

5 August 2025

Missing Middle Housing Reforms
Environment, Planning and Sustainable Development Directorate
ACT Government

Via email: EPSDDcomms@act.gov.au

Dear Missing Middle Housing Reforms team

RE: Missing Middle Housing Reforms

The Green Building Council of Australia (GBCA) welcomes the opportunity to provide input to the consultation regarding the ACT's Missing Middle Housing Reforms. We commend the ACT Government commitment to removing barriers in the planning system to enable more housing types. More broadly, we applaud the ACT Government leadership in initiatives such as the timely implementation of National Construction Code 2022, preventing new gas network connections and releasing the Sustainable Buildings Pathway – all of which will contribute to the successful development of more sustainable housing in the ACT.

GBCA's purpose is to lead the sustainable transformation of the built environment. We do this primarily through our core functions:

- We rate the sustainability of buildings, fitouts and communities through Australia's largest national, voluntary, holistic rating system – Green Star.
- We educate industry, government practitioners and decision-makers, and promote green building programs, technologies, design practices and operations.
- We advocate policies and programs that support our vision and purpose.
- We collaborate with our members and other stakeholders to achieve our mission and strategic objectives.

GBCA notes that accelerating the growth of 'missing middle' housing will help to boost housing supply and deliver a range of other benefits to Canberra's existing suburbs and communities. Importantly, a focus on infill development and ongoing commitment to ACT Government's goal of 70% of new housing growth to take place in existing urban areas, also reduces the need to consider development on greenfield sites. This is a critical step in protecting nature and biodiversity and working towards a nature positive future.

We commend the development of the comprehensive Missing Middle Housing Design Guide (the guide) as a resource for anyone considering, planning, designing, constructing and landscaping a 'missing middle' type of home. We note the Sustainability and Environment chapter which provides guidance for considering a range of elements such as trees, landscaping and natural features, building design performance, natural resource capture and management, and climate change resilience.

We offer the following suggestions for further resources that could be referenced within the guide:

- Indoor air quality – While natural cross-ventilation, air-tightness and acoustic comfort are covered in the guide, this is also an opportunity to share information about avoiding materials with high Volatile Organic Compounds (VOCs). The Australian Government's [Your Home website](#) includes some useful information.
- Embodied carbon – We commend the guidance relating to lowering embodied carbon and note the GBCA's recent releases which may be of interest; [Our homes weigh a tonne \(of carbon per square metre\): Call to action](#) and [Our homes weigh a tonne: Technical report](#).
- Circularity – We commend the promotion of circular outcomes in the guide and suggest the inclusion of GBCA's [A practical guide to circular procurement: For new developments and major refurbishments](#) as an additional resource.
- Waste – We note our recently released report, [Australia's Waste\[d\] Opportunity 2025](#). This paper aims to help establish more accurate and meaningful benchmarks for construction waste. This is designed to encourage action beyond diversion from landfill, to reduce waste generation overall.
- Nature and biodiversity – The guide includes excellent information about landscaping, planting and retaining plants to protect and enhance biodiversity. GBCA's draft [Nature positive roadmap: For new developments](#) details key principles to support nature positive outcomes in new developments and sets a pathway towards a nature positive future.

To arrange further discussion or briefings on any of the GBCA resources noted above, please do not hesitate to contact Katy Dean, Senior Policy Adviser, via email at katy.dean@gbca.org.au.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'D. Rooney'.

Davina Rooney
Chief Executive
Green Building Council of Australia