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1 November 2024

Ms. Eleri Morgan-Thomas,  
Chief Executive Officer  
Homes Tasmania  
Hobart TAS 7000

By email to: [GRASP@homes.tas.gov.au](mailto:GRASP@homes.tas.gov.au)

**Re: HOMES TASMANIA DRAFT HOUSING DESIGN POLICY**

Dear Ms Morgan-Thomas,

The Tasmanian Chapter of the Australian Institute of Architects (the Institute) would like to thank you for the opportunity to review and provide feedback on Homes Tasmania's draft Housing Design Policy.

**About our organisation**

The Australian Institute of Architects (the Institute), has been the peak body for the architectural profession in Australia for more than ninety years. It is an independent, national member organisation, with more than 14,500 members across Australia and overseas and 340 members in Tasmania.

- The Institute's vision is: Everyone benefits from good architecture.
- The Institute's purpose is: To demonstrate the value of architecture and support the profession.

At the time of this submission the Tasmanian Chapter President is Daniel Lane RAI and the Tasmanian Executive Director is Jennifer Nichols.

Our Chapter, together with our Institute's Policy and Advocacy Unit, has reviewed the consultation paper. Our Institute is very active in policy and advocacy on social and affordable housing, urban design, housing supply, building quality, (enabling architecture) inclusive design and climate action. These are all issues with which we regularly engage at both a national and state and territory level. These issues all intersect with Homes Tasmania's draft Housing Design Policy.

## Our feedback

### *General*

The draft design policy is a very good document which we commend. In particular we note the clarity of Homes Tasmania's intention that *'Tasmanians live in quality, sustainable and durable housing that meets their needs'*.

The design policy is concise and well-explained. It is commendable that it unequivocally adopts 7-Star NatHERS for energy efficiency performance. The policy also encourages design innovation.

It has been very affirming to see that one of the three standards clusters is durability. The Institute and this chapter have articulated durability as an important outcome in many submissions across different jurisdictions.

Below is some detailed feedback with suggestions for improvements and additions.

### *Design Standards*

While the Design Standards are logical, they will need clearly defined parameters in the yet-to-be-released Housing Design Guidelines.

The parameters around sustainability should be very specific (specify rating tools) and not establish minimum requirements only. While minimum requirements are essential for compliance purposes, at the same time it is also good to establish aspirational performance criteria to avoid a minimum compliance approach.

When Homes Tasmania goes out to market either through funding rounds to non-government community housing associations or providers, or to the private market for direct procurement, the aspiration performance criteria can be used on a weighted basis to evaluate proposals, and tender responses.

### Standard 2

An emphasis on 'diversity' in housing is supported. We suggest that the proposed Standard 2 is also articulates the inclusion of a range of household mixes within individual housing developments (to the degree appropriate) in addition to applying broadly to 'neighbourhoods' as is currently proposed.

One of our members has noted:

*Experience in delivering multiple-housing across a range of types and scales emphasises the benefit of diverse/differential household types within housing developments to foster healthy communities and provide appropriate choice and flexibility.*

### Standard 3

'Standard 3: Liveable' may be better broken into two sub-parts. The first part could be Livability – amenity and the second part could be Livability – inclusive design.

Among groups in the community who use social housing, a higher prevalence of disability is often observed. The Australian Institute of Health and Welfare in its report *People with disability in Australia 2024*<sup>1</sup> observed that 36% of all social housing households have at least one person with known disability (at June 2022). This observed proportion is the highest among public housing households with this proportion being 39%.

The 2021 census identified that 7.32% of people aged 15 years resident in Tasmania, have a 'Core Activity Need for Assistance'<sup>2</sup> a proportion 17% higher than national average of 6.27% in people 15 years and older<sup>3</sup>.

The Australian Bureau of Statistics' 2018 Survey of Disability Ageing Carers (SDAC) show that Tasmania has the highest prevalence of disability<sup>4</sup>. In 2018 in Tasmania this was 26.8% of the population, an increase from 25.8% of the population in 2015 and markedly higher than national proportion of 17.7% in 2018 (down from 16.2% in 2015).

These data are strong evidence that social housing in Tasmanian should be designed to enable Tasmanians who live in social housing to do so as successfully and independently as possible – not to mention our public spaces and buildings that might be part of the neighbourhood or community infrastructure where the housing is located.

Some construction industry stakeholders have attempted to argue that Livable Housing Design Standards are too costly to incorporate on an argument that few people require the benefits. This reflects a poor understanding of the aforementioned disability prevalence. However, older people carry the highest burden of chronic illness and disability. Designing step-free thresholds into dwellings as well as step-less, hob-less showers are a good means to reduce falls in the elderly that result in costly hospitalisation including lengthy rehabilitation in the state funded health system. As a separate attachment, we have summarised some links to evidence on falls risk and costs.

Based on this evidence, Homes Tasmania may wish to pursue the Livable Housing Design Guidelines' (LHDG)<sup>5</sup> Gold level, not just the Silver level. The NCC2022 release of the ABCB's Livable Housing Design Standard<sup>6</sup> was done with equivalence to the Livable Housing Design Guideline "Silver". While the Silver level might be a minimum for all dwellings, Gold level might be used for all dwellings intended for Tasmanians aged 65 years and older, or for a proportion of dwellings in general social housing developments. Similarly, a proportion of dwellings in general social housing developments should be designed to the higher LHDG platinum level.

Notwithstanding this, a proportion of dwellings might also be set aside for enrolment with the National Disability Insurance Scheme as Specialist Disability Accommodation and designed for the

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<sup>1</sup> Available as full web-based report or download from: <https://www.aihw.gov.au/reports/disability/people-with-disability-in-australia/contents/about>

<sup>2</sup> See: [https://www.abs.gov.au/census/guide-census-data/census-dictionary/2021/variables-topic/disability-and-carers/core-activity-need-assistance-  
assnp#:~:text=The%20Census%20concept%20'Core%20activity,similar%20criteria%20to%20the%20SDAC](https://www.abs.gov.au/census/guide-census-data/census-dictionary/2021/variables-topic/disability-and-carers/core-activity-need-assistance-<br/>assnp#:~:text=The%20Census%20concept%20'Core%20activity,similar%20criteria%20to%20the%20SDAC)

<sup>3</sup> Source data: Australian Bureau of Statistics 2021 Census - counting persons, 15 years and over STATE (UR) by ASSNP Core Activity Need for Assistance. Data table constructed using ABS Tablebuilder.

<sup>4</sup> <https://www.abs.gov.au/statistics/health/disability/disability-ageing-and-carers-australia-summary-findings/2018>

<sup>5</sup> <https://livablehousingaustralia.org.au/design-guidelines/>

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

needs of the intended NDIS SDA 'participant' using the SDA Design Standard. In this case all dwellings should not only be designed for LHDGs' Silver level but also ensure adaptability.

Adaptability in terms of reinforcing in bathroom and toilet walls are already present in the LHDG Silver level, but further parameters for adaptability can be found in Australian Standard AS 4299—1995 Adaptable Housing. A further reference is relevant parts of AS 1428–2009 Design for Access and Mobility, which is only partially codified into the National Construction Code

A further comment is that while much of the attention on inclusive design is often focussed on access and mobility, other forms of disability may create a need to design for neurodiversity or using trauma-informed design principles, such as quiet areas and gardens both in individual dwellings as well in multi-dwelling apartment or townhouse developments. For example, Homes Tasmania may recognise the importance for high acoustic separation between dwellings. We would encourage Homes Tasmania to engage a qualified acoustic engineer to recommend appropriate sound separation values for party walls in particular (in our experience the NCC minimum requirements are not sufficient, particularly regarding discontinuous construction).

#### Standard 4

Standard 4, a standard that designs should be respectful, could be increased in its articulated scope to include landscape design. This could be otherwise incorporated into the guidelines. In particular there could some articulation of "biophilic" principles about positively enhancing the environment – especially in brownfields developments. An example includes planting of endemic plant varieties.

Greenfields development could also consider a "Country-centred" design response, particularly in relation to retention of existing landscape features on green-field sites; as opposed to a clear-fell approach which is often encountered.

#### *Interpretation of the Design Principles*

The interpretation of the Design Principles emphasises that designers (and assessors) should interpret the design standard to the best of their professional ability using the policy's guiding principles to understand the intent and to obtain the best outcome.

We note the yet to be released Design Guidelines will be available as a tool to practically apply the policy. The guidelines could include a decision matrix or multi-criteria assessment tool which enables the architects and other design professionals to present Homes Tasmania with options related to building features, enabling clear comparison of the design performance of each option. For example, when choosing between three floor finish options, Homes Tasmania could see each options pros and cons related back to each performance requirement (eg. durability, cost, health, sustainability), in order to make a holistically informed decision. These performance requirements could each represent or relate back to this Housing Policy's Design Principles.

There is also a procurement related responsibility that remains with Homes Tasmania, as the client, to be clear and comprehensive with the project brief as well as budget. Scopes of architectural services for projects should be sufficiently comprehensive, when appropriate, to enable architects

to advise Homes Tasmania on prospective project design requirements including the preparation of reverse briefs.

‘On the ground’ feedback on roadblocks for policy aspirations:

*‘Good quality shared space’*

Architects are currently being instructed to remove or minimise these spaces where possible as they are an ongoing maintenance issue. More strategic briefing around the purpose and use of these communal spaces would allow for more specific designs to be developed and appropriate budget allocations to be made to ensure they are delivering what the policy intends, and they are not a source of maintenance issues.

*‘Encourage the use of new and innovative developments in design and building materials’*

Innovative construction systems are currently being explored by architects on Homes Tasmania projects, however they are faced with hurdles implementing them into projects. One key issue is that innovative items are perceived as risks and quantity surveyors attribute costs to this risk element which can make an innovative idea look unfeasible in the Concept Design stage of a project, making it very hard to achieve anything beyond the status quo. It would be beneficial for innovative items to be ‘flagged’ with Homes Tasmania so that they can be appropriately assessed and retained within projects until there can be more detailed assessment made about their net benefit. Two examples below:

1. ‘MASSLAM’ timber construction system presents multiple benefits both through the speed of construction and long term, through creating buildings that can be retrofitted without the limitation of structural party walls. The system allows for a reductionist approach to sustainability where ceilings and other linings can be reduced or omitted, and the timber structure exposed creating an improved quality of space by exposing the timber structure which is sustainably sourced Tasmanian timber. It is noted that depending on the scale of the building, the current Tasmanian industry may not be sufficiently large enough to handle the supply required. The promotion of MASSLAM construction may enable the local, Tasmanian-based industry to grow to be able to accommodate large-scale construction in the future. These benefits, amongst others, potentially increase the value and desirability of the building asset long term. At the Concept Design stage, this innovative solution looks to be more expensive when compared to concrete, however there are potential savings in construction program that are hard to establish until a later stage of a project, as well as life cycle consideration, and an innovative approach such as this would benefit from being assessed in greater detail by Homes Tasmania before dismissing it on a preliminary cost basis.
2. Heat recovery VRF systems can be introduced to reduce condensation, especially in apartment buildings, through providing fresh air while reducing energy consumption through recovering heat. This promotes a healthy indoor environment, reduces ongoing heating costs, and reduces building maintenance stemming from issues where residents not opening windows or let fresh air into their homes. The upfront cost of such a system makes it hard to justify on project cost plans, however we believe aspects of this should be considered through a life cycle assessment to better understand the overall benefits. The design teams aspire to

create better outcomes for residents but often find there is a stumbling block of upfront cost that prevent them being incorporated.

A clear process of identifying and assessing innovative materials/systems on projects by Homes Tasmania may lead to a greater level of innovative outcomes.

#### *Demonstrated compliance with the Housing Design Policy*

The requirement for Design Reports is good and standard practice for many architects. However, we suggest that 'design experts' are defined to include architects, interior designers, landscape architects and urban designers.

#### *Separation of Housing Design Policy from Design Guidelines*

This proposed separation of the policy to focus on broad objectives and strategies rather than more prescriptive guidelines/design specifications should be supported as it allows for design responses to be advocated for on strategic terms rather than dealing with minutia of often abstract and arcane rules and regulations that limit innovation.

#### *Development of standard terms and definitions for housing in Tasmania*

Recognising the proposed increased breadth and application of the updated Housing Design Policy it may benefit the document to include reference to Terms and Definitions to provide clarity of the differing housing types that are mentioned in the policy (ie. Social Housing, Community Housing, SDA Housing, Affordable Housing, Temporary and Crisis Accommodation, etc)

Ideally any terms and definitions developed as part of this housing policy document would have reciprocity with other Tasmanian policy/guideline documents, including those that are referenced in the draft policy, to ensure a consistent language for Government-involved housing in Tasmania.

#### *The design guidelines*

The Tasmanian Chapter of the Australian Institute of Architects are willing to assist in any consultation for the purposes of drafting, reviewing or testing the proposed Design Guidelines.

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**  
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