



Standing Committee on Environment and Planning,
ACT Legislative Assembly
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Inquiry into DPA-04 – Missing Middle Housing Reform

The National Trust of Australia (ACT) welcomes the opportunity to make a submission to the Inquiry into the Draft Major Plan Amendment to the Territory Plan 04 (DPA-04), referred to the Committee by the Minister for Planning and Sustainable Development under section 70 of the *Planning Act 2023*.

Our submission addresses the Inquiry's consideration of:

- the intent and operation of the proposed Territory Plan amendments;
- their likely impacts on housing supply, urban character, heritage and environmental values; and,
- whether the proposed framework provides clear, effective and enforceable planning outcomes.

The Trust supports efforts by the ACT Government to increase Canberra's housing supply and recognises the objectives of the Missing Middle Housing Reforms to improve housing affordability, accessibility and flexibility. We acknowledge the need to respond to population growth and changing housing needs.

However, we consider that these objectives must be pursued alongside the protection of Canberra's distinctive character, including its Garden City principles, and the safeguarding of places of environmental and heritage significance. Effective planning reform should balance growth with long-term liveability and place-based values.

The draft amendments indicate that key protections will be achieved through:

- design standards emphasising integration with street character and environmentally sustainable outcomes;
- consideration of heritage and environmental factors in development assessment; and,
- protection of trees and landscaping through design guidance.

The Trust is concerned that these protections are not embedded as clear, enforceable rules within the Territory Plan. Instead, they rely heavily on guidance and discretionary assessment.

In particular:

- heritage and environmental protections are not clearly guaranteed in the planning controls;
- the removal of fixed parameters, such as minimum block sizes, increases reliance on subjective judgement; and,
- the absence of mandatory standards risks inconsistent outcomes across similar sites.

While outcomes-based assessment can provide flexibility, it also places significant weight on interpretation unless supported by precise and enforceable specifications. This is particularly problematic in sensitive locations.

It is unclear how proponents are expected to demonstrate that heritage considerations have been adequately addressed. The current wording is vague and subjective, providing limited guidance to applicants or assessors about acceptable development outcomes in areas of heritage value.

The Trust is concerned that the proposed framework is insufficient to protect Canberra's character, including its Garden City legacy. Without clearer direction, there is a risk that incremental change will gradually erode heritage values, even where individual developments appear compliant.

The proposed changes may disproportionately affect Canberra's inner suburbs, particularly heritage-listed housing precincts such as Ainslie, Wakefield Gardens, Braddon, Reid, Barton, Kingston/Griffith, Forrest, Blandfordia 5 and others.

Unsympathetic or highly distinctive new development within these areas risks undermining the integrity of Special Character Zones and diminishing the historic and aesthetic qualities of established neighbourhoods.

By comparison, the *National Capital Plan* clearly articulates planning principles and aesthetic standards to maintain and enhance the character of the National Capital. The absence of similarly strong and enforceable provisions within DPA-04 creates a concerning gap.

Direct threats, or the gradual erosion, of Canberra's character would represent a significant and irreversible loss.

The Trust supports the development of a Design Guide but considers the current proposal insufficiently detailed to support consistent decision-making. A stronger guide should set out clearly articulated parameters to reduce subjectivity and provide certainty.

Development proposals should be required to demonstrate consideration of:

- heritage values, natural features and site characteristics;
- adjacent places, curtilage and broader neighbourhood context; and,
- sustainability, climate adaptation, infrastructure and utilities.

There is a risk that assessments will focus narrowly on site boundaries, rather than the broader context in which development occurs.

Meaningful tree retention, canopy coverage and a minimum of 40% soft landscaping are essential to maintaining Canberra's character and ensuring environmental sustainability, and should be explicitly protected.

In heritage-listed precincts and places, the Trust strongly supports retaining existing planning controls, including:

- maximum site coverage of 27.5%;
- minimum 40% green space (soft landscaping);
- maximum building height of two storeys; and,
- retention of existing significant trees.

These controls are effective, well understood and central to protecting Canberra's character, and places of environmental and heritage significance.

Rather than applying a uniform approach across all RZ1 zones, the Trust advocates for a more sensitive and nuanced framework that reflects the distinct character of different areas, particularly the inner north and inner south.

Additional guidance should clearly define acceptable design responses to site context and neighbourhood character.

Clarification is also required regarding whether certain developments could proceed without a development application and be assessed solely by a certifier. Such pathways should not be permitted where heritage and character outcomes are at stake.

There may also be merit in encouraging well-designed block consolidation to achieve appropriate medium-density outcomes rather than incremental redevelopment of individual blocks.

The Trust supports housing reform that is balanced, well-designed and sustainable. We encourage the Committee to recommend stronger, clearer and enforceable planning controls within DPA-04 to ensure that increased housing supply does not compromise Canberra's heritage and environmental values or distinctive character.

Thank you for the opportunity to make this submission.

Yours faithfully,



Linda Roberts
President

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