

Environment, Planning and
Sustainable Development Directorate
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Via email: EPSDDComms@act.gov.au

Submission to the ACT Government: Missing Middle Housing Reforms

Thank you for the opportunity to provide feedback on the Missing Middle Housing Reforms.

Advocacy for Inclusion acknowledge and welcome the ACT Government's focus on improving the planning system to allow more diverse housing options in Canberra's established suburbs. However, while these reforms are designed to increase private medium-density housing supply, it is essential to recognise that without safeguards and clear standards, they risk entrenching barriers to safe, affordable, and accessible housing for people with disability and older Canberrans.

About us

Advocacy for Inclusion (AFI) is an independent organisation delivering reputable national systemic advocacy informed by our experience in individual advocacy and community and government consultation. We provide dedicated individual and self-advocacy services, training, information and resources in the ACT. As a Disabled People's Organisation, the majority of our organisation, including our Board of Management, staff and members, are people with disabilities. AFI speaks with lived experience and is committed to advancing opportunities for the insights of people with disability to be heard and acknowledged.

Housing and Disability in the ACT

People with disability face a double disadvantage in Canberra: a lack of affordable housing and a lack of housing designed to support disability and ageing in place. This is compounded by a high-cost private rental market, limited tenure security, and declining public housing investment.

Around one in five Canberrans has a disability, and one in two people over 65 experience some form of disability. With Canberra's population ageing rapidly – more than 114,000 residents will be over 65 by 2060 – designing inclusive housing is not just a niche concern but a central planning imperative.

More than half of ACT public housing households include a person with disability, and yet only 60 per cent of those dwellings meet an acceptable standard. A Disability Support Pension recipient could not afford any of the 1,978 rental properties in the ACT and surrounding areas

advertised in March 2025. Inaccessible and poor-quality housing increases the risks of homelessness, poor health, and social exclusion.

While planning reforms can expand housing supply, simply enabling more medium-density redevelopment will not on its own deliver the accessible and affordable homes that people with disability and older people urgently need.

Three Priorities for Reform

To ensure the Missing Middle reforms deliver meaningful improvements rather than replicating past inequalities, we recommend the following:

1. Accessibility as a Baseline Requirement

- New housing enabled through the reforms should be required to meet Gold-level accessible design standards by default.
- Accessibility must be treated as essential infrastructure within planning frameworks, not an optional feature in the private market.

Universal design enables safe and dignified participation in daily life regardless of age or ability. Embedding these principles now ensures Canberra's housing stock remains fit-for-purpose over time. It also avoids the much greater cost of retrofitting inaccessible homes later.

2. Diversify Beyond Medium-Density by Default

- Medium-density housing should not become the default model for all redevelopment.
- Planning rules should support a mix of housing types – detached dwellings, dual occupancies, terraces, small-scale infill – to better match the diverse needs of people with disability and older Canberrans.
- Reforms must also avoid the risk of smaller, less accessible homes becoming the only affordable options.

Intentional social planning, driven by lived experience voices, is critical to ensuring this diversity. Canberra's changing demographics demand a housing system that supports ageing in place and lifelong inclusion.

3. Incentivise Accessible Private Housing Supply

- The ACT Government should include measures within the planning reforms to incentivise the delivery of accessible housing in the private market.
- Options could include planning bonuses, reduced fees, or other incentives to encourage developers and landlords to deliver accessible dwellings.

Too often, the cost of inclusion is over-scrutinised, while the significant costs of inaction – social exclusion, wasted public investment, preventable hospitalisation – go unexamined.

Additional considerations to support the success of Missing Middle reforms

While these planning reforms focus primarily on zoning and approval pathways, complementary policy action in adjacent domains will be critical to achieving equitable outcomes. We encourage the ACT Government to consider the following areas as part of broader implementation and future reform efforts:

- **Visibility and choice in the rental market**
Ensure that accessible and adaptable dwellings are clearly identified and searchable in rental listings, enabling people to find appropriate housing when seeking to downsize or relocate.
- **Secure tenure and capacity to modify housing**
Improve protections for renters with disability and older people to remain in their homes, including the ability to make reasonable accessibility modifications, so that newly built accessible dwellings retain their value and purpose over time.
- **Climate-ready and suitable housing**
Embed minimum standards for thermal comfort, energy efficiency, and climate resilience in medium-density dwellings to protect residents with temperature regulation issues and other health vulnerabilities.

These considerations, while beyond the immediate scope of zoning reform, are vital to ensuring that medium-density housing delivers on the goals of inclusion, liveability, and long-term suitability for Canberra's diverse and ageing community.

Conclusion

The Missing Middle reforms are an important opportunity to modernise Canberra's planning system and improve housing supply. However, they must be designed and implemented in ways that do not leave people with disability and older Canberrans behind.

Medium-density infill alone will not solve the shortage of affordable, appropriate, and secure housing. The reforms should embed accessibility as standard, support a diversity of housing types, and include clear requirements and incentives to deliver homes that people with disability and older residents can actually live in.

Accessible, affordable housing is not a niche issue – it is a whole-of-community investment. By embedding universal design and inclusive planning now, the ACT Government can shape a future Canberra that is age-friendly, disability-inclusive, and socially just.

Thank you for your time and consideration. Please feel free to contact me at jo@advocacyforinclusion.org to discuss this submission.

Regards,



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