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Department of State Growth
Tasmanian Government

Submitted online at: <https://engage.stategrowth.tas.gov.au/medium-density-design-guidelines>

Re: Medium Density Design Guidelines

To whom this may concern,

The Tasmanian Chapter of the Australian Institute of Architects (the Institute) would like to thank the Tasmanian Government for the opportunity to provide feedback on the draft Medium Density Design Guidelines (guidelines). The Institute has long advocated for guidelines and is supportive of them.

The Institute would like to commend the process that has led to the development of the guidelines, and is pleased to see that skilled professionals, including architects, urban designers, landscape architects and planners, were part of the consultant team, led by ERA Planning & Environment.

The Institute applauds the Tasmanian Government for encouraging well designed medium density development in our existing built-up areas. Our cities and towns must plan for the future in a way that is well considered, strategically planned, and focuses on the value of good design and the benefits it affords the community in both the short- and long-term. The Institute encourages densification in appropriate locations, with well designed and built solutions.

While this document, in its current form, is non-statutory, and aspirational in nature, the Institute understands that the guidelines are proposed to work with parts of the recommendations outlined in the 'Improving residential standards in Tasmania – Draft report' that is currently out for consultation. The Institute's members would like to see these type of guidelines introduced in a more statutory manner, and to be used by all relevant councils across Tasmania. The Institute also notes that council and assessment bodies require the relevant skills and education to enact and implement the adherence to these guidelines, and this will require commitment from the Government to provide the necessary training and upskilling. This could also take the form of a design review panel, similar to the City of Hobart's Urban Design Advisory Panel, but with broader functions.

The Institute notes that there is currently no consideration of First Nations perspectives within the guidelines and recommends that design for Country is an essential addition to the document. The

Institute's goal is to empower architects to create spaces and buildings that respect and celebrate the cultural significance of First Nations peoples¹.

In consulting with Institute members who have worked with various proponents, feedback has been received about the feasibility of medium density residential development. The Chapter has heard of instances where private proponents have sought to create medium density developments, but under the current planning scheme, have found that these developments aren't financially viable, due to the constraints of the site yield, due to setbacks and height limits.

The Institute suggests there should be incentives to encourage high-quality private development in the right locations. This could take the form of increased height, reduced development application fees, fast track approvals etc, in return for high-quality design that provides community benefit. For example, the creation of open usable public space is to be lauded at ground level, but certain sites would preclude this due to the scale or shape of the site, unless permission were to be given to go a little higher. A proponent should be able to negotiate for a "rule" breaking component by offering another community beneficial aspect that somehow "pays" for the development. The Institute suggests that (while perhaps outside the remit of the guidelines) there should be some form of methodology for this kind of negotiation to allow for projects that don't specifically comply with the planning rules, to allow for benefits for both the neighbourhood and its people, and the site. Clever, well thought-out, and designed opportunities that give back to the neighbourhood and the public, have the potential to create a positive impact. These types of negotiations require a high-level of design intelligence to assess and would benefit from the assistance of a design assessment panel.

In the Tasmanian context, single residential sites are often densified by strata-titling a block of land and building one or more additional dwellings either in front or behind the existing house, which often results in less-than-ideal outcomes. While the guide includes 'grouped housing' as part of its remit, it would be good to include more specific references to this typology of housing to ensure that these types of developments are well designed, as they seem to be an 'accepted' form of increasing density in many urban and suburban areas in Tasmania. It would also be useful for the plan to include consideration of courtyard models of medium-density housing, which are used around the world, are space-efficient and allow for outdoor amenity in the middle of the property. Some existing planning controls in relation to setbacks preclude this type of development.

The Institute commends the inclusion of the example projects within the documents, but notes that they are mostly Melbourne-based examples. The Institute suggests that in encouraging good design, there could be scope to include best-practice examples from across the world, along with floor plan examples. While there are some inclusions of examples within Hobart (and understandably there are not many examples within Tasmania to include), it would be good for the guide to have scope to add local case studies as they are developed and lived in.

The Institute has an Affordable Housing Policy², along with a Multi-Residential Standards Policy³, that encourage outcomes that provide high quality living spaces for residents and excellent public amenity.

The Tasmanian Chapter has consulted with our membership and have reviewed the relevant documents and has the following comments.

¹ The Institute has a First Nations Resource Hub that can be found here: <https://www.architecture.com.au/advocacy-news/policy/first-nations-resource-hub>

² <https://www.architecture.com.au/wp-content/uploads/Affordable-Housing-Policy.pdf>

³ <https://www.architecture.com.au/wp-content/uploads/Multi-Residential-Standards-Policy.pdf>

Specific Responses

The Institute has reviewed the document and has the following suggestions relating to specific pages and content.

Introduction – page 6

Under the dot-point ‘promote designs that respond to the natural and built features of the area...’, the Institute suggests making reference also to the site history and existing site conditions.

The Institute suggests that under the dot-point ‘Improve liveability by designing for’, the note about ‘appropriate vehicle access and parking options’ should include reference to the encouragement of other forms of transport, including active modes of transport.

How to use the guidelines – page 7

Under the dot point noting that the guidelines are for the community, the Institute suggests adding ‘understand’ to the sentence: ‘...to better understand and communicate the design expectations...’

What is medium density housing? – page 8

The Institute suggests that in the fourth paragraph, there should be reference to not only the impact on our natural areas, but our agricultural areas: ‘...and impact our natural and agricultural areas.’

What is good design? – page 9

The Institute is pleased that good design has been defined. Under the dot-point about ‘Improving environmental outcomes...’ the Institute suggests that this could extend to referencing Indigenous ecosystems, corridors and nodes (IEC+N)⁴. The Institute also suggests that there could be a reference to healthy buildings and cities.

Context analysis – page 10

The Institute recommends that in the final paragraph, architects are included in the list of experts that includes ‘landscape architects, sustainability specialists, and arborists’.

Streetscape – page 14

The ‘Context Queries’ that lists ‘How do vehicles, pedestrians, cyclists...’, should include people with mobility issues and mobility aides.

Streetscape analysis should also consider how Indigenous fauna navigates the site and surrounds, and include the incorporation of DarkSky⁵ appropriate lighting.

Design elements – page 18 & 19

As ‘Design elements’ has been identified as a ‘chapter’, with four sections (in the opening text), each of the four sections below should have the references to ‘chapter’ changed to ‘section’.

The Institute suggests that the environment section makes reference to IEC+N.

Site structure: sloping sites – page 25

⁴ Find out more about IEC+N here: <https://acumen.architecture.com.au/environment/place/habitat-and-ecology/four-strategies-to-design-for-ecological-connectivity/> and https://www.uia-architectes.org/wp-content/uploads/2022/03/20201027_uia_ifla_iec_n_website_plan_ar_tw_ar2.pdf

⁵ Find out more about DarkSky lighting here: <https://darksky.org/what-we-do/darksky-approved/>

The Institute suggests that the design response should consider the pedestrian entry, allowing for those with mobility issues, particularly given the upcoming changes to the NCC and the incorporation of the Liveable Housing Design Standards⁶.

The building: Design prompts – page 28

The Institute suggests that a reference to sustainability be included in the Design Prompts on this page. Universal design principles, as mentioned in the design prompts, should have a definition included within the glossary. Also to note is the inclusion of Livable Housing Design Standards in the NCC⁷ (rather than the Livable Housing Design Guidelines that is linked to within the document). This is also the case in the linked reference under 'Universal Design' on page 35.

Dwelling design – page 31

The Institute questions the usefulness of the example dwelling layout diagram that is included on this page. There is a danger that developers could use this at face-value, without consideration of the context and how the connection between the internal spaces work with the overall building layout, its site and broader context.

Room ventilation – page 38

The figures illustrating ventilation within rooms should have a reference as to what is a 'good' level of ventilation – i.e., a single window opening doesn't provide much ventilation in reality, and best practice is to have cross-flow ventilation – so the illustrations and associated text should convey this.

Balconies and courtyards – page 46

The Institute notes that in some instances, the provision of outdoor space for individual residences may be provided in alternate ways, for example, via a communal laundry, communal garden, or communal outdoor eating and bbq areas, which may result in the size of balconies differing from those outlined in the guidelines.

The environment – page 40

The Institute suggests that reference to DarkSky appropriate lighting and IEC+N should be considered within the design prompts.

Landscaping – page 42

The Institute suggests that the landscaping section could include reference to providing productive garden areas for residents, and also suggests that there be consideration of the inclusion of indigenous and endemic plant species.

Parking and access: bicycle parking – page 52

The design response that ensures that 'bikes and cars can move safely and independently' should also ensure that pedestrian accessing the bikes can make their way to and from them safely.

Site services: dwelling storage – page 56

The figures illustrating the areas for storage should be expressed in volume (m³) rather than in area (m²) and could also be expressed as a minimum amount.

Overall

⁶ <https://ncc.abcb.gov.au/resource/standard/livable-housing-design-standard>

⁷ <https://ncc.abcb.gov.au/resource/standard/livable-housing-design-standard>

Diagrams that are included within the document should state whether they are a plan, elevation or section, so that this is clear to the reader who may be less familiar with these drawing conventions (this includes the diagrams on p. 23 (fig. 4), p. 25 (fig. 5), p. 38 (fig. 8 and 9)).

Ultimately, our cities require high quality designed outcomes that incorporate innovative design responses. The quality of design affects how places and people function, is able to stimulate the economy, enhance the environment and improve wellbeing for all. Good design adds value for all people and can play a transformative role in the lives of every person.

The Institute commends the development of the Medium Density Design Guidelines and looks forward to seeing them finalised. The Institute would welcome the opportunity to discuss any of the above further. If we can be of any assistance, please don't hesitate to contact us.

Kind regards,



Daniel Lane
President, Tasmanian Chapter
Australian Institute of Architects



Jennifer Nichols
Executive Director, Tasmanian Chapter
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The Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation with over 14,500 members across Australia and overseas. The Institute exists to advance the interests of members, their professional standards and contemporary practice, and expand and advocate the value of architects and architecture to the sustainable growth of our 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. To learn more about the Institute, log on to www.architecture.com.au.