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State Planning Office
Department of Premier and Cabinet
GPO Box 123
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By email: yoursay.planning@dpac.tas.gov.au

Re: Improving Residential Standards in Tasmania

To whom this may concern,

The Tasmanian Chapter of the Australian Institute of Architects (the Institute) would like to thank the State Planning Office for the opportunity to provide feedback on the *Improving residential standards in Tasmania – Draft report* (the report). Overall, and in principle, the Institute is supportive of the recommendations outlined in the report.

The Tasmanian Chapter has consulted with our membership, had a briefing session with the State Planning Office, have reviewed the relevant documents, and has prepared the following response.

It is clear that Tasmania requires a significant investment in medium density housing that is of high quality and provides excellent urban outcomes in the places in which we live. Our cities and towns must plan for the future in a way that is considered, well planned, and focuses on the value of good design and the benefits it affords the community (both for those who live in the buildings, the people who live around and alongside these buildings, and those visiting and working in the areas) in both the short and long-term. The Institute encourages the appropriate densification of appropriate locations, with well designed and built solutions.

The Institute would like to commend the process that has been undertaken to develop the project so far, which has involved a technical reference group comprising skilled professionals from relevant fields, including architects, planners, and representatives from local and state government. The leading of the project team by highly experienced planners, ERA Planning & Environment; community-minded developers, Hip v Hype; and Studio GL, is also to be commended.

It is important to note that these standards, once implemented within the planning scheme, will require review after a period of time of them being used in practice to ensure they are working as intended, and to adequately access their suitability.

The Institute has an Affordable Housing Policy¹, along with a Multi-Residential Standards Policy², that encourage outcomes that provide high quality living spaces for residents and excellent public amenity.

¹ <https://www.architecture.com.au/wp-content/uploads/Affordable-Housing-Policy.pdf>

² <https://www.architecture.com.au/wp-content/uploads/Multi-Residential-Standards-Policy.pdf>

GENERAL COMMENTS:

It is pleasing to see that the performance pathways outlined in the report include reference to best practice design guidance in the Medium Density Design Guidelines (which is currently in draft format). The Institute notes that council and assessment bodies require the relevant skills and education to enact and implement the adherence to these guidelines along with the other considerations outlined in the performance pathways, and this will require commitment from the Government to adequately resource and coordinate a program of training and upskilling the approval authorities (councils) throughout the state.

A complementary advocacy program targeting the design and development community to explain the opportunities and benefits of high quality design outcomes and working with a performance based planning scheme, should also be considered. This also needs to target the broader community, who are often highly invested in the development that takes place in their local neighbourhoods. Both these programs will benefit from the introduction of additional design review panels, similar to the City of Hobart's Urban Design Advisory Panel, but with broader functions. The importance of providing an environment of high level of decision making competence, coupled with an informed and enlightened development community, supported by design review panels when appropriate, can not be overstated.

The Institute understands that the Apartment Development Code, as referenced within the report, is currently under development, and would be interested in seeing a draft of this when it is available.

The Institute is supportive of the proposed changes for both development standards and subdivision standards. The inclusion of bonus plot ratio allowance for the incorporation of social housing and dwelling diversity is particularly heartening. Improvements to subdivision design, particularly through lot design and urban greening, are imperative. As stated within the report, 'decisions made at the subdivision stage of a development have long terms effects on liveability...' (p. 28) and thus it is crucial to ensure these early decisions result in high quality design and outcomes. The inclusion of an architect in these early stages of subdivision design would facilitate this. The development of subdivision guidelines, also recommended in the report, would be welcomed.

Viability & Incentives

The Institute agrees that there are barriers to infill development. 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 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.

Along with the inclusion of bonus plot ratio allowance for the incorporation of social housing and dwelling diversity, the Institute suggests other incentives to encourage high-quality private development in the right locations. Such 'bonus' mechanisms that allow proponents to build additional floor space or building height than would otherwise be allowed under the planning rules should be encouraged. These could include:

- Formulation of 'design excellence' architectural design competition approach, similar to the City of Sydney, and within NSW.
- Inclusion of urban realm and public amenity improvements as part of the project in collaboration with relevant councils or authorities (e.g. street tree planting, urban design upgrades, powerline undergrounding, public art, etc. to public spaces in proximity to a development site)

The formulation of a 'design excellence' competition mechanism within the planning scheme could also be used in some instances to streamline or fast-track planning approvals, giving proponents further incentive, increased confidence, and improved prospects of project feasibility if processes that support good design are utilised.

The Institute suggests there could be the consideration for implementation of 'demonstration projects', to illustrate to proponents and the community exemplary residential development across a range of scales and contexts. From this, opportunities for incentives could be identified (through expedited planning or mechanisms that improve project feasibility) for proponents who adopt principles/design exemplified in

demonstration projects as a means of encouraging desirable residential development. The NSW Government is currently undertaking the development of a pattern book of endorsed building designs, to enable proponents (who use these designs) to have access to an accelerated approval pathway.³ As this project is in the early stages, it is unclear how this will work. This approach could be reviewed by the Tasmanian Government when evidence of outcomes is available. It is an approach that could have both positive and negative results and so must be carefully reviewed before considered.

Building Typologies

It is pleasing to see consideration of a holistic approach in regard to performance assessment for setbacks, plot ratios, heights and solar access, that has the potential to recognise design excellence. These types of assessments require a high-level of design intelligence to assess and would benefit from the assistance of a design assessment panel. As noted above, council and assessment bodies require the relevant skills and education to assess these proposals, and this will require commitment from the Government to provide the necessary training and upskilling. It is essential that there is consistency in the assessment of proposals across different council jurisdictions. This holistic approach has the potential to allow for avenues to provide alternative building types, including courtyard models, which should be considered in the provision of medium-density developments. These models are used around the world and are space-efficient and allow for outdoor amenity in the middle of the property. Some of the existing planning controls in relation to setbacks preclude this type of development.

Spatial Application of Zones

The Institute notes that the report contains a proposal to revise the spatial application of residential zones, as outlined in Option 2 under the implementation options. The Institute also notes there are observations in the report that the current envelope planning control does not allow much flexibility for development proposals to adapt to site conditions. As part of the proposed revisions to the spatial application of zones suggested in the report, 'sub zones' or specific areas not curtailed by significant extant heritage fabric and where an intensity of urban renewal or future residential development is anticipated should be identified and more specific planning controls developed to ensure that future desired street types are achieved.

A more proactive and deliberate definition of planning parameters in specific areas is warranted to ensure that in areas with potential to accommodate many new buildings, developments collectively contribute towards achieving a specific and consistent 'street-type' response rather than an ad-hoc or inconsistent outcome.

Examples of some controls that may be considered for such sub-zones are as follows:

- application of consistent 4-6 storey street wall
- whether continuous awnings are included or not
- mandated cross block circulation patterns/granularity to ensure ground plane porosity
- increased plot ratio

SPECIFIC COMMENTS:

There are a couple of specific suggested revisions to the document, as follows.

It is pleasing to see examples of high-quality architecture used within the document. These images, however, should reference both the architect responsible for the work, as well as the photographer (not just that they are sourced from ERA).

On page 29 of the document, 'BUZ' is used as an acronym. This acronym should be included in the glossary.

There are some inconsistencies with the numbering of the figures included within the report, with two figures 10s included (p. 42 and p. 50).

Implementation Options

³ [Pattern book of housing design | Planning \(nsw.gov.au\)](https://www.planning.nsw.gov.au/pattern-book-of-housing-design)

The Institute notes that it is complex to assess the suitability of each of the three options outlined for the implementation of the recommendations. Whatever approach is taken, it should be one that simplifies the interpretation and use of the planning scheme, as well as encouraging a wider application of diverse housing types. As suggested within the report, a hybrid approach that maximises the benefits of each implementation option may be the best outcome.

The Institute has provided the following comments relating to each option.

Option 1

This option appears to be slightly limited in scope and capacity for real change, and therefore is not thought as the best course of implementation.

Option 2

This option appears at the outset to send a clearer signal to development proponents and the community as to the preferred locations for new and diverse housing types. A benefit of this option is that it appears to propose a broader application of higher density housing types with a nuanced approach based on proximity to activity centres or transit corridors. Such an approach may better suit the long-term provision of new infill housing types in more areas.

Option 3

A downside of this option is that it appears to propose a narrower application of higher density housing types to only those areas within 400m of activity centres or transit corridors. Careful attention would need to be made to identify whether the extent of land that would fall within these areas will adequately address future housing needs (i.e. published mapping may be required to better assess this).

A benefit of this option is that it appears to propose a simpler application of the proposed changes to the planning scheme, making the use and interpretation of the planning scheme easier than in Option 2.

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 report and looks forward to seeing this project as it continues to develop. 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
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Australian Institute of Architects



Jennifer Nichols
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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.