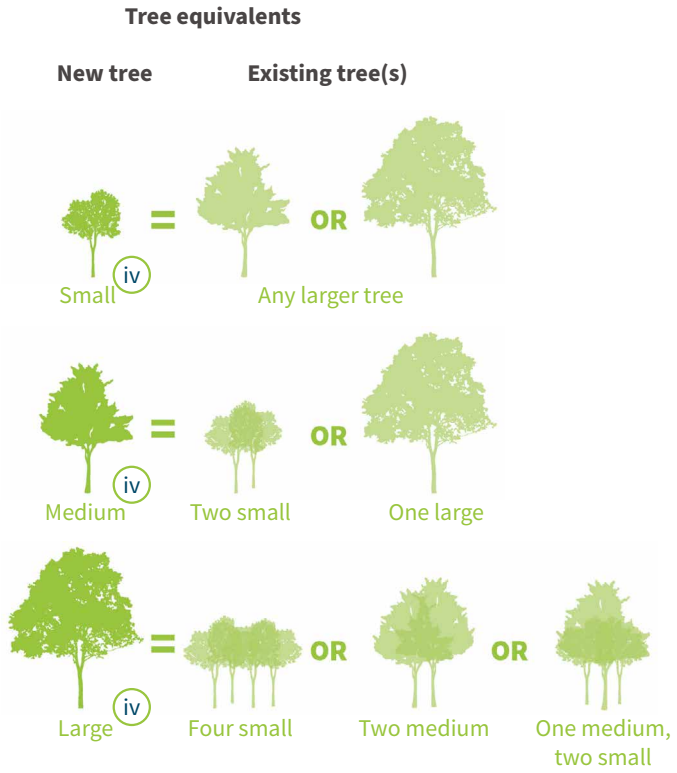

Figure 98:Approximate equivalents for new and existing trees are shown above.

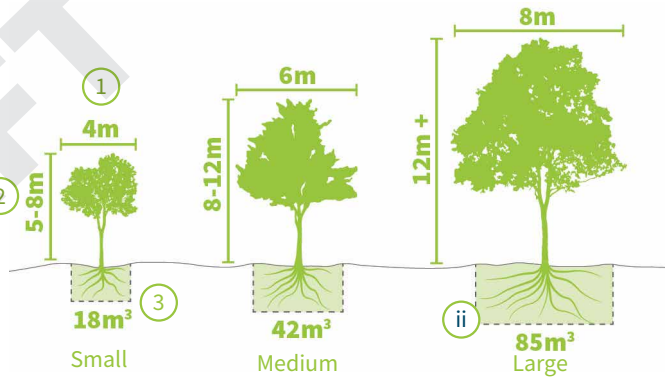

Figure 99:Approximate soil volumes and heights of trees are shown in the figure above.

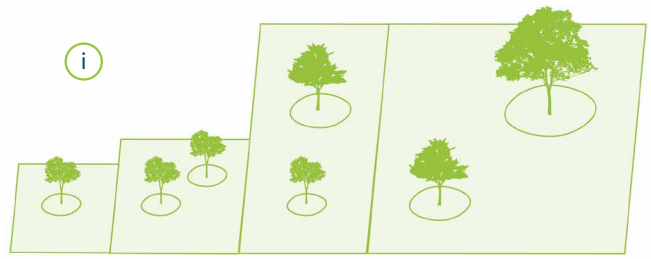

Figure 100: Ensure that the amount and size of tree canopy is proportionate to the site of the block that is being developed.

Related planning strategies and tools:

→ Urban Forest Strategy

→ Canberra's Living Infrastructure Plan: Cooling the city

→ The ACT Government must approve any activity to a protected tree through a tree activity application, available on the ACT City Services website.

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7.1C PLANT SELECTION

i. Plant a diverse range of endemic and native species and minimise exotic species to reduce maintenance and support biodiversity in the ACT's changing climate.

ii. Prioritise preserving existing endemic and native trees, especially mature and hollow-bearing ones to support their role in the ecosystems in urban areas.

iii. Layer planting to enhance vegetation complexity and maximise the value of habitats for biodiversity.

iv. Choose tree species that provide dense, continuous canopy coverage in summer to reduce the urban heat island effect.

v. Consider planting deciduous trees close to glazed opening in buildings for summer shading and access to winter sun light.

vi. Use the Canberra Plant Selector Tool to choose plants based on sun/shade tolerance, frost tolerance, water needs, fire resistance, and endemic and native status.

Related planning strategies and tools:

→ ACT Government Canberra Plant selector Website: actsmart-plantselector.com.au

7.1D INTEGRATED GREEN INFRASTRUCTURE

i. Utilise permeable pavements and green parking areas to manage stormwater runoff and reduce urban heat island effect.

ii. Incorporate planting and greenery on podium spaces and car parking basements, to capture stormwater runoff and for aesthetic benefit.

iii. Include planter beds with visible greenery on communal balconies, shared spaces and entries facing the street to enhance the urban landscape.

iv. Incorporate productive gardens and urban farming in communal areas and rooftops to enhance urban resilience, reduce waste, and foster social connections among neighbours.

v. Where possible, embed sustainable planting elements into the built form, such as rooftop gardens, to enhance building insulation, manage stormwater, and provide urban green spaces.

vi. Consider incorporating living walls and façades to improve air quality, reduce building temperatures, support biodiversity and add aesthetic value.

Related planning strategies and tools:

→ Canberra's Living Infrastructure Plan: Cooling the city

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Photo 69:Vegetated buffers provide additional green space and tree canopy.

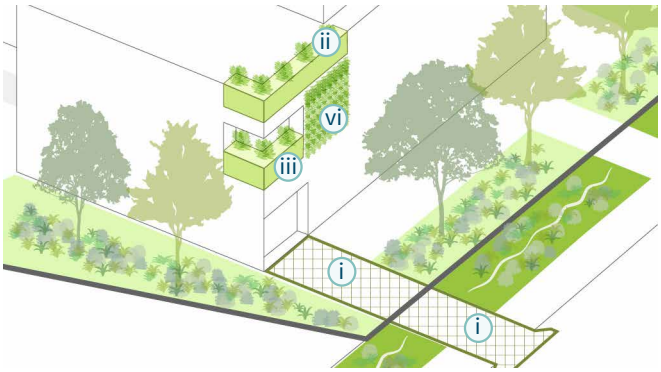

Figure 101: A mix of green infrastructure helps to enhance sustainability outcomes and add amenity value.

7.1E REDUCED HARDSTAND

i. Minimise hardstand surfaces to reduce the urban heat island effect by using permeable surfaces like mulch, gravel, permeable pavers, and grass in driveways and landscaped areas, as per Living Infrastructure Plan targets.

ii. Use building setbacks and separation to reduce the urban heat island effect by incorporating permeable surfaces, minimising hardstand areas, and limiting driveways and vehicle circulation spaces

iii. Incorporate sustainable planting elements like rooftop gardens, living walls, ground-level gardens, and balcony planters to mitigate the urban heat island effect and add greenery to urban areas.

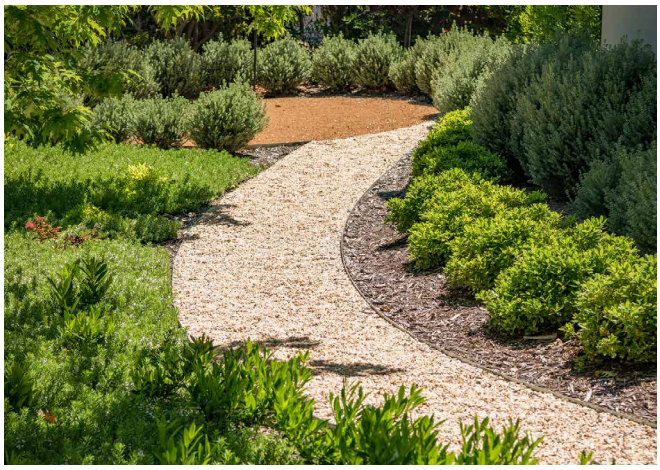

Photo 71: Using a mix of permeable pavement types creates visual interest and a natural finish.

Photo 70: Native grasses or lawn can be an excellent alternative to hard stand pavement.

DESIGN ELEMENT:

7.2 BUILDING DESIGN PERFORMANCE

Create spaces that provide residents with access to light, air, and passive living conditions without compromising privacy.

Access to natural light is essential to support a healthy lifestyle, provide comfortable living conditions and reduce the energy demands for artificial lighting. Natural cross-ventilation allows for the circulation and exchange of fresh air which contributes to thermal comfort, passive cooling opportunities and a comfortable and healthy indoor environment. Reducing the impacts of noise and sound from neighbouring properties also improves the overall functionality, comfort, and liveability of a community.

DESIGN GUIDANCE

7.2A SOLAR ACCESS, SHADING AND THERMAL PERFORMANCE

i. A building's orientation should maximise and capture the use of prevailing breezes for natural cross ventilation of habitable rooms.

ii. Optimise thermal mass in building materials, such as concrete or brick, to store and release heat, balancing Canberra's warm days and cool nights.

iii. Include effective thermal breaks in construction, particularly around windows, balconies, and roofing, to reduce heat transfer and enhance energy efficiency.

iv. Combine thermal mass with passive solar design, utilising orientation and shading to regulate indoor temperatures year-round.

v. Introduce slab breaks to mitigate thermal bridging, improving the energy performance of the building envelope.

vi. Orient living spaces and bedrooms towards the north wherever possible to allow for direct solar access in winter, with shaded glazing in summer.

vii. Minimise direct sunlight to the interior during summer to reduce energy required for cooling.

viii. Allow direct sunlight access to the interior during winter to reduce energy required for heating.

ix. Increase the height of windows for deeper floor plates to allow more daylight into dwellings.

x. Provide all habitable rooms with operable windows with sufficient area of glazing to allow for quality of light and natural ventilation.

xi. Consider using architectural elements such as protruding balconies, lintels, columns and window recesses to create self-shading elements appropriate to the façade orientation to reduce unwanted heat gains from direct sunlight.

xii. Locate balconies, windows and sun shading devices to capture sunlight through the winter, and temper sunlight in the summer, to main a comfortable living environment.

xiii. Use horizontal shading elements on northern facing elevations and vertical or adjustable elements to the east and west facing elevations to temper direct sunlight throughout the day.

xiv. Include heavier materials in floors and walls reached by direct sunlight in winter to create thermal mass that can store and release warmth after the sun sets.

xv. Create spaces that provide residents with access to light, air, and energy efficient living conditions without compromising privacy.

Photo 72:The use of architectural elements can be used to produce shade.

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Why is this important:
The biggest carbon and cost savings are in designing and building smaller. Engaging design professionals helps to achieve efficient floor plan designs on a smaller footprint with efficient use of space and climatically responsive layout.

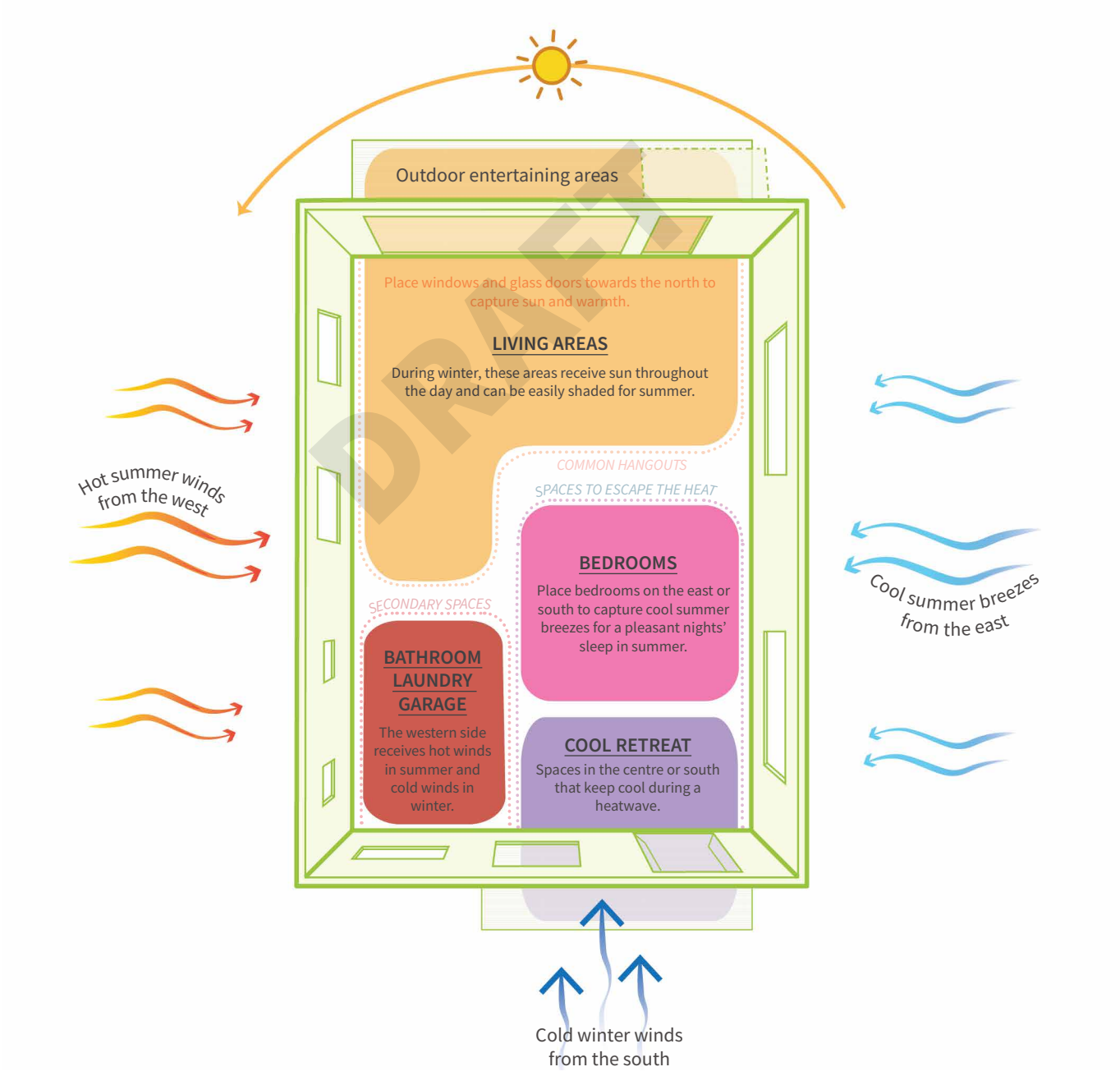

Figure 102: Strategic placement of living spaces, bedrooms and secondary spaces to maximise airflow through all seasons.

7.2B NATURAL CROSS VENTILATION

i. Consider the direction of prevailing breezes and provide openings configured to create natural cross ventilation and air movement between different rooms and through buildings.

ii. Include dual aspect dwellings, cross-through dwellings, corner dwellings and limited dwelling depths to allow for natural cross ventilation.

iii. Provide natural cross ventilation between rooms for the benefit of the entire dwelling. Ventilation between openings within a single room does not meet the definition of natural cross ventilation.

iv. Design buildings so that windows can be left partially open and secure during rainy weather to allow for maximum airflow and ventilation.

v. Make sure enclosed balconies do not obstruct airflow to a degree that prevents natural cross ventilation within the dwelling.

vi. Install ceiling fans to help create and assist air movement.

Why is this important:

Natural cross ventilation is when building openings are arranged on adjacent or opposite walls, encouraging air to enter and exit by flowing through the space. Maximising natural cross ventilation allows bringing outdoor air in and distributing throughout the home. This is crucial for creating a comfortable internal environment and create constant air renewal, improving air quality, removing moisture, and naturally reducing the internal temperature of the dwelling. As a result, this reduces energy consumption and promotes a more sustainably-designed dwelling all year round.

Additional guidance:

→ For more information, the Suburban Land Agency has developed a climate-resilient home design guide Your Resilient Home Guide.

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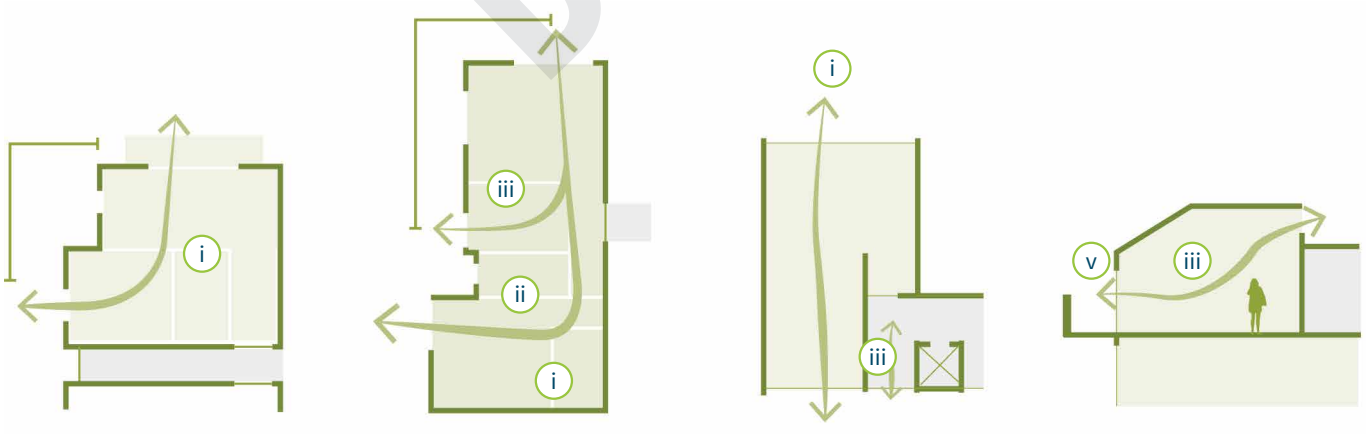

Cross-ventilation on corner dwelling

Dwelling with cross-through ventilation

Cross-ventilation on corner dwelling

Dwelling with cross-ventilation through high window

Figure 103: Examples of cross ventilation.

7.2C NOISE AND ACOUSTIC COMFORT

i. Undertake a noise management plan, prepared by a suitably qualified consultant, on sites adjacent to a road carrying high volumes of traffic (12,000 vehicles per day) or affected by other significant noise sources to ensure comfort, health and compliance with planning and building regulations.

ii. Design party walls between adjacent attached housing or apartments to reduce noise and low frequency noise impacts between adjacent dwellings.

iii. Use winter gardens with noise reducing design for private outdoor space instead of open balconies in noisy locations.

iv. Orient windows and door openings away from noise sources.

v. Balance ventilation requirements with acoustic privacy, including considering the placement of electric heat pumps to minimise noise impacts on bedrooms, including on neighbouring sites.

vi. Locate and screen mechanical equipment that produces noise to minimise negative noise and visual impacts on site and to adjacent properties.

vii. Locate noise sensitive areas, such as as bedrooms and living rooms, away from noise sources such as garage doors, driveways, service areas, plant rooms, building services, mechanical equipment (including heat pumps), active communal open spaces and circulation areas.

viii. The internal dwelling layout should be designed to separate noisy spaces from quiet spaces.

ix. Provide landscaping to reduce the perception of noise and act as a filter for air pollution generated by traffic and industry.

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Why is this important:
The perception of noise and acoustic comfort differs from person to person, making conscious design decisions crucial for providing a balanced and comfortable living experience that is adaptable to diverse needs. A dwelling with good acoustics minimises echo, allows for private conversations and controls excess noise from both outside and within. Improved acoustic design can enhance mental wellbeing by creating peaceful living environments, reducing stress and promoting relaxation. Incorporating soundproofing materials and strategic layout choices maintains privacy between neighbours, ensuring residents can enjoy their personal sanctuary without disruption. Acoustic comfort can boost productivity levels, particularly as work-from-home offices and study spaces become more common and important multi-functional living spaces.

Exemplar:
Acoustic design is utilised in this dwelling, including insulated glass and sound-proof materials, to mitigate noise pollution from an adjacent railway station. This ensures that a high level of internal amenity is achieved while being in close proximity to transport infrastructure.

Photo 73: Passive Pleat, Melbourne, Victoria.

7.2D AIRTIGHTNESS OF BUILDING ENVELOPE

i. Externally wrap the building envelope with a protective barrier between the frame and walls for greater airtightness and to avoid air leakages to make the most of good insulation and ensure lowered energy use during operation.

ii. Undertake air leakage testing of the building to ensure the construction quality meets design specifications.

iii. The NCC requires a maximum air permeability of 10 m3/hr.m2 (@50Pa). With external wrapping and high construction quality to avoid air leakages, conventional construction techniques can readily achieve an air permeability of 5 air changes per hour (ACH).

iv. For airtightness at or below a permeability of 5 ACH, mechanical ventilation must be provided to maintain a healthy indoor air climate.

v. At air permeabilities of 2 or below, “balanced” mechanical ventilation systems, such as heat recovery ventilation units, will be required.

Related planning strategies and tools:

→ Green Building Council of Australia’s Building Air Tightness resource

→ Suburban Land Agency’s Your Resilient Home Guide

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7.2E EMBODIED CARBON

i. Consider engaging design professionals to achieve floorplans that make efficient use of materials and provide flexible designs for multi-purpose spaces.

ii. Choose building materials and design for lower embodied carbon, including:

- Green concrete, including mixes with a high proportion of recycled aggregate
- Biax Pod System underneath slabs, a plastic void forming system for foundations, made from 100 per cent recycled plastic (polypropylene) which minimise transport costs and emissions through stackable design and waste compared to conventional alternatives (polystyrene pods) as they are completely re-recyclable on demolition.
- Renewable lightweight cladding systems, e.g. Weathertex external cladding – 100% natural, made from 97% hardwood and 3% paraffin wax., or similar that contain no added silica, glues, resins or formaldehydes.
- Recycled bricks.
- Marmoleum flooring, which is comprised of 97% natural raw materials (linseed oil, jute, rosin, wood flour, limestone) and has a CO2 neutral lifecycle.
- Paperock bench tops and joinery units for kitchen and laundry spaces .
- ECO+ Carpet, a partially plant-based, extra heavy duty product, 100% recyclable and made from 98% recycled materials.
- Up-cycled materials for landscaping, e.g. recycled concrete pavers, bricks, recycled timber.

Tip:
Modern methods of construction (MMC), including prefabricated and modular building technologies, have the potential to support the delivery of higher quality buildings as they are assembled in an off-site environment, or on-site using advanced methods such as additive manufacturing like 3D printing concrete. They have the potential to increase productivity in the construction sector by producing buildings with greater speed and accuracy.

Further information on materials, construction and compliance can be found in the ABCB Prefabricated, modular, and off-site construction handbook.

Related planning strategies and tools:

→ For further information on measuring embodied carbon, see NABERS framework

→ Examples of Life Cycle Assessment tools to decarbonise buildings include *Cerclos eTool* and *eToolglobal.com*

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DESIGN ELEMENT:

7.3 NATURAL RESOURCE CAPTURE AND MANAGEMENT

The urban and built environment offers opportunities to implement sustainable resources and energy production to improve the resilience and longevity of our human environments. Integrating renewable energy technologies will improve building performance.

DESIGN GUIDANCE

7.3A WATER SENSITIVE URBAN DESIGN

i. Improve water resource capture and management by incorporating rain gardens and tree trenches with storm-water infiltration soil pit systems that manage stormwater while maintaining tree health.

ii. Incorporate rainwater reuse into ancillary functions that do not require potable water such as toilets and washing machines. Use grey water to irrigate landscaped areas and bio-sensitively treat before discharging from a development site.

iii. Equip all new dwellings with water-efficient fixtures and fittings, such as low-flow toilets, shower heads, and faucets to reduce water consumption.

iv. Provide on-site water storage of roof harvesting in accordance with the zone specifications.

v. Where appropriate, use captured rainwater for individual use, such as watering plants, cleaning or for use in laundries and toilets.

vi. Incorporate drought tolerant, low water plants to minimise water requirements.

vii. Use permeable systems and materials in shared spaces such as car parks and open space.

References:

→ Development complies with the *ACT Practice Guidelines for Water Sensitive Urban Design Module 2: Designing Successful WSUD Solutions in the ACT*

Related planning strategies and tools:

→ Renewable Energy Transformation Agreement (RETA)

→ ACT 2024-2030 Integrated Energy Plan: Our Pathway to Electrification

→ Powering Canberra: Our pathway to electrification and Make Your Next Choice Electric web tool

7.3B ELECTRIFICATION

i. De-carbonise buildings' energy usage by deploying renewable energy technology and using all-electric systems and appliances such as induction cook-tops.

ii. Do not include a natural gas distribution network connection. For blocks with an existing gas connection, abolish the gas connection.

iii. Ensure electrical infrastructure has sufficient capacity for all-electric heating and cooling load, future electric vehicle uptake and solar panel uptake.

iv. Connect solar panels to each individual dwelling's power meter to enable greater flexibility and discretion in utilising solar power.

v. Orient solar panels to maximise efficiency while mitigating any negative impact from overshadowing and glare.

vi. Residents' parking spaces in shared basements and garages must be 'EV ready'. Dwellings with a private garage with power supply through the dwelling's meter don't need 'EV ready' provision.

vii. Install energy-efficient lighting systems and appliances, including LED lighting, smart thermostats, and Energy Star-rated appliances to reduce energy consumption and emissions.

viii. Where battery storage is incorporated, establish energy demand management systems, including grid-integrated battery storage, to allow batteries to feed excess energy back into the grid. Battery storage must also consider fire safety and noise requirements.

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The Village: Three homes, three generations.
Sustainable materials and resource capture
Rivett, ACT. Light House ArchiScience.

DESIGN ELEMENT:

7.4 CLIMATE CHANGE RESILIENCE

Prepare for climate instability by designing dwellings to withstand extreme weather events such as floods, droughts, bushfires and heatwaves.

Incorporating climate change resilience into the design of housing creates sustainable and liveable communities. With the impacts of climate change becoming more severe and frequent, homes must be able to withstand extreme weather events such as floods, droughts, bushfires and heatwaves. Building resilience into housing can also reduce the environmental impact of homes and lower energy costs, while ensuring that homes are able to serve as a long-term investment for homeowners.

DESIGN GUIDANCE

7.4A FLOOD RESILIENCE

i. Provide a stormwater retention management report undertaken by a suitably qualified person on large sites where a stormwater regime is altered (above 2,000 sqm).

ii. Design buildings with elevated habitable rooms, using elements such as stilts and raised floors to help keep living spaces above projected flood prone levels.

iii. Consider using flood resistant materials for exterior walls, such as brick or stone, that can help reduce the risk of permanent flood damage in flood prone areas.

iv. Detail façades with multiple, physical fail-safes in flood prone areas to prevent water ingress.

v. Incorporate waterproof coatings and sealants to vulnerable exterior roofs, walls and foundations to prevent staining of surfaces.

vi. Elevate electrical utilities and heating ventilation and air conditioning (HVAC systems) above projected flood levels to prevent damage to critical systems infrastructure during a flood.

vii. Install high-capacity drainage systems such as gutters and downpipes to divert water away from the building and reduce the risk of flooding during a heavy rain event.

viii. Maximise site permeability through use of permeable surface paving to reduce the impact of flood and water run-off.

7.4B URBAN HEAT ISLAND

The following hierarchy of urban heat mitigation measures should be used to design an urban heat approach. Where high reliance is placed on medium and low value measures, more of these measures should be undertaken.

i. Best
   - Retained trees – large and medium
   - New large trees
   - New medium trees - with irrigated underplanting or dense underplanting of tall shrubs

ii. High
   - Retained trees – small (4m+ in height)
   - New medium trees
   - New small trees and tall shrubs – irrigated, dense plantings that are 4m+ in height
   - 'Cool'/reflective roof materials with a high Solar Reflectance Index or low Solar Absorptance

iii. Medium
   - New small trees and tall shrubs
   - Grass, ground covers and low shrubs – irrigated
   - Green roofs and green walls
   - Water features such as small ponds or fountains

iv. Low
   - Grass, ground covers and low shrubs - unirrigated
   - Permeable paving or decking
   - 'Cool' paving (low heat capacity and/or high solar reflectance)

v. Minimise
   - Artificial grass
   - Dark coloured, impermeable paving (e.g. standard asphalt)

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Photo 74:Shading devices help to reduce heat in the courtyard and in the adjacent home.

Why is this important:
The urban heat island effect is heat accumulation within an urban area caused by surfaces that absorb and retain heat and a lack of plants and water to enable cooling. The urban heat island effect can exacerbate the health impacts of heatwaves, increase cooling costs and make outdoor activities more unpleasant or even a risk to health in hot weather.

Exemplar:
The design and development of six townhouses includes private gardens that are comprised of native, drought-resistant plants. Using endemic and native plants creates a high-level amenity, stronger resilience and reduced water consumption, as well as supporting local biodiversity.

Photo 75:57 Martin Street, Thornbury, Victoria.

Related planning strategies and tools:

- → ACT Climate Change Strategy 2019-2025
- → ACT Government City Renewal Authority Sustainability Strategy 2021-2025 (applies to Dickson, Braddon, Civic, Northbourne Avenue, Haig Park and West Basin, but offers information relevant for the whole of the ACT)
- → Canberra's Living Infrastructure Plan: Cooling the city
- → ACT Well being Framework 2020
- → ACT Regional Fire Management Plan 2019-2028
- → ACT Strategic Busfire Management Plan and Standards
- → ACT Flood Sub-Plan 2023

Tip: Climate modeling
The ACT is included in the NSW Government's NARCLiM regional climate modeling. The ACT Government recommends you use NARCLiM when considering the ACT's future climate in engineering, urban design and planning projects.

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7.4C ROBUST, LOW MAINTENANCE MATERIALS AND PLANTING

i. Use resilient and durable elements and materials that reflect quality, performance, permanence and have visual and functional quality over time, while considering ongoing maintenance costs.

ii. Re-use and recycle materials where possible and appropriate.

iii. Choose building materials that have high insulation properties and are sustainable and attractive, while still creating individuality in design.

iv. Incorporate modular pavement that is easy to install, adapt and maintain, allowing paths and access ways to evolve over time, while reducing ongoing installation and maintenance costs.

v. Design buildings, streets and spaces to be resource efficient, durable and low maintenance to reduce energy consumption and construction and maintenance costs.

vi. When selecting exterior materials, consider the maintenance and climate to ensure they can withstand natural elements and age well in terms of aesthetics.

vii. When specifying window framing, consider materials that are sustainable, low maintenance, durable, energy-efficient, resistant to corrosion and available in a broad range of colours.

viii. Consider choice of materials and finishes throughout which align with total maintenance life of interrelated components to avoid unnecessary or repetitive replacement of materials.

ix. During material specification, consider the entire material life cycle and circular economy processes to reduce embodied carbon emissions.

Exemplar:
The adaptive reuse of an existing mid-century apartment block into a new community meant that embodied carbon was minimised and the existing character of the neighbourhood was enhanced.

Photo 76: Park Street, Brunswick, Victoria.

TIP: Circular economy principles for the built environment in ACT Circular Economy Strategy and Action Plan 2023-2030

Creating a circular economy goes beyond waste to embed circular concepts across the economy. It expands on the prevention (reduce) and reuse measures to reduce the need in the first place and focuses on keeping materials in circulation for as long as possible before they need to be recycled.

Keep materials circulating in the economy at their highest value through purposeful design that consider durability, repairability, reuse and recycling.

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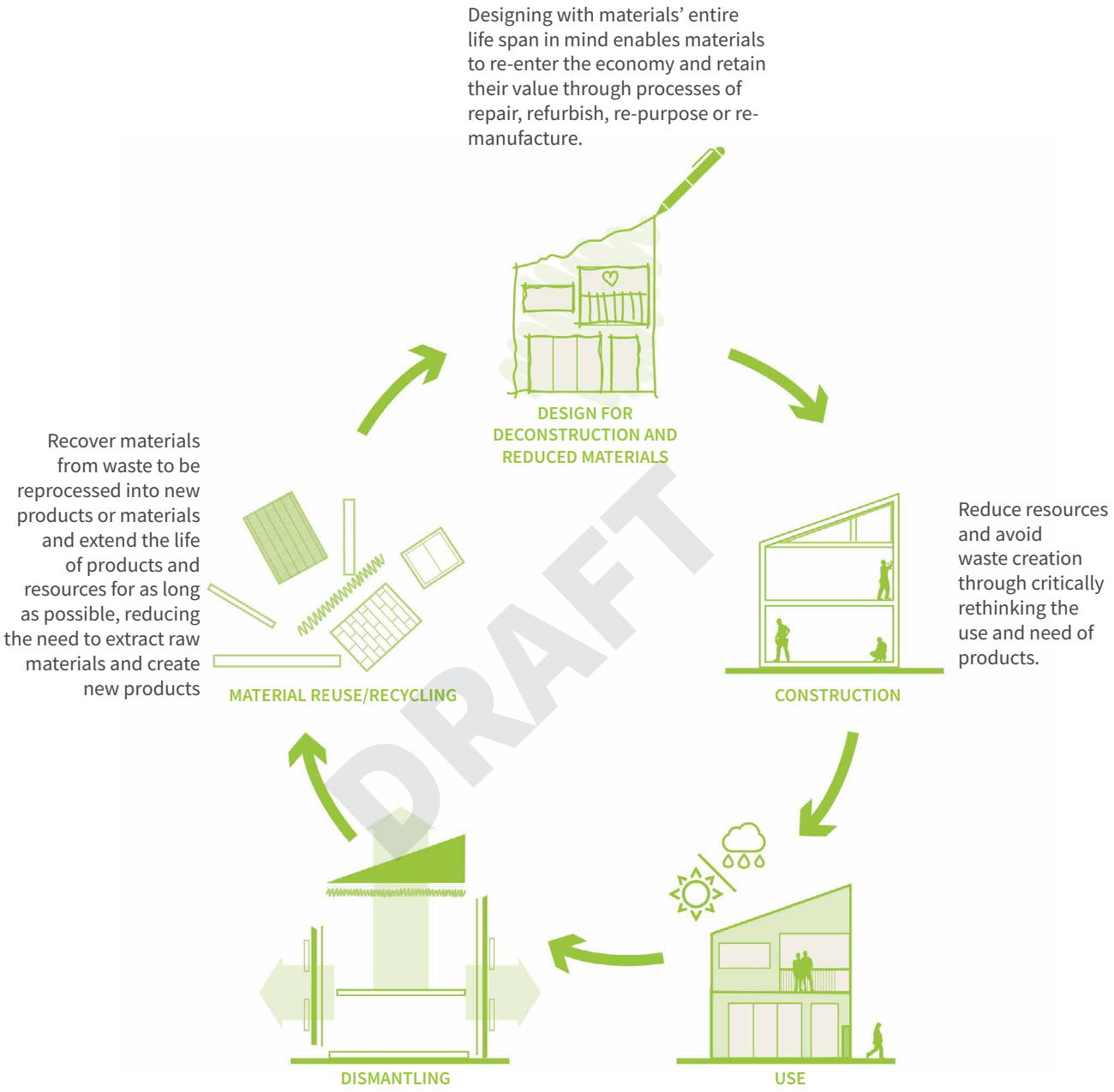

Figure 104: Up-cycling and circular economy processes

Related planning strategies and tools:

- → ACT Circular Economy Strategy and Action Plan 2023-2030
- → ACT Climate Change Strategy 2019-2025
- → ACT Sustainable Building Pathway

Haig Townhouses, Turner ACT. Architect: DNA Architects

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Part Four: Appendices

MISSING MIDDLE HOUSING CHECKLIST

This design criteria checklist is an evaluation tool for those involved in the planning, design and delivery of built environment projects to demonstrate that a given project achieves good design outcomes in the ACT context. It could be used at several stages throughout a project, from early design concepts, to detailed proposals and completed works.

SITE AND LAND USE	NOTES

This theme supports the interpretation, application and assessment of the following assessment outcomes as outlined in the Territory Plan.

- → The functionality and usability of the development is appropriate for its intended purpose/use.
- → The proposed use and scale of development are appropriate to the site and zone.
- → 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.

3.1 TYPOLOGIES	
3.1A Siting	☐
3.1B Multi-occupancy	☐
3.1C Townhouses	☐
3.1D Terrace houses	☐
3.1E Low-rise apartments	☐

3.2 UNDERSTANDING YOUR SITE	
3.2A Site conditions	☐
3.2B Slope and topography	☐
3.2C Water drainage	☐
3.2D Tree retention	☐
3.2E Prevailing winds and cross ventilation	☐

3.3 LAND USES	
3.3A Residential use	☐
3.3B Non-residential uses	☐
3.3C Block consolidation and sub-division	☐

3.4 BUILDING ENVELOPE	
3.4A Height and transitions	☐
3.4B Orientation and outlook	☐
3.4C Overshadowing	☐

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ACCESS, MOVEMENT AND PLACE NOTES

This theme supports the interpretation, application and assessment of the following assessment outcomes as outlined in the Territory Plan.

- → The functionality and layout of the development is accessible and adaptable, while achieving good connections with the surrounding area. This includes consideration of passive surveillance.
- → The development encourages active travel through safe and convenient access to the active travel network.
- → The development provides electric vehicle parking and access to charging locations in multi-unit housing.
- → The development provides appropriate end-of-trip facilities in multi-unit housing which includes secure bicycle parking.
- → The site is appropriately serviced in terms of infrastructure and utility services and any associated amenity impacts are minimised.

4.1 SITE ACCESS AND CONNECTIVITY

4.1A Vehicle access, driveways and laneways ☐

4.1B Safe pedestrian and cycle access ☐

4.1C Cross-block links ☐

4.2 RESIDENT AND VISITOR CAR PARKING

4.2A Off-street and surface car parking ☐

4.2B Garages and carports ☐

4.2C Basement and sleeved podium car parking ☐

4.3 INTEGRATED SERVICES

4.3A Waste collection, loading and delivery areas ☐

4.3B Ground floor services and infrastructure ☐

4.3C External storage and bulky items ☐

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PUBLIC SPACE AND AMENITY NOTES

This theme supports the interpretation, application and assessment of the following assessment outcomes as outlined in the Territory Plan:

- → The development achieves reasonable solar access and microclimate conditions to public areas and streets to support their use by the community.
- → Private open space and communal open space provides sufficient space and facilities for residents and visitors to recreate and relax, as well as providing area for service functions. Spaces are readily accessible for a range of activities.
- → Reasonable levels of active ground floor interface and passive surveillance to public spaces and streets is achieved.
- → Any advertising or signs are suitable for their context and do not have a detrimental impact on the surrounding area (for instance due to size or light emission).

5.1 COMMUNAL OPEN SPACE

5.1A Use, size and location	☐
5.1B Integrated landscaping	☐

5.2 PRIVATE OPEN SPACE AND BALCONIES

5.2A Principal private open space	☐
5.2B Public realm interface and passive surveillance	☐
5.2C Privacy and outlook	☐

5.3 GENERAL LANDSCAPING

5.3A Deep soil planting and canopy cover	☐
5.3B Plant selection	☐
5.3C Integrated green infrastructure	☐
5.3D Reduced hardstand	☐

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BUILDING DESIGN AND BUILT FORM NOTES

This theme supports the interpretation, application and assessment of the following assessment outcomes as outlined in the Territory Plan.

- → The height, bulk and scale of the development is appropriate, noting the desired zone policy outcomes and the streetscape. This includes consideration of building envelope and setbacks.
- → Reasonable solar access to dwellings and private open space within a block and on adjoining residential blocks is achieved. This includes solar access into main living spaces within a dwelling.
- → Reasonable levels of privacy to dwellings and private open space within a block and on adjoining residential blocks is achieved.
- → The dwelling mix and the internal size, scale and layout of dwellings in multi-unit housing provide for a comfortable living environment that meets the changing needs of residents.
- → Courtyard walls and fences do not have an adverse impact on the streetscape.
- → Vehicle and bicycle parking, access and egress sufficiently caters for the development while permitting safe and legible movement for all users (including pedestrians) and minimising visual impacts from the street or public space. This includes consideration of parking dimensions, the number of spaces provided, vehicle manoeuvrability and access routes.

6.1 SCALE AND BUILDING FORM

6.1A Building heights and scale ☐

6.1B Building visual form and appearance ☐

6.2 ORIENTATION AND STREET INTERFACE

6.2A Setbacks and separation ☐

6.2B Building entries ☐

6.2C Building to street interface ☐

6.2D Ground floor edge conditions ☐

6.3 DIVERSE HOUSING CHOICE AND OCCUPANT AMENITY

6.3A Housing mix ☐

6.3B Size and layout ☐

6.3C Housing accessibility ☐

6.3D Ceiling heights ☐

6.4 STORAGE

6.4A Within dwellings ☐

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SUSTAINABILITY AND ENVIRONMENT NOTES

This theme supports the interpretation, application and assessment of the following assessment outcomes as outlined in the Territory Plan:

- → Sufficient planting area and canopy trees are provided, and roofed areas and hard surfaces limited, to reduce urban heat island effects, minimise stormwater run-off and maintain ecosystem services. This includes consideration of water sensitive urban design measures.
- → Deep soil zones are provided to support healthy tree growth and provide adequate room for canopy trees.
- → Threats to biodiversity such as noise, light pollution, invasive species incursion or establishment, chemical pollution, or site disturbance are avoided or minimised through good design.
- → Minimise cut and fill to protect natural hydrological function and limit soil erosion and site disturbance.
- → The development considers, addresses and mitigates site constraints and environmental risks, including natural features, topography, noise, bushfire, flooding, contamination, air quality or hazardous materials are appropriately considered for the site.
- → Waste is appropriately managed on site without having a detrimental impact on residents and the surrounding area.

7.1 TREES, LANDSCAPING AND NATURAL FEATURES

7.1A Planting areas ☐

7.1B Tree planting and tree canopy ☐

7.2 BUILDING DESIGN PERFORMANCE

7.2A Solar access, shading and thermal performance ☐

7.2B Natural cross ventilation ☐

7.2C Noise and acoustic comfort ☐

7.2D Air tightness of building envelope ☐

7.2E Embodied carbon ☐

7.3 NATURAL RESOURCE CAPTURE AND MANAGEMENT

7.3A Water sensitive urban design ☐

7.3B District energy system ☐

7.4 CLIMATE CHANGE RESILIENCE

7.4A Flood resilience ☐

7.4B Heatwave and urban heat island resistance ☐

7.4C Robust, low maintenace materials and planting ☐

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DOCUMENT REFERENCES

A literature review was undertaken and the relevant policies and documents listed below are referenced throughout this design guide. In addition, earlier review work engaged by the Planning Review and Reform Project provided a clear baseline for what constitutes good design.

POLICY

Territory Plan

Resiential zone Policy

Planning technical specifications

GOVERNMENT PLANS

National Capital Plan

The Griffin Legacy

A blueprint for the future development of the central national areas, ACT Government 2006

ACT Infrastructure plan

ACT Canberra's Living Infrastructure Plan: Cooling the City

ACT Powering Canberra our Pathway to Electrification

ACT Conservation Effectiveness Monitoring Plan

ACT STRATEGIES

District strategies

2022 draft planning strategies for each of the ACT districts: East Canberra, Belconnen, Gunghlin, Inner North and City, Inner South, Molonglo Valley,Tuggeranong, Weston Creek, and Woden

ACT Planning Strategy 2018

ACT Transport Strategy 2020

ACT Climate Change Strategy 2019-2025

ACT Digital Strategy 2020

ACT Water Strategy

ACT Sustainable Building Pathway

ACT Urban Forest Strategy

ACT City Plan

ACT Nature Conservation Strategy 2012-2023

ACT Native Woodland Conservation Strategy and Action Plans

ACT Native Grassland Conservation Strategy and Action Plans

Zero Emissions Vehicles Strategy 2022-2023

CRA Sustainability Strategy 2019-2025

ACT Circular Economy Strategy and Action Plan 2023-2030; and

ACT Waste Management Strategy 2011 - 2025

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GUIDES

Gawari Ngilanmanyin. Remembering the Bush.
A Climate-wise Landscape Guide for the ACT

ACT Microclimate Assessment Guide (Forthcoming)

ACT Practice Guidelines for Ecologically Sensitive Urban Design (to be developed)

ACT Separation Distance Guidelines for Air Emissions

Practice Guidelines for Water Sensitive Urban Design in the ACT and Water Sensitive Urban Design General Code
National Capital Design Review Panel

ACT National Capital Design Review Panel: Design Principles for the ACT

Practitioner's guide, Preparing for design review

A practical guide to electrification for new buildings

Green Building Council Australia

Bringing embodied carbon upfront

World Green Building Council

FRAMEWORKS

ACT Wellbeing Framework

ACT Economic Development Priorities 2022-2025: CBR Switched on

ACT Gender Sensitive Urban Design Framework

City Gateway Urban Design Framework

City Centre Urban Design Framework

ACT Gender Sensitive Urban Design Framework

ACT Living Infrastructure Plan

The Griffin Legacy

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GLOSSARY

This glossary identifies the words and acronyms that appear frequently throughout the Urban Design Guide, to help the reader identify unfamiliar words and industry specific terminology.

The terms in the glossary do not replace defined terms or uses in the Territory Plan, refer to Territory plan definitions for any development applications.

ACT – Australian Capital Territory

Accessibility – The ease of reaching destinations. In a highly accessible location, a person, regardless of age, ability or income, can reach many activities or destinations quickly, whereas people in places with low accessibility can reach fewer places in the same amount of time.

Activations – A place with the appropriate facilities that invite people to spend time in that space, thereby activating it, making it lively.

Active frontages – Occurs where there is active visual or tactile engagement between the ground and upper floor of buildings and the adjacent street/public space.

Active travel – Any form of transport involving physical activity, e.g. cycling and walking.

Active use – Active uses are uses that generate many visits, in particular pedestrian visits, over an extended period of the day.

Adaptive reuse – Projects that give new life to an existing place, building or structure through sympathetic alterations, conversions and additions that enable compatible new uses and functions, while maintaining the heritage significance where applicable.

Affordable housing – Housing that is appropriate for the needs of a range of very low to moderate income households, and priced (whether mortgage repayments or rent) so these households are able to meet their other essential basic living costs. It differs to social housing which is provided and/or managed by the government (public housing) or by a not-for-profit organisation (community housing). Housing is often defined as affordable when a household spends less than 30% of their income on housing costs, and that household falls within the lowest 40% of household incomes.

Amenity – The features of an area, street or building, that provide facilities and services that contribute to physical or material comfort and benefit, and are valued by users. Amenity is important in the public, communal and private domains.

Articulation – Primarily the stepping and recessing of external walls on visible frontages but also includes expression of horizontal elements and variation in the roof form. This includes porticos, balconies, bay windows, decks, patios, pergolas, terraces, verandahs, window box treatments, window bays, awnings and sun-shading features.

Attached housing – means any dwelling, within a building containing two or more dwellings, which has within its curtilage open space at ground level and separate private access for each dwelling for the exclusive use of the occupants of the dwelling. Attached housing may incorporate communal basement car parking. Attached housing includes row house, semi-detached house, terrace house, townhouse.

Battle axe block – A rear block with no street interface other than for a vehicle access/driveway, creating a 'battle-axe'-like shape.

Block ratio – block ratio means the gross floor area in a building divided by the area of the site.

Building depth – The overall cross-section dimension of a building envelope. It includes the internal floorplate, external walls, balconies, external circulation and articulation such as recesses and steps in plan and section.

Building edges – The façade plane of a building's ground floor faces the outer perimeter of a site.

Café - The use of land the principal purpose of which is the preparation and serving, on a retail basis, of food and drink to people for consumption on the premises, take away meals and drinks or entertainment are also provided.

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City Centre – The area broadly defined by Canberra's civic centre and bordered by the outer hexagonal road (Cooyong Street and extensions) radiating from City Hill, ANU and Lake Burley Griffin (map included in Commercial Zones Policy).

City Plan/CP – ACT Government document establishing the long-term vision for Canberra City Centre.

Community garden – The use of land for the cultivation of produce primarily for personal use by those people undertaking the gardening, including demonstration gardening or other environmental activities which encourage the involvement of schools, youth groups and citizens in gardening activities.

Communal open space – Communal open space means common outdoor open space within an easily accessible location on the subject site for recreation and relaxation of residents of a housing development.

Connectivity – The number of connecting routes and intersections within an area. An area with high connectivity provides multiple routes to and from destinations.

Corner apartment – Cross ventilating apartments on one level with aspects at least 90 degrees apart. Corner apartments are commonly located on the outermost corners of buildings.

Courtyard – Communal space at ground level or on a structure (podium or roof) that is open to the sky, formed by the building and enclosed on 3 or more sides.

CRA – City Renewal Authority.

Cross-over apartment – A cross ventilating apartment with two opposite aspects and with a change in level between one side of the building and the other.

Cross-through apartment – A cross ventilating apartment on one level with two opposite aspects

CPTED – Crime Prevention Through Environmental Design.

Datum – A significant point or line in space established by the existing or desired context, often defined as an Australian Height Datum. For example, the top of significant trees or the cornice of a heritage building.

Daylight – light generated from the sun(Often measured in Lux).

Deep soil zone – An area of soil within a development that is unimpeded by buildings or structures below ground, and which has adequate dimensions to allow for the growth of healthy trees. Deep soil planting zones exclude basements, services, swimming pools, tennis courts and impervious surfaces including car parks, driveways, podium, and roof areas.

Density – Average number of residents, households, dwellings, or habitable space in a given area, usually expressed as dwellings/ people per hectare or floor area ratio.

Dense urban environment – an area characterised by a relatively a high concentration of dwellings, buildings and people.

Desired Character - means the form of development in terms of siting, building bulk and scale, and the nature of the resulting streetscape that is consistent with the relevant desired outcomes, and any statement of desired character in a relevant district code. It does not necessarily reflect the existing character of the area.

Detached dwelling - means a dwelling that does not share any walls with any abutting dwelling.

Dual aspect apartment – Apartments which have at least 2 major external walls facing in different directions, including corner, cross-over and cross-through apartments, which provide for and improve ventilation.

Dual occupancy – means the use of land that was originally used or leased for the purposes of single dwelling housing for two dwellings.

Dual key apartment – An apartment layout with a common internal corridor and lockable doors to sections within the apartment so that it is able to be separated into 2 independent units. Dual key apartments are regarded as two dwellings.

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Embodied Emissions – Attributable to development, means the greenhouse gas emissions resulting from the materials used to construct a building that forms part of the development, including emissions from:

- the extraction of raw materials that are used to construct the building,
- transportation of materials,
- the manufacture of the materials used to construct the building.

Enclosure – Where building height and open space width created a feeling of contained space .

EPSDD – Environment, Planning and Sustainable Development Directorate.

Façade – The external face of a building, generally the principal face, facing a public street or space.

Floor plate – The total floor area of a storey within a building or structure.

GBCA – Green Building Council of Australia

Good design – Architectural and urban design outcomes are expected to comply with good practice design principles as a minimum ambition.

Green roof – A roof surface that supports the growth of vegetation, comprised of a waterproofing membrane, drainage layer, organic growing medium (soil) and vegetation.

Habitable – habitable (including habitable room) means a room within a dwelling capable of being lawfully used for the normal domestic activities of living, sleeping, cooking, or eating, and:

i. includes a bedroom, study, living room, family room, kitchen, dining room, home theatre, rumpus room; but

ii. does not include a bathroom, laundry, hallway, garage, or other spaces of a specialised nature occupied neither frequently or for extended periods.

Habitable Spaces – Comfortable external spaces and places for people to spend time.

Heritage Place – Any place from a building to a monument, natural area, landmark or viewpoint that has special cultural or natural heritage significance. Can be identified at a local, state, federal or global level.

Infrastructure – The basic systems, facilities or framework that support a community's population, e.g. roads, transport, utilities, water, sewage

Juliet balcony – a type of balcony that does not protrude from the building's façade, but in stead, a decorative railing in front of an openable door.

Key Public Space – May be located in parks, plazas or streets. They are public places of significance, with high levels of amenity.

Legibility – The ease with which a person is able to see, understand and find their way around an area, building or development.

Living Infrastructure – The vegetation, soils and water systems that are sometimes referred to as blue or green infrastructure.

Local character/local identity– Local character makes an area distinctive and contributes to the identity of the place. This includes the natural, cultural and historic characteristics of an area that are intrinsic to the locality, and which the local community relate to. Local character and local identity is subject to change over time.

Micro-mobility – Refers to a wide range of lightweight movement options, including bicycles and powered options such as electric scooters and e-bikes.

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Missing middle – An umbrella term that is used to describe housing types that fall between single dwellings and apartments. Dwelling types within this category are generally low rise, missing middle, and designed to meet the needs of a diverse range household types and demographics, across different life stages. Missing middle housing types may include granny flats, dual-occupancy, tri-occupancy, townhouses, terrace housing and manor houses.

Mixed-use – Mixing residential, commercial, retail, entertainment and community uses in same building, site or precinct.

Modal Interchange – Co-locating multiple public transport modes to allow for enhanced connections between alternative transport modes (eg bus and tram).

Natural cross ventilation – Wind-driven ventilation that provides ventilation rates at least 7 times greater than a single-aspect apartment in the same location, due to 2 or more openings on separate façade aspects being exposed to a wide range of unobstructed wind directions. The improvement in ventilation rates is to be achieved over a year.

Non-habitable room – A space of a specialised nature not occupied frequently or for extended periods, including a bathroom, laundry, water closet, pantry, walk-in wardrobe, corridor, hallway, lobby, photographic darkroom or clothes drying room.

Operable walls – (moveable walls) are partitions or room dividers that can easily be moved and adjusted to change the layout of a space.

Passive Surveillance – Observation from the street or adjacent buildings provided by ordinary people as they go about their daily activities.

Performance glass – Typically referring to windows. Glass with high thermal performance due to double or triple glazing.

Permeability (In the context of built form) – The extent to which the urban structure allows or restricts movement of people or vehicles through an area.

Permeability (In the context of landscape) – The quantity of pervious surfaces that allow for water to penetrate into and be retained by the landscape.

Planting area – Planting area means an area of land within a block that is available for landscape planting and that is not covered by buildings, structures, vehicle parking and manoeuvring areas or any other form of impermeable element that impacts permeability of the ground surface (i.e., terraces, pergolas, patios, decks, or pools).

Podium – The base of a building upon which taller (tower) elements are positioned.

Potable water – Water which conforms to Australian Standards for drinking quality.

Precinct – Is defined as:

iii. development on land that forms part of a centre – group centre, town centre, local centre

development that forms part of a corridor

Primary private open space (PPOS) – means private open space that is directly accessible from a habitable room other than a bedroom.

Public space (ACT) – General term for an open area or place for public use. It is the collective, communal part of cities and towns, with shared access for all. It is the space of movement, recreation, gathering, events, contemplation and relaxation. The public space includes streets, pathways, rights of way, parks, accessible open spaces, plazas and waterways that are physically and visually accessible regardless of ownership.

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GLOSSARY

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Rights holder – Ngunnawal people.

Scale – The apparent size of a building in relation to its surroundings and to the scale of a person.

Solar access– The ability of a building to receive direct sunlight without obstruction from other buildings or impediments, not including trees.

Storey – Storey means a space within a building that is situated between one floor level and the floor level next above, or if there is no floor level above, the ceiling or roof above but does not include an attic or a basement or a space that contains only a lift shaft or stairway.

Street setback – means the horizontal distance between a block boundary and the outside face of any building or structure on the block.

Studio apartment – a small dwelling unit with no separate bedroom from the living area.

Sustainability – An approach that considers the environmental, social and economic aspects (such as of a building) so it can meet the needs of the present, without compromising the ability of future generations to meet their needs.

TCCS – Transport Canberra and City Services.

TGSI – Tactile ground service indicators to support people with visual impairment to navigate streets and public space.

TP / Territory Plan – Provides statutory planning guidance for development in the ACT.

Universal design – a design approach that aims to create buildings and environments that can be used by all people of all ages, abilities and backgrounds, without the need for adaptation or specialised design.

Urban design development – Urban design development is defined as:

i. development on land that is not in an industrial zone that has a site area greater than 1 hectare; or

ii. development in relation to which a planning instrument requires a planning and response report to be prepared for the land before development consent may be granted for the development.

In an industrial zone this only applies to a development that has a capital investment value of $30 million or more and a site area of greater than 1 hectare.

Urban Fabric– The make-up of an urban area. Refers to characteristics such as movement network, block structure, building heights and grain.

Visual/ Temporary Activation Frontage – Engaging activation of otherwise blank frontages on buildings, fences or hoarding during construction periods.

Water Sensitive Urban Design (WSUD) – A set of design elements and on-ground solutions that aim to minimise impacts on the water cycle from our built environment and enhance our city's livability.

TCCS – Transport Canberra and City Services.

TGSI – Tactile ground service indicators to support people with visual disability to navigate streets and public space.

TP / Territory Plan – Providing statutory planning guidance for future development in the ACT.

Typology – Means types of development, including multi-occupancy, townhouses, terraces and low-rise apartments.

Urban Fabric– The make-up of an urban area. Refers to characteristics such as movement network, block structure, building heights and grain.

Visual/temporary Activation Frontage – Engaging activation of otherwise blank frontages on buildings, fences or hording during construction periods.

Water Sensitive Urban Design (WSUD) – A set of design elements and on-ground solutions that aim to minimise impacts on the water cycle from our built environment and enhance our city's livability.

Wintergardens – An enclosed balcony attached to a dwellings unit.

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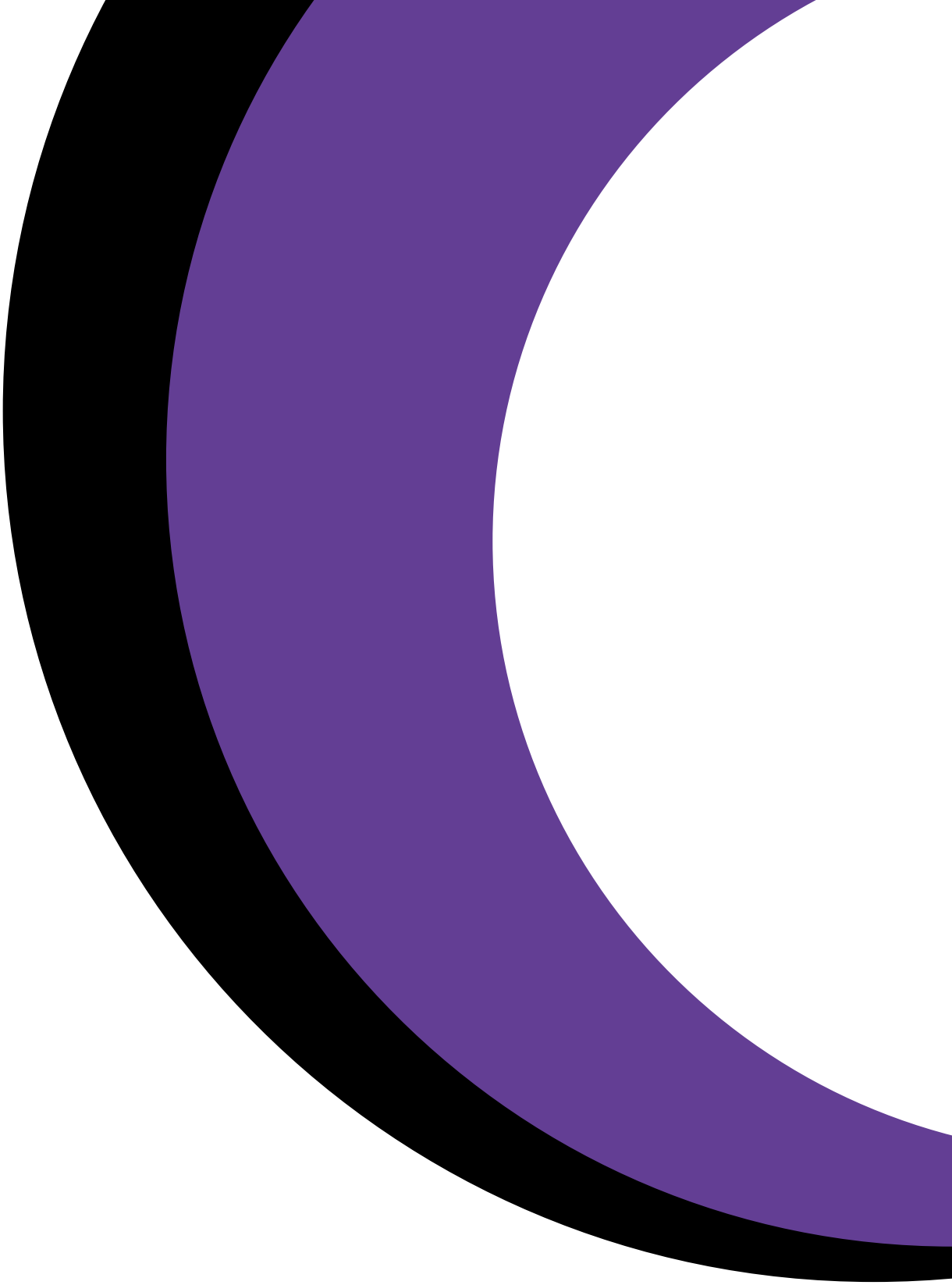
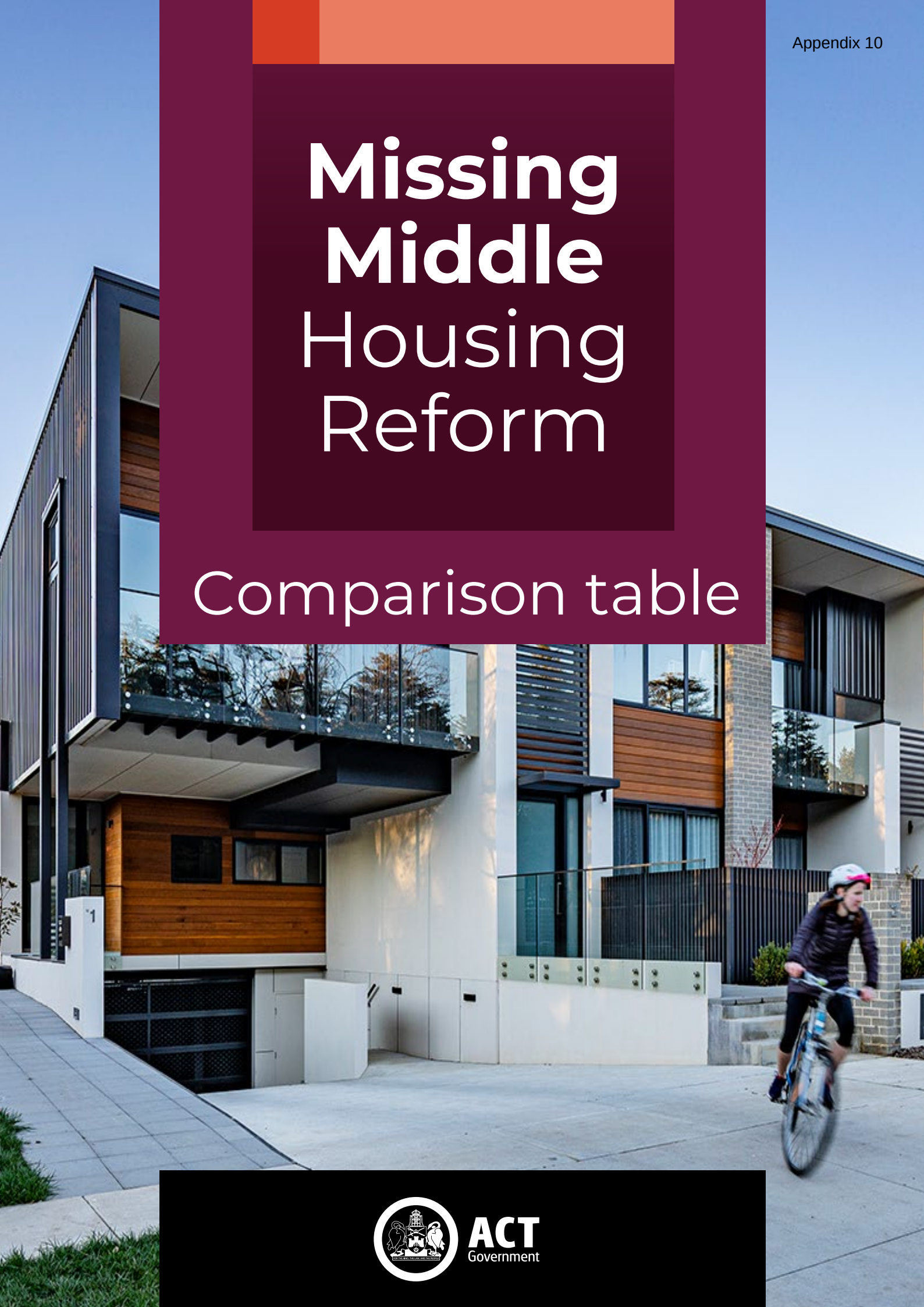


Missing Middle Housing Reform

Comparison table



ACT Government

Comparison table RZ1

	Current Territory Plan provision	*Proposed Territory Plan provision*	*Reason for change*
Zone name:	**RZ1 – Suburban Zone**	**RZ1 – Suburban Zone**	
Policy Outcomes: (Residential Zones Policy)	1. Achieve and/or maintain low density residential neighbourhoods in suburban areas. 2. Provide for a range of housing choices that meet changing household and community needs. 3. Limit the extent of change that can occur particularly with regard to the residential density and original pattern of subdivision. 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.	1. Provide for a range of housing choices in a suburban setting which is primarily low density and low rise. 2. Housing development meets changing household, and community needs and demonstrates good design outcomes. 3. Provide opportunities for redevelopment by enabling some change to residential density and subdivision pattern. 4. Development respects valued features of the neighbourhood and landscape character of the area and does not have unreasonable negative impacts on neighbouring properties.	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.
Maximum height: (Residential Zones Policy)	2 storeys + attic	2 storeys + attic	No change.
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.
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.
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 parking and suburban character.

	Current Territory Plan provision	*Proposed Territory Plan provision*	*Reason for change*
Zone name:	**RZ1 – Suburban Zone**	**RZ1 – Suburban Zone**	
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).
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 other key outcomes such as planting 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-generational living). Other provisions allow for blocks to be subdivided to provide a separate dwelling.
Co-housing (Residential Zones Policy)	Limited to blocks of 1,050m^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.
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	A reduction in minimum car parking rates intends to balance the desire to achieve more housing, achieve on-site amenity and limit unreasonable impacts to the street and neighbourhood. Car parking 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. 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.

	Current Territory Plan provision	*Proposed Territory Plan provision*	*Reason for change*
Zone name:	**RZ1 – Suburban Zone**	**RZ1 – Suburban Zone**	
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.
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.
Other Residential Zones Technical Specification changes	> Private open space for MUH – 40% of site > Principal private open space (at lower level) for MUH 28m²-45m² minimum area and 5m-6m minimum dimension > Building envelope – measurement taken from 3.5m above boundaries > Front setbacks for MUH – 6m > Side and rear setbacks for MUH – 3m-6m > Solar building envelope angle for MUH – 31°	> Private open space for MUH – 30% of site > Principal private open space (at lower level) for MUH –24m2-36m2 minimum area and 4m-6m minimum dimension > Building envelope – measurement taken from 4m above boundaries > Front setbacks for MUH – 4m-6m > Side and rear setbacks for MUH – 0m-6m > Solar building envelope angle for MUH – 45°	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. 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.
Subdivision: (Subdivision Policy)	Unit titling above 800m², max 120m² for size of second dwelling Block subdivision not permitted	Unit titling above 600m², 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 creation of larger 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 2000m², 2500m² for consolidations adjoining urban open space/community path network, and 3000m² for end of section consolidations.	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 outcomes 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.

Comparison table RZ2

	Current Territory Plan provision	*Proposed Territory Plan provision*	*Reason for change*
Zone name:	**RZ2 – Suburban Core Zone**	**RZ2 – Suburban Density Zone**	
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. 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. 3. Provide opportunities for redevelopment by enabling a limited extent of change in density.	1. Facilitate development or redevelopment of sites that are generally in reasonable proximity to local services and amenities. 2. Achieve a mix of low and medium density housing in a manner that demonstrates good design outcomes. 3. Provide for a range of housing choice that is primarily low-rise multi-unit housing or more compact single dwelling housing. 4. Provide opportunities for redevelopment by enabling change, including to residential density and subdivision pattern.	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.
Maximum height: (Residential Zones Policy)	2 storeys + attic	Single dwellings / secondary residences: 2 storeys + attic Multi-unit housing: 3 storeys + attic	Building heights for multi-unit housing in RZ2 have been increased to better reflect the transition in scale between RZ1 and RZ3 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.
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.
Minimum block area for 2 dwellings: (Residential Zones Policy)	700m^2 (or 600m^2 for multi-unit adaptable 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.

	Current Territory Plan provision	*Proposed Territory Plan provision*	*Reason for change*
Zone name:	**RZ2 – Suburban Core Zone**	**RZ2 – Suburban Density Zone**	
Maximum dwellings: (Residential Zones Policy)	1 additional for every 250m^2 over the minimum	No maximum	To incentivise missing middle housing developments in RZ2, where they can be proposed and constructed to meet the other relevant Assessment Outcomes and guidance.
Subdivision: (Subdivision Policy)	Permitted	Permitted	No change
Consolidation: (Subdivision Policy)	Permitted	Permitted	No change
Other Residential Zones Technical Specification changes			
Car parking rates	Same as RZ1 information above	Same as RZ1 information above	
Planting area (MUH)			
Tree canopy coverage (MUH)			

Comparison table RZ3

	Current Territory Plan provision	*Proposed Territory Plan provision*	*Reason for change*
Zone name:	**RZ3 – Urban Residential Zone**	**RZ3 – Residential Transition Zone**	
Policy Outcomes: (Residential Zones Policy)	1. Facilitate development or redevelopment of sites to achieve medium density housing. 2. Provide for a range of housing choices where the housing contains a mix of single dwelling and multi-unit housing. 3. Provide opportunities for redevelopment by enabling changes to the residential density and original pattern of subdivision. 4. Provide opportunities for redevelopment by enabling change.	1. Facilitate urban development or redevelopment to achieve primarily medium density, low-mid rise housing within close proximity to local services and amenities in a manner that demonstrates good design outcomes. 2. Provide for a range of housing choices, which are predominately multi-unit housing of various dwelling types or more compact single dwelling housing. 3. Provide opportunities for redevelopment by enabling change, including to the residential density and the original pattern of subdivision.	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 accommodating more compact single dwellings (such as the case through Gungahlin), or as more of a medium density and mid-rise zone (as is the case in more of the established suburbs).
Maximum height: (Residential Zones Policy)	10.5m	Secondary residence: 2 storeys Single dwelling housing: 3 storeys Multi-unit housing: 4 storeys	The gradation of heights across the different housing typologies is designed to incentivise multi-unit housing redevelopment to provide more housing in an efficient manner in this zone.

Comparison table RZ4

	Current Territory Plan provision	*Proposed Territory Plan provision*	*Reason for change*
Zone name:	**RZ4 – Medium Density Residential Zone**	**RZ4 – Urban Residential Zone**	
Policy Outcomes: (Residential Zones Policy)	1. Facilitate development or redevelopment of sites to achieve a distinctively medium density housing character in a manner that demonstrates design excellence. 2. Provide for a range of housing choices where the housing contains a mix of single dwelling and multi-unit housing. 3. Provide opportunities for redevelopment by enabling changes to residential density and the original pattern of subdivision. 4. Provide opportunities for redevelopment by enabling change.	1. Facilitate urban development or redevelopment of sites to achieve medium to high density, mid-rise housing in a manner that demonstrates good design outcomes. 2. Provide for a range of housing choices, which are predominately medium to high density multi-unit housing of various dwelling types. 3. Provide opportunities for redevelopment by enabling change, including to residential density and the original pattern of subdivision.	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.
Maximum height: (Residential Zones Policy)	12.5m	Secondary residence: 2 storeys Single dwelling housing: 3 storeys Multi-unit housing: 6 storeys	The gradation of heights across the different housing typologies is designed to incentivise multi-unit housing redevelopment to provide more housing in an efficient manner in this zone.

Comparison table RZ5

	Current Territory Plan provision	*Proposed Territory Plan provision*	*Reason for change*
Zone name:	**RZ5 – High Density Residential Zone**	**RZ5 – Urban Density Zone**	
Policy Outcomes: (Residential Zones Policy)	1. Facilitate development or redevelopment of sites to achieve high density housing in a manner that demonstrates design excellence. 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. 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. 4. Provide opportunities for redevelopment by enabling changes to the original pattern of subdivision. 5. Provide opportunities for redevelopment by enabling change.	1. Facilitate urban development or redevelopment of sites to achieve high density, medium rise housing in a manner that demonstrates good design outcomes. 2. Provide opportunities for the establishment and maintenance of residential housing that is generally high density. 3. Provide housing in areas with very good access to facilities and services and/or frequent public transport services. 4. Provide for a range of high density and larger scale housing choices of various dwelling types. 5. Provide opportunities for redevelopment by enabling changes, including to the original pattern of subdivision.	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.
Maximum height: (Residential Zones Policy)	21.5m	Secondary residence: 2 storeys Single dwelling housing: 3 storeys Multi-unit housing: 7 storeys	The gradation of heights across the different housing typologies is designed to incentivise multi-unit housing redevelopment to provide more housing in an efficient manner in this zone.

More homes, more choices. Built for your lifestyle.

Missing Middle Housing Reform

Missing Middle Housing Reform

Snapshot

ACT Government

Planning for more housing choice in Canberra

Canberra is growing quickly. By 2050 we expect nearly 700,000 people to call our city home. Because of this growth, it's estimated that there will be a need for 30,000 new homes in the next five years.

Meeting this goal isn't just about expanding the city and building more houses – it's about making sure new homes that get built include a variety of housing choice. With limited undeveloped greenfield land, we need to make better use of our existing suburbs and plan for a more compact, efficient and sustainable Canberra.

Currently, new homes in Canberra are mostly single houses or high-density apartment buildings. This leaves a 'gap' in the housing market - typically referred to as 'missing middle' housing - with potential for more low and medium density housing options.

In Canberra, missing middle housing includes:

> dual or tri-occupancies (2 or 3 houses on one block),
> townhouses and terrace homes
> low-rise apartments.

This isn't a new concept for Canberra – we already have some great examples of this type of housing in some of our oldest (as well as newest) suburbs. But we need to make sure that more Canberrans across the whole city have access to a range of housing options. While we have pockets where middle housing occurs, there isn't enough and it's not available in all suburbs. Providing more housing options can help meet the needs of our diverse and growing population.

Missing Middle Housing Reforms

The ACT Government is responding to the demand for greater housing choice by reforms to our planning system, including draft changes to the Territory Plan through a Major Plan Amendment, and a new Missing Middle Housing Design Guide:

- **The Missing Middle Housing Design Guide** will provide best practice guidance for creating well-designed homes that respect local character and contribute positively to our streets and neighbourhoods
- **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.

The reforms have been developed with local architects, designers and technical experts to balance the needs of new and existing residents, aiming to supply more well-designed, sustainable housing in existing residential areas while maintaining Canberra's unique amenity and suburban character.

By allowing more and different types of homes across Canberra, the Missing Middle housing reforms will:

- **Provide more housing choices for Canberrans** including opportunities for multi-generational living, to age in place, and first home buyers
- **Remove barriers** to make it easier for people to build and purchase different types of homes
- **Allow people to live in the communities they love** with housing that meets their needs at different life stages
- **Revitalise** our older suburbs by adding new homes which make a positive contribution to the street and suburb
- **Limit urban sprawl and increase the availability of land and housing** in our existing urban footprint
- **Support vibrant and walkable neighbourhoods**.

Draft Major Plan Amendment to the Territory Plan

The Territory Plan focuses on delivering high-quality buildings for residents while encouraging new design and planning ideas.

The proposed changes to the Territory Plan include updates to key policies and supporting documents including the Residential Zones and Subdivision Policy and associated technical specifications. The changes include:

- Minimum block area for 2 dwellings or secondary residence
- maximum dwelling numbers on a block
- setbacks and building envelope
- allowable subdivision and block consolidation

A comparison table of the draft changes is provided with this snapshot.

These changes will enable well-designed, low-rise sustainable and comfortable homes that blend into our existing suburbs without too much change to the character of these areas, helping individuals, couples and families to find homes in existing suburbs, and making it easier for older Canberrans to stay in their communities as they age.

The reforms will help the planning system to quickly respond to population growth and market demand, reducing the need for new housing in undeveloped areas and creating a more compact and efficient city.

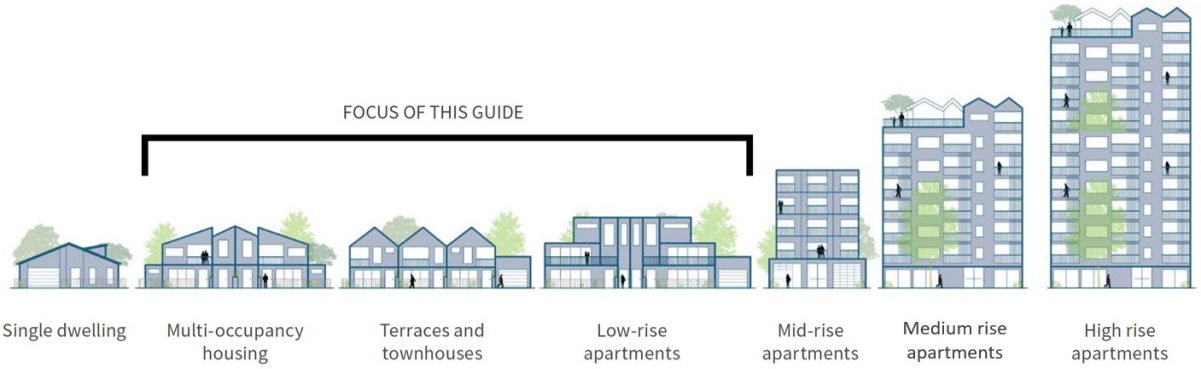
Residential zones in Canberra

Most land in the ACT suitable for buildings (urban land) is zoned for residential use, or RZ, meaning it is land for housing (including houses and multi-units). RZ1 the 'Suburban Zone', makes up 79.7% of Canberra's residential land, and has typically included mainly single houses. RZ2, the 'Suburban Core', (around 12.9% of the city's residential land) is usually located closer to local shops or services and allows for a greater mix of single houses and denser housing. RZ3, RZ4 and RZ5 zones allow higher medium density buildings (like apartments).

The Missing Middle Housing Design Guide

The draft Missing Middle Housing Design Guide (the draft guide) will be a new addition to the existing suite of design guidance documents that help create better buildings and public spaces across our city. Based on key Design Principles, the document provides guidance on how to achieve best practice design outcomes for new 'missing middle' homes to be 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
- encouraging sustainable building practices, efficient land use and minimal negative impact on the natural environment
- promoting designs that deliver lively, safe and walkable communities.



The draft guide explains what good design for different housing types looks like and encourages new ideas for developing low-rise 'missing middle' housing - assisting design professionals, builders and landowners in achieving well designed missing middle housing projects. The draft guide focuses on buildings that are of a height and scale that feels comfortable for pedestrians and residents ('human scale' development), designs that protect and enhance street character and verge trees, and ensuring that denser housing developments don't impact negatively on neighbours.

The main features of the draft Missing Middle Housing Design Guide are to:

- encourage new housing types like multi-occupancies, townhouses, terraces and low-rise apartment buildings that blend into existing neighbourhoods
- help the community, landowners and developers understand and apply the Territory Plan's assessment requirements when planning for new buildings in Canberra's suburbs
- offer guidance on how to achieve best practice outcomes in sustainable buildings and liveable communities
- show how change can happen in existing suburbs while protecting and improving street character through good design.

Having your say on missing middle housing reforms

The ACT Government is consulting with the community and asking for feedback on the proposed Missing Middle Housing Reforms, including feedback on the draft Missing Middle Housing Design Guide and the Major Plan Amendment to the Territory Plan.

Information about the proposed reforms, including a full copy of the draft design guide and proposed Territory Plan amendment supporting documentation, is available during the consultation period via the YourSay website and at a number of events, including online and face to face presentations and workshops, district 'pop up' information stalls and listening spaces.

You can find out more information about the proposed reforms and upcoming engagement events, and provide your comments or detailed submissions by visiting the YourSay website.

The Territory Plan – how does it work

When someone is looking to design a new building in Canberra they need to show that they have considered the requirements and guidance of the ACT's planning documents including:

- The Territory Plan
- Technical Specifications
- Design Guides.

The Territory Plan is a legislative document that includes District Policies, Zone Policies and Policies for Subdivision and Leasing. The documents within the Plan include desired built outcomes and specific requirements for new developments. New developments must demonstrate that they are consistent with the assessment outcomes and meet the mandatory assessment requirements:

- District Policies include desired policy outcomes and assessment outcomes and requirements for new developments in each specific district
- Zone Policies list the types of developments and uses that can be built in specific zones, the policy outcomes for different zones as well as the relevant assessment outcomes and requirements.

New developments also need to consider other documents to ensure the best built outcome for our city. These include technical specifications and design guides:

- Technical specifications provide more clarity about the expectations for new developments in particular areas, including for elements like building height and density. They are not 'rules', but rather give detailed guidance about the community and Territory Planning Authority's expectations for that area
- Design guides offer guidance on how to achieve the assessment outcomes required by the District and Zone Policies for new developments. The guides use clear writing, images and diagrams to demonstrate best practice approaches and examples of good design. The guides must be considered and responded to when seeking development approval. Current design guides include the:
  - Housing Design Guide
  - Urban Design Guide
  - Biodiversity Sensitive Urban Design Guide
  - City Centre Urban Design Guide

Comparison table RZ1

	Current Territory Plan provision	*Proposed Territory Plan provision*	*Reason for change*
Zone name:	**RZ1 – Suburban Zone**	**RZ1 – Suburban Zone**	
Policy Outcomes: (Residential Zones Policy)	1. Achieve and/or maintain low density residential neighbourhoods in suburban areas. 2. Provide for a range of housing choices that meet changing household and community needs. 3. Limit the extent of change that can occur particularly with regard to the residential density and original pattern of subdivision. 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.	1. Provide for a range of housing choices in a suburban setting which is primarily low density and low rise. 2. Housing development meets changing household, and community needs and demonstrates good design outcomes. 3. Provide opportunities for redevelopment by enabling some change to residential density and subdivision pattern. 4. Development respects valued features of the neighbourhood and landscape character of the area and does not have unreasonable negative impacts on neighbouring properties.	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.
Maximum height: (Residential Zones Policy)	2 storeys + attic	2 storeys + attic	No change.
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.
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.
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 parking and suburban character.

	Current Territory Plan provision	*Proposed Territory Plan provision*	*Reason for change*
Zone name:	**RZ1 – Suburban Zone**	**RZ1 – Suburban Zone**	
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).
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 other key outcomes such as planting 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-generational living). Other provisions allow for blocks to be subdivided to provide a separate dwelling.
Co-housing (Residential Zones Policy)	Limited to blocks of 1,050m^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.
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	A reduction in minimum car parking rates intends to balance the desire to achieve more housing, achieve on-site amenity and limit unreasonable impacts to the street and neighbourhood. Car parking 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. 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.

	Current Territory Plan provision	*Proposed Territory Plan provision*	*Reason for change*
Zone name:	**RZ1 – Suburban Zone**	**RZ1 – Suburban Zone**	
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.
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.
Other Residential Zones Technical Specification changes	> Private open space for MUH – 40% of site > Principal private open space (at lower level) for MUH 28m²-45m² minimum area and 5m-6m minimum dimension > Building envelope – measurement taken from 3.5m above boundaries > Front setbacks for MUH – 6m > Side and rear setbacks for MUH – 3m-6m > Solar building envelope angle for MUH – 31°	> Private open space for MUH – 30% of site > Principal private open space (at lower level) for MUH –24m2-36m2 minimum area and 4m-6m minimum dimension > Building envelope – measurement taken from 4m above boundaries > Front setbacks for MUH – 4m-6m > Side and rear setbacks for MUH – 0m-6m > Solar building envelope angle for MUH – 45°	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. 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.
Subdivision: (Subdivision Policy)	Unit titling above 800m², max 120m² for size of second dwelling Block subdivision not permitted	Unit titling above 600m², 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 creation of larger 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 2000m², 2500m² for consolidations adjoining urban open space/community path network, and 3000m² for end of section consolidations.	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 outcomes 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.

Comparison table RZ2

	Current Territory Plan provision	*Proposed Territory Plan provision*	*Reason for change*
Zone name:	**RZ2 – Suburban Core Zone**	**RZ2 – Suburban Density Zone**	
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. 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. 3. Provide opportunities for redevelopment by enabling a limited extent of change in density.	1. Facilitate development or redevelopment of sites that are generally in reasonable proximity to local services and amenities. 2. Achieve a mix of low and medium density housing in a manner that demonstrates good design outcomes. 3. Provide for a range of housing choice that is primarily low-rise multi-unit housing or more compact single dwelling housing. 4. Provide opportunities for redevelopment by enabling change, including to residential density and subdivision pattern.	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.
Maximum height: (Residential Zones Policy)	2 storeys + attic	Single dwellings / secondary residences: 2 storeys + attic Multi-unit housing: 3 storeys + attic	Building heights for multi-unit housing in RZ2 have been increased to better reflect the transition in scale between RZ1 and RZ3 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.
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.
Minimum block area for 2 dwellings: (Residential Zones Policy)	700m^2 (or 600m^2 for multi-unit adaptable 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.

	Current Territory Plan provision	*Proposed Territory Plan provision*	*Reason for change*
Zone name:	**RZ2 – Suburban Core Zone**	**RZ2 – Suburban Density Zone**	
Maximum dwellings: (Residential Zones Policy)	1 additional for every 250m^2 over the minimum	No maximum	To incentivise missing middle housing developments in RZ2, where they can be proposed and constructed to meet the other relevant Assessment Outcomes and guidance.
Subdivision: (Subdivision Policy)	Permitted	Permitted	No change
Consolidation: (Subdivision Policy)	Permitted	Permitted	No change
Other Residential Zones Technical Specification changes	Same as RZ1 information above	Same as RZ1 information above	
Car parking rates			
Planting area (MUH)			
Tree canopy coverage (MUH)			

Comparison table RZ3

	Current Territory Plan provision	*Proposed Territory Plan provision*	*Reason for change*
Zone name:	**RZ3 – Urban Residential Zone**	**RZ3 – Residential Transition Zone**	
Policy Outcomes: (Residential Zones Policy)	1. Facilitate development or redevelopment of sites to achieve medium density housing. 2. Provide for a range of housing choices where the housing contains a mix of single dwelling and multi-unit housing. 3. Provide opportunities for redevelopment by enabling changes to the residential density and original pattern of subdivision. 4. Provide opportunities for redevelopment by enabling change.	1. Facilitate urban development or redevelopment to achieve primarily medium density, low-mid rise housing within close proximity to local services and amenities in a manner that demonstrates good design outcomes. 2. Provide for a range of housing choices, which are predominately multi-unit housing of various dwelling types or more compact single dwelling housing. 3. Provide opportunities for redevelopment by enabling change, including to the residential density and the original pattern of subdivision.	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 accommodating more compact single dwellings (such as the case through Gungahlin), or as more of a medium density and mid-rise zone (as is the case in more of the established suburbs).
Maximum height: (Residential Zones Policy)	10.5m	Secondary residence: 2 storeys Single dwelling housing: 3 storeys Multi-unit housing: 4 storeys	The gradation of heights across the different housing typologies is designed to incentivise multi-unit housing redevelopment to provide more housing in an efficient manner in this zone.

Comparison table RZ4

	Current Territory Plan provision	*Proposed Territory Plan provision*	*Reason for change*
Zone name:	**RZ4 – Medium Density Residential Zone**	**RZ4 – Urban Residential Zone**	
Policy Outcomes: (Residential Zones Policy)	1. Facilitate development or redevelopment of sites to achieve a distinctively medium density housing character in a manner that demonstrates design excellence. 2. Provide for a range of housing choices where the housing contains a mix of single dwelling and multi-unit housing. 3. Provide opportunities for redevelopment by enabling changes to residential density and the original pattern of subdivision. 4. Provide opportunities for redevelopment by enabling change.	1. Facilitate urban development or redevelopment of sites to achieve medium to high density, mid-rise housing in a manner that demonstrates good design outcomes. 2. Provide for a range of housing choices, which are predominately medium to high density multi-unit housing of various dwelling types. 3. Provide opportunities for redevelopment by enabling change, including to residential density and the original pattern of subdivision.	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.
Maximum height: (Residential Zones Policy)	12.5m	Secondary residence: 2 storeys Single dwelling housing: 3 storeys Multi-unit housing: 6 storeys	The gradation of heights across the different housing typologies is designed to incentivise multi-unit housing redevelopment to provide more housing in an efficient manner in this zone.

Comparison table RZ5

	Current Territory Plan provision	*Proposed Territory Plan provision*	*Reason for change*
Zone name:	**RZ5 – High Density Residential Zone**	**RZ5 – Urban Density Zone**	
Policy Outcomes: (Residential Zones Policy)	1. Facilitate development or redevelopment of sites to achieve high density housing in a manner that demonstrates design excellence. 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. 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. 4. Provide opportunities for redevelopment by enabling changes to the original pattern of subdivision. 5. Provide opportunities for redevelopment by enabling change.	1. Facilitate urban development or redevelopment of sites to achieve high density, medium rise housing in a manner that demonstrates good design outcomes. 2. Provide opportunities for the establishment and maintenance of residential housing that is generally high density. 3. Provide housing in areas with very good access to facilities and services and/or frequent public transport services. 4. Provide for a range of high density and larger scale housing choices of various dwelling types. 5. Provide opportunities for redevelopment by enabling changes, including to the original pattern of subdivision.	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.
Maximum height: (Residential Zones Policy)	21.5m	Secondary residence: 2 storeys Single dwelling housing: 3 storeys Multi-unit housing: 7 storeys	The gradation of heights across the different housing typologies is designed to incentivise multi-unit housing redevelopment to provide more housing in an efficient manner in this zone.

More homes, more choices. Built for your lifestyle.

Missing Middle Housing Reform

YOURSAY CONTENT

MAIN YOURSAY PAGE: https://yoursayconversations.act.gov.au/missing-middle-housing-reforms

Project status: This project is open for feedback

We are accepting long form submissions until 5 August 2025. You can provide your submission by clicking here or emailing EPSDDcomms@act.gov.au.

About the project

Canberra is growing quickly. By 2050, we expect nearly 700,000 people to call our city home.

That's why we have a plan to enable 30,000 new homes across Canberra in the next five years. These new homes will support more housing choice in new and existing suburbs across the ACT.

Meeting this goal is not just about building more houses – it's about making sure the new homes that get built include a variety of housing choice.

The ACT has only a limited amount of available land left for new suburbs which means we can't rely on new suburban developments alone to fit our growing population. We need to make better use of our existing suburbs and plan for a more compact, efficient and sustainable Canberra.

Currently, new homes in Canberra are mostly single houses or high-density apartments in our town and city centres. This leaves a 'gap' or 'missing middle' in the housing market.

Missing middle housing includes:

- **dual or tri-occupancies (2 or 3 homes on one block),**
- **townhouses and terrace homes**
- **low-rise apartments.**

To make more of this type of housing possible, the ACT Government is updating our planning system with:

- The Missing Middle Housing Design Guide which will provide good practice guidance for creating well-designed homes that respect local character and contribute positively to our existing streets and neighbourhoods.
- Changes to the Territory Plan which will remove barriers in the planning system and allow more housing options (including more townhouses, terraces, duplexes and low-rise apartments) in RZ1 and RZ2 areas. These changes will make it easier to build well-designed, sustainable homes in our existing suburbs.
- These two elements have been carefully considered and are closely linked to one another.

These changes will help our city change over time, responding to housing demand and ensuring Canberra has a strong supply of well-designed, diverse, affordable and sustainable housing options for our growing community.

For more information about the Missing Middle Housing Reforms you can download the Snapshot document.

Watch our video on Missing Middle Housing Reforms

<VIDEO>

What are we looking at

The ACT Government is seeking comments and submissions on the proposed Missing Middle Housing Reforms, including feedback on the draft Missing Middle Housing Design Guide and the draft Major Plan Amendment to the Territory Plan. The reforms will help the planning system to quickly respond to population growth and market demand, reducing the need for housing in undeveloped areas or green spaces and creating a more compact and efficient city.

The community's input is vital in shaping well-designed and sustainable housing options that can be delivered to enhance our neighbourhoods and meet the needs of current and future residents.

Draft Major Plan Amendment

To formalise this change, we need to amend the Territory Plan which is the overarching planning document and which sets out what you can do in each land use zone. Without this change, missing middle housing will remain limited in the ACT. The **draft Major Plan Amendment** includes updates to key policies and supporting documents in the Territory Plan including the Residential Zones and Subdivision policies and associated technical specifications. The reforms include changes to:

- residential zone policy outcomes
- building heights
- minimum block area for 2 dwellings
- maximum dwelling numbers on a block
- allowable subdivision and block consolidation.

More detail about the proposed changes is provided in the **Supporting Report to the Draft Plan Amendment**. Key proposed changes are summarised in this comparison table within the snapshot document.

Draft Missing Middle Housing Design Guide

The ACT Government has worked with expert consultants as well as local design and architecture experts to develop the **draft Missing Middle Housing Design Guide** (the draft guide). This will be a new addition to the existing suite of design guidance documents that help us create better buildings and public spaces across our city. 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.
- encouraging sustainable building practices, efficient land use and minimal negative impact on the natural environment
- promoting designs that deliver lively, safe and walkable communities with better access to local amenities.

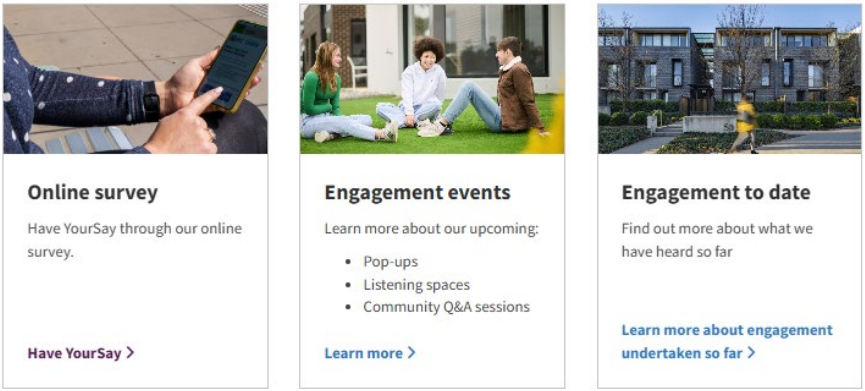
The draft guide includes four parts that can be used by design professionals, builders and landowners to achieve good design for missing middle housing projects:

- Part one: Introduction and Purpose
- Part two: Character and Site
- Part three: Design Guidelines for
    - Site and Land Use
    - Access and Movement
    - Public Space and Amenity
    - Built Form and Building Design
    - Sustainability and Environment
- Part four: Appendices including a missing middle housing checklist.

How to have Your Say

We’re inviting you to consider the draft Missing Middle Housing Design Guide and draft Major Plan Amendment to the Territory Plan and to let us know what you think. Your feedback will inform the final version of the Missing Middle Housing Design Guide and the changes to the Territory Plan and relevant technical specifications.

The YourSay online survey and quick comment functions have now closed however we are receiving long form submission until 5 August 2025.



What are RZ zones?

Most land in the ACT suitable for buildings (urban land) is zoned for residential use, or RZ, meaning it is land for housing (including houses and multi-units).

RZ1 the 'Suburban Zone', makes up 79.7% of Canberra's residential land, and typically includes mainly single houses.

RZ2, the 'Suburban Core', (around 12.9% of the city's residential land) is usually located closer to local shops or services and allows for a greater mix of single houses and low density.

RZ3, RZ4 and RZ5 zones allow higher medium density and taller buildings (like apartments). These are often close to our town centres and core commercial centres, or main transport corridors.

If you would like to find out more about your zone, visit **ACTmapi** and click on the 'Territory Plan' map.

What might new missing middle housing look like?

Move the slider to see an example of how some typical Canberra streets might adapt over time as more housing types are built.

Leave us a quick comment on Missing Middle Housing Reforms

FAQ

Don't we already have this type of housing in Canberra? Why do we need more?

Yes, this type of housing already exists in Canberra, however, the ACT's population is currently around 470,000 people and by 2050, the population is expected to reach almost 700,000 people. The growing ACT population means there will be a need to provide 30,000 new homes by 2030 and up to 100,000 new homes by 2050.

There is a need for more homes in the ACT, but also more housing choice. Currently, new homes in Canberra primarily comprise low-density, separate housing and high-density apartments.

While we have pockets where middle housing occurs, there isn't enough and it's not available in all suburbs. Providing more housing options can help meet the needs of our diverse and growing population

Will this mean more apartments in my suburb?

Missing middle multi-unit housing includes low rise apartment development, such as walk-up apartments, that look and feel very similar to terrace homes. It is proposed to allow these smaller scale apartments in the RZ1 and RZ2 zones.

Medium and higher-rise apartment development, which are not included in the definition of 'missing middle' housing, are not permitted in RZ1 and RZ2 zones, but can continue to be developed in other more appropriate residential zones, such as RZ3, RZ4 and RZ5 **Will this housing type change the character of my street?**

Many areas within Canberra and the RZ1 and RZ1 residential zones already have ‘missing middle’ homes on them, such as dual occupancies, townhouses and terrace homes, for example.

While the types and numbers of buildings may change, the street character, often guided by the public land verge and street trees, must be protected.

The Missing Middle Housing Design Guide shows how new development should consider and integrate with the existing street character, reduce impacts on neighbours and contribute positively to the character of the suburb

RIGHT HAND SIDE NAVIAGTION

Timeline

Engagement satisfaction quick poll

ALL FAQS

Don't we already have this type of housing in Canberra? Why do we need more?

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There is a need for more homes in the ACT, but also more housing choice. Currently, new homes in Canberra primarily comprise low-density, separate housing and high-density apartments.

While we have pockets where middle housing occurs, there isn't enough and it's not available in all suburbs. Providing more housing options can help meet the needs of our diverse and growing population.

How is missing middle housing better for the environment?

In addition to enabling more housing choice, missing middle housing such as duplexes and townhouses helps the environment by reducing urban sprawl, lowering greenhouse gas emissions and making efficient use of existing residential land. This type of housing aims to promote more walkable neighbourhoods and better access to public transport, contributing to more sustainable and resilient urban areas.

The proposed changes to the Territory Plan also increase the tree canopy cover requirements on residential blocks which will help reduce urban heat, support biodiversity and improve air quality.

Will missing middle housing be built on green spaces or community land in existing suburbs?

No. Missing middle housing reform applies to existing residential zoned land only and is not intended for urban open space areas or land zoned for community uses. The ACT Government's long-term strategic planning policy has been to deliver 70% of new housing within the existing urban area. More recently, the ACT Government has also committed to address the current housing supply crisis by promoting a greater diversity of housing, including more townhouses, terraces, and duplexes in the existing RZ1 and RZ2 Residential Zones.

What does this mean for Canberra's character as a city in the landscape?

Canberra's unique landscape character will remain. As Canberra grows, our urban character will evolve, as it has done so since the early days of our city. New housing development will be required to contribute positively to street and neighbourhood character, and the Missing Middle Housing Design Guide talks about the importance of understanding and designing for the local site context. Missing middle housing reform aims to enable more housing that blends into our existing suburbs while also respecting the unique character of these areas.

What does this mean for me as a homeowner looking to develop my block?

Proposed changes to the Territory Plan aim to reduce current barriers for missing middle housing within existing RZ1 and RZ2 residential zones. For example, this includes increasing the number of dwellings per block and also allowing more block consolidation to occur, which in

turn allows more sites to be available and suitable for this type of development. Those wanting to develop for missing middle housing will need to demonstrate how the proposal aligns with the relevant design provisions of the policies and guidelines, including how a proposal responds to its site context and local character, how amenity provisions are achieved on site and how impacts to neighbours are mitigated.

What does this mean for me as a neighbour of someone with a missing middle housing block?

The Territory Plan contains important provisions that guide how missing middle housing development can occur. These provisions balance the need for new housing with the need to respect existing residents and avoid unreasonable impacts.

Key provisions include:

- limiting the size of new developments (site coverage),
- guiding where new development can be placed on the block, including setbacks and building envelopes to limit overlooking and overshadowing,
- requiring planting area and tree canopy to be provided on the block, and
- requiring some parking to be provided on the block.

Missing middle development proposals will need to meet the requirements of the *Planning Act 2023* and the Territory Plan. This includes assessment against the key planning rules outlined above, as well as the need to consider and respond to the Missing Middle Housing Design Guide during the development application process. A development proposal will be required to respond to its local site context and provide a positive contribution to the local streetscape. It will also need to demonstrate how impacts to neighbouring sites, such as shadow impacts and overlooking, are managed and/or mitigated When a development application is submitted, it is publicly notified, and neighbours can provide comments to the Territory Planning Authority during the assessment process.

Will this housing type change the character of my street?

Many areas within Canberra and the RZ1 and RZ2 residential zones already have 'missing middle' homes on them, such as dual occupancies, townhouses and terrace homes, for example.

While the types and numbers of buildings may change, the street character, often guided by the public land verge and street trees, must be protected.

The Missing Middle Housing Design Guide shows how new development should consider and integrate with the existing street character, reduce impacts on neighbours and contribute positively to the character of the suburb.

How tall can new missing middle housing be?

Missing middle housing reform proposes to retain the cap on building heights to two (2) storeys within existing RZ1 residential zones. It is proposed to allow for three (3) storeys within existing RZ2 residential zones for multi-unit residential development (i.e. missing middle development).

Will this mean more apartments in my suburb?

Missing middle multi-unit housing includes low rise apartment development, such as walk-up apartments, that look and feel very similar to terrace homes. It is proposed to allow these smaller scale apartments in the RZ1 and RZ2 residential zones.

Medium and higher-rise apartment development, which are not included in the definition of 'missing middle' housing, are not permitted in RZ1 and RZ2 residential zones, but can continue to be developed in other more appropriate residential zones, such as RZ3, RZ4 and RZ5.

How will the extra cars and traffic be managed in suburban streets?

Missing middle housing reforms interact with how car parking can be managed on residential blocks and within existing suburbs. A reduction in the overall provision of car parking and parking for visitors associated with missing middle housing development is proposed, however this will need to be carefully assessed through a development application.

Car parking is considered through the Development Application process, with the acceptable rate of parking considered on a case-by-case basis. This involves 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. Traffic generation is also an important consideration in the Development Application process. 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.

Can I object if I don't like the design for new housing in my suburb?

Yes, you will continue to have the opportunity to provide comments on a development application for a missing middle development during the public notification period.

What does this mean for me as a developer?

The missing middle reforms enable greater housing opportunities within existing RZ1 and RZ2 residential zones. The reforms enable greater dwelling density, block consolidation, and block subdivision. You will need to consider the Territory Plan requirements and design your developments in accordance with the Missing Middle Housing Design Guide.

What does this mean for me as a design professional?

Design professionals will be required to respond to the requirements within the Missing Middle Housing Design Guide, and the Territory Plan, when preparing a missing middle housing design proposal for a development site.

What planning application process will apply to missing middle housing?

The planning application process will be similar to current processes, with the consideration of the applicable design guides included.

Before you start any building or renovation project, you may need approvals. If you are building a new development, you may need to make a development application (DA). A DA looks at your project's design to make sure it suits the area by meeting a few requirements:

- Territory Plan policies
- Considers any applicable design guides, including the Missing Middle Housing Design Guide

- Crown lease requirements
- Planning legislation, and
- other specific conditions to develop on that land.

Development of missing middle housing is required to consider and provide a design response to the Missing Middle Housing Design Guide where the development:

- Provides more than 1 dwelling on a block.
- Is for subdivision or consolidation of currently leased RZ1 and RZ2 blocks associated with a missing middle housing development proposal.

Will there be re-zoning of residential land?

This phase of missing middle housing reforms does not propose re-zoning of residential land. The proposed reforms aim to reduce the current barriers to missing middle housing within the existing RZ1 and RZ2 residential zones.

How will development intensity be managed?

Missing middle development proposals will be assessed against the requirements of the *Planning Act 2023,* the Territory Plan and associated supporting documents, such as the Technical Specifications. A design proposal will be required to respond to its established context and provide a positive contribution to the local character. The missing middle reform includes guidance on housing density that is recommended for this type of development. This is contained within the residential zones technical specifications.

How will the reforms protect against too much density in our suburbs?

Increased density is expected through the missing middle housing reform, however there are key protections included in the Territory Plan, supported by housing density guidance in the technical specifications. Each proposal will need to consider the Missing Middle Housing Design Guide which provides best practice design guidance for how development is integrated into existing RZ1 and RZ2 residential zones.

It is also important to note that changes within streets and suburbs are likely to be incremental and occur over a long period.

Are other financial levers being considered as part of this housing reform (eg changes to LVC or rates)?

No. This phase of the Missing middle housing reform includes proposed changes to the planning framework that includes the development of the new Missing Middle Housing Design Guide and associated changes to the Territory Plan. Reforms to tax and financial settings are not included.

How will Government invest in infrastructure to support additional development?

The ACT Government will work closely with utility services providers, such as ICON Water and EvoEnergy, to monitor development activity within existing suburbs and consider the need for investment and upgrades to maintain infrastructure capacity.

The ACT Government also 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.

Will Government undertake precinct planning to identify redevelopment areas?

In 2023, the ACT Government introduced district strategies. The district strategies highlight areas for change that may be available to support growth and residential development in each of the ACT's 9 districts. Each district has change areas that may be suitable for future housing. They may provide greater housing choice in areas that are well located to current or future transport and where local amenity may be further enhanced by development.

The current reform proposals apply to all RZ1 and RZ2 residential blocks across Canberra.

Where do the changes apply and where will redevelopment happen?

The proposed changes apply to all RZ1 and RZ2 residential zones across the city, enabling missing middle housing development in existing suburbs where people may want to live. This allows existing residents to age in place within their community or to move to areas close to friends, family, or amenities they enjoy. Additionally, it provides missing middle housing at various price points throughout the city.

Redevelopment will occur in areas influenced by several factors. Homeowners might add dwellings for multigenerational living, while builders or developers may seek market gaps and viable opportunities. Generally, missing middle housing redevelopment will occur close to public transport and shops, and where older housing stock is suitable for redevelopment.

Has there been any planning and economic feasibility assessment undertaken for the missing middle reforms?

In 2024, planning consultants Purdon undertook a planning and economic feasibility assessment to inform the ACT Government on the feasibility of integrating missing middle housing in some residential zones (RZ1 and RZ2) in the ACT. 'Planning and Economic Feasibility Analysis – Integrating the Missing Middle in RZ1 and RZ2'

The purpose of the study was to identify opportunities and constraints for government consideration for integrating missing middle development in RZ1 and RZ2 areas to increase the diversity of housing typologies and increase the number of homes closer to shops and services.

The study looked at strategic and statutory planning policy factors to determine if a development is feasible and non-planning factors like incentives, market and economic matters. This study was not a feasibility assessment of the reform proposal. Rather, the study has informed the missing middle housing reforms and other policy work.