



**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:

Simon Copland, Executive Director, director@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.