

Plan for Victoria

AND THE
PLANNING SYSTEM REFORMS

A CHARTER 29 REPORT

NOVEMBER 2024

APPENDICES

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The information in these appendices attempts to summarise the provisions of a large number of complex planning scheme amendments and other government initiatives, some of which are emerging, and some of which provide contradictory information. The authors have done their best to summarise, encapsulate and explain this information, but inevitably over-simplifications and errors of interpretation will have occurred. Readers should consult the relevant original documentation, rather than relying on the summary information provided here.

APPENDIX 1: LISTS OF MAJOR ACTIVITY CENTRES

PRINCIPAL ACTIVITY CENTRES in Melbourne 2030 (2002)			METROPOLITAN ACTIVITY CENTRES in Plan Melbourne (2014 and 2017)		
Airport West	Doncaster	Prahran/South Yarra	Box Hill	Footscray	Sunshine
Box Hill	Epping	Preston, Northland	Broadmeadows	Fountain Gate-Narre Warren	FUTURE:
Broadmeadows	Footscray	Ringwood	Dandenong	Frankston	Lockerbie
Camberwell Junction	Frankston	Sunshine	Epping	Ringwood	Toolern
Chadstone	Glen Waverley	Sydenham	MAJOR ACTIVITY CENTRES in Plan Melbourne (2014 and 2017)		
Cheltenham, Southland	Greensborough	Wantirna South, Knox City and Tower	Airport West	Fitzroy-Smith Street	Port Melbourne-Bay Street
Coburg	Maribyrnong, Highpoint	Point	Altona	Flemington-Racecourse Road	Prahran/South Yarra
Cranbourne	Moonee Ponds	Werribee	Altona North	Forest Hill Chase	Preston-High Street
Dandenong	Narre Warren, Fountain Gate		Ascot Vale-Union Road	Gladstone Park	Preston-Northland
MAJOR ACTIVITY CENTRES in Melbourne 2030 (2002)			Balaclava	Glen Waverley	Reservoir
Altona	Fitzroy, Brunswick Street	North Essendon	Bayswater	Glenhuntly	Richmond-Bridge Road
Altona North	Fitzroy, Smith Street	Northcote	Bentleigh	Glenroy	Richmond-Swan Street
Ascot Vale, Union Road	Forest Hill Chase	Nunawading	Berwick	Greensborough	Richmond-Victoria Street
Balaclava	Gladstone Park	Oakleigh	Boronia	Hampton	Rosebud
Bayswater	Glenhuntly	Pakenham	Brandon Park	Hampton Park	Rowville-Stud Park
Bentleigh	Glenroy	Parkmore Keysborough	Braybrook-Central West	Hastings	Roxburgh Park
Boronia	Hampton	Port Melbourne, Bay Street	Brighton-Bay Street	Hawthorn-Glenferrie Road	Sandringham
Brighton, Bay Street	Hastings	Preston, High Street	Brighton-Church Street	Heidelberg	South Melbourne
Brighton, Church Street	Heidelberg	Reservoir	Brimbank Central	Hoppers Crossing	South Morang
Brunswick	Hoppers Crossing	Richmond, Swan Street	Brunswick	Ivanhoe	Springvale
Burwood East, Kmart Plaza	Ivanhoe	Richmond, Bridge Road	Burwood East-Tally Ho	Karingal	St Albans
Burwood East, Tally Ho	Karingal	Richmond, Victoria Street	Burwood Heights	Kew Junction	St Kilda
Carlton, Lygon Street	Kew Junction	Rosebud	Camberwell Junction	Keysborough-Parkmore	Sunbury
Carnegie	Lilydale	Rowville, Stud Park	Carlton-Lygon Street	Lilydale	Sydenham
Caulfield	Malvern/Armadale	Roxburgh Park	Carnegie	Malvern/Armadale (= 2 ACs)	Tarneit
Chelsea	Melton	Sandringham	Caroline Springs	Manor Lakes	Toorak Village
Cheltenham	Melton, Woodgrove and Coburns	South Melbourne	Casey Central	Maribyrnong-Highpoint	Wantirna South-Knox Central
Chirnside Park	Road	South Morang	Caulfield	Melton	Werribee
Clayton	Mentone	Springvale	Chadstone	Melton-Woodgrove and Coburns	Werribee Plaza
Croydon	Moorabbin	St Albans	Chelsea	Road	Williams Landing
Deer Park Central	Mordialloc	St Kilda	Cheltenham +	Mentone	Williamstown
Deer Park, Brimbank	Mornington	Sunbury	Cheltenham-Southland	Mernda	FUTURE:
Central	Mount Waverley	Toorak Village	Chirnside Park	Moonee Ponds	Beveridge
Diamond Creek	Mount Waverley, Pinewood	Werribee Plaza	<i>Clayton</i>	Moorabbin	Clyde
Doncaster East, The Pines	Centreway	Whealers Hill, Brandon Park	Coburg	Mordialloc	Clyde North
Elsternwick	Mountain Gate	Williamstown	Craigieburn	Mornington	Hopkins Rd
Eltham	Mulgrave, Waverley Gardens		Craigieburn Town Centre	Mount Waverley	Mickleham
Endeavour Hills	Niddrie, Keilor Road		Cranbourne	Mountain Gate	Plumpton
			Croydon	Niddrie-Keilor Road	Riverdale
			Deer Park	Noble Park	Rockbank
			Diamond Creek	North Essendon	Rockbank North
			Doncaster East-The Pines	Northcote	Sunbury South
			Doncaster Hill	Nunawading	Wallan
			Elsternwick	Oakleigh	Wollert
			Eltham	Officer	
			Endeavour Hills	Pakenham	
			Fitzroy-Brunswick Street	Point Cook	

Centres listed in bold form part of the 2024 government announcements

KEY URBAN RENEWAL AREAS 2024		VPA ACTIVITY CENTRES PROGRAM 2024			
"OTHER KEY PRECINCTS"	SRL EAST STATIONS	PILOT PROJECT ACs	ACs ANNOUNCED OCTOBER 2024		ACs ANNOUNCED LATE 2024
Arden Dandenong Docklands East Werribee Fishermans Bend Footscray Latrobe Parkville Richmond-Swan Street Sunshine	Box Hill Burwood Cheltenham + Southland Clayton Glen Waverley Monash	Broadmeadows Camberwell Junction Chadstone Epping Frankston Moorabbin Niddrie-Keilor Road North Essendon Preston-High Street Ringwood	Armadale Auburn Blackburn Carnegie Darling Gardiner/Glen Iris Glenferrie (Hawthorn) Hampton Hawksburn Hawthorn Hughesdale Malvern Middle Brighton (Church St)	Middle Footscray Mitcham Murrumbeena North Brighton (Bay St) Nunawading Oakleigh Sandringham Toorak Toorak Village Tooronga Tottenham West Footscray	??

APPENDIX 2: CHRONOLOGY OF PLANNING SCHEME REFORM PROCESS MILESTONES

DATE	EVENT	CHANGES	IMPACT
Pre-1990s	Melbourne Metropolitan Planning Scheme , numerous Interim Development Orders and local planning schemes	A simple land use zoning system (column 1 listed uses = no permit needed; col 2 = permit needed; col 3 = prohibited) that gradually became complex (eg multiple municipal variations; introduction of urban conservation zones)	Had three base Residential Zones: A, B and C, each denoting a different level of density. Residential A and B were deleted under Plan Melbourne, leaving Residential C as a uniform base residential zone.
1990s	Victoria Planning Provisions (VPPs) introduced	A uniform menu of Zones and Overlays introduced across Victoria, accompanied by a performance standard planning control system, with 'mandatory' objectives and mostly discretionary standards ('should' policies), with limited 'must' and non-negotiable use provisions, and local variations limited to standard schedules or Local Policy. Residential C Zone renamed Residential 1 (R1Z). VicCode 1, then the Good Design Guide, were introduced to provide standards for multi-unit development in residential zones, but these were soon superseded by ResCode (see below).	Only limited opportunities for local councils to control the location of more intense residential development, and to protect local character. Mandatory height and other controls were largely replaced by discretionary standards , resulting in: <ul style="list-style-type: none"> – An increase in the volume and complexity of development assessment work – A decrease in certainty and predictability of the planning system (eg some buildings were approved at double the 'preferred' height limit) – An increase in referral of developments to VCAT and the involvement of lawyers
2001	ResCode (VCo12) amendment	Introduced a Neighbourhood Character Overlay and new residential development provisions in Clauses 54, 55 and 56 for dwellings and subdivision. Retained a single zone (R1Z) for most urban residential areas.	The Neighbourhood Character Overlay enabled some areas to be designated for variations to a limited list of ResCode standards. There was a proliferation of neighbourhood character studies and associated Local Policies included in council planning schemes, but with limited impact 'on the ground'.
2002	MELBOURNE 2030	Focussed development around District and other activity centres.	
2005	Development Assessment Forum report (Federal government)	Proposed a model for development assessment that allowed applicants to self-certify certain types of planning application. This is referred to as a ' code assessment ' or ' deemed to comply ' or performance assessment model (PAM) .	Adopted in principle and gradually rolled out in Queensland, NSW and (ongoing) in Victoria. VicSmart is the term used in the VPPs for applications that meet the requirements of this model. VicSmart applications generally do not allow for third party review (eg referral to VCAT as a result of resident objections). This government website https://www.planning.vic.gov.au/guides-and-resources/guides/all-guides/vicsmart-permits explains the adopted VicSmart process.
2008	MELBOURNE @ 5 MILLION	(update of Melbourne 2030)	
2013	Voo8 Changes to Residential Zones amendment	Created the Neighbourhood Residential Zone (NRZ) , General Residential Zone (GRZ) and Residential Growth Zone (GRZ) , with the following key provisions:	Enabled planning strategies to delineate residential areas with different intensities and scales: Minimal Change (NRZ: 'no go'), Incremental Change (GRZ: 'slow go') and Substantial Change (RGZ: 'go go').

DATE	EVENT	CHANGES	IMPACT
		<ul style="list-style-type: none"> – NRZ – maximum 2 storey height, and no more than two dwellings per lot – GRZ – maximum 3 storeys, or taller if specified – RGZ – up to 4 storeys or taller if specified, in locations close to jobs, services, facilities 	
2014	PLAN MELBOURNE		
2014	VC114 VicSmart enabling amendment	Introduced clauses enabling VicSmart processes to be applied.	Explanation of the adopted VicSmart process: https://www.planning.vic.gov.au/guides-and-resources/guides/all-guides/vicsmart-permits
The VicSmart 'pathways' subsequently introduced enable ' deemed-to-comply ' provisions of certain categories of development to receive fast-tracked approval (10 business days), and to be exempt from review and notice .			
2016-2017	Smart Planning Discussion Paper	Aimed "to deliver long term, transformative changes to the planning system" through progressive amendments and legislation, including: <ul style="list-style-type: none"> – increase code assessment to remove "entirely from the need for assessment" more applications, including for multiple dwellings – apply VicSmart to complex applications – streamline assessment pathways – reduce numbers of prohibited uses 	
2017	Smart Planning consultancies , engaged to prepare specific initiatives in line with the 2016 Discussion Paper	The tender documents included review of the following: <ul style="list-style-type: none"> – planning permit triggers – permit exemptions – zones, overlays, general provisions and particular provisions – duplicated and outdated clauses – assessment pathways, with a focus on Code Assessment (applications being assessed against pre-determined criteria). 	Resulted quickly in a restructure of the VPPs, but other proposals were held back.
2018	VC142 and VC148 Victoria Planning Provisions restructure amendments	Introduced changes to the structure of the planning scheme, resulting from the consultant work, but only minor changes to the planning provisions.	VPPs restructured.
2019	Red Tape Commissioner commissioned to review the building and planning approvals systems to identify "how the current system could be streamlined to reduce delays and unnecessary costs".	Discussion paper released in October 2019 and final report in November 2021.	Resulted in few changes of consequence.
2020?	Smart Planning team reports to Minister for Planning	Significant changes were recommended, but few changes of consequence resulted.	Resulted in few changes of consequence.

APPENDIX 3: GOVERNMENT INTERVENTION IN PLANNING APPROVALS SINCE 2020

AREAS AFFECTED	CONTROL CHANGES	ADMINISTRATIVE CHANGES	NOTICE & REVIEW CHANGES
LEVEL CROSSING REMOVAL PROJECTS	Exempts Level Crossing Removal Projects from needing a planning permit [VC170, (2020): new clause 52.03].	Designates the Minister as responsible authority .	Replaces planning scheme notice and review with an obligation to consult.
DEVELOPMENT OF SCHOOLS	-	Designates the Minister as responsible authority for projects above a certain value in non government schools [VC180 clause 52.31 (2021)] and government schools [VC194 clause 52.30 (2021)].	Exempts projects above a certain value in non government schools from review.
BIG HOUSING BUILD PROJECTS	Exempts projects from most planning scheme requirements [VC190 (2021): new clause 52.20].	-	Replaces planning scheme notice and review with an obligation to consult.
STATE & LOCAL GOVT PROJECTS	Enables the Minister to exempt state & local govt projects from planning scheme requirements [VC194 (2021): new clauses 52.30 and 52.31].	The Minister has 'call-in' powers.	Replaces planning scheme notice and review with an obligation to consult.
MAJOR ROAD & RAIL PROJECTS	Exempts major road & rail projects from most planning scheme requirements [VC198 (2021): new clauses 52.35 and 52.36].	Designates the Minister as responsible authority .	
SIGNIFICANT RESIDENTIAL DEVELOPMENT WITH AFFORDABLE HOUSING [VC242 (2023)]	Clause 53.22 <i>Significant Economic Development</i> lists an optional approval pathway to the Minister for 21 uses or developments based on the cost of developments; notice may still be required but objection rights are curtailed and appeal rights denied. Clause 53.23 <i>Significant Residential Development with Affordable Housing</i> . Similar uses to clause 53.22 with one category requiring at least 10% of affordable housing although the RA can waive this.		

APPENDIX 4: PRINCIPAL SOURCES OF REFORMS AFFECTING RESIDENTIAL AREA BUILT FORM

GOVERNMENT PROGRAM/PROJECT	PRINCIPAL CONTENT	SCOPE	AREAS AFFECTED	ADDITIONAL INFORMATION
SIGNIFICANT PLANNING SCHEME AMENDMENTS				
VC110 (2017)	Reformed Residential Zones	Neighbourhood Residential Zone changed to allow more than two dwellings per lot	Neighbourhood Residential Zone	
VC243 (2023)	Deemed-to-comply ResCode provisions	Fourteen residential development standards in clauses 54 and 55 (ResCode) become deemed-to-comply .	All residential zones in Victoria.	
	Deemed-to-comply multi-unit development	Multi-unit developments that accord with one of four 'exemplar' 3 storey apartment block designs licensed by the government are deemed to comply [Clause 53.24].	Sites with a minimum area of 900m ² (generally two consolidated lots) in a General Residential Zone (GRZ) that are: <ul style="list-style-type: none">– Within 800 metres of a train station, an activity centre in Metropolitan Melbourne, or an identified regional activity centre; and– <i>Not</i> within a Heritage Overlay or a Neighbourhood Character Overlay	The <i>Walkable Catchment Zone</i> (see below) is to be applied to the 800 metre catchment areas of activity centres. This will override existing zones, including the NRZ, in which case the number of lots affected will be greatly increased.
	Future Homes Potential Lots Map published online 2023	Shows every lot affected by VC243 (multi-unit developments) under Clause 53.24 Future Homes program for apartments. At present, this omits lots within a heritage overlay and the Neighbourhood Residential Zone (NRZ) – but see RH column.		
SUBURBAN RAIL LOOP AUTHORITY (SRLA)				
Draft structure plan/precinct 'visions' prepared by Urbis (2023)	Broad-brush structure plans that include preferred building heights.	Include activity centre core building heights ranging from 10 storeys (Monash), 18 storeys (Cheltenham), 20 storeys (Clayton, Burwood), 25 storeys (Glen Waverley) and 40 storeys (Box Hill) .	SRL stations: <i>Cheltenham, Clayton, Monash, Glen Waverley, Burwood, Box Hill</i>	
Catchment area delineation	Maps in the structure plan/precinct 'visions'	The SRLA is planning authority for all land within 1.6km radius of an SRL station. The draft structure plan/precinct 'vision' maps delineate a somewhat more contained residential catchment area.		
HOUSING TARGETS				
Housing targets (2024)	Draft municipal housing targets for 2051	Show how the 2.24 million additional homes will be distributed by municipality.	Every Victorian municipality	https://engage.vic.gov.au/project/shape-our-victoria/page/housing-targets-2051

GOVERNMENT PROGRAM/PROJECT	PRINCIPAL CONTENT	SCOPE	AREAS AFFECTED	ADDITIONAL INFORMATION
VPA ACTIVITY CENTRES PROGRAM (2024)				
VPA City of Centres report (Urbis/Sheppard & Cull, May 2024)	Standardised built form controls in activity centres	Establishes typologies for precinct definition and standardised built form controls in and around activity centres. Pilot project: 10 activity centres; further 25 announced 19/10/24, with additional 25 to follow.	Broadmeadows, Camberwell Junction, Chadstone, Epping, Frankston, Moorabbin, Niddrie, Essendon North, Preston, Ringwood. Armadale, Auburn, Blackburn, Carnegie, Darling, Gardiner/Glen Iris, Glenferrie, Hampton, Hawksburn, Hawthorn, Hughesdale, Malvern, Middle Brighton, Middle Footscray, Mitcham, Murrumbeena, North Brighton, Nunawading, Oakleigh, Sandringham, Toorak, Toorak Village, Tooronga, Tottenham, West Footscray. Further 25 to be announced – eventual total 60.	
VPA draft Activity Centre Plans (2024)		Delineates the 800m catchment area for each of the ten pilot project activity centres		
VPA Urban Design Background Summary Report (Sep 2024)	Prototype BFO Schedules Includes Local Variations schedules for Broadmeadows, Niddrie, North Essendon, Chadstone and Moorabbin.	Tabulates the standardised heights and setbacks for each precinct type. Clarifies which are discretionary and which are deemed-to-comply.	Each of the 60 nominated activity centres, presumably starting with Broadmeadows, Camberwell Junction, Chadstone, Epping, Frankston, Moorabbin, Niddrie, Essendon North, Preston, and Ringwood. Includes the 800m catchment area.	
DRAFT AMENDMENTS SEP 2024				
Draft for comment	Deemed-to-comply ResCode provisions	Clause 54 and 55 (ResCode) changes that reduce setbacks, increase heights and delete reference to neighbourhood character. Further ResCode standards in clauses 54 and 55 will become deemed-to-comply.	All residential zones in Victoria.	
Draft for comment	Built Form Overlay	The statutory instrument for implementing the standardised heights and setbacks proposed in the VPA's City of Centres report (see above).	Every major activity centre	
Draft for comment	Walkable Catchment Zone	The statutory instrument for built form controls within the 800m catchment area around a major activity centre (eg as delineated in the VPA's draft Activity Centre Plans (see above).	The 800m catchment area around each major activity centre.	

APPENDIX 5: CHANGES TO RESIDENTIAL ZONES (NRZ, GRZ, RGZ) & RESCODE

REFORM	AREAS AFFECTED	CONTROL CHANGES	ADMINISTRATIVE CHANGES	NOTICE & REVIEW CHANGES
VicSmart	All residential zones.	Exempts extensions to dwellings from needing a planning permit and expands the coverage of VicSmart arrangements [VC137 (2017)].		Explanation of the adopted VicSmart process: https://www.planning.vic.gov.au/guides-and-resources/guides/all-guides/vicsmart-permits
Reformed Residential Zones	All Neighbourhood Residential Zones	Neighbourhood Residential Zone changed to allow more than two dwellings per lot , weakening control over density in areas with high neighbourhood character or heritage values [VC110 (2017): Reformed Residential Zones].	-	-
Draft municipal housing targets (Future Homes 2024)	Every Victorian municipality , with the final targets embedded into <i>Plan for Victoria</i> .	Show how the 2.24 million additional homes will be distributed by municipality. Some of the targets double the amount of housing in a single municipality (source: https://engage.vic.gov.au/project/shape-our-victoria/page/housing-targets-2051).	Local councils will be responsible for introducing the planning scheme changes necessary to meet their target.	-
Uses allowable in a residential zone [VC242 (2023)]	All residential zones	Amended all three residential zones to allow office and retail uses under certain conditions.		
Deemed-to-comply ResCode provisions [VC243 (2023)]	All residential zones.	Fourteen residential development standards in clauses 54 and 55 (ResCode) become deemed-to-comply .	Aspects of a development that conform to the deemed-to-comply provisions are presumed to meet the relevant ResCode objectives, and therefore cannot be varied by means of a permit condition .	Aspects of a development that conform to the deemed-to-comply provisions are exempt from review .
Deemed-to-comply ResCode provisions (draft amendment, 2024)	All residential zones.	Clause 54 and 55 (ResCode) changes that reduce setbacks, increase heights and delete reference to neighbourhood character . Further ResCode standards in clauses 54 and 55 will become deemed-to-comply .		

APPENDIX 6: CHANGES TO ACTIVITY CENTRE BUILT FORM CONTROLS

REFORM	AREAS AFFECTED	CONTROL CHANGES	ADMINISTRATIVE CHANGES	NOTICE & REVIEW CHANGES
Standardised built form controls in activity centres [City of Centres report (2024)]	Pilot project: 10 activity centres: Broadmeadows (4), Camberwell Junction (3), Chadstone (2), Epping (4), Frankston (4), Moorabbin (2), Niddrie (2), Essendon North (2), Preston (2), and Ringwood (4) activity centres. Includes 800m residential catchment areas.	Proposes: <ul style="list-style-type: none"> – A four level hierarchy of activity centres (1 to 4 – see left), according to redevelopment potential. – Delineation of up to eight precinct types, each with a standardised built form control based on a particular combination of street wall height and upper level setbacks. – Deemed-to-comply building heights are up to 20 storeys in the commercial core, six storeys in the 800m residential catchment. – Specific envelopes for heritage strips that allow substantial height. 	See New Activity Zones (below).	See New Activity Zones (below).
Structure planning to determine precinct boundaries	Every Major Activity Centre, starting with the ten pilot project centres. The VPA Urban Design Background Summary Report (Sep 2024) reclassifies Broadmeadows from 4 to 3.	The VPA has embarked (2024) on an Activity Centres Program to delineate the precinct boundaries for the standardised built form controls. In some centres this involves adjusting the provisions of approved council structure plans. In all centres the VPA is delineating the 800m residential catchment (see below).	-	-
Built Form Overlay [draft Sep 2024]	Presumably intended ultimately for every Major Activity Centre and its 800m catchment area.	Intended to enable the introduction of the City of Centres built form control schedules with deemed-to-comply heights, setbacks etc.	Many provisions including the heights specified in the overlay will be deemed-to-comply, so cannot be varied by permit conditions.	Compliant developments are likely to be exempt from normal notice and review requirements.
Prototype BFO Schedules [VPA Urban Design Background Summary Report (Sep 2024)]	Specifies and modifies the built form controls for the activity centre core. Includes Local Variations schedules for Broadmeadows, Niddrie, North Essendon, Chadstone and Moorabbin.	Tabulates the standardised heights and setbacks for each precinct type. Clarifies which are discretionary and which are deemed-to-comply.		
Suburban Rail Loop (SRL) project (ongoing)	The core area around all six proposed SRL stations (Cheltenham, Clayton, Monash, Glen Waverley, Burwood, Box Hill). All residential zoned land within 1.6km radius of an SRL station, which encompasses a large area of the eastern middle suburbs.	Draft structure plan/precinct 'visions' prepared by the SRLA include activity centre core building heights ranging from 10 storeys (Monash), 18 storeys (Cheltenham), 20 storeys (Clayton, Burwood), 25 storeys (Glen Waverley) and 40 storeys (Box Hill). Planning scheme amendment expected in 2025.	The SRL Act designates the SRLA as a planning authority and enables it take over comprehensive use and development planning powers throughout the 3.2km wide designated corridor. At present local councils retain responsible authority status.	The SRL Act and the project's designation as a major transport project enable the SRLA to exempt developments from notice and review.

APPENDIX 7: CHANGES TO RESIDENTIAL AREA BUILT FORM CONTROLS NEAR ACTIVITY CENTRES

REFORM	AREAS AFFECTED	CONTROL CHANGES	ADMINISTRATIVE CHANGES	NOTICE & REVIEW CHANGES
Deemed-to-comply multi-unit development [VC243 (2023)]	<p>Sites with a minimum area of 900m² (generally two consolidated lots) in a General Residential Zone (GRZ) that are:</p> <ul style="list-style-type: none"> Within 800 metres of a train station, an activity centre in Metropolitan Melbourne, or an identified regional activity centre; and Not within a Heritage Overlay or a Neighbourhood Character Overlay <p>Areas affected by this provision have been mapped by the government and designated Eligible Future Homes Lots (see below).</p>	Multi-unit developments that accord with one of four 'exemplar' 3 storey apartment block designs licensed by the government are deemed to comply .	The relevant local council's CEO would certify the plans, as responsible authority.	Compliant developments are exempt from normal notice and review requirements .
Future Homes Potential Lots Map published online 2023	<p>Every lot in a General Residential Zone within 800 metres of a train station or an activity centre, excluding lots in a Heritage Overlay or Neighbourhood Character Overlay area [source: https://mapshare.vic.gov.au/futurehomes/ (2023)].</p> <p>The extent of these areas varies considerably:</p> <p>The inner and inner middle suburbs, where character and heritage controls are extensive, are also largely untouched, though substantial redevelopment has already occurred.</p> <p>By contrast, large areas of middle suburbs are included: for example in the east, much of the area between Warrigal Road and Springvale Road, virtually the whole of Doncaster, Box Hill North, Springvale and Noble Park. Virtually all established outer suburbs are included.</p> <p>The large areas designated for Suburban Rail Loop Authority control (see above) add considerably to the area of eastern suburbs subjected to special planning provisions.</p>	<p>The Future Homes Potential Lots map is an information resource, not a planning control.</p> <p>It shows every lot affected by VC243 (see above): ie multi-unit developments are deemed to comply if they accord with one of four 'exemplar' 3 storey apartment block designs licensed by the government.</p>	-	-
Delineation of 800m residential catchment (intended Walkable Catchment Zone – see below).	<p>Residential areas (and other uses) within 800m of the edge of the activity centre core.</p> <p>Properties in the Neighbourhood Residential Zone, Heritage Overlay (HO) and Neighbourhood Character Overlay (NCO) are not excluded on the VPA map, though the VPA reports state that the HO will be retained.</p> <p>Modelling is being undertaken of the impact of raising the allowable height to 5 or 6 storeys, and redevelopment 50% of HO and 20% of NCO areas.</p>	<p>These appear on draft plans prepared by the VPA for the pilot program of the ten City of Centres activity centres, which are currently out for consultation.</p> <p>New planning controls anticipated by end of 2024.</p>	Many provisions including the heights specified in the overlay will be deemed-to-comply , so cannot be varied by permit conditions.	Compliant developments are likely to be exempt from normal notice and review requirements .
Walkable Catchment Zone (draft Sep 2024)	<p>Residential areas (and other uses) within 800m of the edge of the activity centre core (see above).</p> <p>Includes properties in the Neighbourhood Residential Zone.</p>	<p>Intended to enable the introduction of deemed-to-comply provisions for:</p> <ul style="list-style-type: none"> A dwelling on a small lot and a small second dwelling. 		

REFORM	AREAS AFFECTED	CONTROL CHANGES	ADMINISTRATIVE CHANGES	NOTICE & REVIEW CHANGES
	Does <i>not</i> mention exclusion of heritage and neighbourhood character overlay areas.	<ul style="list-style-type: none"> – An apartment development to a maximum height of 6 storeys (higher with a permit) on a lot of at least 1000m² and 20m frontage. 		
Built Form Overlay (BFO) [draft Sep 2024]	Would apply to any parts of the 800m catchment area covered by City of Centres precincts.	Intended to enable the introduction of the City of Centres built form control schedules with deemed-to-comply heights, setbacks etc.		
Prototype BFO Schedules [VPA Urban Design Background Summary Report (Sep 2024)]	<p>Would apply to any parts of the 800m catchment area covered by City of Centres precincts.</p> <p>Includes Local Variations schedules for Broadmeadows, Niddrie, North Essendon, Chadstone and Moorabbin.</p> <p>Confusingly the Local Variations maps omit the 800m Walkable Catchment Zone boundary.</p>	<p>Tabulates the standardised heights and setbacks for each precinct type.</p> <p>Clarifies which are discretionary and which are deemed-to-comply.</p>		
Apartments over five storeys	Every Major Activity Centre, including the 800m catchment area.	Contains design requirements for apartments above 5 storeys in residential zones (excluding the NRZ) and commercial zones, supplemented by built form standards and a built form overlay intended to apply to high density precinct development [Clause 58 consultation draft (Sep 2024)].		
Suburban Rail Loop (SRL) project (ongoing)	<p>All residential zoned land within 1.6km radius of an SRL station (Cheltenham, Clayton, Monash, Glen Waverley, Burwood, Box Hill), which encompasses a large area of the eastern middle suburbs.</p> <p>Designated Structure Planning Boundaries cover most of the 1.6km radius around each station.</p> <p>Includes properties in the Neighbourhood Residential Zone</p>	<p>Draft structure plan/precinct 'visions' prepared by the SRLA include building heights ranging from 4-6 storeys in peripheral precincts.</p> <p>Planning scheme amendment expected in 2025.</p>	<p>The SRL Act designates the SRLA as a planning authority and enables it take over comprehensive use and development planning powers throughout the 3.2km wide designated corridor.</p> <p>At present local councils retain responsible authority status.</p>	<p>The SRL Act and the project's designation as a major transport project enable the SRLA to exempt developments from notice and review.</p>

APPENDIX 8: NEW BUILT FORM CONTROLS FOR ACTIVITY CENTRES

The following are excerpts from City of Centres, a consultant report commissioned by the VPA. The controls described in this report form the basis of the new built form controls being introduced for Major Activity Centres (MACs) across Melbourne.

Below: the four density categories into which Melbourne's MACs are being categorised for the purpose of built form control.

Right: the menu of eight precinct types to be applied to the core of a MAC for the purpose of applying the new built form controls.

- **Type 4 AC (highest density):** MeACs, NEICs and PPs
- **Type 3 AC (moderate - higher density):** centres with great access to fixed PT, high levels of employment access and/or less than 2.5km from the CBD
- **Type 2 AC (moderate density):** centres with good access to fixed PT and moderate access to employment
- **Type 1 AC (lowest density):** centres with limited access to fixed PT and low employment access

Precinct type	Description	Defining attributes	Opportunities	Constraints
Heritage Main Street Core (H)	Typically comprising a fine-grain subdivision pattern and traditional shopfront buildings that have heritage or at least high character value, and higher expectations of public realm amenity	<ul style="list-style-type: none"> • TR22 interface C1Z, C2Z or ACZ zoned land • Narrow lots (typically <8m) • Small lots (average area of 150m² - 350m²) • Heritage overlay • 20m wide road reserve • Commonly served by a rear lane 	<ul style="list-style-type: none"> • Additions behind heritage frontage and set back above, for office or residential uses 	<ul style="list-style-type: none"> • Heritage values requiring respect • Narrow lots requiring amalgamation • High character value requiring respect • Expectation of a high public realm amenity (e.g. solar access to footpaths)
Non-Heritage Main Street Core (N)	Typically comprising a mixed subdivision pattern with shopfront buildings that have dwellings and/or office space in the levels above	<ul style="list-style-type: none"> • TR22 interface C1Z, C2Z, ACZ, CDZ or MUZ zoned land • Mix of lot widths, with no consistent frontage width • Average lot area of 520m² • 20m wide road reserve • Commonly served by a rear lane 	<ul style="list-style-type: none"> • Redevelop for a taller building with a setback upper form 	<ul style="list-style-type: none"> • Need for side and rear setbacks could restrict built form above the podium • Narrow lots requiring amalgamation • Expectation of a high public realm amenity (e.g. solar access to footpaths)
Fringe Precinct (F)	Typically comprising a fine-grain subdivision pattern and a mix of shopfronts and dwellings	<ul style="list-style-type: none"> • TR22 interface C1Z, ACZ, or MUZ zoned land • Narrow lots (typically <8m) • Occasionally affected by the Heritage overlay • Commonly served by a rear lane • 20m wide road reserve • Generally only 1 lot deep • Adjacent to residentially-zoned properties at the rear 	<ul style="list-style-type: none"> • Redevelop for a taller building with a setback upper form, particularly close to the core 	<ul style="list-style-type: none"> • Low scale residential interface at rear requiring moderated scale • Narrow lots requiring amalgamation

Precinct type	Description	Defining attributes	Opportunities	Constraints
Limited Sensitivities (S)	Typically comprising larger lots developed with older low-rise commercial and light industrial buildings, some of which have been redeveloped into mixed-use, predominantly apartment buildings	<ul style="list-style-type: none"> • C1Z, ACZ, MUZ zoned land • 15-20m wide road reserve • Medium-sized lots (typically >1,500m²) • Mix of 1 and 2 storey industrial buildings and 5-7 storey infill redevelopment 	<ul style="list-style-type: none"> • Redevelop for a taller building, particularly on larger lots and those close to the core 	<ul style="list-style-type: none"> • Narrow streets could restrict built form to maintain reasonable public realm amenity • Residential interfaces at the rear
Residential Precinct (R)	Comprising lots zoned RGZ (or ACZ where residential use is allowed at ground floor) at the edge of an activity centre	<ul style="list-style-type: none"> • Generally zoned RGZ but sometimes ACZ • 15m wide road reserve 	<ul style="list-style-type: none"> • Redevelop for a taller building, particularly on larger lots and those close to the core 	<ul style="list-style-type: none"> • Strata titling limiting the lots available for development • Need to protect amenity of neighbouring residential properties • Transition area to residential hinterlands • Residential interfaces at the rear
Large Opportunity Sites (L)	Comprising landholdings in single ownership that are large enough for multiple buildings	<ul style="list-style-type: none"> • C1Z, MUZ or ACZ zoned land • Large lots (>5,000m²) 	<ul style="list-style-type: none"> • Redevelop for multiple, taller buildings, particularly close to the core 	<ul style="list-style-type: none"> • Narrow streets could restrict built form to maintain reasonable public realm amenity
Enclosed shopping Centres (C)	Comprising landholdings in single ownership with a large-format enclosed shopping centre, typically with at grade or multi-level parking at edges	<ul style="list-style-type: none"> • C1Z, CZD1 or ACZ zoned land • Large lots (>5,000m²) 	<ul style="list-style-type: none"> • Redevelop for multiple, taller buildings, particularly close to the core 	<ul style="list-style-type: none"> • Transition to low-scale residential lots (RGZ) within the activity centre
No charge	Comprising lots whose zoning precludes residential development	<ul style="list-style-type: none"> • IN1Z, IN2Z, PUZ, PPRZ zoned land 	<ul style="list-style-type: none"> • N/A 	<ul style="list-style-type: none"> • N/A

Table 1. Precinct attributes

Below: examples of the new MAC built form controls. These envelopes are to apply to heritage streetscapes, typically those of heritage strip shopping centres.



**Address:**

**Site area:**

**FAR:**

**Height:**

229 Smith Street,
Fitzroy

372m²

5.8

7 storeys

**Heritage Main
Street Core**

CODE: H

Development example

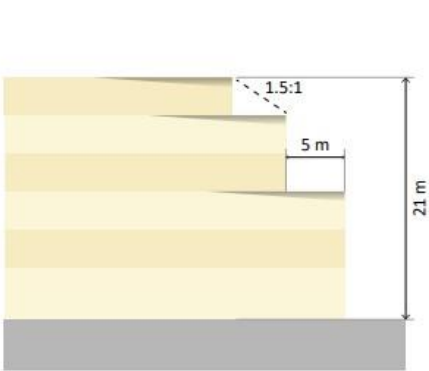


Figure 5. Lower density activity centre heritage response (AC type 1-2)

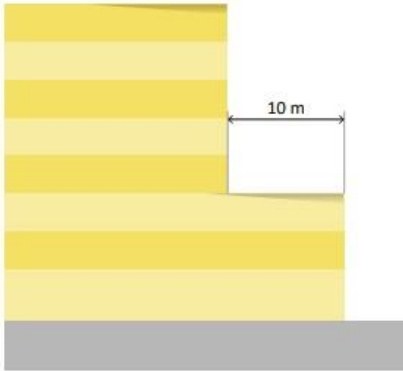


Figure 6. Higher density activity centre heritage response (AC type 3-4)

APPENDIX 9: RMIT'S MELBOURNE AT 8 MILLION DWELLING TARGET SCENARIOS

A different scenario with different assumptions from those used in government modelling for target allocation can meet required land supply without the detrimental impacts of the government's proposal. The RMIT *Melbourne at 8 Million* report calculates possible housing supply across the city by identifying sites suitable for development and applying appropriate yields informed by relevant characteristics – lot size; planning zone; region; existing dwelling number; and heritage value – to assess development potential for every lot in metropolitan Melbourne. Its modelling is based on the 2013 zones including the NRZ which excludes multi-unit development.

ASSUMPTIONS

The RMIT scenario prevents medium density development on lots in the General Residential Zone (GRZ) below 1,000 square metres and requires a lot size of 450 square metres before dual occupancy at trend take up rates. Proposed development in the Neighbourhood Residential Zone (NRZ) prevents multi-unit development, requires a lot size of 750 square metres before dual occupancy and follows trend take-up rates. The model assumes development of all the Residential Growth Zone (RGZ). ACZ, C1Z and MUZ development is restricted to 6 storey development with four residential levels.

RESULTS

Limiting development to the scenario assumptions demonstrates that Melbourne's suburban housing does not need to be redeveloped *en masse* to satisfy projected housing demand. Land supply needs can be met while retaining all Melbourne's built heritage assets and preserving high amenity values, reducing

the emphasis on high rise and favouring a traditional European urban form, and excluding pre-1945 shopping strips from redevelopment.

The report scenario shows that almost 80 per cent of anticipated demand can be met within the established city while protecting Melbourne's remaining heritage buildings. Most future dwelling supply could be available in Melbourne's established suburbs mainly in the General Residential Zone (GRZ). Residential zones outside the City of Melbourne and Fishermans Bend could meet 42 per cent of projected future dwelling demand, or 700,000 new dwellings. The total estimated yield from the GRZ is five times greater than the yield from the most restrictive zone, the Neighbourhood Residential Zone (NRZ), and double the yield from the most development-oriented zone, the Residential Growth Zone (RGZ). The RGZ applies to only one per cent of the total metropolitan area zoned residential yet has potential for 190,000 dwellings, the vast proportion on lots under 2,000 square metres.

The commercial and mixed-use zones could accommodate almost a third more dwellings – 260,000 – than the Residential Growth Zone, restricted to a height of six storeys including four storeys of residential. This potential yield is also greater than that from large inner urban brownfield sites in the City of Melbourne and Fishermans Bend (178,700). The other main non-residential zones, the Commercial 2 Zone and the Industrial Zones could potentially provide another 108,000 dwellings. Large inner city and other brownfield sites and lots over 2,000 square metres in all zones could account for about 750,000 dwellings, or almost half the required dwelling yield.

An important finding was that the State government's dwelling projections could be met while protecting heritage buildings and improving amenity. The NRZ applies only to about 12 per cent of all zoned land and 17 per cent of residentially zoned land. Even municipalities where the NRZ is applied to a high proportion of residentially zoned land retain other large areas capable of redevelopment, easily meeting official projections. This zone has the potential for 85,000 additional dwellings on one third of the area compared to the spatial extent of the GRZ.

The scenario models the impact of protecting all pre-1945 buildings in residential and Commercial 1 (C1Z), Activity Centre (ACZ) and Mixed Use (MUZ) zones along tram routes from development. Redevelopment of all buildings along these routes could result in almost 82,000 new dwellings in four to six storey mixed use buildings. Protection of lots with an existing heritage overlay would almost halve the yield, while protecting all pre-1945 buildings would reduce potential yields to 30,000 dwellings. This demonstrates that a large heritage and amenity benefit with significant economic value results in a small overall loss of potential dwelling supply. It makes no sense to demolish historic retail strip centres while there are such large potential supplies of land zoned MUZ, C1Z and potentially RGZ, and a range of infill sites, immediately adjacent or close to these centres

APPENDIX 10: THE FUTURE HOMES POTENTIAL LOTS MAP COMPARED WITH THE WALKABLE CATCHMENT MAPS

In the following pages:

The top map, published on the government's Future Homes website, shows in green each residential lot on which multi-unit developments are deemed to comply if they accord with one of four 'exemplar' 3 storey apartment block designs licensed by the government. The Future Homes Potential Lots Map can be inspected at <https://mapshare.vic.gov.au/futurehomes/>

The lower map shows in light pink the 800m catchment area defined by the VPA, which is likely to become the boundary of the Walkable Catchment Zone (WCZ). Within this zone multi-dwelling developments up to six storeys will be deemed-to-comply in prescribed circumstances. Ten activity centres have so far had their catchment areas delineated in this way, and ten more are to be announced soon. Presumably the government intends ultimately to delineate catchment areas around every one of the 130 plus Major Activity Centres. The VPA plans can be inspected at <https://vpa.vic.gov.au/metropolitan/activity-centres/>

An exception is Box Hill, one of the six SRL East station locations. For each of these stations, the SRLA has delineated a 'declared boundary' (in pink), stretching up to 1600m out from the station, in which the SRLA has an interest as planning authority. The red boundary is the SRLA's Structure Plan boundary, within which

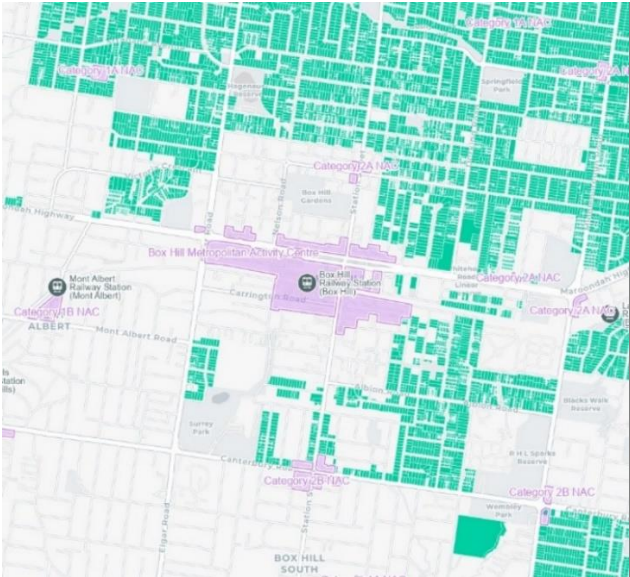
SRL consultants (Urbis) have prepared Key Directions Maps, which include proposed height limits. These can be inspected on <https://bigbuild.vic.gov.au/projects/suburban-rail-loop/planning/srl-east-precinct-planning>

The two sets of maps – three if the SRL East maps are added – convey information about different aspects of the planning system reforms. There is no single map that conveys all the information needed to understand the effect of the planning reforms on a single location.

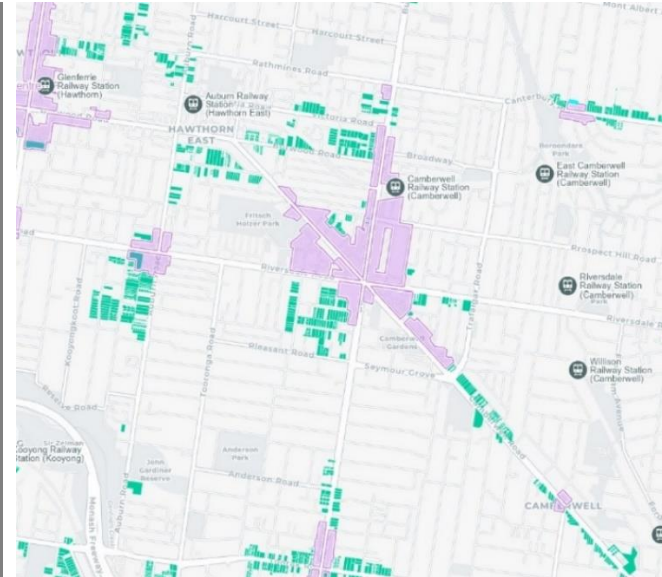
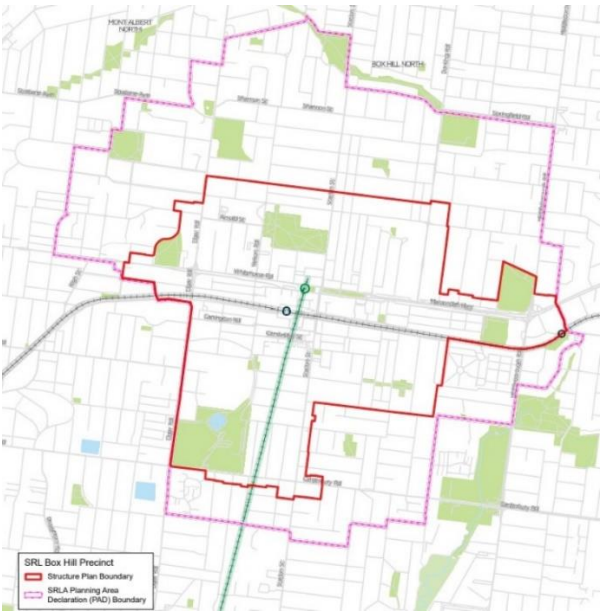
To add to the confusion:

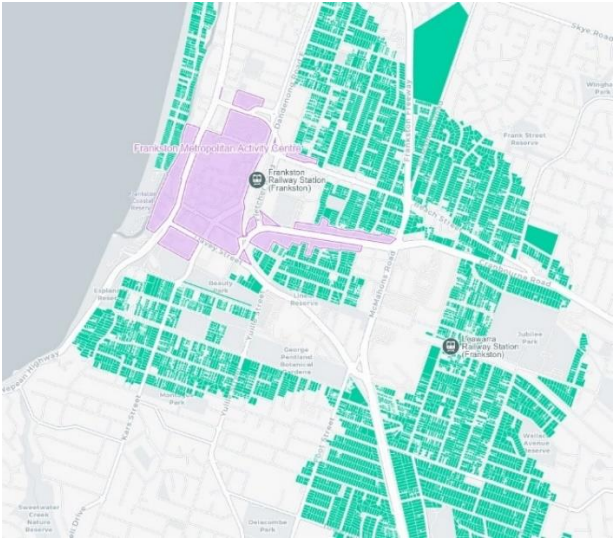
The boundary of the activity centre core is different on each pair of maps

The activity centre maps in the VPA City of Centres report show yet another 'activity centre boundary' that includes part only of the walkable catchment area. These maps show the extent of the built form control precincts, which are likely to form the boundary of the Built Form Overlay (BFO). The implication is that the BFO will overlap the WCZ in parts.

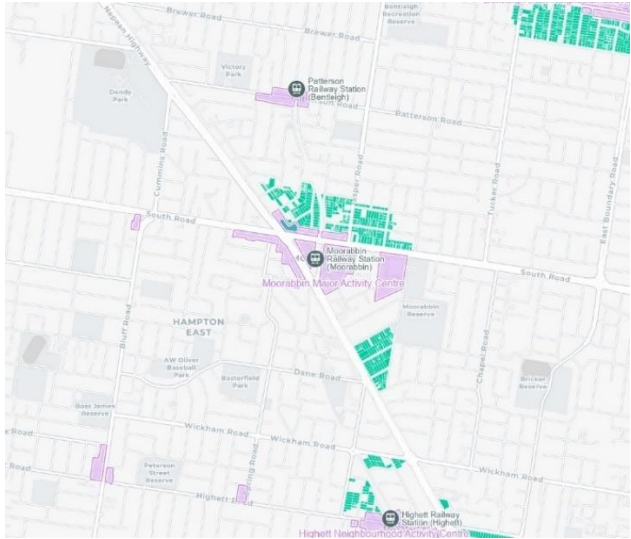


BOX HILL (below: SRLA planning precinct boundaries)

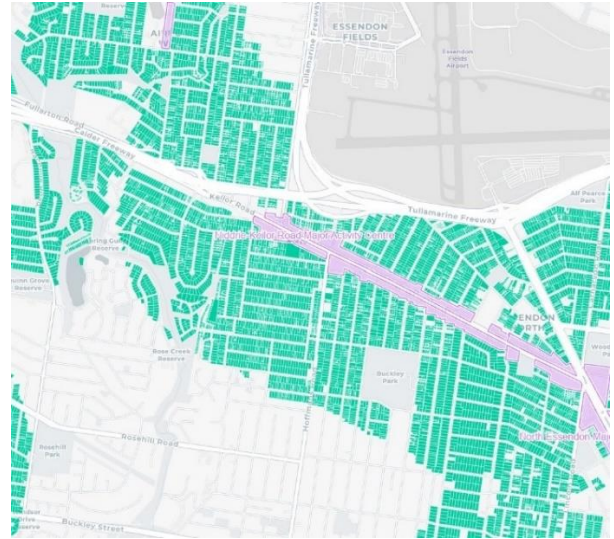




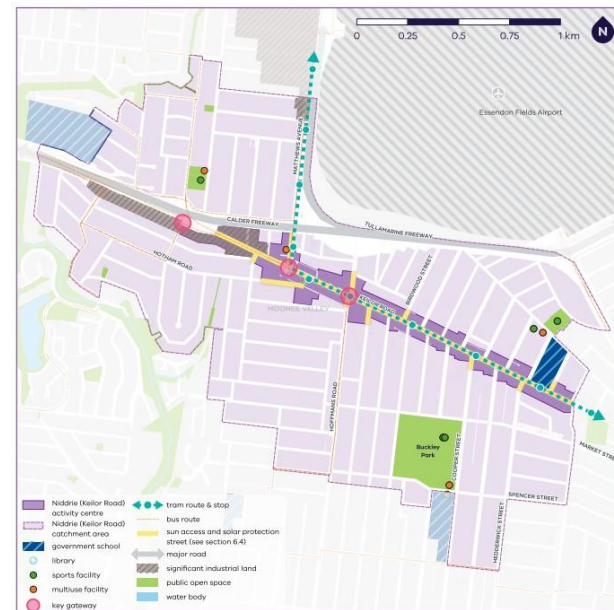
FRANKSTON

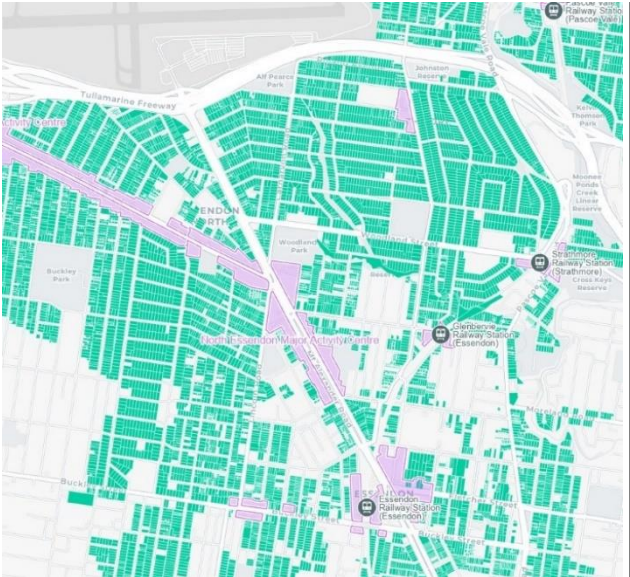


MOORABBIN

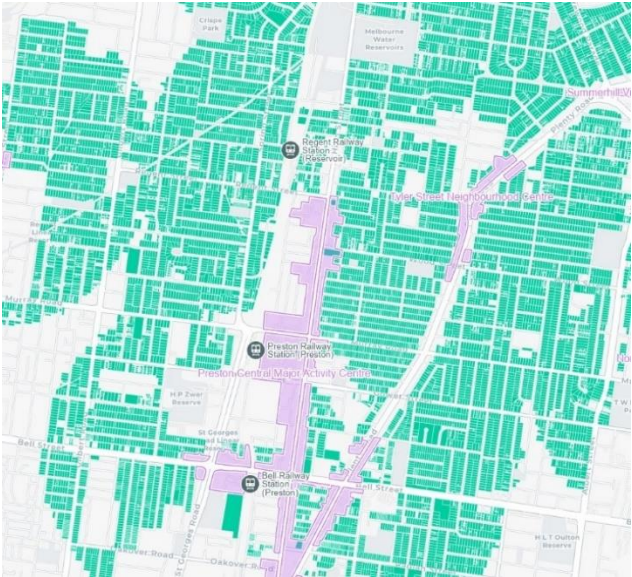


NIDDRIE

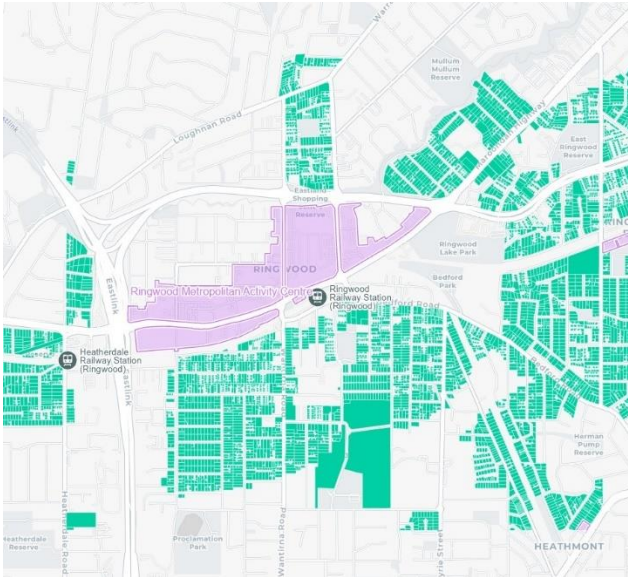




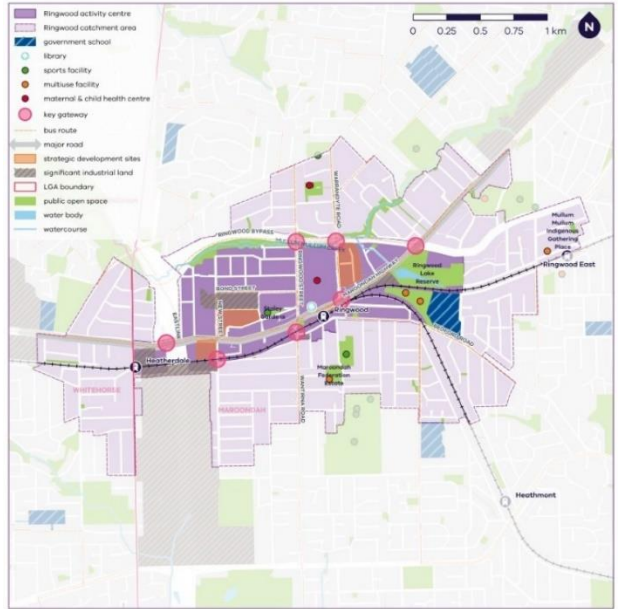
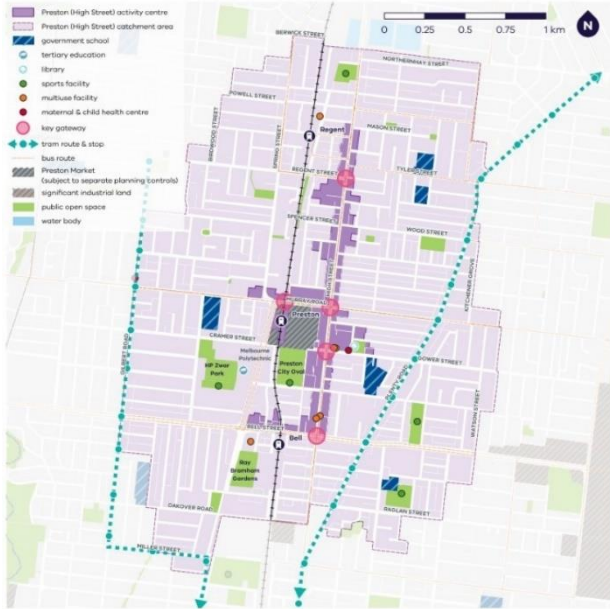
NORTH ESSENDON



PRESTON (HIGH ST)



RINGWOOD



APPENDIX 11: CHARTER 29 OBSERVATIONS AND SUGGESTIONS

ACTIVITY CENTRE 'CORE' AREAS

Incorporate greater heritage sensitivity

- Melbourne's best and most lively shopping strips have high heritage values, at a scale that is pedestrian friendly, free of wind gusts and open to sunlight.
- The height control diagrams in the VPA documents for redevelopment behind and above heritage buildings reduce the heritage component to a façade on a modern tower.
- The controls should allow sufficient upper level setback behind the heritage façade to maintain the dominance of the heritage building at street level, ideally **allowing retention of the front room of the heritage building**, and the allowable overall height should be reduced.

Improve rear residential interfaces

- The angle by which acceptable interface with residential properties adjoining at the rear is calculated should be reduced from 45 degrees to 30 degrees.
- Significant redevelopment opportunities exist in the ACZ, C1Z and MUZ even while excluding all pre-1945 shopping centre buildings.
- However, further yields could be gained by allowing controlled redevelopment of these shopping centres including HO buildings.
- A front upper level set-back of 12 metres and a height control of 11.5 metres at the rear of buildings with a HO would allow significant further development while not affecting heritage values. This could be mandatory for pre-1914 shop buildings.

Promote alternatives to high-rise tower-and-podium development

- The proposed controls rely on upper level setbacks to reduce the visual impact of taller buildings on public spaces.
- **This approach tends to encourage a podium-and-tower type of built form**, which has become the standard template in many of Melbourne's urban renewal areas.
- **A preferable alternative in many locations is mid-rise, street-fronting buildings of six storeys:** 20m, the same dimension as the road reserve of most of Melbourne's high streets, giving a comfortable 1:1 ratio of street width to building height.

- Merri-bek council is demonstrating the practicality of this approach in South Brunswick (Design & Development Overlay (DDO) 18), which preserves the scale of Sydney Road, while allowing 6-8 storey development between the strip and the railway.

Mandate some maximum heights and minimum setbacks

- The VPA documentation specifies each maximum height/minimum setback as either deemed-to-comply or discretionary – **none are mandatory**.
- Since the introduction of the performance-based planning scheme in the 1990s, the almost universal use of **discretionary height 'limits' has undermined the credibility of the planning system**, with developments double the preferred height receiving approval in some instances.
- Merri-bek council appears to be having some success in using deemed-to-comply building heights to deliver a consistent scale of development. But **mandatory controls should be more freely allowable in place of ineffective discretionary limits**.

ACTIVITY CENTRE 'CATCHMENT' AREAS

Retain closer control of character, heritage and amenity for 4-6 storey apartments

- **Urban context needs to be considered everywhere**, especially where a change in building scale is ordained. For example, use of materials and front fence design can make all the difference between a development that 'fits in' with local character, and one that doesn't.
- **Allowing up to six storeys as deemed-to-comply is not appropriate** in sensitive, low rise residential neighbourhoods, particularly in Heritage Overlay areas.

Simplify and rationalise the controls regime

- The control instruments are **complex** and there appear to be **overlaps and gaps** in the way they are to be applied.

- The **different arrangements for SRL catchment area planning** compared with the other catchment areas is **confusing**; their **exclusion from the Future Homes Potential Lots Map** is **blatantly misleading**.

RESIDENTIAL AREAS AWAY FROM ACTIVITY CENTRES

Reinstate urban context, heritage and amenity as essential components of liveability

- Urban context is relevant not just in areas covered by a special overlay control.
- Allowing up to **four storeys as deemed-to-comply is not appropriate** in Heritage Overlay areas.

Reinstate the clear distinction between residential zones

- The previously clear distinction between the NRZ ('no go'), GRZ ('slow go') and RGZ ('go go') zones formed a logical implementation tool for the kinds of strategy the state has promoted for the last several decades.

COUNCIL AND COMMUNITY ROLE IN PLANNING DECISIONS

Enable residents to exercise their democratic right to be informed and to be heard

- Neighbours have a right to information about a large new development proposal, and to be able have their concerns considered by the local council before a determination is made. This need not translate into a right to seek review of every decision at VCAT.

Work with local councils in a genuine partnership to refine the reformed controls

- It is councils who understand fully the impact of changes to the planning system, and councils who know best where (for example) conditions are best suited to higher density development.

COUNCIL AND COMMUNITY ENGAGEMENT IN THE REFORMS

Manage the planning system as a partnership between state and local government

- Just as the federal government devolves policy implementation responsibilities to state governments, so does the state to councils.
- Councils and their planners act as the planning and responsible authorities for their local areas, and they hold vital local knowledge and experience.

Engage the Victorian community in genuine deliberation about their future

- Initiate an open, honest public discussion about the reform program and Plan Victoria.

PLANNING SYSTEM REDESIGN

Redesign the planning system to provide greater certainty, efficiency and lower costs

- **Increase the number of prohibitions** for inappropriate uses and developments.
- Provide **mandatory and quantified criteria** for assessing planning applications.
- Allow approvals without the need for permits **only for minor matters**.
- **Rewrite the Heritage overlay** to provide clear, quantified and mandatory content, mandatory height controls, and where appropriate, development setbacks, placing primary emphasis on the need to protect both built and landscape heritage. The use of the Heritage overlay could be better linked to the use of a revised Neighbourhood Residential zone which prohibits multi-unit development.
- State and local policy, overlays and particular provisions should be rewritten to **remove vague and contradictory language**, provide clear direction, mandated and quantified controls including the use of mandatory height controls and a policy framework rejecting high rise residential towers as a building model.
- **Local government could be given greater power to develop planning controls** over local matters.

A BETTER APPROACH TO STRATEGIC PLANNING

Base the statewide planning strategy on a regional planning context

- Develop a **city-wide or metro-region-wide approach to housing targets**.
- Identify housing capacity through a detailed lot analysis.
- Use the regions identified in Plan Melbourne (2017).

Provide a positive role for local councils

- **Individual municipalities would negotiate** their additional dwelling potential at regional level, as occurred with the government's Regional Housing Working Group process following Melbourne 2030.

- Target allocation could be based in a process involving detailed estimates of available land supply using a variety of land types and urban opportunity sites such as infill sites, underused or vacant sites and development opportunities under existing zones and other planning controls. Several councils have undertaken such surveys and identified significant additional land supply.
- The results could be agglomerated into proper metropolitan regional framework plans, showing the spatial distribution of job and population growth, and the location of key services and infrastructure to service them.

ALTERNATIVE MODELLING OF HOUSING TARGETS

Establish a new participatory process

- A new participatory process could involve the task of deciding what to build where.
- This process could **involve representatives of local government, resident community groups, government and the property industry** for the six metropolitan regional areas identified in Plan Melbourne.
- A similar process should be followed for regional areas. This process would be led both by strategy and the need to identify future dwelling supply.

THE GROWTH AREAS

In the greenfield growth areas, we should:

- **Stop wasting precious farmland.**

- **Reproduce the things that work best and are most loved about our existing suburbs.**

Use less land per dwelling and give every lower density home a decent back yard

- Replace useless side setbacks with a **substantial north-facing garden** overlooked by living areas

Connect shops and community facilities directly to walkable residential areas

- Require retail, community, business and local services to be co-located in **street-based centres** that connect directly with adjoining residential areas along streets fronted by active uses

Design new greenfield suburbs around a network of fast, frequent, direct public transport routes

- **Mandate a minimum 25 lots per hectare density**
- Mandate a dwelling **density gradient** built up around shopping hubs and public transport routes, graduating from apartments to town houses, row houses and then detached dwellings
- **Structure new suburbs around a grid of trunk, bus routes**, along which are located the major activity centres and higher density dwellings, instead of treating bus service provision as an afterthought
- Siting and design requirements (Particular Provisions linked to Zones) require a decent back yard, good solar orientation, and improved street interface
- Build more affordable 'starter' homes and locate them close to facilities