



Australian  
Institute of  
Architects

TAS

ABN 72 000 023 012

The Royal Australian Institute of Architects  
trading as Australian Institute of Architects

1/19a Hunter Street  
nipaluna/Hobart, Tasmania 7000

P: (03) 6214 1500  
[tas@architecture.com.au](mailto:tas@architecture.com.au)  
[architecture.com.au](http://architecture.com.au)

31 January 2025

Clarence City Council  
38 Bligh Street  
PO Box 96  
Rosny Park TAS 7018

By email to: [shannan@ccc.tas.gov.au](mailto:shannan@ccc.tas.gov.au)

## Re: Clarence City Heart Plan

To whom this may concern,

The Tasmanian Chapter of the Australian Institute of Architects (the Institute) would like to thank the Clarence City Council (the Council) for the opportunity to provide feedback on the final draft of the Clarence City Heart Plan (the Plan).

The Institute applauds the Clarence City Council for taking steps to ensure that the future of the City Heart is considered, well planned, and focuses on the value of good design and the benefits it affords the community in both the short- and long-term. Strategic planning, along with master planning, are both critical for high-quality outcomes that are well-thought out and provide long-term solutions. Good urban policy and design are key to delivering a built environment that can sustain our communities into the future. The Institute is broadly supportive of the Plan.

The Institute encourages the appropriate development of the City Heart in a way that enhances what makes the place special, with well designed and built solutions. The health and sustainability of our neighbourhoods and cities is of utmost importance, and the quality of the built environment contributes to the health and wellbeing of our communities. As noted by the World Health Organisation, 'healthy cities are places that deliver for people and the planet.'<sup>1</sup>

The Tasmanian Chapter has consulted with our membership and reviewed the Plan, and has prepared the following response, that is divided into general and specific comments that directly relate to sections of the Plan.

---

### GENERAL COMMENTS:

The Institute would like to commend the process that has guided the development of the Plan and acknowledges that changes have been made in response to community and stakeholder feedback. The Institute is pleased to see that a group of skilled professionals, including architects, urban designers, landscape architects and planners were involved as part of the consultant team.

---

<sup>1</sup> <https://www.who.int/europe/groups/who-european-healthy-cities-network/what-is-a-health-city>

## Well Designed and Well Built

The Institute is pleased to see that the Council is promoting design excellence, as noted in Outcome 5. The Institute suggests that the Plan promotes built outcomes that are well-designed and built, throughout the Plan and strives for design quality. Given the scope and aspiration of the Plan, the introduction of design review panels, similar to the City of Hobart's Urban Design Advisory Panel, would help to ensure high-quality built outcomes are achieved.

To further the work of the Plan, the Institute suggests that the Council develops place-specific guidelines for the built form, including the ground floor interface with the public realm (be these streets or parks) for each precinct. Canberra's urban framework for Northbourne Avenue is a good case study of such guidelines<sup>2</sup>.

It is also important that any built outcomes are also well built, as the quality of the outcome depends on both. While this is further down the track in the enacting of this Plan, involving architects in the contract administration part of a project (while it is being built) can help ensure a quality build, as the architect observes conformity to the building contract documents as well as the quality of the outcome.

The Institute has an Affordable Housing Policy<sup>3</sup>, along with a Multi-Residential Standards Policy<sup>4</sup>, that encourage outcomes that provide a good quality of living for residents and suitable public amenity.

## Heritage

The Institute strongly supports good design that responds to its context, and advocates for the conservation and adaptive re-use of significant built heritage – both for older buildings, and more recent built heritage. The Institute has a Heritage Policy<sup>5</sup> that outlines this in more depth. This is particularly pertinent in any adaption of the existing Clarence Council Chambers, as contained within the Plan. The Chambers, by Bush Parkes Shugg and Moon, was given the Award for Enduring Architecture at the 2022 Tasmanian Architecture Awards<sup>6</sup>, and was also shortlisted in the National Architecture Awards in the same year<sup>7</sup>, and is of great architectural significance.

## Indigenous Ecosystems Corridors and Nodes

The Institute commends the Plan incorporating consultation and input from the Tasmanian Aboriginal People, and the publication of 'A living city heart: recognition of Country' document as part of this. The Institute suggests that the Plan could incorporate opportunities to create Indigenous ecosystems, corridors and nodes (IEC+N)<sup>8</sup> to enhance parks and wildlife diversity areas, as well as restore urban areas with low flora and fauna diversity due to patterns of settlement since colonisation. This would be undertaken through consultation with people with relevant cultural and landscape expertise to achieve outcomes that are beneficial for biodiversity and restore Indigenous ecosystems across urban areas, and not just in parklands.

## Dark Sky Lighting

The Institute suggests that the Plan incorporates DarkSky appropriate lighting<sup>9</sup>. This lighting minimises glare, reduces light trespass and doesn't pollute the night sky, and ensures a better outcome for both the users of the spaces, both fauna and human life forms, and the broader environment.

---

<sup>2</sup> <https://www.nca.gov.au/sites/default/files/City%20and%20Gateway%20Urban%20Design%20Framework.PDF>

<sup>3</sup> <https://www.architecture.com.au/wp-content/uploads/Affordable-Housing-Policy.pdf>

<sup>4</sup> <https://www.architecture.com.au/wp-content/uploads/Multi-Residential-Standards-Policy.pdf>

<sup>5</sup> <https://www.architecture.com.au/wp-content/uploads/Heritage-Policy.pdf>

<sup>6</sup> <https://www.architecture.com.au/awards/2022-awards/2022-tasmanian-architecture-awards-winners>

<sup>7</sup> <https://www.architecture.com.au/awards/2022-awards/national-shortlist/enduring-clarence-council-chambers>

<sup>8</sup> 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](https://www.uia-architectes.org/wp-content/uploads/2022/03/20201027_uia_ifla_iec_n_website_plan_ar_tw_ar2.pdf)

<sup>9</sup> Find out more about DarkSky lighting here: <https://darksky.org/what-we-do/darksky-approved/>

## SPECIFIC COMMENTS:

### **How to use this plan**

In relation to p. 12 of the Plan, the Institute suggests that the Council should have a method of measuring and reviewing data to gauge the effect of any changes (as a result of the Plan, or otherwise). This could be in the form of place-performance audits of indicators relevant to the Plan – this could include footfall, retail spend, retail mix, tenancy and public space utilisation, business turnover, property values, travel mode, tree canopy cover, etc. A base line should be established (i.e., starting today or at the release of the Plan) to then be able to compare to in future years.

### **The Vision for the City Heart**

The Institute suggests that the reference to ‘village’ as noted in the description on p. 19 of the Plan should be changed, as it has the potential to create confusion. There is consistent reference to ‘Bellerive Village’ throughout the Plan as a precinct, and this area is already well-known by the community by this such name, therefore, the ‘village’ terminology should not be used in reference to the greater Plan area.

### **Outcome 1 – A living City Heart**

- The Institute is supportive of the vision and strategies outlined, but suggests that these strategies could be incorporated throughout the entire City Heart area, and not just in the more ‘natural’ areas, as indicated in the diagram on p. 25.
- While all six outcomes are interconnected, Outcome 1 and 2 are especially related and could be counter-referenced within the document.

### **Outcome 2 – A resilient and sustainable City Heart**

- While Strategy 2.7 mentions ‘reuse’, this should have a bigger focus and should be the first line in sustainable thinking – to use what is already there. Infrastructure and buildings should be reused in positive ways.
- The Plan does not make note of natural vs reclaimed land, and how this has influenced connection to the natural environment over time.
- Strategy 2.2 has two aspects that could warrant separation into two individual strategies, as the first part refers to the urban tree canopy (which could be incorporated in Strategy 2.3) and the other relates to the Kangaroo Bay Rivulet.
- The Institute notes that there seems to be a disjunction between the listed strategies to enhance street tree canopy to reduce urban heating, which is a functional approach, and the plan illustration and focus areas for increased street canopy planting. The plan illustration appears to note more aesthetic-driven tree lined corridors, and the focus areas for increased street canopy planting to compliment the legibility of urban form and movement, appears to define primary circulation and connections to parklands and the building up of planting in the inner core. The Institute questions whether there is a there is a whole of precinct urban tree canopy target or similar.

### **Outcome 3 – A vibrant City Heart**

- The Institute notes that “...a projected growth of 1,040 jobs by 2041...indicates a potential demand for employment floorspace to increase by 32,600m<sup>2</sup> by 2041.” The 1,040 jobs is referenced to the ABS census data, but there is no reference to how the net floor space is derived. Using the numbers provided, this results in a need for 31m<sup>2</sup> per job (i.e. 32,600m<sup>2</sup> divided by 1,040 jobs = 31m<sup>2</sup>). The Institute questions how this area has been calculated. Given the projected jobs growth is likely to be in office-based employment (more so than say blue-collar jobs) – an area which is seeing changes in the way offices work with work-from-home arrangements and hot-desking etc. – a net projected area demand is an important aspect to define.
- The delineation of “preferred night-time economy locations” on the plan illustration is broad and general. The Institute suggests this could be more focussed to represent a converted strategy to (say) define night-time movement along Bligh Street, working to the inherent finer-grain urban form around and off Bayfield Street, and continue the existing use and character of Bellerive Village.
- Regarding Strategy 3.6 for embedding digital infrastructure, the Institute questions the responsibility that landowners or developers have, compared to the service provider – Council or other authorities.

This is currently a general statement but could benefit from further drilling down to the roles different parties have to enable a digitally connected City Heart.

- While there is a focus is on the area of the existing Bellerive Village and Eastlands/Bayfield Street commercial areas, the Institute questions whether there is consideration for promoting a vibrant diversity along Bligh St (as a main connector) through the residential precincts, and Kangaroo Bay Drive, as a connector between the two existing commercial precincts.
- The Institute suggests that Council develops policies that encourage and enable operators of retail and hospitality, arts, events and cultural activities to curate their spaces and activate the ground level along the new and upgraded streetscapes and parks.

#### **Outcome 4 – An inclusive City Heart**

- There is no apparent context evident for the inclusion of “Medium and high density residential (up to 4 storeys)” in the Riawena Rd and Bastick St frontages of Charles Hand Park. There is also no detail as to how this relates to the reference to the “public art opportunity for expression and promotion of Aboriginal heritage and cultural values” at the intersection of Rosny Hill Rd and Riawena Rd, as identified under Outcome 1.
- The Institute recommends the acknowledgement of a variety of lot sizes that currently throughout the Plan, and questions how these will relate to future development targets, such as the densification of existing lot patterns, or the need to consolidate lots to achieve the desired the uplift in density.
- The Plan does not identify any “infill housing opportunity” for the area adjacent Bellerive Village (bound by Clarence St and Scott St). This area has undergone some infill residential development in recent times, and while is identified further in the Plan under the “Mixed use development opportunities on Council car parks and land”, the broader area could be a worthy inclusion to the areas identified under Outcome 4.
- While the Plan identifies the areas at the end of Kangaroo Dr as a “Future development site” with and outlined “Proposed built form” (as noted on the Concept Masterplan on page 43), this area is not mentioned within Outcome 4, or further within the Plan.

#### **Outcome 5 – A liveable City Heart**

- The opening bold text statement refers to a series of well-connected network of spaces. It specifically refers to “...spaces along the rivulet.” Whilst the rivulet does order the spaces, it is not just the spaces along the rivulet that should be included. The Institute suggests broadening this reference beyond just along the rivulet.
- The plan illustration notes “Views to the (Rosny) parklands”. These views shown are in proximity, i.e. just over the rivulet. The Institute suggests that the significance of the Rosny Parklands is arguably the medium distant views from deeper within the City Heart and up over Cambridge Rd and beyond the City Heart area, from the foothills below the Waverly Flora Park.
- The Institute suggests developing the representation of the character of spaces further; there is a natural sequence of more intimate spaces adjacent the rivulet to the northeast, down through the Rosny Parklands and opening out to the broad/flat space around Kangaroo Bay. Tied into this is how the more intermittent existing and future spaces spread within the residential and commercial areas and relate to the linear parkland space on the north side of the rivulet.
- There is a distinct absence of open space and landscape envisioned for the Town Centre Precinct. The planned increased density to this area, combined with the physical impediment of Eastlands to visual/access to the Rosny Parklands, suggests this is an area where it is crucial to incorporate considered urban open space in future development.
- The Institute suggests considering cross-referencing this Outcome to Outcome 2 (A resilient and sustainable City Heart), especially regarding water-sensitive urban design, promotion of tree canopy etc..

#### **Outcome 6 – A connected City Heart**

- The retention and upgrading of the bus mall makes sense in terms of activation of the centre, and building on existing infrastructure. However, the Institute notes that it also presents challenges in managing bus movements in and through the Town Centre Precinct in particular. The desired vehicle connections to and from the bus mall are not readily apparent.
- The Clarence Foreshore Trail is a significant asset to the municipality – stretching over 20km. The intersection with the City Heart is approximately at the midpoint of this. Such an intersection warrants stronger consideration, such as the significance of the intersection with the Rivulet Track and how (on

approach from the west) movement is managed up and into Bligh St. Presently the foreshore trail merges into the Bligh Street Corridor on the east side of Kangaroo Bay.

- Acknowledgement of the varied topography of the City Heart area is important for pathways, especially for pedestrian, bicycle, and e-scooter users, along with consideration for those with mobility aides and prams. Some connections include direct paths over steep grades; the existing/upgraded shared path through Charles Hand Park towards the Riawena Rd cycle route is an example. The Institute questions how infrastructure is to address steep topography to promote ease of access for all.
- The Institute questions how public facilities are, or will be, incorporated into the public realm network of streets and pathways (or whether this should be addressed in another Outcome?). Regarding universal access, the Institute suggests consideration of Changing Places facilities<sup>10</sup>.

---

Ultimately, the Clarence City Council needs a plan that provides strategic preparation for the future, whilst enabling for vision and innovation. These are fast-moving, dynamic times that require agility and problem solving, but we also respect the need for well thought-out and considered planning, that includes a whole-of-community approach. The quality of design affects how spaces and places function, is able to stimulate the economy, enhance the environment and improve wellbeing. Good design adds value for all people and can play a transformative role in the lives of every person, and this, coupled by the Plan, has the potential to make a significant positive change to the City Heart of Clarence.

The Institute commends the constructive and consultative approach the Clarence City Council is taking to develop a plan for the City Heart for the future. The Institute looks forward to seeing how the Plan progresses, and 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  
Australian Institute of Architects

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](http://www.architecture.com.au).

---

<sup>10</sup> As noted on their website, "Changes Places toilets are larger than standard accessible toilets which provide people with disability and high support needs access to suitable, safe, and private bathroom facilities." <https://changingplaces.org.au/>