



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: 016

Submitter: Curtin Residents Association (CRA)

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SUBMISSION FROM THE CURTIN RESIDENTS ASSOCIATION TO THE STANDING COMMITTEE ON ENVIRONMENT AND PLANNING INQUIRY INTO DPA-04 – MISSING MIDDLE HOUSING REFORMS

Overview and recommendation

The Curtin Residents Association (CRA) is pleased that the Legislative Assembly's Standing Committee on Environment and Planning has an inquiry into the proposed major amendment to the Territory Plan DPA-04 as it provides an opportunity to provide further comment on the ACT Government's "missing middle" proposals.

The stated aim of the proposed Missing Middle Housing Reforms is to supply more well-designed, sustainable housing in existing residential areas while maintaining Canberra's unique amenity and suburban character. The CRA supports this objective, as it supports densification / urban infill generally on the condition that it is done well.

Doing infill well includes, but is not limited to:

- 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.
- Ensuring that all residents have easy access to high quality urban green space, both private and public, as urban green space has a powerful positive impact on peoples' physical and mental health and overall social wellbeing
- An overarching objective 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-being¹.

Unfortunately, the current version of DPA-04 is very unlikely to achieve the stated aim of the proposed Missing Middle Housing Reforms; however, it will have major adverse impacts on the live-ability and amenity of Canberra's residential areas and consequentially on the well-being of Canberrans.

Major issues with the current proposal, and recommendations to address them, are set out in the CRA's submission to the Territory Planning Authority (see the Appendix). Identical or similar issues are set out in submissions from other community groups.

¹ (a) Bartholy and Pongrácz, A brief review of health-related issues occurring in urban areas related to global warming of 1.5°C, *Current Opinion in Environmental Sustainability*, vol.30, pp 123 - 132 (2018)

(b) ACT Urban Forest Strategy 2021-2045

Unfortunately, these issues and constructive recommendations to address them have been ignored, or rejected, by the Territory Planning Authority despite evidence that the proposed Missing Middle Housing Reforms will not achieve its objectives. In other words, the current proposal is not evidence-based policy, indeed it is the exact opposite.

Consequently, the CRA makes the following recommendation:

The Committee should recommend that:

- the proposed DPA-04 be NOT approved by the Legislative Assembly; and,
- the Territory Planning Authority be required to amend the proposed DPA-04 to incorporate
 - (1) governance provisions that set out clear, explicit mechanisms for balancing the competing objectives of “a suburban setting which is primarily low density...” and the high maximum dwelling density proposed for RZ1.
 - (2) policies clearly based on evidence.

Important instances where the proposed DPA-04 is NOT evidence based are:

(a) the focus on redeveloping individual blocks

Australian research has shown that individual, small-lot redevelopment is not an effective way of meeting the objectives of the proposed Missing Middle Housing Reforms.

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 amenity². and

“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 impacts¹.

land assembly is a prerequisite. This...is a step that planning systems need to recognise as being the missing step in creating the missing middle¹.

(b) adapting the urban environment for climate change and mitigating its effects, particularly urban heat

The Planning Authority’s statement that 20% canopy cover balances an increase in housing stock, with the need to reduce associated urban heat. is simply contrary to research evidence. 20% tree canopy cover will NOT reduce associated urban heat.

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; and, Peter W. Newton et al, ‘Greening the Greyfields – New Models for Regenerating the Middle Suburbs of Low-Density Cities’ Palgrave Macmillan, 2022

Tree canopy cover of at least 40% is needed to mitigate urban heating^{3,4}. 20% tree canopy cover is completely inadequate and, if adopted, would decrease the health and well-being of Canberrans.

Research also shows that addressing urban heating requires planning on scales of 60 to 90 m, which is greater than a single block⁶. This reinforces the folly of a focus on redeveloping individual blocks.

Additional comments

The following comments are additional to those in the CRA's submission to the Territory Planning Authority (see the Appendix). They address two issues that complement the points made in the preceding section:

- (1) fragmentation of both buildings and green space; and,
- (2) the need to provide sufficient urban green space to ensure residents' physical and mental health and overall social wellbeing.

Both issues relate to individual, small-lot redevelopment not being an effective way of meeting the objectives of the proposed Missing Middle Housing Reforms.

Managing urban infill at the scale of sections and streets, encouraging, some consolidation of existing blocks and investing in transforming some blocks to local mini-parks would result in better outcomes, including improved physical and mental health and overall social wellbeing for residents.

Fragmentation of buildings and green space

Allowing redevelopment block-by-block over time risks fragmenting denser infill development onto small sites with very small parcels of low-quality green space and few large trees. Such fragmentation of buildings and green space results in poorer outcomes through less effective buildings and many small patches of green space that are ineffective in providing canopy cover, shading and natural evaporative cooling. One solution is to link allowed building height to the size of the block. For example:

- the minimum block size for buildings more than 12m and up to 18m high should be 1800 sq. m.
- the minimum block size for buildings more than 8.5m and up to 12m high should be 1200 sq. m.

This will encourage some consolidation of existing blocks. The resulting streetscapes will also be more coherent.

³ Alonzo et. al., Spatial configuration and time of day impact the magnitude of urban tree canopy cooling, *Environmental Research Letter* 2021

⁴ 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

Provision of urban green space – another example of the need for evidence-based policy

Providing more dwellings in residential zones must not be at the expense of the community's health and well-being.

Increased heat in urban heat islands is one concern as it has a direct effect on human health. Examples of the effect of increased heat on human health include:

- asthma
- kidney disease, including kidney stones
- cardiovascular disease - a 1°C increase in temperature is associated with a significant increase in cardiovascular disease-related death and illness⁵

Ensuring that there is sufficient urban green space is one critical aspect of addressing this issue.

Urban green space has a powerful positive impact on peoples' physical and mental health and overall social wellbeing, with resultant benefits for the health sector in terms of reduced burden and significant cost savings⁶. For example, green space, particularly tree canopy, is associated with reduced rates of morbidity from diseases, lower psychological distress, and lower risks of dementia diagnosis⁵.

To ensure provision of sufficient urban green space:

- blocks in all residential zones should have a minimum of 30% deep soil planting area to enable planting of medium and large trees; and,
- everyone should live within 300 m of high-quality public green space⁵.

Providing high-quality public green space within 300m of all residences is likely to require the ACT Government to manage infill areas at the scale of sections and streets and potentially including purchasing blocks within the infill area and converting them to mini-parks to support the denser development nearby.

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 See, for example, Williams et al, Urban green space provision: the case for policy-based solutions to support human health, *Medical Journal of Australia*, 222(3), 110 - 113 (2025) [doi: 10.5694/mja2.52569](https://doi.org/10.5694/mja2.52569)

**MISSING MIDDLE HOUSING REFORM
SUBMISSION FROM
THE CURTIN RESIDENTS ASSOCIATION**

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CONTENTS

Summary

1. The Curtin Residents Association (CRA) and its role
2. Major issues - discussion and recommendations
 - 2.1 Failure to achieve the intended outcomes because of the focus is on redeveloping individual blocks
 - 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 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-being⁷.

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:

⁷ (a) Bartholy and Pongrácz, A brief review of health-related issues occurring in urban areas related to global warming of 1.5°C, *Current Opinion in Environmental Sustainability*, vol.30, pp 123 - 132 (2018)

(b) ACT Urban Forest Strategy 2021-2045

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 amenity⁸.

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.⁹ 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 subdivision².

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:

⁸ 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

Also, Peter W. Newton et al, '*Greening the Greyfields – New Models for Regenerating the Middle Suburbs of Low-Density Cities*' Palgrave Macmillan, 2022

⁹ Western Sydney Local Health District, *Healthy Higher Density Living for Families with Children*, 2024

- 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 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-being¹. Examples:

- asthma
- kidney disease, including kidney stones
- cardiovascular disease¹⁰
 - a 1°C increase in temperature is associated with a significant increase in cardiovascular disease-related death and illness¹¹

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^{12,13}. 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 block⁶. **This reinforces Recommendation 1.**

¹⁰ Liu et. al., High temperature and cardiovascular disease in Australia under different climatic, demographic, and adaptive scenarios, *European Heart Journal*, 2025

¹¹ Liu et. al., Heat exposure and cardiovascular health outcomes: a systematic review and meta-analysis, *Lancet Planet Health* vol.6, e484–95 (2022)

¹² Alonzo et. al., Spatial configuration and time of day impact the magnitude of urban tree canopy cooling, *Environ. Res. Lett.* 2021

¹³ 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

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 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

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 home³. 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.