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Engagement Team  
Era Planning and Environment  
Level 1, 125A Elizabeth St nipaluna (Hobart)

By email to: [engagement@eraplanning.com.au](mailto:engagement@eraplanning.com.au)

**Re: Medium Density Design Guidelines Discussion Paper**

Dear Era Planning and Environment,

The Tasmanian Chapter of the Australian Institute of Architects (the Institute) would like to thank you for the opportunity to provide feedback on the Discussion Paper for the Medium Density Guidelines, being developed for the Department of State Growth as part of the 30-Year Greater Hobart Plan.

Below is a summary of key values and themes that the Institute would like to see resonate in the future Medium Density Guidelines.

- The Institute supports the development of design guidelines in Tasmania in alignment with design governance in other states.
- The Institute asks that architects lead the development of content for the Medium Density Guidelines.
- Given the Medium Density Guidelines are not yet drafted, the Institute at this stage is not willing to commit to them being either statutory or non-statutory. The Institute would need to see the Guidelines in a more developed format to endorse either approach.
- Consistent with the recommendation that the Medium Density Guidelines are going to be in electronic form as a PDF that emphasises interactivity and ease of use, we recommend that this approach is all planning documents in circulation for professional use.
- The Institute wishes to continue to have input into the process of developing design guidelines.

The remainder of the submission is divided into three parts. The first part reflects the Institute's overall impressions on the Discussion paper. The second part offers more granular insights into the discussion paper's "Feedback Opportunities". The third part summarises the Institute's core values when it comes to housing.

## **1.Overall Impressions**

The Institute supports the development of Medium Density Guidelines and values being a part of this initiative. This is a positive step towards achieving good design outcomes and we encourage an approach that is design-led.

In Hobart, and across Tasmania, there is a pressing need to accommodate a growing population and manage urban growth more effectively and economically – much of which could be assisted through medium-density in-fill housing stock. These sentiments reflect two of the Institute's prior submissions this year. In our response to the draft *Tasmanian Planning Policies* from June 2023, the Institute underscored the importance of infill strategies and where possible, de-emphasise the use of greenfield sites for housing.<sup>1</sup> In our July response to the *Tasmanian Housing Strategy*, we agreed with the area of the strategy that highlighted the value of environmentally and socially sustainable new builds.<sup>2</sup> We certainly agree that the creation of Medium Density Guidelines would align Hobart with design guidelines developed by other capital cities, such as those referenced in the summary table provided on p.12. Broadly speaking, the Institute supports any form of design guideline that supports and encourages design excellence being applied state-wide.

The literature review of design guidelines from other jurisdictions and precedent studies are thorough. The precedent studies of individual projects offer in-depth analysis. In some areas of the report, there could be further scope for cross-referencing and balance across the sources gathered in the literature review and those cited directly (for example: some areas are quite reliant on one particular source, Hodyl et al.). The Institute registers that the apartment guidelines that form the literature review from other states are current. We would however, also like to suggest reflecting on previous Guidelines and Policies that have informed housing outcomes. One particular document that we believe is an exemplar of the kinds of ideas that the Guidelines are working towards (though is no longer in use), is the *NSW State Environmental Planning Policy No 65—Design Quality of Residential Apartment Development (2002 EPI 530)*.<sup>3</sup>

While it is useful to see a range of housing typologies from Tasmania and interstate none as yet indicate outcomes in plan form, nor with respect to neighbourhood scale. Additional information on the kinds of demographics that these housing examples are targeted to would also help contextualise the examples within their neighbourhood and clarify if they reflect a spread of low, mid, and high-income households. Alongside the text descriptions and the photographs, it would be useful to include diagrams or plans of the buildings, to illustrate key elements of their formal and spatial layout, e.g. the organisation of internal dwelling and site development spaces, including the division of public and private space. In instances where there are minimal car parks provided due to proximity to transport nodes or urban facilities, a map or diagram that positions the project in a wider context would be helpful. Where possible in the breakdown of the 'elements of design', further visual examples such as diagrams abstracted from the analysis of the project's spatial layouts would serve further as a design guide, as opposed to text descriptions, which may either be subject to interpretation or cannot quite convey what an image can.

While the approach to a medium-density building typology in the context of a state-wide planning framework is well underway, the Institute feels that the locational character of settlement is yet to be addressed in the discussion paper. Fundamental to urban design outcomes in Tasmania is the terrain of settlement, meaning that settlement patterns in a particular place ought to influence future building work, be site-specific and be informed by place. Medium-density housing needs to

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<sup>1</sup> Tasmanian Chapter Response to Draft Tasmanian Planning Policies 2023, June 2023:

[https://www.architecture.com.au/wp-content/uploads/20230628\\_Tasmanian-Planning-Policies\\_Aus-Inst-Arch.pdf](https://www.architecture.com.au/wp-content/uploads/20230628_Tasmanian-Planning-Policies_Aus-Inst-Arch.pdf)

<sup>2</sup> Tasmanian Chapter Response to Tasmanian Housing Strategy Exposure Draft, July 2023:

[https://www.architecture.com.au/wp-content/uploads/20230712\\_Aus-Inst-Arch-Tasmanian-Housing-Strategy.pdf](https://www.architecture.com.au/wp-content/uploads/20230712_Aus-Inst-Arch-Tasmanian-Housing-Strategy.pdf)

<sup>3</sup> State Environmental Planning Policy No 65—Design Quality of Residential Apartment Development (2002 EPI 530):  
<https://legislation.nsw.gov.au/view/html/inforce/current/epi-2002-0530#statusinformation>

be considered through the topographic diversity of the state's regions and its differing population centres. If addressed, the Institute is confident more distinctive, appropriate and robust typologies will emerge.

The Institute would like to commend Era for the clarity and tone of the report, and the accessibility of information; especially through varied media such as tables, charts, and infographics. A lot of key data and statistics, as well as more analytical insights into housing issues, are presented clearly and legibly. There are a few typographical errors (e.g., inconsistent hyphenation between medium-density housing vs medium density housing), which could be amended through another proofread through. The Institute also appreciates the signposting for feedback on key topics across the report that corresponds with the survey – this has been a welcome aid to collating member feedback, which we have synthesised below.

## **2.Granular comments on “Feedback Opportunities”**

### **Scope of the Guidelines (p. 23)**

*The design guidelines will be:*

- *Focused on medium density residential development only (see Section 3.6).*
- *Focused on infill residential development, not new residential subdivisions.*
- *A practical guideline that could be referenced in the Tasmanian Planning Scheme and/or in a Tasmanian Planning Policy.*
- *Targeted to providing clear and practical guidance to design professionals and proponents.*
- *Suitable as a communication and advocacy tool for the community.*
- *Flexible to provide for different design responses in different contexts.*

The Institute is supportive of the proposed scope of the guidelines. It is great to see a strong emphasis on infill development. We agree with the comments in 3.2 that suggest including “more prescriptive approaches or minimum standards” – this would align with the operation of the document as a “practical guideline”. There could be an additional comment that underscores affordability, sustainability, and climate responsiveness and in doing so, registers broader themes found across the Discussion Paper.

### **Desired outcomes (p. 24)**

- *Guidelines are actively used by design professionals and proponents to guide residential design and development.*
- *Community awareness is increased around the benefits of medium density infill residential development and there is a stronger understanding of what constitutes good design and what can and should be expected by new developments.*
- *Diversity and quality of medium density housing types increases in infill areas of Greater Hobart.*
- *Increased investment in and approval of new medium density housing types.*
- *Reduction in the number of applications for ‘one-behind-the-other’-style medium density developments (where an additional unit is placed behind an existing residence on a typical suburban-size lot).*
- *Where feasible, there is an increase in medium density developments that use larger lots (or the consolidation of adjoining lots) to achieve a larger site area. (This can allow for greater flexibility in the site and building layout; more innovative approaches to communal and private open space; improved sunlight access; and rationalise vehicle access points.)*

The Institute supports the desired outcome of the Project. The language and scope are very clear, with no further suggestions recommended from us.

In response to the survey question on community support for medium-density development, the Institute believes that support for infill is contingent on the community demographic. Generally, younger demographics or people who have immigrated to Hobart are more supportive of infill development, whereas older residents of Hobart are more resistant to new housing types, and broader changes in their suburb – especially changes that impact on neighbourhood character. A recent example of community opposition to an infill development appears in an ABC Hobart Article from March this year, “Social housing proposal receives 31 objections as neighbours say it does not fit the area.”<sup>4</sup> Further public engagement and education of the benefits of infill development in Hobart could play a positive role in shifting the mindset articulated by the residents in the article, and the introduction of positive design guidelines could help mitigate poor design outcomes.

### **Proposed audience (p. 24)**

- *Project proponents, designers, and Council planners (with a focus on providing clear design guidance to assist with the assessment of complex development proposals).*
- *The community (to set expectations of what good medium density residential developments can and should look like; and the benefits of appropriate and well-designed medium density housing).*

The Institute supports the proposed audience base. The word designers could be more specific to cater to the range of professions that belong to this category. This could include architects, building designers, developers, consultants, builders, and town planners. Additionally, the phrase “should look like” potentially signals that there are visual and physical standards embodied by an ideal medium-density typology. This language is problematic and should be reconsidered to focus on the performance of a building, rather than preconceived ideals of image and aesthetics.

### **Proposed definition of medium density housing in Greater Hobart (p. 26):**

*Multiple dwellings on a site that can range from single storey to up to six storeys in height. Typical typologies include single-storey villa developments, duplexes and co-joined dwellings, terrace housing, townhouses, apartment buildings up to six storeys, shop top housing and mixed-use residential developments with commercial ground floor tenancies.*

The Institute supports this definition of medium-density housing. It is clear and well-articulated.

### **Proposed definition of infill (based on the Toward Infill Housing Development report) (p. 27):**

*The development of new dwellings in an existing urban area.*

The Institute supports this definition, though we suggest additional detail. The infill could be described as an existing urban area without any current use or development assigned to it. This might reassure those who are wary of the demolition of infrastructure or restructuring land within existing urban space – specifically in a heritage/character zone – in favour of new development.

### **Positioning in the Tasmanian Planning System: Proposed approach (p. 30):**

- *The design guidelines will fit with the existing planning system and not create new structures or parallel processes.*

<sup>4</sup> ABC News, “Social housing proposal receives 31 objections as neighbours say it does not fit in the area” ABC Hobart, March 2023: <https://www.abc.net.au/news/2023-03-04/social-housing-proposal-receives-31-objections/102052686>

- *The design guidelines will not involve the creation of a new medium-density housing code (noting it may inform the review of residential standards that are currently in progress).*
- *Explore whether there is a preference from Councils or State Government for a particular approach (1, 2, and 3) or a combination of approaches.*
- *Recognise the guidelines in a Tasmanian Planning Policy and deliver through a future review of the SPPs. Explore whether this poses any advantages to referencing them in the SPPs only (without reference in a Tasmanian Planning Policy).*
- *Explore any current issues experienced with medium-density infill housing applications and identify preferences and options for whether the design guidelines should be referenced through the SPPs, LPSs, or a combination of both.*

The Institute appreciates that three different approaches have been promoted and examined in terms of their disadvantages and opportunities.

The Institute would favour a combination of 1 and 2; this would ensure their application in SPPs or LPS at a minimum. Given there are currently no planning provisions for medium-density residential developments (forcing the inappropriate application of other planning mechanisms), we are concerned that if approach 2 is taken, guidelines will not be adopted, and if approach 3 is taken, it will not be suitably effective.

Potential barriers that may impede the adoption of the Guidelines could arise if the language or requirements set out in the policy framework are too prescriptive or suggest more rigid design approaches that rely on and adhere to specific forms, layouts, and materials (e.g., roof pitches, materials that correspond with local context, or spatial requirements). A strategy that could be promoted could focus on the applicability of the Guidelines across varied contexts, where the success of 'good design' resonates to specific themes and requirements, but also offers an approach that is site, user, and environment-specific. Ultimately, the Institute would like to advocate for architects seeking to innovate and to promote the value of good design, within the statutory requirements set out by the SPPs and LPS.

As we have stated on the first page of this submission, as the Medium Density Guidelines are not yet drafted, the Institute at this stage is not willing to commit to them being either statutory or non-statutory. The Institute would need to see the Guidelines in a more developed format to endorse either approach.

#### **Design Governance: Proposed approach (p. 31):**

*The Guidelines will function as both a **regulation** and **advocacy** tool around best practice medium density residential development. Approaches for **investment** are considered outside the scope of this project, but it is encouraged to be considered as part of future components of the Greater Hobart Plan or as part of state-wide planning initiatives.*

The Institute broadly supports the design governance approach, however, would like to question where there should be additional focus on Investment, relating to tender stipulations for public land sale or lease, and procurement of public works. The lack of medium-density stock in Hobart currently reflects a need for more investment in this area, and opportunities to promote investment should be explored and re-evaluated in the context of the design guidelines.

#### **Prescriptive or minimum standards: Evaluation (p. 32):**

*Are there particular acceptable solutions or performance criteria under the TPS that would benefit from further exploration as part of the guidelines? For example, best practice examples and visuals.*

It is not currently possible to increase density within Residential Zones in many municipalities. Acceptable Solutions with minimum lot densities of 325 metres squared (for example) do not allow for an increase in density of more than one house per lot or 2 houses per lot for larger sites. This is perpetuating the ‘house at the back of an existing dwelling’ scenario.

Where the minimum lot size cannot be met the application is assessed under the Performance Criteria; often the criteria will refer to “compatibility with the density of the surrounding context” or “compatibility with the existing character”. Planning officers will often determine that if there are no other developments with a higher density within a 100 metre radius of the site, then the development is not compatible. Based on the issue of density alone (a numeric calculation), the application is refused. It is therefore impossible to be the ‘first’ development in an area to increase density, even incrementally.

There are many residential and inner-residential zones located close to amenities and transport where infill development would be well-suited.<sup>5</sup> However, in a residential zone, the risk of refusal based on density is too high for developers to proceed. They are instead looking to urban-mixed use sites, or commercial zones where residential amenity provisions are not applicable.

If minimum lot size is to remain part of the acceptable solutions when assessing multiple dwelling development, then significant work needs to be done around the corresponding performance criteria to facilitate a holistic assessment of the proposal.

#### **Performance-based approaches: Evaluation (p. 34):**

*Should the guidelines use a basic rating system to illustrate what may be considered a ‘silver’ versus ‘gold’ standard design outcome? How might performance-based approaches aimed at achieving higher quality design help to minimise the assessment burden on Councils?*

For a rating system – such as a star rating system – to be effective would need to have a fairly proscriptive framework to assess the development against. The Institute is not sure if this approach would work, if other aspects of the design guidelines focus on performance criteria that are intended to foster innovation and design flexibility for site-specific strategies. The Institute agrees with the notion that performance-based approaches provide space for collaboration between the proponent, design team and assessing planner/ officers. Less ambiguity around the intended outcomes and wording of performance criteria would result in more straightforward assessment processes. It would also allow officers to provide advice in pre-planning meetings that can assist in reducing the planning risk for proponents where performance criteria are relied upon. The idea of a rating system requires further thought with regard to application against the scheme.

#### **Design Review Panels: Performance-based approaches: Evaluation (p. 35):**

*What is the level of interest and perceived benefits of establishing a design review panel for Greater Hobart to provide advice on medium density housing proposals and support the implementation of the guidelines (noting that establishment of a design review panel for Greater Hobart is outside the scope of this project)?*

The Institute strongly supports the establishment of a design review panel for medium-density housing proposals. We support the formation of a panel that combines expertise from a range of professionals across fields listed on page 34, “architecture, urban design, landscape architecture, engineering, planning, sustainability and cultural heritage”. We would also like to advocate for the

<sup>5</sup> \*North Hobart is a good example due to the number of semi-industrial sites becoming available for development.



inclusion of professional input from individuals with expertise in First People’s cultural heritage and design for Country, and heritage architecture and urbanism.

In the background text, Hobart’s Urban Design Advisory Review Panel (UDAP) is mentioned as a precedent. The Institute supports this, however, unlike the current workings of UDAP, we would recommend the formation of a Design Review Panel to have oversight across the Guidelines.

We also recommend that the following considerations are adhered to: that there is a transparent and competitive process for recruiting applicants; that the panel works closely with Council and does not seek to override Council planning decisions or provisions; that the panel members are rotated on a fixed basis to allow for new insights periodically from other professionals; that conflicts of interest be avoided; and that the actions and decisions made by the panel are publicly accessible (minutes, online recordings, public engagement sessions). Most critically, the panel needs to be comprised of independent experts from the above-mentioned fields, who operate from a distance from inner workings of local government, so that they may provide professional and unbiased perspectives.

A current issue with UDAP is the lack of consideration for the planning scheme, which leads to design feedback that is not within the planning scheme context and at times at odds with relevant planning policies. This feedback is therefore challenging for the design team to interpret and respond to, and confusing for councillors/aldermen who ultimately rely on this advice to assist them in forming a view to grant or refuse a permit as the permit authority.

There needs to be clear guidance on the role of this panel and whether it is purely formed to provide advice to applicants, or if this advice is also provided to assist the assessing officer and ultimately contribute to the outcome of the permit process.

#### **Trade-off approaches: Evaluation (p. 36):**

*Is there an appetite for ‘trade-offs’ to allow for greater innovation in design approaches?*

The Institute finds the notion of a trade-off problematic regarding the function of the tribunal and the tribunal’s ability to assist with providing precedent and clarification regarding the definitions of performance criteria. This process could complicate the assessment process, increasing pressure on planning officers and reducing certainty for proponents. Although the Institute advocates for a qualitative approach, we feel this could lead to a cherry-picking approach and would favour reworking of the performance criteria to provide space for innovation.

#### **Proposed approach to standards: Proposed approach (p. 37):**

*The guidelines will support a mixed approach including:*

- **Minimum standards or examples** for more straight-forward design elements that are suitable to measure.
- **Performance-based standards or examples** for design elements that could be addressed through more open, aspirational guidance and to support qualitative assessment approaches.

The Institute is supportive of this approach, and in the previous question on “Positioning in the Tasmanian Planning System”, we suggested a path forward that combined Approach 1 and 2, to achieve a balance between a more prescriptive set of guidelines and performance-based standards that used visual examples and precedents. We believe this could lead to both flexibility and innovation for designers.

#### **Design elements and themes: Proposed approach (p. 40):**

*The guidelines will focus on design elements under the following themes:*

- *Neighbourhood context*

- *Movement and access (as it relates to the site and surrounding infrastructure only, not the broader road network)*
- *Site layout*
- *Building design*
- *Dwelling amenity*
- *Landscaping and open space*
- *Sustainability (incl. building performance)*
- *Site services*

*It is proposed the guidelines will not cover:*

- *Construction management*
- *Project implementation.*

***Evaluation:***

*Is there support for proponents to prepare and submit a short design response to the local neighbourhood context as part of a planning permit application for medium density residential development.*

The Institute supports all of the themes listed under the proposed approach. The only additional theme that we recommend include climatic conditions and solar orientation.

For the last statement, the Institute would like further clarification on the parameters of a ‘short design response. We support the idea of responding to context and would recommend that this requirement be considered in further depth, and at what stage in the design process would this response be asked for.

#### **Structure of design standards: Proposed approach (p. 41):**

*The structure for explaining each design element will broadly cover:*

- *Objectives – articulating the design outcomes sought for that design element*
- *Performance metrics or design criteria – supported by descriptive text, diagrams, and photo images of real examples.*
- *Design guidance – supported by explanatory notes on preferred design outcomes, diagrams, and exemplary case studies.*

The Institute supports the structure of the design standards – these are clear and easy to follow. There could be some potential overlap between “Performance metrics or design criteria” and “Design Guidance” in terms of the information they provide to designers. Perhaps the title or description of these could be enhanced, to clarify that the performance metrics and criteria are the basis on which good designs are judged (rather than a series of examples to aim for), and that the design guidance offers a range of different options and approaches for achieving the criteria.

#### **Proposed document accessibility (p. 42):**

- *Designed to be a single pdf document that can be made available on a website for online reading and printed in a single hard copy format as required.*
- *Table of contents to be designed to allow for ease of navigation and to jump to sections as required.*
- *Be visually appealing, with a heavy use of precedent images and graphics to illustrate key points.*

*The document will not be a web-based document that consists of multiple webpages to navigate between.*

The Institute supports the Design Guideline’s final format as a PDF file, with a strong emphasis on precedent images and graphics. These two elements are currently working well in the Discussion Paper. One area that we caution against is the excessive use of stock imagery, and careful use of images to be illustrative rather than decorative. A tendency observed across planning documents



reviewed in the past, is an excess of visual stimuli at the expense of detailed text explanation. A careful balance between text and images (especially the use of diagrams) is recommended.

### **Complementary approaches: Evaluation (p. 43):**

*Are complementary programs such as design awards, pilot programs or exemplar local building designs deemed useful complementary activities to explore alongside this Project?*

The Institute is highly supportive of design excellence programs, design exemplars, design awards, and pilot programmes. These would be useful tools for designers when developing projects but also play a strong role in publicly advocating for medium-density infill development. Other initiatives that the Institute would support include public talks series, potentially from architects focusing on medium-density projects and / or residents in new medium-density builds, and tours of specific buildings or sites.

### **3. Summary**

The below points would like to be taken into account when the Medium Density Design Guidelines are developed. These relate to specific design outcomes and ways of working.

- The ability for architects to innovate and develop design-led solutions to contemporary challenges
- The responsibility for architects to respond to Country, culture and heritage, climate, community, sustainability, and environment
- Compatibility with new technologies that serve to benefit sustainable living (e.g. PV on roofs, EV charging stations)
- That planning must develop and improve existing transport infrastructure and create new transport options that facilitate robust transport networks, supporting the community and their access to amenities and services
- Mitigating the impact of new builds: minimising pollution of the construction process (waste materials, noise, and light pollution); prioritising sustainable building methods and materials; post-occupancy evaluation of performance and impact on occupants and surrounding neighbourhood
- New builds consider their relationship with the city, to promote broader social values of health, liveability, and longevity

As the Medium Density Design Guidelines begin to take shape, the Institute would very much like to be a part of this, to encourage the uptake of these themes, and fulfil the Institute's vision: "everyone benefits from good architecture." These values also resonate with the Institute's Multi-Residential Standards Policy and Affordable Housing Policy.<sup>6</sup>

Thank you for the opportunity to provide feedback on this important document has the potential for wide-scale impacts. Please contact us if you would like to discuss any of the points raised further, as we are very happy to continue the conversation.

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<sup>6</sup> Australian Institute of Architects, 'Multi-Residential Standards Policy', May 2017: [Multi-Residential-Standards-Policy.pdf \(architecture.com.au\)](#); Australian Institute of Architects, 'Affordable Housing Policy', May 2017: [Affordable-Housing-Policy.pdf \(architecture.com.au\)](#).

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).