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Department of State Growth
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27 February 2026

By email to: haveyoursay@stateplanning.tas.gov.au

Re: Draft Southern Tasmania Regional Land Use Strategy

To whom this may concern,

The Tasmanian Chapter of the Australian Institute of Architects (the Institute) welcomes the opportunity to provide feedback on the draft Southern Tasmania Regional Land Use Strategy (STRLUS).

The Tasmanian Chapter is committed to helping create a positive future for our state that benefits all Tasmanians. The Institute advocates for the built environment, and works to shape policies, foster collaboration, and promote design excellence that benefits society as a whole. Strategic planning and coordination are critical components in this, and the Institute advocates for this in all decisions related to planning. Our members bring expertise in urban design, climate-responsive development, heritage conservation, housing delivery and community infrastructure – all of which are central to the objectives of a regional land use strategy for Southern Tasmania.

The Institute strongly supports the role of regional land use strategies in guiding sustainable settlement patterns, coordinating infrastructure investment and protecting environmental and cultural values, and is supportive of the review of the STRLUS, and the direction that it takes.

GENERAL COMMENTS

The Institute is generally supportive of the revisions to the STRLUS, and the aspirations it has for the future development of Southern Tasmania. The Institute emphasises that the effectiveness of the strategy will depend on:

- clear links between high-level strategic directions and statutory planning mechanisms;
 - measurable objectives and targets that can be monitored over time; and
 - transparent implementation pathways that demonstrate how strategic intent will be translated into planning outcomes.
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1. GROWTH MANAGEMENT

The Institute advocates for well-designed outcomes that benefit communities as a whole and strongly advocates for the early and ongoing involvement of built environment professionals – including architects, planners, urban designers and landscape architects – in implementing regional land use strategies.

Design quality directly affects:

- housing affordability over the life of buildings,
- climate performance,
- community health and wellbeing,
- long-term economic value.

The STRLUS should explicitly recognise:

- the role of good urban design in achieving strategic outcomes,
- the value of design review and multidisciplinary input for significant developments and precincts,
- the importance of public realm quality in town centres and growth areas.

The Institute is supportive of there being boundaries to consolidate growth and limit urban sprawl of cities and towns, as outlined by Hobart's Metropolitan Urban Area. The Institute has assumed that this boundary is what was formally called the Urban Growth Boundary and suggests that this should be identified within the document to avoid confusion.

The Institute is supportive of goals to increase the diversity of housing, particularly within the Metropolitan Urban Boundary. Members of the Institute have reported that it is often difficult, within the current planning controls, to deliver infill accommodation and small, multiple dwellings on existing blocks. An example of an infill model that has dealt with these challenges is 'Bluefield Housing' that has been implemented in Adelaide. It is:

'...both a land definition and an accompanying urban infill housing model...It is co-located housing that integrates new additions with existing homes, looks and feels

like single-family housing, but operates financially and legally like a small group of units.¹

A model such as this could be adopted in Tasmania.

Growth management targets

The targets that are identified within this section are commendable, however the Institute questions how these are going to be achieved. We do acknowledge that the STRLUS notes that Structure Plans and LPS amendment should allow for these targets to be met, but question how this will work. The Institute has long advocated for incentives to be available for delivering targets, as when left to the private sector, these aspirations are often left out or deemed not economically viable. Incentives need to be provided across different levels of government.

In relation to the density targets, the Institute comments that it would be helpful for there to be a figure reference associated with the 'Principle Centres' and 'District Centres' to assist with the interpretation of this. To assist with the interpretation of the density targets, it would be helpful to have a base-line density of the applicable areas, to demonstrate the existing density – to help with comparison. The Institute also questions whether these densities have been tested against the current planning scheme to ensure that they are achievable.

While there are documented reasons as to why higher-density housing isn't often delivered, community opposition is one of these reasons. While this is likely outside of the scope of the STRLUS, providing the community with examples of how these densities could look, could assist with community understanding and support. This could be in the form of exemplar projects, that are well-designed and built to ensure quality outcomes for both occupants and the surrounding neighbourhood.

Again, in relation to the density targets and the required distances outline, the Institute suggests that this distance should also take into account the typology of the surrounding area, as in Hobart, and other areas, the steepness of the land will impact the ease of using active transport to get from one location to another.

In regard to the 'Net dwelling density' outlined as a mandatory target for greenfield sites, the Institute questions how much of this is required to be assigned to public open space. It is critical that the subdivision planning of these spaces is done well to ensure a high-quality environment, where residents have access to quality amenities and services.

¹ <https://bluefieldhousing.com.au/what-is-bluefield-housing/>

2. ENVIRONMENTAL VALUES

Southern Tasmania's landscapes – including river systems, agricultural land, coastal environments and escarpments – are fundamental to regional identity, economic activity and community wellbeing.

The Institute encourages the STRLUS to treat landscape not only as an environmental constraint, but as a multidimensional value that shapes settlement form, urban character and sense of place.

Strategic directions should:

- use landscape to inform where and how growth occurs,
- protect productive agricultural land from unnecessary fragmentation,
- integrate settlement planning with landscape capacity and infrastructure provision,
- recognise the relationship between landscape, culture and built form.

The Institute suggests that reference to Indigenous nodes, corridors and ecosystems² be incorporated into the regional strategies for environmental values. This can not only enhance parks and wildlife diversity areas but also help to restore urban areas with low endemic flora and fauna diversity due to patterns of settlement since colonisation, and should also be incorporated into new development. This should be undertaken through consultation with people with relevant cultural and landscape expertise (local aboriginal community, landscape architects and horticulturalist) to achieve outcomes that are beneficial for biodiversity and restore Indigenous ecosystems across urban areas.

The Institute suggests that the regional strategies for environmental values also include reference to Dark Sky appropriate lighting³. 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.

3. ENVIRONMENTAL HAZARDS

The Institute is supportive of the goals and strategies outlined in this section and has no specific comments.

4. SUSTAINABLE ECONOMIC GROWTH

The Institute is supportive of the goals and strategies outlined in this section.

² Find out more about IEC+N here: <https://acumen.architecture.com.au/environment/place/habitat-and-ecology/fourstrategies-to-design-for-ecological-connectivity/> and https://www.uia-architectes.org/wpcontent/uploads/2022/03/20201027_uia_ifla_iec_n_website_plan_ar_tw_ar2.pdf

³ Find out more about DarkSky lighting here: <https://darksky.org/what-we-do/darksky-approved/>

The Institute suggests that consideration of carparking requirements could be modernised, and notes that current carparking requirements, as stipulated in planning schemes – particularly in inner-city zones – are often an impediment to higher-density developments going ahead. A suggestion from members is that carparking for nearby developments could be consolidated into one lot, and be provided by the Government to encourage nearby developments.

5. PHYSICAL INFRASTRUCTURE

In regard to 3.5.1.2 *water, sewer and waste*, and the note that ‘the management of stormwater by Council requires significant investment,’ the Institute would like to note that the upgrading of stormwater to suitably accommodate developments is a significant financial barrier.

6. CULTURAL HERITAGE

Southern Tasmania contains layers of cultural heritage, including:

- palawa/Tasmanian Aboriginal cultural landscapes and sites;
- early colonial and industrial heritage;
- twentieth-century and post-war architecture that contributes to community identity.

The Institute recommends that the STRLUS:

- recognises heritage as a living, evolving asset;
- supports adaptive reuse and sensitive integration of new development;
- ensures heritage considerations are embedded early in strategic planning, rather than addressed reactively.

The Institute supports the recognition of palawa/Tasmanian Aboriginal people as the first custodians of the land, and is supportive of the strategies outlined in this section. This includes embedding ongoing, meaningful collaboration and partnership with Aboriginal communities in both strategic development and implementation.

This includes:

- early involvement in shaping strategic directions,
- recognition of cultural landscapes, not just discrete sites,
- clear pathways for Aboriginal knowledge to influence land use decisions.

MONITORING, REVIEW AND ACCOUNTABILITY

To ensure the STRLUS remains effective over its lifespan, the Institute recommends:

- clear performance indicators linked to strategic objectives,
 - regular public reporting on progress,
 - a commitment to review and adjust the STRLUS in response to outcomes, not just timeframes.
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The Institute supports the review of the Southern Tasmania Regional Land Use Strategy and welcomes the opportunity to contribute at this stage.

We encourage the STRLUS to:

- maintain strong links between strategic vision and implementation,
- embed climate action, design quality and landscape values as core drivers,
- promote compact, well-serviced and resilient settlement patterns,
- leverage built environment expertise to deliver long-term public benefit.

The Institute looks forward to seeing the finalisation of the STRLUS. 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
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.