



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: 002.1

Submitter: Inner South Canberra Community Council

Date authorised for publication: 19 February 2026

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: Public hearing invitation - Inquiry into DPA-04 - Missing Middle Housing Reforms
Date: Sunday, 8 February 2026 5:07:59 PM
Attachments: [image001.png](#)
[REV 4 PROPOSED STATEMENT ON BEHALF OF ISCCC TO ASSEMBLY INQUIRY INTO DPA 04.docx](#)

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Further to my email of yesterday requesting more time for the Inner South Canberra Community Council (ISCCC) at the public hearing on Tuesday and following my review again of the very large number of documents accompanying this draft Major Plan Amendment I have realised there is one major change that has occurred after the public consultation and which I omitted to include in the ISCCC's submission to the committee.

This is that the document: 'DRAFT MAJOR PLAN AMENDMENT 04 - REVISED VERSION October 2025' section 5.0 contains the statement, under the sub-heading *Administration and Governance*:

*Part A has been amended to **confirm the role of the policy outcomes as high-level objectives rather than specific assessment items**. The amendments to Part A have been reflected across all District Policies, Zone Policies and Other Policies.*

More specifically, subsection 5.6 *Amendments to other Zone Policies* says:
This applies to each of the following zone policies:

- E02 - Commercial Zones Policy
- E03 - Industrial Zones Policy
- E04 - Community Facility Zone Policy [etc]

Policy outcomes inform assessment outcomes and assessment requirements. Where a development is consistent with the assessment outcomes and assessment requirements, it is considered consistent with the policy outcomes.

What has this to do with *Missing Middle Housing Reforms*?

I believe this change has been proposed, following the consultation and without notice, to regularise the current illegal and unprofessional assessment practice being carried out by the planning authority. We have a case in Kingston, on the site of a former child care centre, in a *Community Facility Zone*, where the authority approved a 4-storey office building without any requirement for any community facilities to be provided. The *policy outcomes* are clear that this land is primarily for the purpose of providing community facilities, but the *assessment outcomes* etc are unspecific in that regard.

So the planning authority has put in this late proposal to amend the Territory Plan in respect of all land use zones, surreptitiously, to regularise its current practice which contravenes the specific provisions of the Territory Plan. It is also unworkable, as the *assessment outcomes* for RZ1 zone, for example, fall far short of covering *policy*

outcomes such as:

1. *Provide for a range of housing choices in a suburban setting which is primarily low density and low rise; and*
4. *Development respects valued features of the neighbourhood and landscape character of the area...*

I ask the committee please to consider this important issue as an addendum to the ISCCC submission.

I also attach an opening statement I have drafted for Tuesday's hearing. I can either read this into the record or it can be accepted as read, to allow more time for Q&A.

Richard Johnston
Deputy Chair ISCCC

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These proposed 'reforms' are a complete abdication of the government's responsibility to carefully plan for the development of the Territory, particularly in established residential areas.

As the *Inner South District Strategy* (Part 5, p.10) says, under the heading "Opportunities and challenges for **gradual transformation**": "*Large residential blocks in the district contribute to the green network and the Garden City character and features.*" And "*Most of the district has excellent tree canopy cover providing a cooling effect in hot weather.*"

Our greatest concern is that, in the rush to 'upzone' the whole of the RZ1 zone (approximately 80% of all residential zoned areas in the ACT), the highly valued character and important attributes of the Inner South will be lost. We have proposed that, rather than a "**one size fits all**" planning policy for RZ1 zones, **a sensitive and nuanced planned approach** should include **Special Character Zones** to protect particular high-quality residential areas, including Heritage housing precincts, similar to the *Auckland Unitary Plan 'Single House Zone'*.

These proposed 'reforms' are unprecedented in Australian planning practice. Sydney and Melbourne are sensibly concentrating on residential redevelopment in highly accessible locations, such as near railway stations. More needs to be made of Canberra's existing RZ2 and higher-density zones to accommodate the bulk of required new housing.

These proposed 'reforms' are premature. They ignore Authority responses to the consultation that "*CED is currently undertaking further work...which may inform future rezoning opportunities for well-located blocks, such as those in close proximity to commercial centres*".

These 'reforms' are likely to be ineffective and a wasted opportunity. Experience from Melbourne shows that single-block redevelopment achieves only small overall increases in dwelling numbers and "*typically results in loss of private green space...**land assembly** is a prerequisite...the missing step in creating the missing middle*" ['Greening the Greyfields']

We ask the committee to consider carefully our submission and in particular our recommendation (on the second page) that this major plan amendment be Not approved, for all the reasons we have set out.