



Legislative Assembly for the
Australian Capital Territory

Standing Committee on Environment
and Planning

Submission Cover Sheet

Inquiry into DPA-04 – Missing Middle Housing Reform

Submission number: 019

Submitter: Reid Residents' Association Inc

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Inquiry into DPA-04 – Missing Middle Housing Reform

Thank you for the opportunity to provide comment to the Inquiry into DPA-04 — Missing Middle housing Reform.

This submission will address concerns related to the suburb of Reid, in particular its largest area, the Reid Housing Precinct (RHP).

We have specific concerns regarding the RHP which, under the ACT *Heritage Act 2004* and as defined below in the Draft Missing Middle Housing Reform (MMHDG), is a ‘heritage place’, with how the terminology related to heritage is to be applied in the proposed planning reform processes.

We note in the Glossary of the Draft MMHDG the following definitions are listed:

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.

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.

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.

1. The Reid Housing Precinct has ‘special cultural significance’, many ‘significant trees’ and its dwellings have already undergone many, albeit not all, sympathetic alterations and much adaptive reuse. We would appreciate how the heritage aspects, as cited above, relate to this planning reform. To retain the significance of this area as listed in 1980 (Register of the National Estate) then again in 2004 (ACT Heritage Register) we request details on how the existing classifications and regulations will be retained with changes proposed by the missing middle housing reform.
 - Will missing middle reforms provide appropriate technical details that align with the Heritage ACT?
 - Will there be compliance measures in place to ensure heritage is protected as specified under the Heritage Act.

We are concerned that, at present the Draft [ACT Missing Middle Housing Design Guide](#) appears to be lacking in good design principles, relies on interpretation of opaque

statements and lacks compliance mechanisms. Lack of compliance will undo heritage values of the Reid Housing Precinct, other heritage listed housing precincts and impact on adjacent streets.

If the current 'reform' is adopted such a laissez-faire approach would result in losing the aesthetics, coolness and heritage of the Reid Housing Precinct and other similar heritage-listed precincts. This would be a loss to the unique character of Canberra. One would hope that adherence to the National Capital Plan would be a better model as it states it

'shall define the planning principles and policies for giving effect to the object of the Plan and, in particular, shall set standards for the maintenance and enhancement of the character of the national capital and set general standards and aesthetic principles to be adhered to in the development of the national capital'

<https://www.nca.gov.au/planning/planning-act#>

Under the heading Sustainably and Environment 'the development considers and addresses site characteristics, including heritage, natural features, topography, infrastructure and utilities. Apart from the omission of the vital issue of climate change/crisis and the urgent need to plan for adaptability, what is being proposed are, in fact, conditions contrary to heritage areas.

Heritage/Conservation areas should not accept the proposed conditions which are:

- site coverage 45% compared with current condition of 27.5%
- green space 30% compared with current condition of 40%
- 3 storeys compared with 2 storeys
- Tree canopy of 20% compared with retaining existing trees. Reid has an excellent tree canopy and its coolness is noted in the [Mapping surface urban heat in Canberra, Meyers, J.; Devereux, D.; Van Niel, T.; Barnett, G.](#)

<https://publications.csiro.au/publications/publication/Plcsiro:EP178961>.

2. Reid already 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 indicates a diversity of house/dwelling types. As previously mentioned a great deal of adaptable reuse of many of the nearly century-old dwellings has already occurred. In addition, University of New South Wales will be providing student housing with the development of their new campus on the former CIT site. This is an area adjacent to large apartment buildings such as the Glebe Park apartments, Founders Lane, Gatsby and Braddon Court.

While it may appear areas like the RHP to be an easy target for infill the steadily increasing value of land in these older suburbs is unlikely to yield either much in affordable missing middle housing or even provide space for numerous 'missing middle' dwellings. The RRA raised this fact in an earlier submission on the Proposed Missing Middle Housing Reforms to the Territory Plan. If blocks are sufficiently large enough for potential second dwellings then controls should be reinforced so that such dwellings do not adversely affect the heritage values particularly those

mandated under the *Heritage Act 2004*. These mandated requirements are listed in Attachment 1.

We would very much appreciate the opportunity to provide further information.

Yours faithfully
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