



Australian
Institute of
Architects

MISSING MIDDLE HOUSING REFORM



Response to ACT Government reform proposal

ACT CHAPTER

August 2025

ABOUT THE INSTITUTE

The Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation with around 15,000 members across Australia and overseas.

The Institute exists to advance architecture, architects' professional standards and contemporary practice, and expand and advocate the value of architects and architecture to the sustainable growth of communities, economy and culture.

The Institute actively works to maintain and improve the quality of our built environment by promoting better, responsible and environmental design.

PURPOSE

This submission is made by the Institute to further the development of 'missing middle' housing opportunities within the ACT planning framework.

At the time of this submission the ACT Chapter President is Shoba Cole. The Chief Executive Officer is Cameron Bruhn and Executive Director ACT is Roslyn Dundas.

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MISSING MIDDLE HOUSING REFORM

To address housing needs and ensure a balanced urban environment, we must deliver diverse housing options through sustainable and master-planned developments. This includes a mix of housing types – such as townhouses, apartments, and medium-density developments – that can accommodate various households. Architecture plays a critical role in fostering community connection, promoting environmental sustainability, and ensuring efficient land use through good design outcomes.

Architects are already working to create designs that prioritise energy efficiency, adaptability, and liveability, enhancing the long-term value and social outcomes of housing projects while supporting broader housing affordability goals.

With over 70% of blocks in the ACT zoned RZ1, a strong government focus on enabling a greater variety of housing typologies within suburban areas is strongly encouraged. Architects can design appropriately scaled dual-occupancies, townhouses, manor houses, small apartment buildings, and co-housing to meet the growing demand from ACT residents looking to buy their first home, move within their community – or simply age in place.

The Institute welcomes the consultation put forward by the ACT Government. The proposed changes to encourage missing middle development are generally welcomed. The Institute has appreciated the opportunity to be engaged in the drafting of the Missing Middle Housing Design Guide and looks forward to further consultation on this important document, a potential Pattern Book, and the reform program overall. Locally led engagement is vital to the success of the proposal both in design and build phase.

The potential to meet the goals of missing middle reform will be enhanced with some small technical changes. It is vital the new guidelines foster the take-up of a diversity of housing options, not just allowing larger dwellings.

Summary of Recommendations

- An immediate review of the ACT Heritage policies, and guidelines be conducted to support missing middle development in heritage areas where appropriate.
- Guidelines be developed for heritage sites, drawing on the Bluefield Housing model, to encourage densification while retaining existing building fabric and shared landscape.
- Review current subdivision policy requiring new RZ1 blocks to have either street frontage or public pathway frontage, to allow greater flexibility and considered design in support of retention of existing buildings.
- Establish a design review panel to assess complex (block greater than 2000m²) missing middle developments.
- Multi-unit development proposals that comply with the Residential Zones Policy, Subdivision Policy, and Technical Specifications be considered as exempt (or complying) developments and therefore not be subject to a Development Application process.

- Mandate use of architects for developments over the dwelling/hectare ratios in the Technical Specifications and for all apartment buildings 3 storeys and above, to align with NSW regulations.
- Provide a clearer definition of co-housing (including reference to carparking specifications) within the Missing Middle Housing Design Guide.
- Provide a definition of Micro blocks and develop suitable guidelines to ensure high-quality outcomes for the use of this typology.
- Lease Variation Charges (LVCs) to be reviewed and updated to encourage development in line with missing middle reforms.

HERITAGE GUIDELINES AND RETENTION OF EXISTING DWELLINGS

The importance of heritage in our built environment is well established. A heritage item may be significant for aesthetic, historic, social, spiritual or technical reasons. Creativity allied with design skills and an appreciation of the original item are required for successful conservation and adaptive re-use. The proposed missing middle Design Guides and Technical Specifications do not currently address issues of heritage and sit separate to ACT Heritage policies and guidelines. This division has the potential to restrict missing middle development in heritage areas, or on blocks identified as having heritage value.

Bluefield Housing is a concept developed by Damian Madigan from the University of South Australia. Proposed as an extension to established definitions of Greenfield, Brownfield and Greyfield, Bluefield refers to both a land definition and an infill housing model. With an aim of increasing housing diversity and choice while retaining existing neighbourhood character Bluefield concepts look to retention and adaption as an alternative to knock-down-rebuild developments. Such an approach could support increased density and housing choice in heritage precincts. Undertaking a Bluefield Housing approach can also encourage greater consideration of future heritage value. Thoughtful design can make use of existing dwelling to ensure housing of potential heritage significance (such as mid-century homes) are not lost in densification processes.

Recommendations

- An immediate review of the ACT Heritage policies, and guidelines be conducted to support missing middle development in heritage areas where appropriate.
- Guidelines be developed for heritage sites, drawing on the Bluefield Housing model, to encourage densification while retaining existing building fabric and shared landscape.
- Review current subdivision policy requiring new RZ1 blocks to have either street frontage or public pathway frontage, to allow greater flexibility and considered design in support of retention of existing buildings.

DESIGN REVIEW OPPORTUNITIES AND APPROVALS PROCESS

The ACT Government has been successful in adopting a design review panel to assess complex developments within the urban context of our city. This has seen significant improvement in the quality of multi-residential buildings since its inception. Such a review process could support the successful rollout of missing middle reforms by ensuring developments of a certain scale (block greater than 2000m²) are designed with appropriate amenity and streetscape character.

The NSW Government requires all apartment buildings of a certain scale to be designed, or signed off, by a registered architect. This has delivered a measurable uplift in design quality since inception and should be used as a benchmark for the ACT.

With the implementation of the Missing Middle Housing Design Guide, the ACT can strive for design excellence through the implementation of criteria on design delivery by

mandating the use of professional services on complex projects. ACT registered architects and building designers who demonstrate proficiency in housing design and undertake continuing professional development should be eligible to deliver these professional services.

Recommendations

- Establish a design review panel to assess complex (block greater than 2000m²) missing middle developments.
- Multi-unit development proposals that comply with the Residential Zones Policy, Subdivision Policy, and Technical Specifications be considered as exempt (or complying) developments and therefore not be subject to a Development Application process.
- Mandate use of architects for developments over the dwelling/hectare ratios in the Technical Specifications and for all apartment buildings 3 storeys and above, to align with NSW regulations.

TECHNICAL DEFINITIONS

The proposed missing middle reforms is an opportunity to broadly consider review of definitions to encourage greater shared understanding and ease of use of planning policies. **Further detail on the Institute's response to technical changes is outlined in comments in the comparison tables below.**

Co-housing: There is great opportunity for more co-housing to be developed. Due to a lack of understanding on the typology within the community, co-housing requires additional promotion and education. Clarity on parking requirements that may differ from the current specifications should be included in the definitions.

Micro blocks (under 150m²): The ACT planning framework does not currently include Micro Blocks, with the smallest block typology being Compact Blocks (less than 250m²). Micro blocks (under 150m²) are a viable option to deliver housing density, particularly in the missing middle context. The proposed Design Guide and Technical Specifications can be updated to include the definition of Micro Blocks with suitable guidelines to be developed and tailored to ensure high-quality outcomes.

Recommendations

- Provide a clearer definition of co-housing (including reference to carparking specifications) within the Missing Middle Housing Design Guide.
- Provide a definition of Micro blocks and develop suitable guidelines to ensure high-quality outcomes for the use of this typology.

LEASE VARIATION CHARGE

The current implementation of Lease Variation Charges (LVCs) should be reviewed and updated to encourage development. Even with these missing middle reforms in place there is a need to incentivise the delivery of a greater yield of housing to meet increased population need. Under the current LVC there is a risk developers will reduce the number of

dwellings per hectare on a missing middle project to avoid charges – as the rate is applied per dwelling, regardless of dwelling size. To encourage an uptake of more compact and affordable housing, with increased dwelling yield, the LVCs could be reviewed to have reduced rates for more compact typologies.

Recommendations

- Lease Variation Charges (LVCs) to be reviewed and updated to encourage development in line with missing middle reforms.

Review of Change Tables

Comparison Table: RZ1 – Suburban Zone

Element	Current Provision	Proposed Change	Reason for Change	Institute Comments
Policy Outcomes: (Residential Zones Policy)	1. Achieve and/or maintain low density residential neighbourhoods in suburban areas.	1. Provide for a range of housing choices in a suburban setting which is primarily low density and low rise.	These changes reflect that the main residential zone needs to provide a range of housing choices, that are low-rise. This will require some change within the RZ1 zone to housing density, whilst retaining the lower density character and valuing neighbourhood and landscape character.	Supported.
	2. Provide for a range of housing choices that meet changing household and community needs.	2. Housing development meets changing household, and community needs and demonstrates good design outcomes.	As above	Supported.
	3. Limit the extent of change that can occur particularly with regard to the residential density and original pattern of subdivision.	3. Provide opportunities for redevelopment by enabling some change to residential density and subdivision pattern.	As Above	Supported.

	4. Ensure development respects valued features of the neighbourhood and landscape character of the area and does not have unreasonable negative impacts on neighbouring properties.	4. Development respects valued features of the neighbourhood and landscape character of the area and does not have unreasonable negative impacts on neighbouring properties.	As above.	Supported.
Maximum height: (Residential Zones Policy)	2 storeys + attic	2 storeys + attic	No change	Not Supported. Recommend the number of storeys be removed. The Technical Specification sections 14.1 Building Height, 14.2 Building Envelope, and 15.1 Solar Building Envelope ensure appropriate bulk and scale and the NCC mandates minimum internal ceiling heights. Having no limit on storeys will allow for more creativity and flexibility in design to deliver split level designs and have potential to enhance planting area / tree canopy cover with a reduce building footprint.
Maximum site coverage: (Residential Zones Policy)	45% for MUH	45% for MUH	No Change. This provision works closely with other important planning rules, such as setbacks, building envelopes and canopy cover requirements to	Supported.

			limit the size and scale of development.	
Minimum block area for 2 dwellings: (Residential Zones Policy)	800m ² (or 600m ² for supportive/community housing).	Minimum block area for 2 dwellings no longer specified.	<p>The minimum block area has been removed to enable more missing middle housing in RZ1. These provisions previously sought to limit density, which is now being relaxed.</p> <p>Other requirements, such as those relating to site coverage and living infrastructure, will provide limitations on the size of developments.</p>	Supported.
Maximum dwellings: (Residential Zones Policy)	2	Appropriate number of dwellings is guided by site context and dwelling density targets in the Residential Zones Technical Specifications	<p>Dwelling densities have been developed and are located in the Residential Zones Technical Specification. These have been increased from the previous maximum to enable the delivery of missing middle housing.</p> <p>The dwelling density targets balance providing more housing with important amenity outcomes such as living infrastructure, private open space, on-site</p>	Supported. We note the dwelling/hectare ratios should be flexible and allow for increased numbers where a design solution can prove high quality amenity for the site and surrounding neighbourhood.

			parking, and suburban character.	
Apartments: (Residential Zones Policy)	No apartments permitted in RZ1.	Apartments permitted in RZ1.	Apartment developments are proposed to be allowed in RZ1. Apartment developments are limited to 2 storeys. This will allow walk-up apartments and manor house style developments (i.e. separate dwellings on the ground floor and upper floor).	Supported - Inclusion of apartments. Recommend the restriction to 2 storeys should be reconsidered. Refer to comment above on Maximum Building Height.
Secondary Residences: (Residential Zones Policy)	<ul style="list-style-type: none"> - Associated with a single dwelling. - Maximum dwelling size of 90m². - Minimum block size – 500m² - 1 secondary residence per block. 	<ul style="list-style-type: none"> - Associated with a single dwelling. - Maximum dwelling size of 90m². - 1 secondary residence per block. 	<p>Removed minimum block size to allow secondary residences on smaller blocks, where all other requirements are met.</p> <p>Overall size and scale of secondary residence is primarily controlled by site coverage and the other key outcomes such as planting areas, canopy coverage and other living infrastructure considerations.</p> <p>This has been relaxed to allow for different living arrangements on the same block (such as granny flats for multi-</p>	Supported.

			generational living). Other provisions allow for blocks to be subdivided to provide a separate dwelling.	
Co-housing: (Residential Zones Policy)	Limited to block of 1050m ² or more.	Minimum block area removed.	<p>To allow co-housing developments on all blocks, where all other requirements are met.</p> <p>Overall size and scale of co-housing is primarily controlled by site coverage and other key outcomes such as planting areas, canopy coverage and other living infrastructure considerations.</p> <p>This will contribute to the housing choice available to residents who may wish to live in this type of housing model.</p>	Supported.
Car parking rates: (Technical Specification)	<p>One parking space per single bedroom dwelling.</p> <p>1.5 spaces per 2-bedroom dwelling.</p>	<p>One parking space per dwelling.</p> <p>Plus an additional 1 space per five 2-bedroom dwellings.</p>	A reduction in minimum car parking rates intends to balance the desire to achieve on-site amenity and limit unreasonable impacts to the street and neighbourhood.	Supported.

	<p>2 parking spaces for each dwelling with 3 or more bedrooms.</p> <p>1 visitor space per 4 dwellings.</p>	<p>Plus an dadditional 1 space per three 3+ bedroom dwellings.</p> <p>No requirement for on-site visitor parking.</p>	<p>Car parking is considered through the development assessment process, with the acceptable rates of parking considered on a case-by-case basis, involving consideration of factors such as proximity to public transport and active travel corridors, and capacity of the existing street and parking network to support off-site car parking.</p> <p>It is also important to note that the provision of car parking is often driven by location, such as proximity to public transport routes, and market preferences.</p>	
	Location of car parking spaces: One car space per dwelling is roofed.	No requirement.		Supported.
	Basement car parking: RZ1, where block is less than 30m wide, ramps accessing basement car parking are not located within 50% of minimum front setbacks.	No requirement.		Supported.

Planting area (MUH): (Technical Specification)	35%	30%	A reduction in planting area for MUH is intended to be offset by an increase in canopy cover, to support Government's 30% canopy cover target.	Supported.
Tree canopy coverage (MUH): (Technical Specification)	15%	20%	An increase in canopy cover is intended to be balanced by a decrease in planting area, to support Government's 30% canopy cover target.	Supported.
Dwelling density RZ1 (MUH): (Technical Specification)	None	Attached houses – 54 dwellings per hectare (more can be considered if parking is contained within a basement). Apartments - 67 dwellings per hectare (more can be considered if parking is contained within a basement).		Supported. Recommend densities over these figures be reviewed by a Missing Middle Housing Design Review Panel to ensure higher quality outcomes. Refer to comments associated with this schedule on the Missing Middle Housing Design Review Panel.
Other Residential Zones Technical Specification changes:	Site and Land Use – Distribution of non-residential developments in all residential zones – varied development types	Site and Land Use – Distribution of non-residential developments in all residential zones – varied development types with addition of: - Social enterprise		Supported.

		- Veterinary clinic		
	Site and Land Use – Distribution of non-residential developments in all residential zones – no more than 2 home businesses per section	Site and Land Use – Distribution of non-residential developments in all residential zones – no more than 2 home businesses per 20 dwellings		Supported.
	Private open space for MUH – 40% of site	Private open space for MUH – 30% of site	Private open space requirements have reduced in site percentage however the quality of space that contributes to the private open space area has increased. This is intended to see improvements in usable, high amenity spaces for residents.	Supported.
	Principle private open space (at lower level) for MUH 28m ² – 45m ² minimum area and 5m-6m minimum dimension.	Principle private open space (at lower level) for MUH 24m ² – 36m ² minimum area and 4m-6m minimum dimension.		Supported.
	Building height – RZ1 is 8.5m	Building height – RZ1 is 8.5m	No change.	Not Supported. Recommend this be changed to a height of 9.0m to enable greater flexibility in built form for complex sites such as those with large cross fall and reducing the

				likelihood of developments having ground floor levels below natural ground lines.
	Building envelope measurement taken from 3.5m above boundaries.	Building envelope measurement taken from 4m above boundaries.	Setbacks, building and solar envelopes have been modified to enable increased building area where impacts to neighbours is minimised. Solar access and privacy requirements for neighbours continue to apply.	Supported.
	Front setbacks for MUH – 6m	Front setbacks for MUH – 4m-6m		<p>Remove reference to ‘Primary front boundary setback for blocks in subdivisions approved before 18 October 1993’ from the Technical Specifications.</p> <p>Recommend one front setback of 4m for all single dwelling and MUH. This provides more flexibility in design and allows better use of sites where it is more beneficial to have tree canopy cover in the rear of the site.</p> <p>Remove the proposed single dwelling front setback ‘Maximum of 8m’ requirement. This is inconsistent with maintaining streetscape character where some existing suburbs have larger setbacks.</p>
	Front setbacks for MUH Corner blocks secondary street	Front setbacks for MUH Corner blocks secondary		Supported.

	frontage (mid-sized blocks) – 3m	street frontage (mid-sized blocks) – 2m		
	Side and rear setbacks for MUH primary building zone – 3m	Side and rear setbacks for MUH primary building zone – 0m		Supported.
	Side and rear setbacks for MUH rear setback – 3m	Side and rear setbacks for MUH rear setback – 6m		Supported.
	Side and rear setbacks for MUH unscreened elements – 3m	Side and rear setbacks for MUH unscreened elements – 1m, 3m, 6m		Supported.
	Solar building envelope angle for MUH – 31°	Solar building envelope angle for MUH – 45°		<p>Recommend a review of the solar building envelope solar fence and envelope angle be considered.</p> <p>An increased solar fence height to 3.0m coupled with an angle of 35° allows more flexibility of design whilst ensuring good solar access to neighbouring blocks.</p>
	Separation between walls in MUH – RZ1: Unscreened elements and an external wall on the same block or an adjoining block are separated by 3m or more. External walls at the lower floor level on the same or adjoining	<p>Separation between walls and PPOS in MUH – RZ1:</p> <p>The minimum separation between walls and principle private open space to dwellings on the same block and adjoining block is:</p>		<p>Recommend the various setback be reviewed. Current setbacks to unscreened elements are too onerous and will lead to increased use of screened elements reducing the thermal performance and natural light into dwellings.</p>

	block are separated by 1m or more.	3m, 6m, 9m, 12m (refer to Technical Specifications)		
	Privacy – MUH: various rules (refer Technical Specifications)	Added to above.		Supported.
	<p>Minimum dwelling size – MUH: Minimum dwelling floor areas for:</p> <ul style="list-style-type: none"> - Studio dwellings = 40m² - 1 Bed dwellings = 50m² - 2 Bed dwellings = 70m² - 3+ Bed Dwellings = 95m² 	<p>Minimum dwelling size – MUH: Minimum dwelling floor areas for:</p> <ul style="list-style-type: none"> - Studio dwellings = 35m² - 1 Bed dwellings = 50m² - 2 Bed dwellings = 70m² - 3+ Bed Dwellings = 90m² 		Supported.
	<p>Minimum widths and area – MUH: Minimum widths are as follows:</p> <ul style="list-style-type: none"> - Beds = 3.0m 	<p>Minimum widths and area – MUH: Minimum widths are as follows:</p> <ul style="list-style-type: none"> - Master Beds = 3.0m - All other Beds = 2.7m 		Supported.
	Minimum widths and area – MUH: Minimum widths are as follows:	Minimum widths and area – MUH: Minimum widths are as follows:		

	<ul style="list-style-type: none"> - Living Rooms – Studio + 1 Beds = 3.6m - Living Rooms – 2 Bed + 3 Bed = 4.0m 	<ul style="list-style-type: none"> - Living Rooms – Studio + 1 Beds = 3.0m - Living Rooms – 2 Bed + 3 Bed = 3.6m 		
	<p>Internal Storage – MUH:</p> <ul style="list-style-type: none"> - Studio = 2m³ - 1 Bed = 3m³ - 2 Bed = 4m³ - 3 Bed+ = 5m³ <p>External Storage – MUH: various rules</p>	<p>Storage – MUH:</p> <ul style="list-style-type: none"> - Studio = 4m³ - 1 Bed = 6m³ - 2 Bed = 8m³ - 3 Bed+ = 10m³ 		Supported.
	Balustrades – MUH: various rules	No requirement		Supported.
Subdivision: (Subdivision Policy)	<p>Unit titling above 800m², max 120m² for size of second dwelling.</p> <p>Block subdivision not permitted,</p>	<p>Unit titling above 600m², no maximum size limit for second or subsequent dwellings.</p> <p>Block subdivision permitted where a dwelling has been lawfully constructed.</p>	<p>This is to allow subdivision of RZ1 blocks, but only where the blocks already contain a dwelling. This has been included to:</p> <ul style="list-style-type: none"> - Avoid land banking, - Disincentivise the creation of ad hoc mid-sized and compact single dwelling in favour of the 	Supported.

			<p>creation of larger blocks for appropriate missing middle housing.</p> <p>Site cover, setbacks, planting area and solar access requirements will control the overall size of additional dwellings.</p>	
<p>Consolidation: (Subdivision Policy)</p>	<p>2 blocks for supportive housing only.</p>	<p>Permissible for all development that will result in more dwellings – the Subdivision Technical Specifications guide suitable consolidation outcomes. General limit of 2000m², 2500m² for consolidations adjoining urban open space/community path network, and 3000m² for end of section consolidation.</p>	<p>Block consolidation will support efficient land use for missing middle developments and will support higher quality development outcomes. It will also enable the delivery of more housing and will also contribute to a range of missing middle outcomes.</p> <p>Limits on consolidation outcomes for RZ1 blocks are provided to limit over-development and to maintain the low-rise, lower density character of RZ1 areas compared to RZ2 outcomes.</p>	<p>Supported in principle.</p> <p>The indicated limits are supported.</p> <p>For consolidations over 3000m² it is recommended proposals be reviewed by a Missing Middle Housing Design Review Panel to ensure higher quality outcomes. Refer to comments associated with this schedule on the Missing Middle Housing Design Review Panel.</p> <p>Recommend all developments over 2000m² be subject to RZ2 Policies and Technical Specifications.</p>

Comparison Table: RZ2 – Suburban Density Zone

Element	Current Provision	Proposed Change	Reason for Change	Institute Comments
Policy Outcomes: (Residential Zones Policy)	1. Facilitate development or redevelopment of sites within reasonable proximity to local services to achieve a mix of low to medium density housing.	1. Facilitate development or redevelopment of sites that are generally in reasonable proximity to local services and amenities.	Name change and policy outcome changes are proposed to reflect the aim for more development and redevelopment opportunity and a greater mix of housing to be provided. It is noted that these will still be low rise (up to 3 storeys) and more compact single dwellings.	Supported.
	2. Provide for a range of housing choices where the housing is low rise and contains a mix of single dwelling and multi-unit housing.	2. Achieve a mix of low and medium density housing in a manner that demonstrates good design outcomes.		Supported.
	3. Provide opportunities for redevelopment by enabling a limited extent of change in density.	3. Provide for a range of housing choice that is primarily low-rise multi-unit housing or more compact single dwelling housing.		Supported.
		4. Provide opportunities for redevelopment by enabling change,		Supported.

		including to residential density and subdivision pattern.		
Maximum height: (Residential Zones Policy)	2 storeys + attic	Single dwellings / secondary residences: 2 storey + attic MUH: 3 storey + attic	Building heights for multi-unit housing in RZ2 have been increased to better reflect the transition in scale between RZ1 and RZ2 zones. This change provides a relaxation of height restrictions for RZ2 development to allow more homes to be provided, however there are important requirements around setbacks, building envelopes and over-shadowing that must be met to limit impacts on neighbours.	Not Supported. Recommend the number of storeys be removed. The Technical Specification sections 14.1 Building Height, 14.2 Building Envelope, and 15.1 Solar Building Envelope ensure appropriate bulk and scale and the NCC mandates minimum internal ceiling heights.
Maximum site coverage: (Residential Zones Policy)	45% for MUH	45% for MUH	No change. This provision works closely with other important planning rules, such as setbacks, building envelopes and canopy cover requirements to limit the size and scale of development.	Supported.

Minimum block area for 2 dwellings: (Residential Zones Policy)	700m ² (or 600m ² for supportive/community housing).	Minimum block area for 2 dwellings no longer specified.	The minimum block area has been removed to enable the uptake of missing middle housing in RZ2. Other requirements, such as those relating to site coverage and living infrastructure, will provide limitations on the size of developments.	Supported.
Maximum dwellings: (Residential Zones Policy)	1 additional for every 250m ² over the minimum.	No maximum.	To incentivize missing middle housing development in RZ2 where they can be proposed and constructed to meet the other relevant Assessment Outcomes and guidance.	Supported.
Car parking rates: (Technical Specification)	One parking space per single bedroom dwelling. 1.5 spaces per 2-bedroom dwelling. 2 parking spaces for each dwelling with 3 or more bedrooms. 1 visitor space per 4 dwellings.	One parking space per dwelling. Plus an additional 1 space per five 2-bedroom dwellings. Plus an additional 1 space per three 3+ bedroom dwellings. No requirement for on-site visitor parking.		Supported.

Planting area (MUH): (Technical Specification)	35%	30%		Supported.
Tree canopy coverage (MUH): (Technical Specification)	15%	20%		Supported.
Other Residential Zones Technical Specification changes:	Site and Land Use – Distribution of non-residential developments in all residential zones – varied development types	Site and Land Use – Distribution of non-residential developments in all residential zones – varied development types with addition of: - Social enterprise - Veterinary clinic		Supported.
	Site and Land Use – Distribution of non-residential developments in all residential zones – no more than 2 home businesses per section	Site and Land Use – Distribution of non-residential developments in all residential zones – no more than 2 home businesses per 20 dwellings		Supported.
	Private open space for MUH – 40% of site	Private open space for MUH – 30% of site	Private open space requirements have reduced in site percentage however the	Supported.

			quality of space that contributes to the private open space area has increased. This is intended to see improvements in usable, high amenity spaces for residents.	
	Building height – RZ2 is 8.5m	Building height – RZ2: - Single Dwelling – 8.5m - Multi-unit housing – 10.5m		Single dwelling - Not Supported. Recommend this be changed to a height of 9.0m to enable greater flexibility in built form for complex sites such as those with large cross fall and reducing the likelihood of developments having ground floor levels below natural ground lines Multi-unit housing – Supported.
	Building envelope – 3.5m and 45°	Building envelope – 4.0m and 45°		Supported.
	Front setbacks for MUH – 6m	Front setbacks for MUH – 4m-6m		Remove reference to 'Primary front boundary setback for blocks in subdivisions approved before 18 October 1993' from the Technical Specifications. Recommend one front setback of 4m for all single dwelling and MUH. This provides more flexibility in design and allows better use of sites where it is more beneficial to have tree canopy cover in the rear of the site.

	Front setbacks for MUH Corner blocks secondary street frontage (mid-sized blocks) – 3m	Front setbacks for MUH Corner blocks secondary street frontage (mid-sized blocks) – 2m		Supported.
	Side and rear setbacks for MUH primary building zone – 3m	Side and rear setbacks for MUH primary building zone – 0m		Supported.
	Side and rear setbacks for MUH rear setback – 3m	Side and rear setbacks for MUH rear setback – 6m		Supported.
	Side and rear setbacks for MUH unscreened elements – 3m	Side and rear setbacks for MUH unscreened elements – 1m, 3m, 6m		Supported.
	Solar building envelope angle for MUH – 31°	Solar building envelope angle for MUH – 45°		<p>Recommend a review of the solar building envelope solar fence and envelope angle be considered.</p> <p>An increased solar fence height to 3.0m coupled with an angle of 35° allows more flexibility of design whilst ensuring good solar access to neighbouring blocks.</p>
	Separation between walls in MUH – RZ2: Unscreened elements and an external wall on the same block or an adjoining block are separated by 3m or more. External walls at the lower floor level on the same or adjoining block are separated by 1m or more.	<p>Separation between walls and PPOS in MUH – RZ2:</p> <p>The minimum separation between walls and principle private open space to dwellings on the same block and adjoining block is:</p>		<p>Recommend the various setbacks be reviewed. Current setbacks to unscreened elements are too onerous and will lead to increased use of screened elements that reduce the thermal performance and natural light into dwellings.</p>

		3m, 6m, 9m, 12m (refer to Technical Specifications)		
	Privacy – MUH: various rules (refer Technical Specifications)	Added to above.		Supported.
	<p>Minimum dwelling size – MUH: Minimum dwelling floor areas for:</p> <ul style="list-style-type: none"> - Studio dwellings = 40m² - 1 Bed dwellings = 50m² - 2 Bed dwellings = 70m² - 3+ Bed Dwellings = 95m² 	<p>Minimum dwelling size – MUH: Minimum dwelling floor areas for:</p> <ul style="list-style-type: none"> - Studio dwellings = 35m² - 1 Bed dwellings = 50m² - 2 Bed dwellings = 70m² - 3+ Bed Dwellings = 90m² 		Supported.
	<p>Minimum widths and area – MUH: Minimum widths are as follows:</p> <ul style="list-style-type: none"> - Beds = 3.0m 	<p>Minimum widths and area – MUH: Minimum widths are as follows:</p> <ul style="list-style-type: none"> - Master Beds = 3.0m - All other Beds = 2.7m 		Supported.
	<p>Minimum widths and area – MUH: Minimum widths are as follows:</p> <ul style="list-style-type: none"> - Living Rooms – Studio + 1 Beds = 3.6m 	<p>Minimum widths and area – MUH: Minimum widths are as follows:</p> <ul style="list-style-type: none"> - Living Rooms – Studio + 1 Beds = 3.0m 		

	- Living Rooms – 2 Bed + 3 Bed = 4.0m	- Living Rooms – 2 Bed + 3 Bed = 3.6m		
	Internal Storage – MUH: - Studio = 2m ³ - 1 Bed = 3m ³ - 2 Bed = 4m ³ - 3 Bed+ = 5m ³ External Storage – MUH: various rules	Storage – MUH: - Studio = 4m ³ - 1 Bed = 6m ³ - 2 Bed = 8m ³ - 3 Bed+ = 10m ³		Supported.
	Balustrades – MUH: various rules	No requirement		Supported.

Comparison Table: RZ3 – Residential Transition Zone

Element	Current Provision	Proposed Change	Reason for Change	Institute Comments
Policy Outcomes: (Residential Zones Policy)	1. Facilitate development or redevelopment of sites to achieve medium density housing.	Facilitate urban development or redevelopment to achieve primarily medium density, low-rise housing within close proximity to local services and amenities in a manner that demonstrates good design outcomes.	Name change and policy outcome changes are proposed to align RZ3 to be the 'transition' residential zone between the suburban zones and the urban zones. This acknowledges that RZ3 may play a role in predominately	Supported.

			accommodating more compact single dwellings (such as the case through Gungahlin), or as more of a medium density and mid-rise zone (as in the case in more of the established suburbs).	
	2. Provide a range of housing choices where the housing contains a mix of single dwelling and multi-unit housing.	2. Provide a range of housing choices, which are predominately multi-unit housing of various dwelling types or more compact single dwelling housing.		Supported.
	3. Provide opportunities for redevelopment by enabling change to the residential density and original pattern of subdivision.	3. Provide opportunities for redevelopment by enabling change, including to the residential density and the original pattern of subdivision.		Supported.
	Provide opportunities for redevelopment by enabling change.			Supported.
Maximum height: (Residential Zones Policy)	10.5m	Secondary residence: 2 storeys Single dwelling housing: 3 storeys MUH: 4 storeys	The gradation of heights across the different housing typologies is designed to incentivize multi-unit housing redevelopment to provide more housing in an	Not Supported. Recommend the number of storeys be removed and the Technical Specifications Building Heights be used.

			efficient manner in this zone.	
Other Residential Zones Technical Specification changes:	Site and Land Use – Distribution of non-residential developments in all residential zones – varied development types	Site and Land Use – Distribution of non-residential developments in all residential zones – varied development types with addition of: - Social enterprise - Veterinary clinic		Supported.
	Site and Land Use – Distribution of non-residential developments in all residential zones – no more than 2 home businesses per section	Site and Land Use – Distribution of non-residential developments in all residential zones – no more than 2 home businesses per 20 dwellings		Supported.
	Private open space for MUH – 40% of site	Private open space for MUH – 30% of site	Private open space requirements have reduced in site percentage however the quality of space that contributes to the private open space area has increased. This is intended to see improvements in usable, high amenity spaces for residents.	Supported.

	Building height – RZ3 is 2 storeys.	Building height – RZ3: - Single Dwelling – 10.5m - Multi-unit housing – 14m		Supported.
	Building envelope – 3.5m and 45°	Building envelope – 4.0m and 45°		Supported.
	Front setbacks for MUH – 6m	Front setbacks for MUH – 4m-6m		Remove reference to 'Primary front boundary setback for blocks in subdivisions approved before 18 October 1993' from the Technical Specifications. Recommend one front setback of 4m for all single dwelling and MUH. This provides more flexibility in design and allows better use of sites where it is more beneficial to have tree canopy cover in the rear of the site.
	Front setbacks for MUH Corner blocks secondary street frontage (mid-sized blocks) – 3m	Front setbacks for MUH Corner blocks secondary street frontage (mid-sized blocks) – 2m		Supported.
	Side and rear setbacks for MUH Second Upper Level – 0-6m	Side and rear setbacks for MUH Second Upper Level– removed and aligned with Upper Floor Level rules.		Supported.
	Solar building envelope angle for MUH – 31°	Solar building envelope angle for MUH – 45°		Recommend a review of the solar building envelope solar fence and envelope angle be considered.

				An increased solar fence height to 3.0m coupled with an angle of 35° allows more flexibility of design whilst ensuring good solar access to neighbouring blocks.
	Separation between walls in MUH – RZ3: Unscreened elements and an external wall on the same block or an adjoining block are separated by 3m or more. External walls at the lower floor level on the same or adjoining block are separated by 1m or more.	Separation between walls and PPOS in MUH – RZ3: Addition of unscreened elements to primary window and centre of any other dwelling's PPOS: 12m		Supported.
	Privacy – MUH: various rules (refer Technical Specifications)	Added to above.		Supported.
	Minimum dwelling size – MUH: Minimum dwelling floor areas for: - Studio dwellings = 40m ² - 1 Bed dwellings = 50m ² - 2 Bed dwellings = 70m ² - 3+ Bed Dwellings = 95m ²	Minimum dwelling size – MUH: Minimum dwelling floor areas for: - Studio dwellings = 35m ² - 1 Bed dwellings = 50m ² - 2 Bed dwellings = 70m ² - 3+ Bed Dwellings = 90m ²		Supported.

	<p>Minimum widths and area – MUH: Minimum widths are as follows:</p> <ul style="list-style-type: none"> - Beds = 3.0m 	<p>Minimum widths and area – MUH: Minimum widths are as follows:</p> <ul style="list-style-type: none"> - Master Beds = 3.0m - All other Beds = 2.7m 		Supported.
	<p>Minimum widths and area – MUH: Minimum widths are as follows:</p> <ul style="list-style-type: none"> - Living Rooms – Studio + 1 Beds = 3.6m - Living Rooms – 2 Bed + 3 Bed = 4.0m 	<p>Minimum widths and area – MUH: Minimum widths are as follows:</p> <ul style="list-style-type: none"> - Living Rooms – Studio + 1 Beds = 3.0m - Living Rooms – 2 Bed + 3 Bed = 3.6m 		
	<p>Internal Storage – MUH:</p> <ul style="list-style-type: none"> - Studio = 2m³ - 1 Bed = 3m³ - 2 Bed = 4m³ - 3 Bed+ = 5m³ <p>External Storage – MUH: various rules</p>	<p>Storage – MUH:</p> <ul style="list-style-type: none"> - Studio = 4m³ - 1 Bed = 6m³ - 2 Bed = 8m³ - 3 Bed+ = 10m³ 		Supported.
	<p>Balustrades – MUH: various rules</p>	No requirement		Supported.

Comparison Table: RZ4 – Urban Residential Zone

Element	Current Provision	Proposed Change	Reason for Change	Institute Comments
Policy Outcomes: (Residential Zones Policy)	1. Facilitate development or redevelopment of sites to achieve a distinctly medium density housing character in a manner that demonstrates design excellence.	Facilitate urban development or redevelopment of sites to achieve medium to high density, mid-rise housing in a manner that demonstrates good design outcomes.	Name change and policy outcome changes are proposed to reflect that RZ4 does not often contain housing that is of a density and height that would be considered 'medium density'. While these reforms will step RZ4 closer to medium density, this name change reflects that RZ4 is practically the start of the more 'urban' residential zones.	Supported.
	2. Provide for a range of housing choices where the housing contains a mix of single dwelling and multi-unit housing.	2. Provide for a range of housing choices, which are predominately medium to high density multi-unit housing of various dwelling types.		Supported.
	3. Provide opportunities for redevelopment by enabling changes to residential density and the original pattern of subdivision.	3. Provide opportunities for redevelopment by enabling change, including to residential density and the original pattern of subdivision.		Supported.

	4. Provide opportunities for redevelopment by enabling change.			Supported.
Maximum height: (Residential Zones Policy)	12.5m	Secondary residence: 2 storeys Single dwelling housing: 3 storeys MUH: 6 storeys	The gradation of heights across the different housing typologies is designed to incentivize multi-unit housing redevelopment to provide more housing in an efficient manner in this zone.	Not Supported. Recommend the number of storeys be removed and the Technical Specifications Building Heights be used.
Other Residential Zones Technical Specification changes:	Site and Land Use – Distribution of non-residential developments in all residential zones – varied development types	Site and Land Use – Distribution of non-residential developments in all residential zones – varied development types with addition of: - Social enterprise - Veterinary clinic		Supported.
	Site and Land Use – Distribution of non-residential developments in all residential zones – no more than 2 home businesses per section	Site and Land Use – Distribution of non-residential developments in all residential zones – no more than 2 home businesses per 20 dwellings		Supported.
	Private open space for MUH – 40% of site	Private open space for MUH – 30% of site	Private open space requirements have reduced in site	Supported.

			percentage however the quality of space that contributes to the private open space area has increased. This is intended to see improvements in usable, high amenity spaces for residents.	
	Building height – RZ4 is 3 storeys.	Building height – RZ4: - Single Dwelling – 10.5m - Multi-unit housing – 21m		Supported.
	Building envelope – 3.5m and 45°	Building envelope – 4.0m and 45°		Supported.
	Front setbacks for MUH – 6m	Front setbacks for MUH – 4m-6m		Remove reference to 'Primary front boundary setback for blocks in subdivisions approved before 18 October 1993' from the Technical Specifications. Recommend one front setback of 4m for all single dwelling and MUH. This provides more flexibility in design and allows better use of sites where it is more beneficial to have tree canopy cover in the rear of the site.
	Front setbacks for MUH Corner blocks secondary street frontage (mid-sized blocks) – 3m	Front setbacks for MUH Corner blocks secondary street frontage (mid-sized blocks) – 2m		Supported.

	Side and rear setbacks for MUH Second Upper Level – 0-6m	Side and rear setbacks for MUH Second Upper Level– removed and aligned with Upper Floor Level rules.		Supported.
	Solar building envelope angle for MUH – 31°	Solar building envelope angle for MUH – 45°		<p>Recommend a review of the solar building envelope solar fence and envelope angle be considered.</p> <p>An increased solar fence height to 3.0m coupled with an angle of 35° allows more flexibility of design whilst ensuring good solar access to neighbouring blocks.</p>
	Separation between walls in MUH – RZ4: Unscreened elements and an external wall on the same block or an adjoining block are separated by 3m or more. External walls at the lower floor level on the same or adjoining block are separated by 1m or more.	<p>Separation between walls and PPOS in MUH – RZ4:</p> <p>Addition of unscreened elements to primary window and centre of any other dwelling's PPOS: 12m</p>		Supported.
	Privacy – MUH: various rules (refer Technical Specifications)	Added to above.		Supported.
	<p>Minimum dwelling size – MUH: Minimum dwelling floor areas for:</p> <p>- Studio dwellings = 40m²</p>	<p>Minimum dwelling size – MUH: Minimum dwelling floor areas for:</p> <p>- Studio dwellings = 35m²</p>		Supported.

	<ul style="list-style-type: none"> - 1 Bed dwellings = 50m² - 2 Bed dwellings = 70m² - 3+ Bed Dwellings = 95m² 	<ul style="list-style-type: none"> - 1 Bed dwellings = 50m² - 2 Bed dwellings = 70m² - 3+ Bed Dwellings = 90m² 		
	<p>Minimum widths and area – MUH: Minimum widths are as follows:</p> <ul style="list-style-type: none"> - Beds = 3.0m 	<p>Minimum widths and area – MUH: Minimum widths are as follows:</p> <ul style="list-style-type: none"> - Master Beds = 3.0m - All other Beds = 2.7m 		Supported.
	<p>Minimum widths and area – MUH: Minimum widths are as follows:</p> <ul style="list-style-type: none"> - Living Rooms – Studio + 1 Beds = 3.6m - Living Rooms – 2 Bed + 3 Bed = 4.0m 	<p>Minimum widths and area – MUH: Minimum widths are as follows:</p> <ul style="list-style-type: none"> - Living Rooms – Studio + 1 Beds = 3.0m - Living Rooms – 2 Bed + 3 Bed = 3.6m 		
	<p>Internal Storage – MUH:</p> <ul style="list-style-type: none"> - Studio = 2m³ - 1 Bed = 3m³ - 2 Bed = 4m³ - 3 Bed+ = 5m³ 	<p>Storage – MUH:</p> <ul style="list-style-type: none"> - Studio = 4m³ - 1 Bed = 6m³ - 2 Bed = 8m³ - 3 Bed+ = 10m³ 		Supported.

	External Storage – MUH: various rules			
	Balustrades – MUH: various rules	No requirement		Supported.

Comparison Table: RZ5 – Urban Density Zone

Element	Current Provision	Proposed Change	Reason for Change	Institute Comments
Policy Outcomes: (Residential Zones Policy)	1. Facilitate development or redevelopment of sites to achieve high density housing in a manner that demonstrates design excellence.	1. Facilitate urban development or redevelopment of sites to achieve high density, medium rise housing in a manner that demonstrates good design outcomes.	<p>Name change and policy outcome changes are proposed to reflect that RZ5 does not often contain housing that is of a density and height that would be considered 'high density' which are typically contained in the commercial zones, such as town centres, in the ACT.</p> <p>While these reforms will step RZ5 closer to high density, this name change reflects that RZ5 is just the densest of the residential zones, rather than always delivering high-density apartment tower style developments.</p>	Supported.

	2. Provide for the establishment and maintenance of residential areas where the housing is generally high density in character, particularly in areas with very good access to facilities and services and/or frequent public transport services.	2. Provide opportunities for the establishment and maintenance of residential housing that is generally high density.		Supported.
	3. Provide for a range of housing choices where multi-unit housing, typically of a larger scale, are provided for a range of dwelling types.	3. Provide housing in areas with very good access to facilities and services and/or frequent public transport services.		Supported.
	4. Provide opportunities for redevelopment by enabling changes to the original pattern of subdivision.	4. Provide for a range of high density and larger scale housing choices of various dwelling types.		Supported.
	5. Provide opportunities for redevelopment by enabling change.	5. Provide opportunities for redevelopment by enabling changes, including to the original pattern of subdivision.		Supported.
Maximum height: (Residential Zones Policy)	21.5m	Secondary residence: 2 storeys Single dwelling housing: 3 storeys	The gradation of heights across the different housing typologies is designed to incentivize multi-unit housing redevelopment to provide	Not Supported. Recommend the number of storeys be removed and the Technical Specifications Building Heights be used.

		MUH: 7 storeys	more housing in an efficient manner in this zone.	
Other Residential Zones Technical Specification changes:	Site and Land Use – Distribution of non-residential developments in all residential zones – varied development types	Site and Land Use – Distribution of non-residential developments in all residential zones – varied development types with addition of: - Social enterprise - Veterinary clinic		Supported.
	Site and Land Use – Distribution of non-residential developments in all residential zones – no more than 2 home businesses per section	Site and Land Use – Distribution of non-residential developments in all residential zones – no more than 2 home businesses per 20 dwellings		Supported.
	Private open space for MUH – 40% of site	Private open space for MUH – 30% of site	Private open space requirements have reduced in site percentage however the quality of space that contributes to the private open space area has increased. This is intended to see improvements in usable, high amenity spaces for residents.	Supported.

	<p>Building height – RZ5:</p> <p>Within 50m of RZ1,2,3 – 3 storeys</p> <p>Within 40m of blocks in CFZ, RZ2, or RZ3 – 3 storeys</p> <p>Within 30m of blocks – 4 storeys</p> <p>In all other cases – 6 storeys</p>	<p>Building height – RZ5:</p> <p>For single dwelling housing – 10.5m</p> <p>Within 50m of RZ1,2,3 – 14m</p> <p>Within 40m of blocks in CFZ, RZ2, or RZ3 – 14m</p> <p>Within 30m of blocks – 17.5m</p> <p>In all other cases – 24.5m</p>		Supported.
	Building envelope – 3.5m and 45°	Building envelope – 4.0m and 45°		Supported.
	Front setbacks for MUH – 6m	Front setbacks for MUH – 4m-6m		<p>Remove reference to 'Primary front boundary setback for blocks in subdivisions approved before 18 October 1993' from the Technical Specifications.</p> <p>Recommend one front setback of 4m for all single dwelling and MUH. This provides more flexibility in design and allows better use of sites where it is more beneficial to have tree canopy cover in the rear of the site.</p>
	Front setbacks for MUH Corner blocks secondary street frontage (mid-sized blocks) – 3m	Front setbacks for MUH Corner blocks secondary street frontage (mid-sized blocks) – 2m		Supported.

	Side and rear setbacks for MUH Second Upper Level – 0-6m	Side and rear setbacks for MUH Second Upper Level– removed and aligned with Upper Floor Level rules.		Supported.
	Solar building envelope angle for MUH – 31°	Solar building envelope angle for MUH – 45°		Recommend a review of the solar building envelope solar fence and envelope angle be considered. An increased solar fence height to 3.0m coupled with an angle of 35° allows more flexibility of design whilst ensuring good solar access to neighbouring blocks.
	Separation between walls in MUH – RZ4: Unscreened elements and an external wall on the same block or an adjoining block are separated by 3m or more. External walls at the lower floor level on the same or adjoining block are separated by 1m or more.	Separation between walls and PPOS in MUH – RZ4: Addition of unscreened elements to primary window and centre of any other dwelling's PPOS: 12m		Supported.
	Privacy – MUH: various rules (refer Technical Specifications)	Added to above.		Supported.
	Minimum dwelling size – MUH: Minimum dwelling floor areas for:	Minimum dwelling size – MUH: Minimum dwelling floor areas for:		Supported.

	<ul style="list-style-type: none"> - Studio dwellings = 40m² - 1 Bed dwellings = 50m² - 2 Bed dwellings = 70m² - 3+ Bed Dwellings = 95m² 	<ul style="list-style-type: none"> - Studio dwellings = 35m² - 1 Bed dwellings = 50m² - 2 Bed dwellings = 70m² - 3+ Bed Dwellings = 90m² 		
	<p>Minimum widths and area – MUH: Minimum widths are as follows:</p> <ul style="list-style-type: none"> - Beds = 3.0m 	<p>Minimum widths and area – MUH: Minimum widths are as follows:</p> <ul style="list-style-type: none"> - Master Beds = 3.0m - All other Beds = 2.7m 		Supported.
	<p>Minimum widths and area – MUH: Minimum widths are as follows:</p> <ul style="list-style-type: none"> - Living Rooms – Studio + 1 Beds = 3.6m - Living Rooms – 2 Bed + 3 Bed = 4.0m 	<p>Minimum widths and area – MUH: Minimum widths are as follows:</p> <ul style="list-style-type: none"> - Living Rooms – Studio + 1 Beds = 3.0m - Living Rooms – 2 Bed + 3 Bed = 3.6m 		
	<p>Internal Storage – MUH:</p> <ul style="list-style-type: none"> - Studio = 2m³ - 1 Bed = 3m³ - 2 Bed = 4m³ 	<p>Storage – MUH:</p> <ul style="list-style-type: none"> - Studio = 4m³ - 1 Bed = 6m³ - 2 Bed = 8m³ 		Supported.

	- 3 Bed+ = 5m ³ External Storage – MUH: various rules	- 3 Bed+ = 10m ³		
	Balustrades – MUH: various rules	No requirement		Supported.

Comparison Table: Subdivision Policy

Element	Current Provision	Proposed Change	Reason for Change	Institute Comments
Assessment Outcome 2:	New blocks are of a size and configuration that can accommodate the intended use for the site (for example an appropriately sized and configured site for single dwelling use).	New blocks are appropriately located and are of a size and configuration that can accommodate the intended use for the site (for example an appropriately sized and configured site for single dwelling use).		Supported.
Currently Leased block – Residential block configuration:	RZ1 400m ² RZ2 350m ² RZ3 325m ² RZ4 300m ² RZ5 250m ²	RZ1 350m ² RZ2 300m ² RZ3 275m ² RZ4 250m ² RZ5 250m ²		Not Supported. The variance in blocks size limits based on residential zoning is not required. A standardized limit of 250m ² for all blocks is an equitable approach that provides greater opportunity for appropriate density in RZ1 and RZ2.

<p>Currently leased blocks – frontage of RZ1 block:</p>		<p>RZ1 blocks created through the subdivision of consolidation of a currently leased block have one of the following:</p> <ul style="list-style-type: none"> a) A street frontage b) A frontage on to an urban open space of the community path system. 		<p>Not Supported.</p> <p>This rule discourages the retention of existing dwellings and contradicts the design guide's typical layouts shown for mid-section blocks.</p> <p>There should be no design limitation on how blocks are subdivided on an existing site providing suitable amenity and accessibility to blocks is delivered.</p>
<p>Currently leased blocks – scale and location of consolidation RZ1 blocks:</p>		<p>Consolidation of currently leased RZ1 blocks that:</p> <ul style="list-style-type: none"> a) Create an end of section block is limited to a consolidation area of 3,000m². b) Are adjacent to an urban open space or the community path systems is limited to a consolidation area of 2,500m². c) Consolidation of other RZ1 blocks (which includes mid-section blocks) is limited to a consolidation block area of 2,000m². 		<p>Supported in principle.</p> <p>The indicated limits are supported.</p> <p>For consolidations over 3000m² it is recommended that proposals be reviewed by a Missing Middle Housing Design Review Panel to ensure higher quality outcomes. Refer to comments associated with this schedule on the Missing Middle Housing Design Review Panel.</p> <p>Recommend all developments over 2000m² be subject to RZ2 Policies and Technical Specifications.</p>

Subdivision Design Application – Land use zoning:	New land use zones comply with all of the following: Etc.	New land use zones proposed in a subdivision design application comply with all of the following: Etc.		Supported.
Subdivision Design Application – Residential zoned blocks:	Residential zoned blocks comply with the following: a) RZ1 contains: i) No more than 10% compact blocks ii) No more than 30% mid-sized blocks b) RZ2 contains: i) No more than 15% compact blocks ii) No more than 40% mid-sized blocks c) RZ3+4 contains: i) At least 25% compact blocks ii) At least 50% mid-sized blocks	Residential zoned blocks comply with the following: a) RZ1 contains: i) No more than 15% compact blocks ii) No more than 40% mid-sized blocks b) RZ2 contains: i) No more than 20% compact blocks ii) No more than 50% mid-sized blocks c) RZ3 contains: i) At least 30% compact blocks ii) At least 60% mid-sized blocks		Not supported. This rule, even with increased percentages, is significantly restricting densification. In RZ1 it is mandating 45% of subdivision designs remain as large blocks, which is not consistent with the need for densification. There should be no limit to the number of compact and mid-sized blocks. The regulations should be encouraging subdivision design appropriate to the housing needs of a particular precinct.

	<p>d) RZ5 contains:</p> <p>i) At least 30% compact blocks</p> <p>ii) At least 60% mid-sized blocks</p>	<p>d) RZ4+5 contains:</p> <p>i) At least 40% compact blocks</p> <p>ii) At least 70% mid-sized blocks</p>		
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