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Date: 22/12/2023

By email to: [coh@hobartcity.com.au](mailto:coh@hobartcity.com.au)

## Re: Mount Nelson and Sandy Bay Neighbourhood Plan Discussion Paper

Dear City of Hobart,

The Tasmanian Chapter of the Australian Institute of Architects (the Institute) would like to thank you for the opportunity to provide feedback on the Mount Nelson and Sandy Bay Neighbourhood Plan Discussion Paper. Our responses below reflect feedback received from our membership and the expertise and insights of our Policy and Advocacy team. We have overall feedback on the discussion paper itself, alongside answers to the survey questions provided as part of the *Have Your Say* public consultation. The Institute would very much like to be part of future consultation as the Neighbourhood Plan develops across 2024.

### Overall Feedback

#### Research on Mt Nelson and Sandy Bay

The discussion paper shows that a lot of research has been conducted into the Mount Nelson and Sandy Bay area on multiple levels. The detail is appreciated, especially considering this document is a starting point for the future development of the Neighbourhood Plan. The use of graphic/visual information in the form of maps, diagrams and photographs is particularly helpful in aiding a reader's understanding of key ambitions for the future of these suburbs.

Some additional references to specific sources would be appreciated in the document to confirm the accuracy of claims made (either through in-text citations, footnotes or a reference list). For example, Mount Nelson and Sandy Bay are listed as habitat areas for two critically endangered species - the swift parrot and the spotted handfish - and it would be useful here to identify the resource that this information was retrieved from. Additionally, references to Indigenous culture ought to cite specific organisations or individuals that were liaised with in the creation of this document or who have been involved in larger discussions around the First Nations themes referenced in the discussion paper.

### Connections to other planning documents

It is great to see connections with Tasmanian planning instruments (seen in the diagram on page 11), alongside a clear explanation of the process that the project will undertake - a part of which involved stakeholder engagement earlier this year. One area that would be great to develop further is synthesising the *Key Drivers of Change* and *Directions and Ideas* in this document with the other plans and policy documents that are mentioned in the “Strategic Planning Context” section. It is impressive (and perhaps overwhelming) to see 15 documents that relate to the development of Hobart, Sandy Bay and Mount Nelson that precede this current discussion paper. While these themes are stated in the discussion paper as crossing over into this document, more specific instances of how these other documents have informed, are sympathetic, or contrast the ideas in the current discussion paper are needed. Potentially, this could be represented graphically in a table or matrix, or through consistent citations throughout the discussion paper.

### “Sensitive infill” that considers Heritage

The discussion paper references “Built Form in Heritage” in Mount Nelson and Sandy Bay and lists key heritage precincts within the study area, alongside significant buildings on the Tasmanian Heritage Register. A key finding is presented for the inclusion of “sensitive infill” that “respects local character and heritage values”. The Institute advocates for architects wanting to innovate on heritage in a manner that is consistent with a contemporary architectural setting, while simultaneously reflecting on the context’s history of settlement and built form.

The Institute promotes a key document called the *Burra Charter*<sup>1</sup>, which lays out the importance of architecture that reflects the spirit of the era in which it was built in, rather than attempting to copy or imitate existing forms. In this sense, we recommend reviewing this resource and perhaps including it in future iterations of the Neighbourhood Plan, as the Burra Charter has been widely accepted across municipalities around Australia and can provide direction as to how “sensitive infill” might be achieved.

### Mention of short-stay accommodation

There is limited mention of the impact of short-stay accommodation on housing stock in Hobart as a city (one statistic for Sandy Bay is provided on p. 22). While the study area may not contain as many instances of short-term stay accommodation as other suburbs - such as North Hobart and Battery Point - the Institute suggests some deeper investigation into the impacts of short-stay accommodation on the study area, and speculation as to how this can be sustainably managed, or even restricted into the future.

## **Responses to Survey Questions**

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### ***Direction 1: Celebrate connection to Country by protecting and enhancing the natural environment***

#### ***Idea 1: Enhance and protect areas of high biodiversity value***

The Institute is highly supportive of this idea. Key ways to manage the protection of wildlife diversity areas are to ensure that housing stock does not encroach on specific habitats and to

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<sup>1</sup> Burra Charter & Practice Notes: <https://australia.icomos.org/publications/burra-charter-practice-notes/>

work with local land groups to minimise negative impacts of housing, walkways, and occupation on biodiverse areas. A significant issue that impacts on native wildlife are roads around Mount Nelson which can lead to animal fatalities. Recommendations include specific animal zones where speed limits can be reduced, alongside raising awareness of particular animal species occupying various areas. Specific animal habitat zones (such as those for the swift parrot or spotted handfish mentioned in the discussion paper), or areas identified as high-impact roadkill areas, could also be represented graphically through diagrams and maps.

There is also an opportunity to create Indigenous nodes, corridors and ecosystems 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.<sup>2</sup> 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.

### ***Idea 2: Create an urban environment that is leafy and green***

The Institute is highly supportive of creating a leafy and green urban environment, specifically one that increases the tree canopy area of Hobart and integrates plants that respond to Hobart's climate appropriately. Specific native plant species should be selected that minimise reliance on water and will require minimal maintenance. Strategies could involve identifying particular streets or hardscape areas within the study area that would lend themselves to the further integration of greenery. Other options could include removing or making permeable surface-level car parking spaces, widening footpaths or for new developments to include urban gardens and planting. The permeability of hard landscaping, including car parking and footpaths, should be encouraged to assist with biodiversity and water runoff and retention.

### ***Idea 3: Respond to climate change and environmental constraints, including flooding, bushfire and coastal hazards***

The Institute is highly supportive of the ambition to enact wide-scale changes pertaining to sustainability across the built and natural environment. The Institute would like to underscore the urgency of embracing frameworks and models that combat climate change, through actions taken in the building sector by promoting resource and material efficiency, design and procurement strategies, incentives, site specificity, adaptive reuse and rebuilding. These views are consistent with the larger aims of the United Nation's Sustainable Development Goals (SDGs), and also articulated in a submission the Tasmanian Chapter made this year to Sustainability Tasmania.<sup>3</sup>

### ***Idea 4: Understand and celebrate connection to Country***

The Institute supports this idea and recommends an exhaustive consultation process with the Tasmanian Aboriginal community at all stages of any design process, actively working towards empowering Aboriginal peoples to play a part in determining how public spaces are designed, constructed, and managed.

It is advised that any enhancement or development of the study area to reference and respect the Tasmanian Aboriginal Community should be varied in scope: by going beyond just visual references to Indigenous culture (i.e. street art, statues, murals), provide culturally appropriate

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<sup>2</sup> [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>3</sup> [https://www.architecture.com.au/wp-content/uploads/Response-from-Institute-of-Architects\\_Sustainable-Tasmania\\_Oct-2023.pdf](https://www.architecture.com.au/wp-content/uploads/Response-from-Institute-of-Architects_Sustainable-Tasmania_Oct-2023.pdf)

spaces for reflection and to facilitate activities. Care and design for Country and deep listening should be at the core of all new initiatives.

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***Direction 2: Provide welcoming and inclusive neighbourhoods to live and work***

***Idea 5: Strengthen the economic role of Mount Nelson and Sandy Bay and maintain the local convenience offer***

The Institute supports the application of strong urban design principles and design excellence which will allow the study area to operate well economically. We support mixed-use developments which allow for ground-floor tenancies that provide amenities and services for the local area, while also providing housing or other uses on upper levels. Within the study area, there should be consideration of not only the design of businesses to attract economic revenue, but the spaces around the business i.e. proximity to major roads, buffers between shop fronts and walkways / bikeways, and the design of adjacent spaces such as seating, greenery, and parks. This can lead to the development of attractive and well-utilised precincts.

A key consideration the Institute supports is the location of a variety of housing options that can be used by people who work in local businesses nearby. This would mitigate situations where business owners and workers need to travel long distances from their place of dwelling to work.

***Idea 6: Celebrate local historic heritage values***

As mentioned in the previous section on “Overall Feedback”, the Institute strongly supports good design that responds to its context, which can include a heritage component. The Institute suggests that any guidelines developed need to be consistent with existing heritage guidelines endorsed by the *Tasmanian Heritage Council* and the *Burra Charter*. These guidelines also need to be developed in conjunction with heritage professionals and consultants. Terms such as ‘sensitive’ could be expanded on in later iterations of the Neighbourhood plan to be more specific, as the Institute is concerned that this term might lead to built outcomes that are mimetic of heritage character, rather than reflecting a contemporary context in which architects today are operating in. Essentially, the Institute would like to promote an approach where architects are encouraged to innovate on, rather than imitate existing heritage.

***Idea 7: Identify opportunities to facilitate a diverse range of housing***

The Institute is highly supportive of promoting a range of housing options in the study area. In particular, the Institute supports infill housing as a means to achieve high-quality, well-designed social, affordable and ‘aging in place’ housing options. Focusing on the quality of design (innovation, durability, consideration of passive design principles, sustainability, whole-of-life-cycle costs) provides an opportunity to solve a range of social challenges. Underscoring the importance of design for infill that considers its context and users, site orientation, and proximity to public transport and amenities, will lead to positive outcomes for everyone.

Alongside infill, there could be further opportunities to explore adaptive reuse of existing buildings and improve the quality of existing housing stock. Additionally, the statistic provided on p. 22 that 10.5% of private dwellings in Sandy Bay are unoccupied (which is high, relative to the 35% of households that are being rented), should be a prompt for council action to encourage homeowners to either sell vacant properties or introduce them to the rental market, or even

encourage upgrading existing vacant housing in states of disrepair to make these buildings liveable for homeowners and tenants.

***Idea 8: Identify key redevelopment areas that have the capacity to accommodate growth***

The Institute is highly supportive of this idea. The areas identified in the infill map on p. 55 seem highly appropriate for upgrading existing facilities and encouraging future development that is consistent with growth.

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***Key Redevelopment Opportunity 1 – Sandy Bay Activity Centre***

***To what level do you support this area being identified as a key redevelopment opportunity? Do you have any comments you would like to share about the above key redevelopment opportunity 1?***

The Institute is highly supportive of the development of the Sandy Bay Activity Centre, especially of renewal sites for mixed-use infill (which occupies the majority of the developments proposed). We are highly supportive of the opportunity point: “Allow for a diverse range of housing options including, but not limited to, affordable, social and co-housing models.”

The Institute recommends that any development focuses on delivering design and built excellence and has expert oversight by the Strategic Architectural and Urban Design Advisor for the Tasmanian Government.

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***Key Redevelopment Opportunity 2 – Lower Sandy Bay Activity Centre***

***To what level do you support this area being identified as a key redevelopment opportunity? Do you have any comments you would like to share about the above key redevelopment opportunity 2?***

The Institute is highly supportive of the development of the Lower Sandy Bay Activity Centre, which seeks to activate a key area near Long Beach. It appears that a lot of this zone contains spaces marked for sports facilities and parks. Alongside this plan, we suggest further remediation of the landscape through native planting, or liaison with Indigenous communities/stakeholders/individuals to acknowledge the importance of landscape in a riverside location. Refer also to the paragraph about Indigenous nodes, corridors and ecosystems under Idea 1.

The Institute recommends that any development focuses on delivering design and built excellence and has expert oversight by the Strategic Architectural and Urban Design Advisor for the Tasmanian Government.

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**Key Redevelopment Opportunity 3 – Wrest Point**

**To what level do you support this area being identified as a key redevelopment opportunity?  
Do you have any comments you would like to share about the above key redevelopment opportunity 3?**

The Institute is supportive of the development of Wrest Point, in particular, making this space more publicly accessible and maximising the benefits of the riverside location for recreation, transport (via a proposed ferry terminal), and access via pedestrian networks.

The Institute recommends that any development focuses on delivering design and built excellence and has expert oversight by the Strategic Architectural and Urban Design Advisor for the Tasmanian Government.

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**Key Redevelopment Opportunity 4 & 5 – University of Tasmania and UTAS Sandy Bay Campus**

**To what level do you support this area being identified as a key redevelopment opportunity?  
Do you have any comments you would like to share about the above key redevelopment opportunities 4 & 5?**

In the event of the UTAS move to the city continuing, the Institute supports the adaptive re-use of existing buildings; whether this is for educational facilities or for the provision of housing for students and the broader community and other appropriate uses.

The Institute recommends that any development focuses on delivering design and built excellence, and has expert oversight by the Strategic Architectural and Urban Design Advisor for the Tasmanian Government.

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**Direction 3: Provide outdoor recreation and places for people to connect, enhancing wellbeing in the community**

**Idea 9: Improve the waterfront for recreation to optimise spaces for public enjoyment**

The Institute agrees that the development of the waterfront would be a positive move especially if it allows for more pedestrian circulation or movement along the waterfront. In the diagram provided, there could be further mention of the coastal trail (represented in the diagrams on the Development Opportunities pages). If areas adjacent to the waterfront are to be developed, working with First Nations groups will ideally lead to solutions that promote the environment and establish cultural connections with Country.

**Idea 10: Provide increased public access and recreation opportunities from the coast to Mount Nelson Lookout**

The Institute supports further public access and recreation opportunities identified in the Coast to ridge connection map. As these trails encroach on environmental areas, due process must be

undertaken to identify and mitigate any negative impacts that increased traffic along these areas may have on flora and fauna and existing landscape features.

***Idea 11: Celebrate the ‘special places’ of Mount Nelson and Sandy Bay by improving the open space network.***

The Institute supports developing special places in Mount Nelson and Sandy Bay as identified in the Special Places map. A detail that could be added to the map includes identifying what connections (e.g. footpaths or bike paths) that can be forged between the areas identified. This would allow the map to function as a network, where connections are clearly marked and would allow for a more unified urban experience across these areas.

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***Direction 4: Provide accessible and pedestrian-friendly, sustainable transport options***

***Idea 12: Increase sustainable travel choices in Mount Nelson and Sandy Bay***

The Institute is supportive of upgrades and development of active transport and public transport options across Sandy Bay and Mount Nelson. Connections in particular need to allow for easier access between these two suburbs and the Hobart CBD to reduce reliance on vehicular transport. Sandy Bay road requires extensive upgrades to its cycling network and infrastructure, to make commuters feel safe when using alternative forms of transport, this includes cyclists, scooters, prams and those with mobility aids etc. This should include exploration into options for innovative alternatives for cycleway and pedestrian pathway design, as touched upon in Idea 13.

***Idea 13: Improve walkability and pedestrian amenity across the study area***

The Institute strongly supports this idea, as it speaks to the benefits of reducing reliance on cars for transport. With the development of walkways across the study area, consideration should also be given to the provision of seating, covered areas, greenery and tree cover, improving hard surfaces, and dark-sky-compliant outdoor lighting – all within the scope of good quality urban design principles.

***Idea 14: Investigate road network and other improvements to prioritise public transport***

The Institute supports this idea. Reliable, fast, clean and efficient public transport needs to be available to help support increased residential development, contribute to a vibrant and healthy community, and reduce reliance on cars. This idea however is contingent on sweeping improvements to Hobart’s public transport system that will need to address the pressing issue of reduced services.

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The Institute advocates for any development to have appropriate strategic planning and design measures in place, to ensure long-term benefits to the local community. By prioritising design excellence and built quality, long-term value for money will achieve the best possible outcomes for all.

The Institute recommends that any development focuses on delivering design and built excellence and has expert oversight by the Strategic Architectural and Urban Design Advisor for the

Tasmanian Government. All development should have expert input from built environment professionals – including but not limited to: architects, landscape architects, urban designers, engineers, etc. – with the view to achieve high-quality outcomes that not only provide public amenities but also provide long-lasting economic benefits to the community.

Thank you again for the opportunity to provide feedback on this important document, which has widescale implications for Hobart and its surroundings. Please do not hesitate to get in touch with us if there are any themes or points we have raised that you would like to discuss in further detail.

Kind regards,

A handwritten signature in black ink that reads "Jennifer Nichols". The signature is written in a cursive, flowing style.

**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 13,000 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).