

Submission – Medium Density Design Guidelines

Page 6 Introduction – a few changes to the wording:

The Medium Density Design Guidelines is a non-statutory document developed alongside the Greater Hobart Plan. The Greater Hobart Plan has a 30-year vision to develop Tasmania's towns and cities to cater for all people as the population increases. Maintaining compact and welcoming urban areas is critical for liveability, affordability and accessibility. Medium-density housing typologies provide an opportunity to ensure all people have equal access to essential needs and cultural and social activities to ensure we all feel part of the community.

To achieve developments that are affordable and well-located, density in urban areas will need to increase, particularly in areas close to activity centres and key transport corridors. These guidelines are intended to facilitate a higher standard of medium-density residential development throughout Greater Hobart and Tasmania.

The guidelines aim to:

- Foster attractive, innovative and sustainable design in medium-density housing developments at the appropriate scale for the locality to minimise building bulk, overlooking, and overshadowing,
- Promote housing that caters to all ages and family sizes (single to large family households),
- Encourage development that sets a good precedent and contributes to a positive broader community perception of medium-density housing developments,
- Promote designs that respond to the natural and built features of the area,
- Promote the desired character as stated in the local planning framework and relevant strategic planning strategies for precincts undergoing transition,
- Improve liveability through good design,
- Promote the inclusion of high-quality private and public open spaces within medium-density developments,
- Ensure developments are responsive to climate resilience and running and maintenance costs for residents will be economical,
- Engender a sense of ownership, pride and belonging,
- Promote privacy and security for residents whilst maintaining a connection to the surrounding area,
- Promote appropriate vehicle access and parking options, including alternative transport and sharing options,
- Promote green spaces via a mix of private and public areas for the health and well-being of residents and contribute to urban greening for better amenity, recreation, shade and connection to nature

Page 9 What is good design?

First paragraph – change to.....*Good design of our homes is defined by multiple elements including, responding to the surrounding characteristics and site constraints. But more than that, it has the potential to improve livability, elevate how we feel in a space, promote community spirit and provide lasting value. Good design is important because it creates buildings and public places that adapt to change, foster a sense of place and well-being, are inclusive and sustainable and leave a legacy in the built environment.*

Second paragraph

Remove the word ...gently from 1st sentence.

Remove the word trends from 2nd sentence... while also considering future needs.

Dot points

1 remove the word gentle

6 reword ...enhancing visual and build quality and contributing to the development of a sense of place for the community

Add a dot point

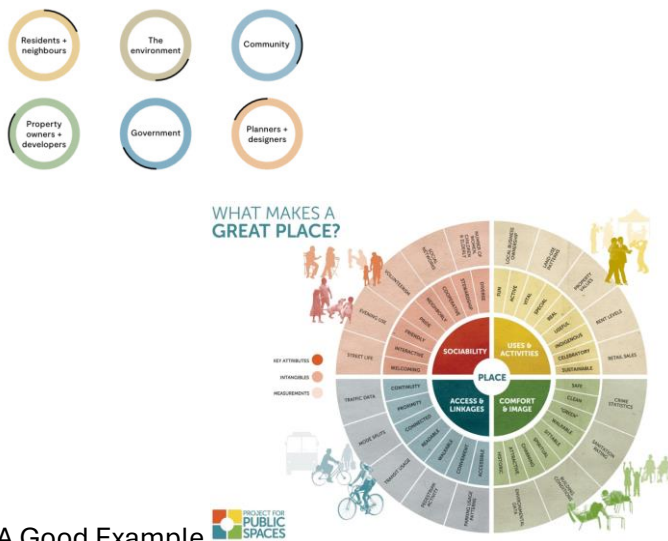
- Creating spaces that are welcoming and people-centred to foster a vibrant community

Last paragraph

Reword...**BENEFITS OF GOOD DESIGN**

Everyone benefits from good design. Quality buildings and spaces provide a positive impact on the well-being of all people, residents, visitors and the immediate community. Comfortable, enjoyable spaces are more engaging and are better places to live, work and play, they create a sense of place and belonging.

This diagram has no obvious meaning - suggest change/add for more meaning and connection.



A Good Example

[Gallery of What Is Placemaking? - 4 \(archdaily.com\)](https://www.archdaily.com/1000000/gallery-of-what-is-placemaking/)

Page 10

SCALES OF CONTEXT ANALYSIS



Some explanation under each of these would be helpful, a line or two from the following pages.

Page 12

First line... add a word.....urban blocks CONNECT WITH streets and transport links

Context queries...box 4 examples....education, work, services, recreation and playgrounds

Context queries...box 5 examples....public transport or active transport (bike/walking paths)

Page 14

In the first paragraph, the second line....future developments will connect with the character of the immediate streetscape.

Context queries box 6...reword to prioritise people....how do pedestrians, cyclists, people with a disability and vehicles interact and navigate the street

Page 16

Context queries box 11...what options are available for managing cars around the development (on-street, off-street underground parking, reduced car ownership with car-share and or e-bike leasing)

Page 20

The Site – 3rd line first paragraph....how well a development ENHANCES and connects with the streetscape.

Context queries...box 7...dwelling size, typology, design, open space, landscape and integration with the streetscape

Page 26

Streetscape – Public domain interface add a dot point

- Limit or eliminate the view of parked cars from the street looking at the development and from within the development (underground/screen car parking with soft landscaping and or permeable walls)

Page 28

The Building – the first paragraph replace with...The façade design, materiality, layout, thermal performance and access to light are some of the essential elements in creating great places for people to live and engage with the community around them.

Context queries box 6...universal design may not be understood by some, a definition should be in the glossary (it is not currently included)

Page 32

Material selection – Design response

Add dot points

- Consider low VOC materials i.e., brass/raw fittings rather than chrome-plated
- Consider a reductive design process (do more with less for a simple and sustainable lifestyle within the building) i.e., take out second bathrooms, individual laundries and car parks

Page 34

Façade design - design response

- Integrate or screen residential and visitor car parking from the streetscape
- Activate the façade with retail i.e., café – for social integration with neighbours and other residents within the development

Roof Design – design response

Add a dot point

- Consider communal gardens with BBQs and or communal laundries and washing lines to promote a sense of community within the building

Page 40

First paragraph – reword... Incorporating natural elements through soft landscaping at all scales and sites across the development as well as reducing hard stand, provides residents with a connection to nature and the opportunity to recreate in their own outdoor environment.

Second paragraph - remove the word meaningfully and replace it with the following ... high-quality and accessible landscaped areas with a mix of communal and private open spaces are vital for residents' well-being and the liveability of the development.

Second paragraph – changeprovide environmental benefits by retaining existing mature trees and planting more to increase the net canopy within the surrounding neighbourhood

Third paragraph – change...communal and private outdoor spaces within a development, including interconnected walkways, entries, façade setbacks, courtyards, rooftop gardens and balconies. Combined they contribute to the greening of the site, streetscape and greater neighbourhood.

Page 42

The first paragraph, second line – change ...of a site and contributes to not only the site's visual and physical amenity to the streetscape and surrounding neighbourhoods tree canopy.

Second paragraph last line – change...landscaping is an integral design element woven into the fabric of the building, throughout the building.

Page 43

Views to greening – design response

Dot point - change...On sites with views of significant landscape features i.e., mountains/water incorporate these views and enhance them with complementary plantings including mature trees that in time, will frame the view and provide scale and localised amenity.

Landscape design - design response

3rd dot point add the word....screen on-site car parking areas from the street and internal window views out over the development.

Add a dot point

- Minimise the visual impact of driveways with planting, co-location, integration, and materiality (underground driveways where possible)

Page 44 Open Space

Second paragraph first line – play a key role in facilitating connected communities.

Third paragraph fourth line – nearby public open spaces.

COMMUNAL OPEN SPACE – First line....open space is vital, it contributes to liveability and the health and well-being of residents of multi-residential developments.

DESIGN RESPONSE

1st dot point - deep soil zones that allow large tree plantings that increase the net canopy over the site and contribute to the greening of the neighbourhood.

Page 49

Urban heat and bushfire – design response

Dot point 1 – Break up hardstand areas with soft landscapes including large canopy trees to shade hardstand and explore alternative surface treatments like porous paving.

Page 52

Parking and access

First paragraph...remove the words...by its nature - because that's not true.

First paragraph...remove prams as a mode of transport – they are not!

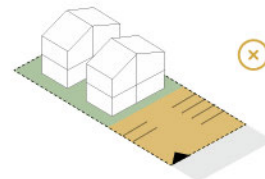
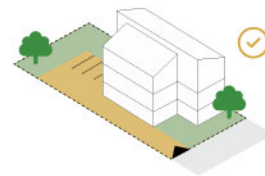
First paragraph, last sentence - Delete entirely.

Consider rewording the first two paragraphs to the following:

Residential developments have a range of transport needs, the reliance on private cars can be supplemented with alternatives that may provide better financial, environmental and design outcomes for residents and developers.

It is important to prioritise an integrated parking and access arrangement that contributes to the safety of the site, and visual and physical amenity rather than detract from it.

General comment about the illustrations:



I think these are more intuitive, they give

Verses in your guide

An instant understanding and the audience can Connect more readily.

REF: [the-good-design-advice-sheets---full-document.pdf \(merri-bek.vic.gov.au\)](https://www.merri-bek.vic.gov.au/the-good-design-advice-sheets---full-document.pdf)

Other things to consider

Light wells



Light wells via internal courtyard gardens, these can be effective for passive cooling, light and private outdoor space. It's also welcoming and creates a sense of space when placed inside a front door instead of a wall or doorways which can enclose a space.

Example - Nightingale 1 by Breathe Architects

Third-age housing – aging in place, medium-density housing for continuing to live within ones established community, where things are familiar and we can stay independent for as long as possible [Reinventing Third Age Housing | Research | Karakusevic Carson Architects \(karakusevic-carson.com\)](#)

References and resources – Australia

[Nightingale Housing — Homes built for people, not profit.](#)

[the-high-life-infographic.pdf \(cur.org.au\)](#) (highlighting good apartment design for health)

[INFRA1219_MCU_R_SQUARE_URBAN_PROTOCOLS_1111_WEB_FA2.pdf \(urbandesign.org.au\)](#)
(creating places for people)

[the-good-design-advice-sheets---full-document.pdf \(merri-bek.vic.gov.au\)](#)

[What Is Placemaking? | ArchDaily](#)

[Good Design | ovga.vic.gov.au](#)

[DGDGMediumDensityDevelopmentAug2020-2pdf.pdf \(darebin.vic.gov.au\)](#)

[01_Good_Design_RevB_2019.indd \(content.vic.gov.au\)](#)

[Implementing Good Design \(nsw.gov.au\)](#)

[Good Design for Social Housing \(nsw.gov.au\)](#)

[Home — GoGet Carshare](#)

[Ditch The Car With Our Premium Electric Bikes from \\$48 per Week - Lug+Carrie \(lug-carrie.com\)](#)

References and resources – UK

[‘Social Housing – Definitions and Design Exemplars’ | Research | Karakusevic Carson Architects \(karakusevic-carson.com\)](#)

[A New Era for public housing and Landscape-led Urbanism | Research | Karakusevic Carson Architects \(karakusevic-carson.com\)](#)

[A New Era for public housing and landscape-led urbanism | Research | Karakusevic Carson Architects \(karakusevic-carson.com\)](#)

[‘Retrofit Social Housing: A Practical Guide for Local Authorities & Registered Providers of Social Housing’ | Research | Karakusevic Carson Architects \(karakusevic-carson.com\)](#)

[Reinventing Third Age Housing | Research | Karakusevic Carson Architects \(karakusevic-carson.com\)](#)

Placemaking

[What is Placemaking? \(pps.org\)](#)

[6335ddc88fbf7f29ec537d49_2022_placemaking_booklet.pdf \(webflow.com\)](#)

Thank you for asking and considering my input.

These guidelines are essential if we hope to have good design outcomes for multi-residential housing in Tasmania. We are behind all other Australian states in this area.

Dear DSG,

The draft Medium Density Design Guidelines includes a section titled 'Urban Heat and Bushfire' (p.49) that provides no guidance with regards to bushfire. TFS recommends expanding the points under the 'Design response' subheading to include guidance about best practice design for bushfire.

For example, some points to consider include:

1. Using simple building shapes that minimise re-entrant corners minimise opportunities for ember/debris accumulation against building facades.
2. Incorporating non-combustible pathways around the perimeter of buildings will harden areas that are vulnerable to ember/debris accumulation and help to separate the building from combustible landscaping.
3. Buildings outside of the bushfire-prone areas overlay may still be exposed to ember attack during a bushfire. For buildings within 150m of bushland areas, designing to BAL-12.5 standard (AS 3959) ought to be considered as a way of improving long-term resilience in a changing climate.
4. Medium density dwellings can be vulnerable to building-to-building fire spread during bushfire emergencies as the ability for fire crews to intervene will be limited. Incorporating fire separation into the design of external facades within 6m of fire source features will reduce the risk of building-to-building fire spread.
5. Requiring non-combustible fencing within 6m of buildings will reduce the potential for external fire sources to impinge on windows and glazed doors.

If you would like to discuss any of the above suggestions - or any other ideas - please don't hesitate to get in contact and we'll be happy to assist.

Addressing Urban Sprawl and Density in Major Australian Cities: A Case for Thoughtful Planning

As Australian cities continue to expand, the demand for medium and high-density housing increases significantly. This type of housing is quickly absorbed in already crowded urban environments due to high population densities.

The Importance of Well-Executed Density

A forum discussion from the Melbourne area, titled "Density Done Well," highlights a critical point: "If density is well done, then it is absorbed and blended in with the existing surroundings." This statement underscores the necessity of integrating new developments seamlessly with the existing urban fabric to maintain the quality of life for residents.

Case Study: Ironcliffe Road Development

The Ironcliffe Road development is an example where high-density housing has raised concerns. The proposed development in Penguin, which has a population of 3,500, would introduce 320 new residents. This increase represents 9.14% of the total population in a concentrated area. In contrast, a similar development in a city with a population of 100,000 would only represent 0.32% of the population, making it less noticeable and more manageable.

Public Opinion on Density

A survey conducted among residents of Melbourne and Sydney revealed a preference for medium-density housing in established suburbs with good public transport and access to jobs and services. However, there is significantly less support for high-density developments like the one proposed on Ironcliffe Road. Residents are concerned that such developments do not integrate well with the existing community and infrastructure.

Case Study: Housing Tas Mooreville Road Development

This development has 55 building blocks at an average size of 900 sq.m. each which verifies what is density.

Recommendations for Local Government

1. **Contextual Density Planning:** Density should be planned relative to the area's existing population and infrastructure. High-density developments may be more suitable for larger cities where the impact is less noticeable.
2. **Effective Community Consultation:** Ensure that community consultation processes are thorough, transparent, and inclusive. Residents should be well-informed about proposed developments and have ample opportunity to voice their opinions. The results of these consultations should be publicly accessible.

3. **Community Integration:** New developments should blend seamlessly with the existing surroundings to maintain the quality of life for current residents. This involves careful planning and community consultation.
4. **Support for Medium Density:** Encourage medium-density housing in established suburbs with robust public transport systems and access to essential services, as this is more widely supported by residents.
5. **Impact Assessments:** Conduct thorough impact assessments for high-density developments to ensure they do not disproportionately affect small communities.

By considering these recommendations, local governments can better manage urban sprawl and housing demands, ensuring sustainable growth and maintaining the quality of life for all residents.

Sources:

- Melbourne Area Forum: "Density Done Well"
- Surveys of Melbourne and Sydney residents on housing preferences
- Case study of Ironcliffe Road development in Penguin
- Homes Tas Mooreville road development

Are there any barriers to delivering housing that is consistent with these guidelines? Yes, I believe Hobart's inner suburbs and CBDs of satellite suburbs (Bellerive/Rosny, Kingston, Taroona, Sorell) need to see a dramatic transformation to medium density housing over the next 15 years to meet the needs of its population. Where are the incentives and coercive controls that accompany this guide? The population doesn't need any more detached housing - there is already way too many family homes especially in suburbs like West Hobart, South Hobart, Sandy Bay etc. which have too little medium density living options. Renters and owners are forced to live in inadequate houses because of lack of choice. These guidelines are frankly fantastic, but they are doomed to remain underutilized without strong policy incentives that make developing duplexes and mall apartment buildings financially viable and attractive, so they become the majority of new housing being build. Look at planning reforms and upzoning in New Zealand for inspiration. Or Hobart and Tasmania will become irrelevant.

Having followed this discussion for years, and hearing a presentation from HCC staff, I (still) think the BRT option is the best of the 3 options. BUT I think one the advantages of BRT needs to be made more prominent to counter the tram & rail lobbyists, and VERY vocal opponents - that is, buses don't need the same amount of car parking/ station infrastructure, because the buses can continue their journeys outside the corridor. Tram & rail options would require park & ride space for car parking at each station - where on earth is that going to be found along the route? It is absolutely essential that during construction, the affects on the Intercity Cycleway are minimized as this is a major daily thoroughfare for cyclists & pedestrians. The previous major blockage when the warehouses in Moonah were having asbestos removed, taking months instead of the original weeks, required a huge detour down Sunderland St & Derwent Park Road. In terms of media, the very vocal Hobart Northern Suburbs Rail Action Group always seem to get their point into the media in support of rail but often/ generally there aren't press release(s) to counter their baseless "facts". The government needs to improve their media presence in this regard to spell out that buses CAN carry the estimated number of patrons etc..

The Draft Medium Density Design Guidelines (MDDGs) include a relevant range of useful design guidance. However, as there is no mention of placemaking, sense of place, green roofs, circular design, distributed energy resources or Aboriginal heritage, the MDDGs are not consistent with the guidance provided by the Draft Tasmanian Planning Policies (TPPs), which are about to be made and implemented. If not consistent with the TPPs, the MDDGs will be out of date by the time they are published. The TPPs will have a significant impact on the State Planning Provisions, Local Planning Provisions and medium density residential development. For the MDDGs to be considered best practice and integrated with contemporary Tasmanian planning concepts and terminology, they should, at the very least, be consistent with the following elements of the TPPs:

- 1.2 Liveability
- 1.5. Housing
- 1.6 Design
- 4.0 Sustainable Economic Development
- 4.4 Renewable Energy
- 6.1 Aboriginal Cultural Heritage
- 6.2 Non-Indigenous Cultural Heritage
- Glossary

Thanks for sharing the guidelines for comment. I recognise that you are trying to keep it short and to the point but think it's worth amending a few of the bike parking points to be more instructive. The current section is really good, especially the nod to cargo bikes and variety of bikes to be accommodated, including children's bikes. Too often bike parking is provided that requires lifting or difficult to access storage space because of stairs or other barriers.

My suggestions mostly are concerned with safety of ebike and escooter charging but also acknowledging bike parking should be close to the street entry to enable riding to be a convenient form of transport.

Building managers are putting in place advice from fire services to limit the possibility of electric battery fires and so it's worth incorporating some of those principle in the guidelines - this includes preventing batteries from overcharging by installing power points that cut out after a set number of hours, providing ebike and escooter parking in an area where a fire can be contained such as basements or rooms with solid walls, and ensuring batteries are charged in a cool area where batteries can't overheat from direct sunlight or high ambient temperatures.

I've attached suggested changes in red.

Bicycle Parking

Provide parking in a designated, **ventilated** and secure area that enables residents to easily access their bikes **close to street entries**.

Where parking is provided in a car park or garage, ensure bikes and cars can move safely and independently.

Provide appropriate shelter for parking areas and locate them **in a contained area away from dwelling entries**.

Provide universally accessible **time-limited** charging points for e-bikes and mobility scooters.

Provide for a range of bicycle types and sizes, including smaller childrens bikes as well as larger heavier cargo or e-bikes which cannot easily be lifted.

In my opinion (as a resident, and locally based property development engineering and planning consultancy) is that this suite of measures accompanying the Guidelines are a very positive move for the prosperity, international competitiveness and desired future character of the entire Greater Hobart area.

While I support the concept of the need for medium density infill housing developments, there is the possibility that some of these developments would be targeted at the wrong clientele

The concept is to provide much needed housing solutions for citizens who actually live and want to live in Hobart.

So how do we ensure that none of these new housing developments are used as short term holiday homes to house visitors rather than citizens.

Simple, the title for these new properties needs to have a covenant in place stating that they can not be used for short term holiday letting.

This was successfully accomplished by the Batch House development in Argyle Street. They were sold with a covenant to this effect in place.

Unlike the recent mid rise apartment block constructed at 66 Patrick Street where I know of at least 10 apartments that have requested planning approval for "Change of use to Visitor Accommodation".

I really believe that people who buy an apartment to live in permanently don't want to find out that they are actually living in a quasi hotel.

Please ensure that this housing is for citizens and not visitors.

There is a great opportunity missed here to provide guidance on ‘how’ to retain trees. I say how as most developers won’t consider trees and wouldn’t know how to incorporate them in designs.

Please consult AS4970 - Protection of Trees on Development Sites for a detailed best practice. They must be considered from site layout stage (page 22) or there is no chance of retaining trees. The first step is a preliminary assessment by a qualified arborist to categorise the tree assets on the property (sustainability and significance in the landscape).

Impact Assessments and Tree protection Plans come next.

Please consider including this process in the guidelines if you want this to be ‘best practice’.



3rd September 2024

Submission via email;
contact@greaterhobart.tas.gov.au

To Whom it may concern,

Comments on Draft release of Medium Density Design Guidelines

For context; I am an architect with nearly 20 years experience in delivering multi-residential projects predominantly in Melbourne, but also Geelong, Bendigo, Sydney and Vancouver. I work with the Victorian Apartment Design Standards on a daily basis, as well as all the other applicable codes and controls governing this building typology.

I currently work for the Melbourne based practice of Austin Maynard Architects, our recent apartment projects have received considerable recognition in various design awards. See more at www.maynardarchitects.com

I have reviewed The Medium Density Design Guidelines (Draft July 2024) and found they contain an excellent overview of key areas that make this typology of residence a joy to live in as an occupier, owner occupier, and in turn a valuable asset from the eyes of an investor. I have the following comments;

I see two key missing attributes to the MDDG: 1) there appears to be no requirement to comply, and 2) there are no metrics to work to.

I did reach out to a contact with a deeper knowledge of the Hobart planning landscape, who mentioned that there are other actions in motion to give this document more weight. I cannot encourage & support that action enough. It is critical that these guidelines be given the weight necessary for the outcomes to be consistently realised. The creation of this guide is of no small investment, and without the appropriate backing it will be nothing more than aspirational.

The Design Elements listed provide excellent coverage of attributes and outcomes that make great multi-residential buildings. However, they stop short of any metrics. I do appreciate that these are 'guidelines' and not legislation. I encourage the authors to consider how and why an applicant would participate in these guidelines if they are not required to.

Things to Consider:

Incentives.

if the private sector is tasked with providing the vast majority of our housing, then speak their language. One of the best ways to achieve high quality outcomes, and as much of them as possible, is to incentivise them. These can be a wide range of things such as: greater FSR / increased height, reduced application/development fees, removal of third party appeal rights, fast-track applications, etc.

I have in my experience that Commercial Developers will only go above and beyond the minimums, if it makes business sense - ie if it gives them more sellable building area, or reduces the project cost/risk.

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Controls.

Our planning and building codes are intended to be a minimum standard, not a gold standard. These MDDG look to strongly encourage much higher than the minimums. The planning legislation must somewhere, capture what is the minimum. (if it doesn't already, please excuse this comment if it does).

Definitions.

I work across many different states and planning schemes. Definitions regularly mean different outcomes across these. its a common frustration among Architects, Consultants and Developers. I would encourage the MDDG to use the NCC definitions for Building Heights/ Types. In doing this many efficiencies and simplifications can be applied. up to 4 stores (12m) and up to 25m (8 stories), and over 25m.

Links.

It is always very helpful for these documents to link to other relevant controls- especially if the controls for heights, setbacks, coverage, shadowing, and parking are not governed by this guide.

Skills of the Reviewers.

A very important step with the creation and implementation of a guide such as this is to ensure that those who are asked with reviewing and implementing these standards are provided with the relevant training to upskil their abilities.

I am constantly frustrated by the inconstancy of how Victoria's ADG is reviewed/implemented from LGA to LGA. I hope that these can be managed better in Tasmania.

Few Specifics:

I have refrained from reviewing the guide element by element as until there are more detailed metrics included this seemed a little premature.

Be conscious of what the NCC already covers, unless the MDDG's intend to require increased requirement's. Things like provision for EV's, design for Bushfire, minimum Thermal Performance etc are all already covered. Avoid confusion.

Demonstration of quality / livability rather than prescribed outcomes.

The MDDG should focus on demonstrated quality outcomes by the application and not discourage or disallow specific types. For example; encourage all apartment/home types; studio apartments can have a negative connotation, but well designed can be wonderfully affordable homes. Victoria's ADG struggles with this. its very specific and so the apartment layout's shown in the the guide have become an unofficial industry standard. Unfortunately these units are quite poor, this is what i hope the MDDG avoids.

Storage Provision, in my experience this is far more successful measured in m3 not m2.

Balconies and Outdoor areas - consider our wonderful Tassie weather, these areas are not often valuable or beneficial. Consider an avenue for the application to provide outdoor space on site in other ways, in place of these such as common gardens. Perhaps a minimum provision of a Juliet type balcony. Balconies can have negative impacts; overshadowing of unit below (blocking passive solar gain/light penetration), thermal bridging, can be very messy/covered in AC units or clothes hangers (poor visual outcome), etc. Good guidelines have diverse options to providing great outcomes.

I did enjoy seeing a project of ours included in the photos of example projects, but do note a few mistakes in the descivtopn - the project is called Slate House, not just Slate. And our practice is called Austin Maynard Architects, not Maynard Architects. See page 29. Please add these to your corrections list.

I would be very happy to discuss any of the above in more detail, over the phone or in person if that would assist the project team,

A handwritten signature in black ink, appearing to read 'M Strahan', with a long, sweeping horizontal line extending to the right.

Mark Strahan
Associate & Project Architect |

Austin Maynard Architects



Feedback submission on the draft Medium Density Design Guidelines, July 2024

Thank you for the opportunity to respond to the Draft Medium Density Design Guidelines, July 2024 (the Guidelines). The need for well-designed medium density housing in appropriate locations in Tasmania is evident, and we commend the Tasmanian Government for issuing these Guidelines. They not only provide direction for developers but also demonstrate the government's support for promoting such developments. While we support the overall approach, we would like to raise the following concerns for further consideration:

- **Implementation:** Our primary concern is the ambiguity surrounding the implementation of the Guidelines. While we acknowledge that they can be used by Council officers in discussions with proponents to encourage quality development proposals, it remains unclear how the Guidelines will assist in planning assessments, approvals or appeals processes. How will they integrate with existing planning schemes to streamline design outcomes? Being voluntary Guidelines, it is unclear how elements such as landscaping, solar access, site design, building materials, textures, neighbourhood context outcomes etc. can be achieved without corresponding requirements in the planning scheme. Many developers prioritise quantity over quality, often leading to poor design outcomes with minimal amenity for future residents. It is essential that the residential standards that are currently under review include requirements for these elements.
- **Defining 'Medium Density Housing':** The Guidelines acknowledge the absence of a clear definition for medium density housing in the Tasmanian Planning Scheme. However, classifying it under the umbrella of 'multiple dwellings' may blur the difference between low and medium density housing in the community's perception. This could hinder achieving the desired infill density targets in zones like the Inner Residential Zone or around Activity Centres. To shift the perspective on infill medium density housing in Tasmania, clear parameters must be established for developers, designers, and the community. The concept of 'detached single-storey dwellings' as medium density housing should be excluded, as the current State Planning Provisions (SPPs) are already written with a heavy focus on detached dwellings. The Guidelines should steer towards attached dwelling typologies for medium density housing such as terrace housing, apartments, and shop-top housing, which differ from lower density detached housing.
- **Following the Guidelines and Discretionary Applications:** Several elements in the Guidelines support development outcomes that would not meet the Acceptable Solutions in the SPPs (e.g., average setbacks, page 15; use of front setbacks for open space, page 20, private open space minimum areas and dimensions, page 46). The document should clearly state upfront that following the Guidelines may result in a Discretionary planning application. From a design perspective, not following the current Acceptable Solutions and instead following the Guidelines, is likely to lead to a positive

design outcome. However, our experience shows that many developers prefer quicker approvals (through the No Permit Required pathways) over pursuing a Discretionary pathway.

- **Desired future character:** It is unclear where people can find the ‘desired future character’ of an area, as mentioned in several sections (e.g., pages 6, 14, 20), which is no longer included in the Tasmanian Planning Scheme. Should this be revised to reference ‘Local Area Objectives’ instead which would be more relevant?
- **‘Gently’ increasing densities:** The Guidelines mention ‘gently increasing densities’ (e.g., on page 8). This approach may be problematic when higher densities, which are well-designed, are proposed in suitable locations such as Activity Centres or along major transport networks, especially when adjacent to existing low-density housing. For example, if 4 -5 storey apartments are proposed adjacent to 1-2 storey dwellings, will this be considered contradictory to ‘gently’ increasing densities?
- **Potential confusion with terminology:** The Guidelines uses terminology such as “building mass”, “building shape”, and “building form” (e.g., page 24) which may be confused with the current “building envelope” concept in the SPPs. While we note previous comments from the State Planning Office about potential updates to the terminology as part of the Improving Residential Standards in Tasmania project, it may take some time before the new residential standards are developed and are fully adopted after consultation. In the interim, will the concepts in the Guidelines cause confusion to the community or developers?
- **Mobility needs:** It is evident that Tasmania has a high demand for housing that is designed to accommodate people with mobility needs. While the Guidelines reference facilitating future retrofitting (e.g., page 35), it would be more cost-effective and beneficial to include these elements in the initial design and approval process.
- **Cost analysis:** It is unfortunate that the Guidelines do not include a section addressing the cost analysis of poor design versus good design – noting that better design may not mean additional cost. Could the Social Housing development by Cumulus Studio in Goulburn Street serve as an example? Perhaps this could be added as an Appendix or a Background document, with the analysis readily available via a hyperlink. Perceived cost is one of the most significant factors limiting developers from producing better-designed developments.
- **Glossary section:**
 - The definition of a ‘dwelling’ in the Guidelines presents the same issues currently seen in the SPPs, as it is defined as a ‘self-contained’ residence with laundry facilities. Medium density housing typologies like apartments may have shared laundry facilities. We suggest updating this definition to be more flexible and suit all typologies.

- There is a typo in the definition of passive surveillance.
- **Barriers identified:**
 - The SPPs not being reviewed and updated in a timely manner, as they currently do not adequately support medium density housing or reflect the design elements in the Guidelines.
 - If the SPPs were to reference the Guidelines, Councils may need to update their Local Planning Provisions to include the Guidelines where appropriate which may have implications on resourcing and costs.
 - There is a risk of creating situations where a proposal that meets the Guidelines still results in a Discretionary application, leading to frustration among developers.

Submission to the State Growth medium density design guidelines.

Robert D M (Bob) Cotgrove.

BA(Hons), MTransEc, MSc(Econ), BDC.

Life Member of the Institute Australian Geographers, Fellow of the Chartered Institute of Logistics and Transport, Member of the Economic Society of Australia.

Changing urban travel behaviour and land use structures of modern societies.

The days of an industrial-age culture when men worked while their wives stayed home to care for the needs of the family and house, when car ownership was low and when the majority of employed people used public transport to take them to and from centralised, routine jobs are long gone and will never return.

In modern post-industrial culture women, including mothers of dependent children, now have workforce participation rates equal to men. That means that all adult members of a household now have their own personal daily activities to perform as well as having to share common household duties.

Thus wives, husbands and adult children have different workplace locations to go to, often at different times, as well as performing tasks such as taking children to and from childcare or school, shopping, engaging in recreational and social activities, and visiting friends and relatives.

Most of these various activities, many of which are constrained to particular appointment times, have to be fitted into the few hours of the day between leaving home in the morning and returning in the late afternoon.

For the vast majority of people, the only practical means of fulfilling these obligations is by using a personal car. All public transport is necessarily limited to taking passengers only to stops or stations (points on a line) and only infrequently at times determined by timetables.

Public transport, for most people, is unable to take them to the spatially dispersed locations they need to get to at the times they need to be there.

Almost universal car ownership has carried with it huge socio-economic benefits. For the first time in history, it has allowed people to separate where they live from the necessity to live close to where they work, openly up attractive residential locations such as hillslopes, bushland settings and sites close to rivers and beaches.

As a result, residential locations have spread out at low densities as households fulfill the desire to have a house of sufficient size to allow for a growing family with space for lawns and gardens and room for recreation and entertaining.

Car ownership has enabled the increasing proportion of elderly people to enjoy more physically, mentally and socially active lives and to reduce age-related diseases such as loneliness and depression.

Trucks, vans, and service vehicles have transformed urban land use structures.

Manufacturing has moved from crowded inner-city locations to new spacious sites in suburban industrial estates with room for storage as well as production. Ports have moved from river sites near the city to new coastal container sites.

Both manufacturing and shipping use trucks and vans to maintain necessary links to road and rail terminals, freight forwarders, retail outlets and private customers.

The result is that non-residential land uses, including retailing and offices, have followed the population to the suburbs.

Does increasing density “create more connected and vibrant communities”?

The Committee for Greater Hobart, a body consisting of the LGAs of Hobart, Glenorchy, Clarence and Kingborough, has recently compared Greater Hobart with five other cities; Auckland in NZ, Ljubljana in Slovenia, Austin and Portland in the US and Coffs Harbour in NSW.

Apart from the basic error of failing to compare like with like; that is comparing a metropolitan area (Greater Hobart) with the other five individual cities, the examples chosen demonstrate what happens with the process of increasing population density.

There are 93 cities in the European Union with populations greater than 300,000 people. Ljubljana, with a population less than 300,000, is not on the list. Yet the authoritative 2023 INRIX Global Traffic Scorecard ranks Ljubljana as the 24th worst city in Europe for traffic congestion.

Among American cities Portland ranks 19th and Austin 21st for traffic congestion, rankings well above their population rankings.

Even Coffs Harbour has severe traffic congestion with a report identifying the Pacific Highway at Coffs Harbour as the third most congested road in NSW. The Australian and NSW governments are considering building a 14 km bypass project, not only to improve transport efficiency and safety, but also to boost the regional economy.

Greater Hobart, with a population of 207,101 at the 2021 Census, suffers from severe traffic congestion due to the necessity of all traffic, whether going to the Hobart city centre or trying to bypass it to reach other urban destinations, being funnelled onto the twin couplet arterials of Macquarie/Davey Streets or their cross-arterials from Antill to Campbell Streets.

Increasing Greater Hobart’s density would certainly exacerbate Greater Hobart’s traffic congestion and decrease Greater Hobart’s liveability as a “connected and vibrant community”.

Medium Density Design Guidelines: Draft

Homes Tasmania submission

Purpose

- This document outlines Homes Tasmania's feedback on the draft Medium Density Design Guidelines.

Overview

- Initiatives to guide the development of diverse housing types will support the delivery of the Tasmanian Housing Strategy's objectives and the Tasmanian Government's goal of delivering 10,000 social and affordable homes by 2032.
- The guidelines are a voluntary, non-statutory mechanism for supporting medium density development and will likely have a limited impact on development outcomes in Tasmania.
- To influence the form of new development, medium density design requirements could be embedded in the planning system via a Medium Density Code alongside the proposed Apartment Code.

Medium Density Design Guideline risks

- There are several risks in releasing the guidelines as a non-statutory document:
 - The guidelines could be used to advocate against medium density developments. For example, opponents of a development could refer to aspects of the guidelines that are not included in a proposed development and argue that an otherwise compliant proposal is not meeting the community's expectations for a sufficiently designed development.
 - The presence of statutory and non-statutory documents could be confusing for councillors, who represent constituents that are objecting, when making decisions on development outcomes.
 - The guidelines could create more confusion for risk-averse developers for the above reason. If there is increased ambiguity around acceptable standards of development, it might further impact the viability of delivering medium density development in Tasmania.
 - Without clarity as to how the document could be used by local governments, there is a risk that it adds additional processes that could further delay assessment timelines.
 - Without being formally embedded in the planning system it could be used inconsistently by local governments. This could create confusion, delays and

- disincentives for development proponents, especially those who work across Greater Hobart, and misaligns with the aims of a statewide system.
- There are also risks in releasing the current guidelines as a statutory document:
 - It could be interpreted as additional requirements and further 'red tape' for medium density development.
 - There may be aspects that unexpectedly misalign with the realities of development in the Tasmanian context, which take time to address through the formal amendment process, and consequently may negatively impact on the immediate quality and financial viability of medium density development.

Recommendation for a Medium Density Code and supporting Medium Density Design Guidelines

- Based on the above risks, Homes Tasmania is supportive of medium density design standards being formalised as a statutory requirement.
- Including a Medium Density Code and Apartment Code would provide clarity around compliant design requirements for the diverse housing models that Tasmania needs to meet the targets and objectives of the Tasmanian Housing Strategy.
- Due to the risks outlined above, Homes Tasmania is recommending the following approach to the release of the Guidelines and development of a Code:
 - Release the finalised Medium Density Design Guidelines by 31 December 2024, as per Action 1.2.2 in the Tasmanian Housing Strategy's '2023-2027 Action Plan' as a non-statutory document.
 - After a period of 12 months, survey local governments, architects, developers, planners and other relevant stakeholders to collect feedback on its contents and impact, including any excessively restrictive cost implications, to identify which aspects may need adjusting to the Tasmanian context and in what circumstances.
 - Alongside the above 12-18 month period, work with local governments and key stakeholders on the development of a Medium Density Code similar to the draft Apartment Code.
 - Release the Medium Density Code and a revised version of the supporting Medium Density Design Guidelines. Consider developing similar guidelines to support the implementation of the Apartment Code. How the Codes are embedded in the planning scheme should be considered holistically as part of the Residential Development Standards review process, including the subsequent proposed review of subdivision requirements.
 - At all stages below, provide clear messaging that explains the process and emphasises the benefits of the changes to increase clarity, flexibility and certainty for medium density development across Tasmania.
- This approach follows the New South Wales model of the pairing of the 'State Environment Planning Policy No 65 – Design Quality of Residential Apartment Development' ([SEPP 65](#)) apartment code and its supporting Apartment Design Guide ([ADG](#)).
- The two NSW documents have been in place since 2015 and feedback from industry has noted that overall they provide '[clarity, flexibility and certainty](#)' for proponents of apartment developments.
- NSW has subsequently introduced a similar pairing of documents to support medium density. The '[\(Part 3B\) Low Rise Housing Diversity Code](#)' is embedded into the existing '[State Environment Planning Policy \(Exempt and Complying Development Codes\) 2008](#)' and is supported by the '[Low Rise Housing Diversity Guide for complying development](#)'.

Minor comments on the Draft Medium Density Design Guidelines

- As the draft Apartment Code process progresses, the State Planning Office should consider developing a supporting Apartment Design Guideline to translate that code into an accessible format to:
 - Clarify and guide development proponents and assessors as to the interpretation and application of the statutory requirements
 - Distinguish between the different implications and expectations for medium density and apartment development in Tasmania.
- The diagram on page 8 provides a visual depiction of the spectrum of dwellings considered medium density in lieu of a formal definition in the planning scheme. As per this illustration, medium density can occur on Torrens Title and the document should be read with such a lens to ensure the guidance provided is appropriate for both Strata and Torrens Titled medium density developments.
- A medium density definition should be developed and added to the Tasmanian Planning Scheme.
- While the scope of universal design principles can include more than dwelling accessibility, such as the needs of families of young children with prams, it is recommended that 'universal design' is replaced with 'livable housing design' (noting the spelling used for the Guidelines) for consistency with language used in other legislation and regulations.
- The Livable Housing Design Guidelines are referred to on page 35 in a suggestive tone. Given the National Construction Code will soon require dwellings in Tasmania to meet the minimum Silver Livable Housing Design Standards, the framing should be changed to reflect this. Further, the adoption of these requirements may have implications for aspects of the Medium Density Design Guidelines, such as communal areas, and the document should be reviewed with this lens.
- The guidelines' scope is limited to development outcomes at the neighbourhood, streetscape and site scale. Multi-residential development at the dwelling level requires different design strategies than single residential development and, if not part of the scope, the implications of site decisions could either guide or articulate considerations that should be made for the design of elements for individual dwellings.



05 September, 2024

To whom it may concern,

Thank you for the opportunity to comment on the draft *Medium Density Design Guidelines*.

YIMBY Hobart was established to advocate for:

1. **Housing abundance:** More housing of all types where people want to live.
2. **A city for people at all ages and stages, of all means and abilities:** Our city and suburbs should reflect the diversity of the community as a whole.
3. **Better access for everyone:** Being an active participant in our city should not rely on owning a car.

We share the Department's desire to see high-quality medium-density development in our cities. Though delivering this outcome is a noble goal, we question if specific design Guidelines are necessary to deliver this result. More importantly, we are concerned the Guidelines could create further barriers to medium-density housing development, particularly public and social housing.

Though the Guidelines make much of the need to ensure "appropriate" medium-density development incorporating "good design" principles, the specific problem they are meant to resolve is not clearly stated in the document. We do not accept there is a significant issue of inappropriate medium-density development that requires specific Guidelines be developed. The specter of "inappropriate" medium-density residential development is, more often than not, a furphy employed by those opposed to all forms of densification in existing neighbourhoods.

In addition, given their lack of statutory weight, we are concerned the Guidelines will strengthen the arm of those opposed to medium-density developments, while providing no cover for proponents. We do not need to look far for an example of non-statutory guidelines being used to campaign against otherwise compliant developments; the results of Hobart City Council's Building Height Standards Review, though not adopted, are regularly wheeled out by opponents of inner-city development. Meanwhile, were a developer to deliver on the Guidelines to the last letter, their efforts would provide no statutory guarantee of approval. We believe these parallel risks are particularly pertinent

for public and social housing proposals, which attract more regular and concerted opposition than private housing developments.

Given these concerns, we encourage the Department to reconsider the need for the Medium Density Design Guidelines. If the decision is made to proceed with the Guidelines, we would like to see:

1. A clearer analysis of the specific issue the Guidelines are designed to resolve. The bar for imposing quasi-regulation on urgently needed medium-density development should be high; we expect the Guidelines' problem definition to reflect this.
2. Evidence of meaningful consultation with industry and more emphasis on ensuring the Guidelines encourage increased medium-density development.
3. More explicit wording throughout making it clear the Guidelines are not a statutory document and should not be read or used as such.
4. More discussion of, and emphasis on, the importance of diverse neighborhoods which include public and social housing, to ensure the Guidelines are not used as a tool by opponents of these developments.

Thank you again for the opportunity to provide feedback on the Guidelines. We will follow subsequent developments with interest.

Regards,

Lachlan Rule & Susan Wallace
YIMBY Hobart.



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05 September 2024

Tasmanian Government
Department of State Growth

HIA Submission in response to the Medium Density Design Guidelines

Thank you for the opportunity to provide comment in response to the Draft Medium Density Design Guidelines, July 2024.

HIA welcomes consultation with the residential construction industry on these important planning matters that if implemented correctly, can help support the development of new housing through streamlined approval processes and reduction of red tape in the planning system.

About the Housing Industry Association (HIA)

The HIA is Australia's only national industry association representing the interests of the residential building industry, including new home builders, renovators, trade contractors, land developers, related building professionals, and suppliers and manufacturers of building products.

As the voice of the residential building industry, HIA represents a membership of 60,000 across Australia. HIA members are involved in land development, detached home building, home renovations, low & medium-density housing, high-rise apartment buildings and building product manufacturing.

HIA members are comprised of a mix of residential builders, including the Housing 100 volume builders, small to medium builders and renovators, residential developers, trade contractors, major building product manufacturers and suppliers and consultants to the industry. HIA members construct over 85 per cent of the nation's new building stock.

Introduction

It is understood by HIA the Medium Density Design Guidelines (guidelines) are intended to be a non-statutory document developed as part of the implementation of the Greater Hobart Plan.

HIA queries whether the guidelines non-statutory status is appropriate.

Having non-statutory status has potential to cause confusion and uncertainty among stakeholders. Certainty in design documents can help contribute towards streamlined planning assessments and decision making. HIA submits further industry consultation specifically

regarding this matter is required – not left open to subjective interpretation. Conversely, the objective and purpose of the guidelines must be developed and included at the front end of the document.

It is further submitted that typically, planning design documents are most beneficial to industry when they extend beyond guidelines and developed as documents that allow code assessments of proposals to be undertaken. It is acknowledged with code assess planning tools there is a balance to be achieved with the level of prescription versus design flexibility. Often this balance can be achieved using design options based on typical site conditions such as slope, corner sites etc. Given the topic and content is intended for a variety of industry stakeholders it is important such documents provide certainty for all industry stakeholders.

It is, therefore, important that code assess planning tools adequately provide alternate design solutions to be implemented by the designer / applicant in instances where full compliance cannot be achieved, or full compliance is not practical or logical. However, streamlining the approval process must remain a key tenet of any design document to ensure a designer / applicant utilising alternative design solutions does not trigger protracted assessment timeframes.

HIA maintains that to enable Tasmania to meet its housing delivery targets in accordance with the National Housing Accord and the State Housing Strategy, a primary objective of any design document must be to facilitate development of lots / housing in well located areas to their best and highest use. This is discussed further in **Appendix A**, along with general commentary regarding the Context Analysis and Design Elements.

HIA also remains concerned with the time-frame for implementation of these guidelines. With a clear need and urgency to upscale and increase housing density, any delays in producing guidelines that support this type of development will have an adverse impact on housing supply and government targets. In the interim a Ministerial Planning Directive that allows for medium density in certain zones or local precincts would be welcomed by industry.

Thank you for the opportunity to provide comment at this initial stage. HIA would appreciate being consulted regarding any further matters relating to the guidelines.

Please do not hesitate to contact us if you wish to discuss matters raised in this correspondence – Mike Hermon HIA Executive Director - Planning & Environment [REDACTED]
[REDACTED] or Stuart Collins [REDACTED]

Yours sincerely
HOUSING INDUSTRY ASSOCIATION LIMITED



Stuart Collins
Executive Director
Tasmania

APPENDIX A.

Context analysis

The Neighbourhood Context Plan example (page 13) shows a 400m radius walking distance.

HIA submit this radius is excessive to determine what is the neighbourhood context. Variances in site features that define the neighbourhood context, including garden and landscaping, front boundary treatments, building typology, setbacks, plot ratios, materials and rooflines vary significantly over this area and may cause discrepancies over what defines neighbourhood context. A more curtailed area to be considered as the Neighbourhood Context would be between a 200-250m radius

The guidelines must be clear in explaining the inclusions of a Neighbourhood Context Plan, but also the exclusions, such as detailed site features and the different purposes between a Neighbourhood Context Plan and a Streetscape Context Plan.

Metrics and scale for the Streetscape Context Plan must also be clearly outlined. HIA submit six properties either side and opposite (front and rear) the subject site is sufficient to define the streetscape context. If there is a change in street direction / orientation, designer discretion is to be applied and can be explained with annotations to the plan.

It would be appropriate as part of the Context analysis to initiate a discussion as to the scope for alternative design solutions that could be considered where particular Design elements could not be satisfied for example due to onsite constraints and or neighbouring site conditions.

Design elements

Most of the Design Elements do not outline or discuss metrics in relation to design requirements.

It is not clear to HIA whether this is a deliberate omission whilst the guidelines are in draft form or whether it is deliberate given the guidelines are intended to be non-statutory.

Whilst the Design Prompts at the beginning of the section are useful, these in the absence of metrics in relation to design requirements may not facilitate and advance the delivery of medium density development beyond that provided by the current planning tools.

HIA submit the guidelines could be improved in the following manner:

- The site - By discussing benefits able to be achieved should site considerations, such as site layout, site structure and streetscape were considered in a more integrated fashion. At present they are discussed in a very singular manner which may limit their potential to achieve the sites maximum development potential.

- The building – Some aspects discussed in this section have the potential to overlap with and create regulatory duplication of building approval requirements. Identifying these potential overlaps would assist in reducing regulatory duplication and help streamline approval assessment and determination timeframes and cost.
- The environment – Some of these measures concentrate on what should or can be achieved in the public domain. As these issues are much broader than just a particular site these elements would benefit from allowing applicants to identify and discuss what is occurring nearby in the public domain. Rather than creating site development constraints where medium density is being encouraged, this would enable the applicant to justify why for example deep soil zones on a particular lot is not feasible.

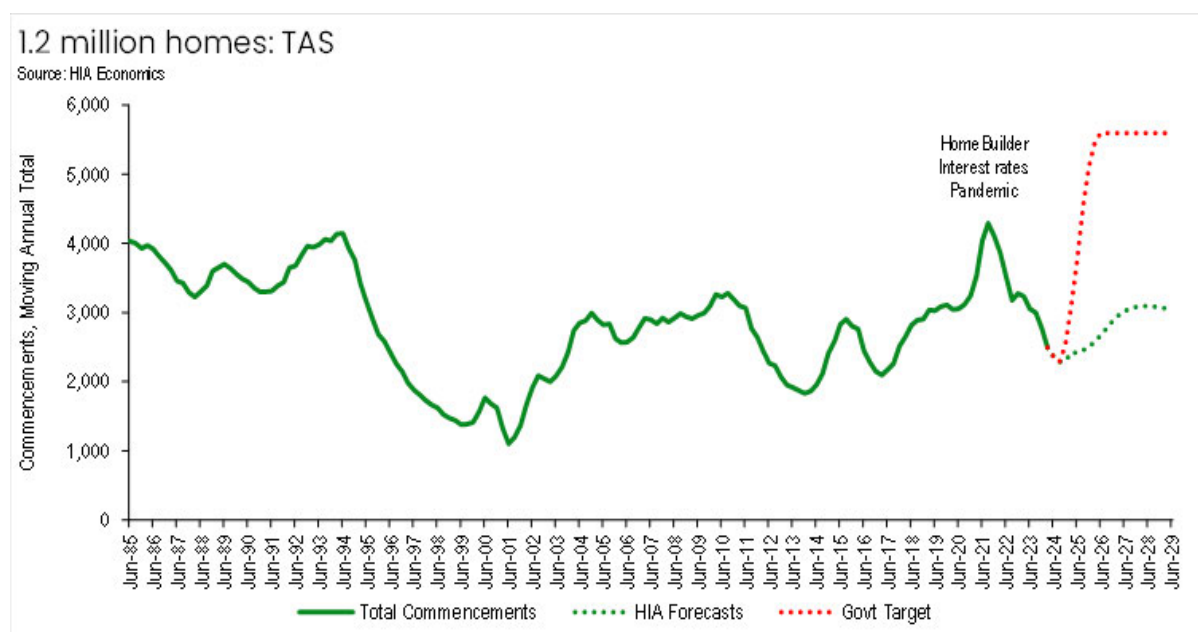
In environments where medium density is being encouraged thought must be given to the development constraint that would be caused should large and medium trees requiring significant amounts of deep soil areas be a development approval requirement. Such requirements can lead to a significant decrease in dwelling yield per site.

Notwithstanding the many benefits of large and medium trees it must be recognised these are better located in the public domains such as parks and linear corridors (ie. roadsides, nature, drainage reserves etc.). Landscape design, integrated with water sensitive urban design and the provision of private and communal open space, is now sufficiently advanced that a range of matters including onsite amenity and climate resilience can be achieved using small trees and other landscape features.

- The services – Commentary around site services is eminently sensible with much already being guided by engineering requirements and Australian Standards. It is recommended these requirements and standards be identified and referenced in the document to ensure the wheel is not being reinvented and there is a degree of consistency among all medium density developments.

National Housing Accord

To meet its housing delivery targets in accordance with the National Housing Accord (NHA), Tasmania will be required to construct 26,117 well located homes over 5 years from mid-2024 (5,223 annually). To put this in comparison, the volume of housing delivered over the previous 5-year period (2019-2023) Tasmania built 16,483 homes. This is 9,634 homes short of that required. Refer Graph 1.1 below.



Graph 1.1 – Tasmania's share of 1.2 million home over 5 years starting mid 2024 compared with previous years

For this target to be achieved it is imperative a range of planning reforms are implemented that facilitate development opportunities. This can only be achieved with genuine planning reform, in accordance with that committed to by states and territory governments to support deliver of the 1.2 million homes target:

- undertaking expedited zoning, planning and land release to deliver on the housing target.
- working with Local Governments to deliver planning and land-use reforms that will make housing supply more responsive to demand over time ensuring achievement of targets for social and affordable housing are met.

The primary objective of the guidelines must be to ensure development is facilitated and provides certainty for industry; by reducing red tape, streamlining approval systems and timeframes and eliminating regulatory duplication, particularly in the form of duplicative requirements with the building approvals system.

We note and generally support the revisions, specifically the addition of standards for multiple dwellings and increased residential use options in the low density residential zone.

We also suggest that a hybrid of the low density residential zone is required for locations such as Whitemark and Lady Barron where urban residential zones were previously used that became prohibited under the Tasmanian Planning Scheme through the mandated servicing requirements.

6 September 2024

Department of State Growth

contact@greaterhobart.tas.gov.au

To Whom It May Concern

Medium Density Design Guidelines

Thank you for the opportunity to provide feedback on the Medium Density Design Guidelines.

Council acknowledges the positive intent behind the Guidelines, particularly the focus on design, landscaping, communal open spaces, and the potential for incorporating a mix of housing within medium density typologies.

Council strongly believes that to achieve the desired outcomes, stronger controls within the planning scheme are necessary. From our experience, guidelines such as these can effectively demonstrate best practices to the public, yet they often lack the legislative authority necessary to ensure compliance with these standards. This gap can lead to suboptimal outcomes for residents, the community, and the Council.

While the controls outlined in the 'Improving Residential Standards' document represent a positive step toward enhancing housing outcomes, it is crucial that these standards are implemented into the Planning Scheme. This integration is essential to ensure that the quality outcomes envisioned in the Guidelines are realised in developments across Tasmania.

Council will provide a separate submission on the 'Improving Residential Standards' document and will address the proposed standards in greater detail.

We support the development and release of these Guidelines and with the incorporation of additional residential standards into the planning scheme, the document can serve as a framework for achieving positive outcomes in medium density developments.

Yours sincerely



Chelsea van Riet

General Manager Community and Place

We support the guidelines and provide the following feedback for consideration:

The Climate Resilience section should also refer to the Risk Ready section of the Tas Alerts website, which provides an easy way to access a wider range of State-based data.

The design guide includes 3-6 storey buildings in which storage for personal items and waste can become an issue. More could be included on additional storage requirements for dwellings, cubic rather than square metres may be a better metric.

Also, the waste section is very small and has no discussion as to the number and size of bins and storage locations. This becomes a bigger issue the bigger the building or number of units. Discussion around central storage areas with shared bins would be useful. While these are not necessarily a GSB issue, they can become an issue for servicing larger multi-dwelling developments comprising of various dwelling forms.



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Friday 6 September 2024

Department of State Growth
Tasmanian Government

Submitted online at: <https://engage.stategrowth.tas.gov.au/medium-density-design-guidelines>

Re: Medium Density Design Guidelines

To whom this may concern,

The Tasmanian Chapter of the Australian Institute of Architects (the Institute) would like to thank the Tasmanian Government for the opportunity to provide feedback on the draft Medium Density Design Guidelines (guidelines). The Institute has long advocated for guidelines and is supportive of them.

The Institute would like to commend the process that has led to the development of the guidelines, and is pleased to see that skilled professionals, including architects, urban designers, landscape architects and planners, were part of the consultant team, led by ERA Planning & Environment.

The Institute applauds the Tasmanian Government for encouraging well designed medium density development in our existing built-up areas. Our cities and towns must plan for the future in a way that is well considered, strategically planned, and focuses on the value of good design and the benefits it affords the community in both the short- and long-term. The Institute encourages densification in appropriate locations, with well designed and built solutions.

While this document, in its current form, is non-statutory, and aspirational in nature, the Institute understands that the guidelines are proposed to work with parts of the recommendations outlined in the 'Improving residential standards in Tasmania – Draft report' that is currently out for consultation. The Institute's members would like to see these type of guidelines introduced in a more statutory manner, and to be used by all relevant councils across Tasmania. The Institute also notes that council and assessment bodies require the relevant skills and education to enact and implement the adherence to these guidelines, and this will require commitment from the Government to provide the necessary training and upskilling. This could also take the form of a design review panel, similar to the City of Hobart's Urban Design Advisory Panel, but with broader functions.

The Institute notes that there is currently no consideration of First Nations perspectives within the guidelines and recommends that design for Country is an essential addition to the document. The

Institute's goal is to empower architects to create spaces and buildings that respect and celebrate the cultural significance of First Nations peoples¹.

In consulting with Institute members who have worked with various proponents, feedback has been received about the feasibility of medium density residential development. The Chapter has heard of instances where private proponents have sought to create medium density developments, but under the current planning scheme, have found that these developments aren't financially viable, due to the constraints of the site yield, due to setbacks and height limits.

The Institute suggests there should be incentives to encourage high-quality private development in the right locations. This could take the form of increased height, reduced development application fees, fast track approvals etc, in return for high-quality design that provides community benefit. For example, the creation of open usable public space is to be lauded at ground level, but certain sites would preclude this due to the scale or shape of the site, unless permission were to be given to go a little higher. A proponent should be able to negotiate for a "rule" breaking component by offering another community beneficial aspect that somehow "pays" for the development. The Institute suggests that (while perhaps outside the remit of the guidelines) there should be some form of methodology for this kind of negotiation to allow for projects that don't specifically comply with the planning rules, to allow for benefits for both the neighbourhood and its people, and the site. Clever, well thought-out, and designed opportunities that give back to the neighbourhood and the public, have the potential to create a positive impact. These types of negotiations require a high-level of design intelligence to assess and would benefit from the assistance of a design assessment panel.

In the Tasmanian context, single residential sites are often densified by strata-titling a block of land and building one or more additional dwellings either in front or behind the existing house, which often results in less-than-ideal outcomes. While the guide includes 'grouped housing' as part of its remit, it would be good to include more specific references to this typology of housing to ensure that these types of developments are well designed, as they seem to be an 'accepted' form of increasing density in many urban and suburban areas in Tasmania. It would also be useful for the plan to include consideration of courtyard models of medium-density housing, which are used around the world, are space-efficient and allow for outdoor amenity in the middle of the property. Some existing planning controls in relation to setbacks preclude this type of development.

The Institute commends the inclusion of the example projects within the documents, but notes that they are mostly Melbourne-based examples. The Institute suggests that in encouraging good design, there could be scope to include best-practice examples from across the world, along with floor plan examples. While there are some inclusions of examples within Hobart (and understandably there are not many examples within Tasmania to include), it would be good for the guide to have scope to add local case studies as they are developed and lived in.

The Institute has an Affordable Housing Policy², along with a Multi-Residential Standards Policy³, that encourage outcomes that provide high quality living spaces for residents and excellent public amenity.

The Tasmanian Chapter has consulted with our membership and have reviewed the relevant documents and has the following comments.

¹ The Institute has a First Nations Resource Hub that can be found here: <https://www.architecture.com.au/advocacy-news/policy/first-nations-resource-hub>

² <https://www.architecture.com.au/wp-content/uploads/Affordable-Housing-Policy.pdf>

³ <https://www.architecture.com.au/wp-content/uploads/Multi-Residential-Standards-Policy.pdf>

Specific Responses

The Institute has reviewed the document and has the following suggestions relating to specific pages and content.

Introduction – page 6

Under the dot-point ‘promote designs that respond to the natural and built features of the area...’, the Institute suggests making reference also to the site history and existing site conditions.

The Institute suggests that under the dot-point ‘Improve liveability by designing for’, the note about ‘appropriate vehicle access and parking options’ should include reference to the encouragement of other forms of transport, including active modes of transport.

How to use the guidelines – page 7

Under the dot point noting that the guidelines are for the community, the Institute suggests adding ‘understand’ to the sentence: ‘...to better understand and communicate the design expectations...’

What is medium density housing? – page 8

The Institute suggests that in the fourth paragraph, there should be reference to not only the impact on our natural areas, but our agricultural areas: ‘...and impact our natural and agricultural areas.’

What is good design? – page 9

The Institute is pleased that good design has been defined. Under the dot-point about ‘Improving environmental outcomes...’ the Institute suggests that this could extend to referencing Indigenous ecosystems, corridors and nodes (IEC+N)⁴. The Institute also suggests that there could be a reference to healthy buildings and cities.

Context analysis – page 10

The Institute recommends that in the final paragraph, architects are included in the list of experts that includes ‘landscape architects, sustainability specialists, and arborists’.

Streetscape – page 14

The ‘Context Queries’ that lists ‘How do vehicles, pedestrians, cyclists...’, should include people with mobility issues and mobility aides.

Streetscape analysis should also consider how Indigenous fauna navigates the site and surrounds, and include the incorporation of DarkSky⁵ appropriate lighting.

Design elements – page 18 & 19

As ‘Design elements’ has been identified as a ‘chapter’, with four sections (in the opening text), each of the four sections below should have the references to ‘chapter’ changed to ‘section’.

The Institute suggests that the environment section makes reference to IEC+N.

Site structure: sloping sites – page 25

⁴ 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

⁵ Find out more about DarkSky lighting here: <https://darksky.org/what-we-do/darksky-approved/>

The Institute suggests that the design response should consider the pedestrian entry, allowing for those with mobility issues, particularly given the upcoming changes to the NCC and the incorporation of the Liveable Housing Design Standards⁶.

The building: Design prompts – page 28

The Institute suggests that a reference to sustainability be included in the Design Prompts on this page. Universal design principles, as mentioned in the design prompts, should have a definition included within the glossary. Also to note is the inclusion of Livable Housing Design Standards in the NCC⁷ (rather than the Livable Housing Design Guidelines that is linked to within the document). This is also the case in the linked reference under 'Universal Design' on page 35.

Dwelling design – page 31

The Institute questions the usefulness of the example dwelling layout diagram that is included on this page. There is a danger that developers could use this at face-value, without consideration of the context and how the connection between the internal spaces work with the overall building layout, its site and broader context.

Room ventilation – page 38

The figures illustrating ventilation within rooms should have a reference as to what is a 'good' level of ventilation – i.e., a single window opening doesn't provide much ventilation in reality, and best practice is to have cross-flow ventilation – so the illustrations and associated text should convey this.

Balconies and courtyards – page 46

The Institute notes that in some instances, the provision of outdoor space for individual residences may be provided in alternate ways, for example, via a communal laundry, communal garden, or communal outdoor eating and bbq areas, which may result in the size of balconies differing from those outlined in the guidelines.

The environment – page 40

The Institute suggests that reference to DarkSky appropriate lighting and IEC+N should be considered within the design prompts.

Landscaping – page 42

The Institute suggests that the landscaping section could include reference to providing productive garden areas for residents, and also suggests that there be consideration of the inclusion of indigenous and endemic plant species.

Parking and access: bicycle parking – page 52

The design response that ensures that 'bikes and cars can move safely and independently' should also ensure that pedestrian accessing the bikes can make their way to and from them safely.

Site services: dwelling storage – page 56

The figures illustrating the areas for storage should be expressed in volume (m³) rather than in area (m²) and could also be expressed as a minimum amount.

Overall

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

⁷ <https://ncc.abcb.gov.au/resource/standard/livable-housing-design-standard>

Diagrams that are included within the document should state whether they are a plan, elevation or section, so that this is clear to the reader who may be less familiar with these drawing conventions (this includes the diagrams on p. 23 (fig. 4), p. 25 (fig. 5), p. 38 (fig. 8 and 9).

Ultimately, our cities require high quality designed outcomes that incorporate innovative design responses. The quality of design affects how places and people function, is able to stimulate the economy, enhance the environment and improve wellbeing for all. Good design adds value for all people and can play a transformative role in the lives of every person.

The Institute commends the development of the Medium Density Design Guidelines and looks forward to seeing them finalised. 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

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Being a non statutory document the guidelines for Hobart can only be a wish list and a feel good document for those who have compiled it but in reality it is not capable of creating positive change.

The only winner will be developers who will be able to increase profits by construction of more dwellings on sites. What is needed is more powerful and influential structures and rules making it statutory for developers to impose better design, positively improve local neighbourhoods by creating positive liveable spaces where everyone is a winner. The developer makes money, the community grows and develops positive liveable environments and social interaction and social connectivity between all members of the community are supported by designed spaces linked to shared amenities.

Suggesting neighbourhood analysis of existing needs/service is highly desirable and again should be mandatory, not just as a 'nice idea'.

So often medium density housing is developed into an existing single house developed pattern and does not respond to context and has a negative impact on neighbours visually, physically and environmentally.

The document is a series of motherhood statements, correct as they are they need real consideration and statutory support ensuring positive change and positive outcomes for all in the future otherwise poor cheap outcomes will prevail.

I have attached some images to show how a neighbourhood was negatively impacted by medium density housing that totally removed neighbours amenity, impacted negatively on the local environment and paid no attention to the existing site and impact of scale to neighbours. It resembles a fish factory from Lochner St.

Medium Density Housing failure in West Hobart



View from Lochner St West Hobart



Introduction

The State Government is conducting concurrent reviews of related planning matters: The Improving residential standards in Tasmania, Draft Report, and the Medium Density Design Guidelines, Draft, Jul 2024.

Seeing as they're so closely related, I've decided to address both documents in a single response. Part A is focussed on the Residential Development Standards, and Part B is focused on the Medium Density Development Guidelines. I also added a third part, dealing with some problematic sections of the Tasmanian Planning Policies, because they carry-over into the Medium Density Design Guidelines.

- Part B specifically addresses the Greater Hobart Committee's July 2024 Draft Medium Density Design Guidelines.
- And Part C contains my response to certain sections of the Draft Tasmanian Planning Policies (TPPs).

Part A: My submission to the State Planning Office's *review of Tasmania's residential use and development standards within the State Planning Provisions (SPPs)*.

Primary resources:

- Feature Document: *Improving residential standards in Tasmania, Draft Report*.¹
- Improving Residential Standards in Tasmania, project - homepage.²
- Improving Residential Standards in Tasmania, project - online presentation.³
- Improving residential standards in Tasmania, project overview.⁴
- Improving residential standards in Tasmania, subdivision standards.⁵
- Improving residential standards in Tasmania, development standards.⁶
- Improving residential standards in Tasmania, implementation framework.⁷
- Tasmanian Planning Scheme, State Planning Provisions.⁸
- Enquiries: stateplanning@dpac.tas.gov.au
- Submissions: yoursay.planning@dpac.tas.gov.au

This section starts with general comments on the social and economic context in which the Planning Scheme operates, drawing on evidence from a wide variety of sources to argue the case for a radical shift in Planning Scheme priorities. It

¹ *Improving residential standards in Tasmania, Draft Report*, ERA Planning and Environment, 15 Jul 2024, commissioned by the State Planning Office, https://www.stateplanning.tas.gov.au/_data/assets/pdf_file/0028/367444/Improving-residential-standards-in-Tasmania-Draft-recommendations-report-15-~-final-16-July-2024.PDF, accessed 6 Sep 2024.

² *Improving Residential Standards in Tasmania, project - homepage*, State Planning Office, <https://www.stateplanning.tas.gov.au/have-your-say/consultations/state-planning-provisions-amendments/state-planning-provisions-review-project-a#Lifecycle>, accessed 6 Sep 2024.

³ *Improving Residential Standards in Tasmania, project - online presentation*, State Planning Office, <https://vimeo.com/997573039/edcba853bd>, accessed 6 Sep 2024.

⁴ *Improving residential standards in Tasmania, project overview*, State Planning Office, https://www.stateplanning.tas.gov.au/_data/assets/pdf_file/0028/368326/Engagement-Factsheet-No-1-Project-Overview-V22-final-16-July-2024.PDF, accessed 6 Sep 2024.

⁵ *Improving residential standards in Tasmania, subdivision standards*, State Planning Office, https://www.stateplanning.tas.gov.au/_data/assets/pdf_file/0030/368328/Engagement-Factsheet-No-2-Subdivision-V22-final-16-July-2024.PDF, accessed 6 Sep 2024.

⁶ *Improving residential standards in Tasmania, development standards*, State Planning Office, https://www.stateplanning.tas.gov.au/_data/assets/pdf_file/0023/368330/Engagement-Factsheet-No-3-Development-V22-final-16-July-2024.PDF, accessed 6 Sep 2024.

⁷ *Improving residential standards in Tasmania, implementation framework*, State Planning Office, https://www.stateplanning.tas.gov.au/_data/assets/pdf_file/0024/368331/Engagement-Factsheet-No-4-Implementation-V22-final-16-July-2024.PDF, accessed 6 Sep 2024.

⁸ Tasmanian Planning Scheme, State Planning Provisions, Tasmanian Planning Commission, https://www.planning.tas.gov.au/_data/assets/pdf_file/0011/711002/Tasmanian-Planning-Scheme-State-Planning-Provisions-effective-26-June-2024.PDF, accessed 6 Sep 2024.

then addresses each of the State Planning Scheme provisions, specifically the objectives, and makes recommendations on each one. It was originally written as a review of the Hobart Interim Planning Scheme's Residential Development Standards, for a TAFE building design/drafting course assignment, so I apologise if it's overly Hobart-oriented.



*'If the supply of new rental dwellings can outpace current demand growth, the rental vacancy rate will increase and there will be an easing of weekly rental payment growth.'*¹⁰

*'Changes to land use regulation such as zoning and planning schemes were seen as critical mechanisms for affecting change in addressing a lack of affordable and social housing, and subsequent homelessness.'*¹¹

A shortage of housing stock has made it difficult for many people to find an affordable property to buy or rent. The average rental vacancy rate in Australia from 2011 to 2023 was 3%.¹² Hobart's rental vacancy rate was estimated to be 1.5% in June 2024,¹³ and Australia-wide it was 1.3%.¹⁴ Facilitating the construction of sufficient housing stock to get Hobart's rental vacancy rate back in line with Australia's historical average rental vacancy rate of 3% should be the primary objective of planning reform. According to my calculations, which are discussed in the following footnote,¹⁵ to achieve a rental vacancy of 3%, the four councils that are the subject of the 30-Year Greater Hobart Plan (Hobart, Glenorchy, Clarence and Kingborough) need roughly 1,378 more dwellings in addition to those that will be needed due to population growth. The 30-Year Greater Hobart Plan estimated that we will need 30,000 new homes in the next 30 years, but it didn't acknowledge the substantial backlog of housing demand.¹⁶ And if we meet this need for more housing, as we should, then population growth will likely exceed forecasts, particularly while the rest of Australia continues to experience a housing shortage.

According to CoreLogic's August 2024 property report, rent increased by 7.8% in Australia in the 12 months to July, while it increased by 3.1% in Hobart.¹⁷ In the same period, dwelling prices fell by 1.2% in Hobart overall, however, the dip in price

⁹ Images left to right: <https://commons.wikimedia.org/wiki/File:Autistic-sweetiepie-boy-with-ducksinarow.jpg>; <https://www.change.org/p/hobart-city-council-stop-skyscrapers-in-hobart>; <https://pulsetasmania.com.au/news/single-hobart-mother-fears-shell-be-homeless-hungry-and-living-in-car-with-children/>; <https://www.abc.net.au/news/2018-05-04/homeless-campers-evicted-from-hobart-parliament-house-lawns/9723466>; <https://www.dailymirror.lk/opinion/white-elephants-that-gulp-public-money-editorial/172-27658>; accessed 11 Aug 2024.

¹⁰ *Background Paper 6: Housing and Affordability*, Greater Hobart Committee, https://www.greaterhobart.tas.gov.au/_data/assets/pdf_file/0019/283015/Background_Paper_-_6._Housing_and_Affordability_as_at_Mar_2021.PDF, accessed 4 Aug 2024.

¹¹ *Affordable Housing and Homelessness Commitment 2021–23*, p.8, City of Hobart, <https://www.hobartcity.com.au/files/assets/public/v/2/council/strategies-and-plans/affordable-housing-and-homelessness-commitment-2021-23.pdf>, accessed 31 Jul 2024.

¹² *Statement 4: Meeting Australia's Housing Challenge*, Budget Paper No. 1, 2024–25, https://budget.gov.au/content/bp1/download/bp1_bs-4.pdf, accessed 4 Aug 2024.

¹³ *Residential Vacancy Rates, Hobart*, SQM Research, https://sqmresearch.com.au/graph_vacancy.php?region=tas-Hobart&type=c, accessed 4 Aug 2024.

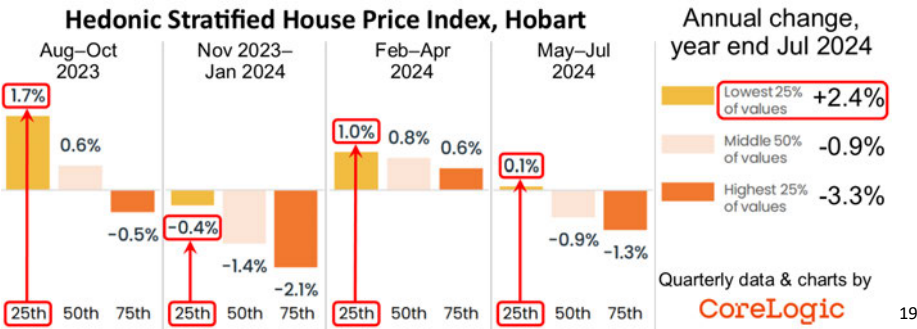
¹⁴ *Residential Vacancy Rates, National*, SQM Research, https://sqmresearch.com.au/graph_vacancy.php?national, accessed 11 Aug 2024.

¹⁵ These figures as calculated as 1.5% of the estimated current number of dwellings. The 1.5% figure comes from deducting Hobart's current estimated vacancy rate of 1.5% from the 3% historical average national vacancy rate. I base my calculation on the total number of dwellings rather than the number of rental properties because there's no reason to believe the proportion of rentals and owner-occupied properties would change substantially if more dwellings were constructed. Source data: <https://www.greaterhobart.tas.gov.au/30-year-greater-hobart-plan>; <https://www.abs.gov.au/statistics/economy/price-indexes-and-inflation/total-value-dwellings/mar-quarter-2024/643201.xlsx>; <https://www.abs.gov.au/census/find-census-data/quickstats/2021/6GHOB>; <https://www.abs.gov.au/census/find-census-data/quickstats/2021/6>; and https://sqmresearch.com.au/graph_vacancy.php?region=tas-Hobart&type=c, accessed 4 Aug 2024.

¹⁶ *30-Year Greater Hobart Plan*, Greater Hobart Committee, <https://www.greaterhobart.tas.gov.au/30-year-greater-hobart-plan>, accessed 4 Aug 2024.

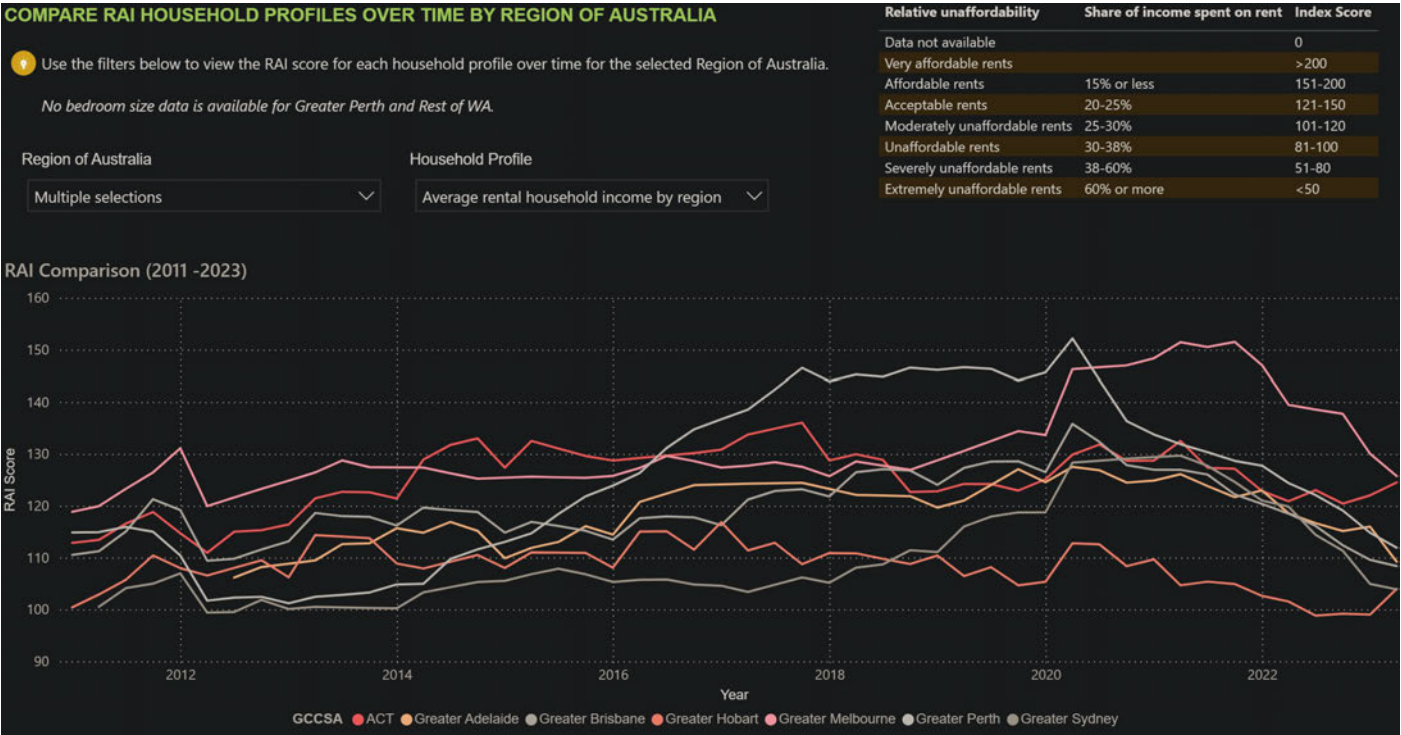
¹⁷ *Monthly Housing Chart Pack, August 2024*, p.27, CoreLogic, https://content.corelogic.com.au/l/994732/2024-08-07/21m1sv/994732/1723026908koqEMAAAn/202408_monthly_chart_pack_2.pdf, accessed 11 Aug 2024.

was entirely in the mid-to-upper price bracket.¹⁸ The most affordable houses (the lowest quarter or 25th percentile price) increased by 2.4% in Hobart in the 12 months to July 2024, although most of that increase was in the first quarter.



SGS Economics & Planning produce a capital-city rental affordability index, and Greater Hobart has been at the bottom of the list for affordability for the average rental household since quarter 4 of 2018, and we only just drew equal-last with Greater Sydney in quarter 2 of 2023. Our Q2 2023 rental affordability index (the latest available from SGS Economics & Planning), was 104, which means the median rental household income in Greater Hobart was 104% of the level deemed necessary to afford the median rent.

RAI = Rental Affordability Index, lower is less affordable; Greater Hobart: ●



There are often no self-contained dwellings available for rent in any capital city in Australia that are deemed affordable for unemployed people, and the dearth of apartments in Greater Hobart accentuates the problem, forcing people into psychologically traumatic sharehouses, where good people are often preyed on by bad people who either dominate or

¹⁸ Ibid, p.5.

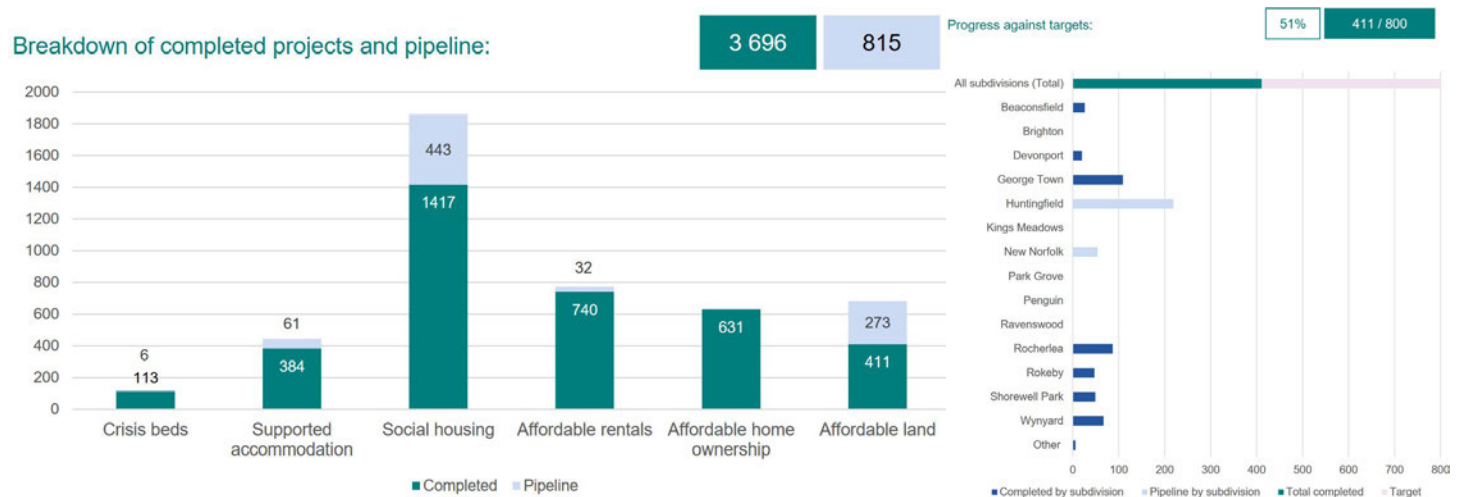
¹⁹ Monthly Housing Chart Pack, p.7, CoreLogic. Aug-Oct 2023: Nov 2023 report, https://www.westpac.com.au/content/dam/public/wbc/images/personal/services/Monthly_chart_pack_Nov.pdf.pdf; Nov 2023-Jan 2024: Feb 2024 report, <https://goodyer.com.au/files/202402-chart-pack.pdf>; Feb-May 2024: May 2024 report, <https://www.mitchellsrealty.com.au/wp-content/uploads/2024/05/Core-Logic-Monthly-Residential-Housing-Pack-May-2024-1.pdf>; May-Jul 2024: Aug 2024 report, https://content.corelogic.com.au/l/994732/2024-08-07/21m1sv/994732/1723026908koqEMAA/202408_monthly_chart_pack_2_.pdf. For an explanation of the index see Hedonic Home Value Index, p.8, CoreLogic, https://www.corelogic.com.au/_data/assets/pdf_file/0028/22969/CoreLogic-HVI-JUN-2024-FINAL.pdf, accessed 11 Aug 2024.

²⁰ Rental Affordability Index: research report, SGS Economics & Planning, <https://sgsep.com.au/projects/rental-affordability-index>, accessed 11 Aug 2024.

harass them, don't clean up after themselves, steal, or leave owing rent or utility debts, or else people are forced to stay with relatives or ex-partners who can be even worse, or they're forced into homelessness.

Our development standards are not delivering and will not deliver the type of housing needed, where it is needed, in anywhere near the volume that's required. Between 2001 and 2021, the proportion of single-person households in Tasmania increased from 26.1% to 29%, while the proportion of dwellings that are apartments fell from 6.9% to 5.3% – the lowest in the country. In May 2024, there was an unmet demand of 4,731 applications for social housing on the Tasmania housing register.²¹

According to the Homes Tasmania Housing Dashboard June 2024, in the year ending Jun-24, there were just 87 lots of land released, 58 additional units of homeless accommodation constructed, and just 59 affordable private rentals constructed.²² The government's new version of the Housing Dashboard from July 2024 onwards doesn't report those figures,²³ but it does report a lot of spin intended to give the false impression that the government is on track to meet its commitment to deliver 10,000 more social and affordable homes by 2032,²⁴ such as counting toward the target 'Affordable land' releases, existing homes acquired by government and community housing organisations, and homes, including existing homes and even existing government or community housing that were sold to people who qualified for the MyHome shared equity program,²⁵ regardless of whether it meets industry standard definitions of affordable (max. 30% of household income according to AHURI).²⁶ And most of the land that was released or is in the pipeline, is well-outside the urban development boundary, and not affordable to many people due to travel costs.



The *30-Year Greater Hobart Plan* made a lot of motherhood statements about densification and infill development, but little has materialised. The council has failed to re-zone significant amounts of land to higher densities.²⁷ The state government has also effectively done nothing to remedy the problem since it created the Inner Residential Zone in 2017, despite numerous reports identifying a need for planning reform to facilitate densification, for example:

²¹ *Improving Residential Standards in Tasmania, Draft Report*, pp.8-9, ERA Planning and Environment, 15 Jul 2024, commissioned by the State Planning Office, https://www.stateplanning.tas.gov.au/data/assets/pdf_file/0028/367444/Improving-residential-standards-in-Tasmania-Draft-recommendations-report-15-final-16-July-2024.PDF, accessed 6 Sep 2024.

²² *Housing Dashboard June 2024*, p.19, Homes Tasmania, https://www.homes Tasmania.com.au/data/assets/pdf_file/0025/280753/Housing-Dashboard-June-2024.pdf, accessed 6 Sep 2024.

²³ *Housing Dashboard July 2024*, Homes Tasmania, https://www.homes Tasmania.com.au/data/assets/pdf_file/0021/281217/Dashboard-July-2024.pdf, accessed 6 Sep 2024.

²⁴ 10,000 Social and Affordable Homes for Tasmanians, Tasmanian Liberals, <https://tas.liberal.org.au/10000-social-and-affordable-homes-tasmanians>, accessed 6 Sep 2024.

²⁵ MyHome shared equity program, Homes Tasmania, <https://www.homes Tasmania.com.au/Buying-a-Home/MyHome>, accessed 6 Sep 2024.

²⁶ What is the difference between social housing and affordable housing - and why do they matter?, Australian Housing and Urban Research Institute, <https://www.ahuri.edu.au/analysis/brief/what-difference-between-social-housing-and-affordable-housing-and-why-do-they-matter>, accessed 6 Sep 2024.

²⁷ The only references to the 'General Residential Zone' in the table of amendments at the start of the *Hobart Interim Planning Scheme 2015*, amended 22 Mar 2024, are for literally a handful of properties, and most of them were rezoned Low Density Residential. *Hobart Interim Planning Scheme 2015*, p.2, Tasmanian Planning Commission, https://www.planning.tas.gov.au/data/assets/pdf_file/0019/712108/Hobart-Interim-Planning-Scheme-2015-22-March-2024.pdf, accessed 5 Aug 2024.

‘Past planning controls... have excluded higher density housing forms... and excluded lower income groups from accessing housing.’²⁸

*‘Feedback from the development sector noted that Tasmania’s planning system can cause **delays, uncertainty** and add **risk** to **infill** projects.’²⁹ (Emphasis added).*

The benefits of infill development resulting in increased residential densities are numerous:

- *More efficient use of physical and transport infrastructure;*
- *Reduced vulnerability to increases in petrol costs and peak oil;*
- *Reduced ecological footprint of urban development and reduction in loss of biodiversity*
- *Increased opportunities for social interaction and reduction in social segregation;*
- *A greater proportion of the population living in proximity to services and employment opportunities;*
- *Increased economic viability of public transport, and subsequent extension thereof;*
- *Better utilisation and revitalisation of other public infrastructure, including parks and open spaces;*
- *Provision of a greater range of housing options to suit the decreasing size of households and ageing population;*
- *Promotion of health and wellbeing by eliminating distance as a barrier to walking and cycling as preferred modes of transport; and*
- *Maximising agglomeration potential of inner cities through intensification of land use.’³⁰*

The State government, via the State Planning Commission, has adopted densification and affordability objectives into the *Southern Tasmania Regional Land Use Strategy 2010-2035*, for example, SRD 2.6 ‘Increase densities to an average of at least 25 dwellings per hectare (net density) within a distance of 400 to 800 metres of Integrated transit corridors...’ and SRD 2.11 ‘Increase the supply of affordable housing.’³¹ Under section 35N(c) of the LUPAA, Local Provisional Schedules must be reviewed for consistency with Regional Land Use Strategies, but these policies within the Regional Land Use Strategy calling for higher densities and more affordable housing have yet to be reflected in the State Planning Provisions / Residential Development Standards, and the City of Hobart hasn’t even adopted the Tasmanian Planning Scheme yet.

It’s obvious to me why planning restrictions increase the cost of housing – things like excessive building offset requirements, bloated heritage & significant tree registers, shadow and privacy restrictions, restrictions on building height (other than due to engineering or geotechnical limits), and ‘acceptable solution’ land density or plot ratio limits (other than due to services capacity limits that can’t be economically overcome), landscaping requirements, etc, etc – but I was surprised to read by how much:

‘Recent estimates from the Reserve Bank of Australia (Kendall and Tulip 2018) suggested that planning and zoning restrictions could contribute two-fifths of the cost of a house in Sydney or Melbourne and nearly a third of the cost in Brisbane.’³²

The City of Hobart advocates for inclusionary zoning,³³ and the *National Planning Reform Blueprint* obliges state governments to ‘consider the phased introduction of inclusionary zoning and planning to support permanent affordable,

²⁸ *Improving Residential Standards in Tasmania, Draft Report*, p.80, ERA Planning and Environment, 15 Jul 2024, commissioned by the State Planning Office, (via AHURI Final Report 349), https://www.stateplanning.tas.gov.au/_data/assets/pdf_file/0028/367444/Improving-residential-standards-in-Tasmania-Draft-recommendations-report-15-final-16-July-2024.PDF, accessed 6 Sep 2024.

²⁹ *Toward Infill Housing Development*, p.24, Prepared for the Tasmanian Department of State Growth, Aug 2019, https://www.stategrowth.tas.gov.au/_data/assets/pdf_file/0019/216172/Toward-Infill-Housing-Development.pdf, accessed 8 Aug 2024.

³⁰ *Southern Tasmania Regional Land Use Strategy 2010-2035*, p.91, Southern Tasmanian Councils Authority, <https://www.stca.tas.gov.au/wp-content/uploads/2023/10/Southern-Tasmania-Regional-Land-Use-Strategy-2010-2035-Effective-17-May-2023.pdf>, accessed 14 Aug 2024.

³¹ *Ibid*, pp.97-99.

³² *Vulnerable Private Renters: Evidence and Options*, p.37, Productivity Commission Research Paper, Sep 2019, <https://www.pc.gov.au/research/completed/renters/private-renters.pdf>, accessed 1 Aug 2024.

³³ *Affordable Housing and Homelessness Commitment 2021–23*, p.15, City of Hobart / Community Input – What we heard, <https://www.hobartcity.com.au/files/assets/public/v/2/council/strategies-and-plans/affordable-housing-and-homelessness-commitment-2021-23.pdf>, accessed 31 Jul 2024.

*social and specialist housing in ways that do not add to construction costs.*³⁴ That last bit is key. If new developments had to subsidise affordable housing, without any assistance from the government, then those who don't qualify for subsidised housing would have to pay more.³⁵

The *July 2024 Improving Residential Standards in Tasmania, Draft Report* claims there's a preference for inclusionary development incentives such as dwelling height and density bonuses, rather than mandatory measures,³⁶ but it's certainly not my preference. If we were to restrict higher-density development to only those developments that include some 'inclusionary' i.e. subsidised dwellings in the development, as is proposed in the draft report, then that would create a strong bias towards lower-density developments that don't require the provision of 'inclusionary' dwellings.

The HIA described inclusionary zoning as 'minuscule and random relief',³⁷ and while I wouldn't put all inclusionary zoning policies in that category, the proposed inclusionary zoning policy certainly fits that description.

There is an economical way to make housing affordable though: Large subsidies for higher-density, affordable housing construction, paired with an easing of development restrictions. South Australia's inclusionary zoning program, which was the most effective in the country, delivering around 17% of total dwellings, did so by offering government subsidies for inclusionary development.³⁸

And of course, *how* affordable housing subsidies are raised matters. It doesn't help those struggling to pay for affordable housing if the subsidies come from regressive taxation like car rego or profits on electricity supply. To be most effective, affordable housing subsidies should mostly come from the wealthy, for example, mansion taxes, holiday home taxes, luxury car registration surcharges, or a reduction in government spending on things that are more of a priority for the wealthy than the poor, such as beautification of public spaces, whiskey distilleries, music festivals, V8 Supercars, the TSO, AFL, a new stadium, private schools, private health, etc, etc.

Taxation of low-density land usage in the 'Densification Areas' (shown below) would also be an economical way of funding affordable housing because it would strengthen the incentive to redevelop low-density land in the densification areas.

The *Southern Tasmania Regional Land Use Strategy 2010-2035* seeks to as much as possible restrict development to the 'Urban Growth Boundary' (shown below). In my opinion, until the current housing affordability crisis has passed, this objective should be set aside.

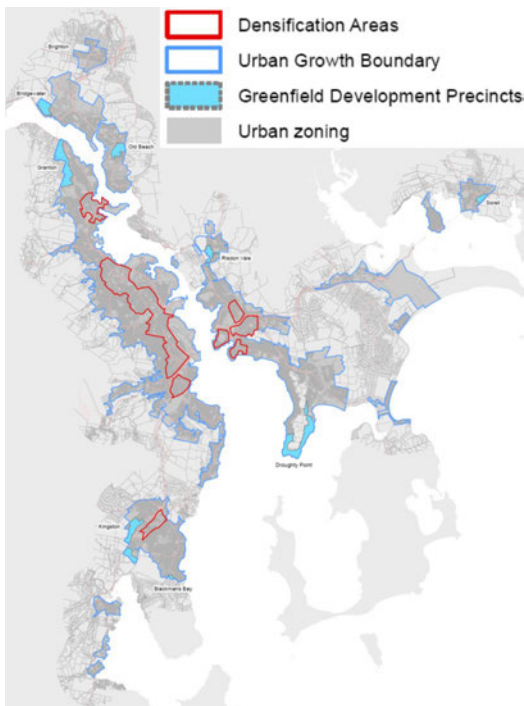
³⁴ *Working together to deliver better housing outcomes*, Media release, Meeting of National Cabinet, PM Anthony Albanese, 16 Aug 2023, <https://www.pm.gov.au/media/meeting-national-cabinet-working-together-deliver-better-housing-outcomes#a1>, accessed 4 Aug 2024.

³⁵ *Vulnerable Private Renters: Evidence and Options*, Productivity Commission Research Paper, Sep 2019, pp.36-38, <https://www.pc.gov.au/research/completed/renters/private-renters.pdf>, accessed 31 Jul 2024.

³⁶ *Improving Residential Standards in Tasmania, Draft Report*, p.80, ERA Planning and Environment, 15 Jul 2024, commissioned by the State Planning Office, https://www.stateplanning.tas.gov.au/_data/assets/pdf_file/0028/367444/Improving-residential-standards-in-Tasmania-Draft-recommendations-report-15~final-16-July-2024.PDF, accessed 6 Sep 2024.

³⁷ *Inclusionary Zoning in Australia: Can it encourage supply of affordable housing across the spectrum of community need? Literature Review*, p.14, Planning and Urban Policy Branch, ACT Government, Nov 2022, https://www.environment.act.gov.au/_data/assets/pdf_file/0007/2435218/24_017238-Documents-Part-1-1-2.pdf, accessed 1 Aug 2024.

³⁸ *Improving Residential Standards in Tasmania, Draft Report*, p.80, ERA Planning and Environment, 15 Jul 2024, commissioned by the State Planning Office, (via AHURI Final Report 297), https://www.stateplanning.tas.gov.au/_data/assets/pdf_file/0028/367444/Improving-residential-standards-in-Tasmania-Draft-recommendations-report-15~final-16-July-2024.PDF, accessed 6 Sep 2024.



39

According to the City of Hobart's *Action on Homelessness* page, 'Housing stress in Hobart is caused by many factors, including population growth, the rise of the sharing economy and increased demand for student accommodation.'⁴⁰ Unfortunately planning doesn't rate a mention. They're implying that it's someone else's problem or that they don't have the power to fix it, when in fact, it is their problem, and they do have the power to fix it, via planning reform.

The City of Hobart continues to advocate for the restriction of Airbnb, and last year they implemented a tax on short-stay accommodation.⁴¹ The rapid growth of short-stay accommodation in the Greater Hobart area is widely seen as a significant contributor to the housing crisis.⁴² However, the number of rental properties that have been converted to short-stay accommodation in Hobart is dwarfed by the number of dwellings *not built* due to planning restrictions. In 2016, the number of residences in Inner Hobart was 23,737 while in 2021 it was 24,795, an increase of just 4.5%. Contrast that with Inner Melbourne where in 2016 the number of residences was 306,654 while in 2021 it was 358,845, an increase of 17.0%. If Inner Hobart had grown at Inner Melbourne's rate from 2016 to 2021, we would have an extra 2,982 dwellings (6.7 times the number of non-primary residence permit short-stay properties).⁴³ Another issue is that restricting short-stay accommodation foregoes income into the state. And if it weren't for the city's hostility to highrise, more, larger hotels would've been built, which would've taken away much of the demand from short-stay accommodation.

The *Tasmanian Planning Scheme's* 'Development Standards for dwellings' in the General Residential Zone are contained in Section 8.4 Development Standards for Dwellings (pdf pages 61-71). Section 9.4 (pdf pages 83-94) covers residential development standards in the Inner Residential Zone, and section 10.4 covers the residential development standards for development in the Low-Density Residential Zone. Each of the standards starts with an Objective, and then lists one or

³⁹ *Southern Tasmania Regional Land Use Strategy 2010-2035*, Attachment 1, p.106, Southern Tasmanian Councils Authority, <https://www.stca.tas.gov.au/wp-content/uploads/2023/10/Southern-Tasmania-Regional-Land-Use-Strategy-2010-2035-Effective-17-May-2023.pdf>; *Sthn Tas Regional Land Use Strategy boundaries*, ArcGIS, Department of State Growth, <https://maps.stategrowth.tas.gov.au/portal/apps/mapviewer/index.html?webmap=b33eb22ec8244295abcb577cd59cb000>, accessed 14 Aug 2024.

⁴⁰ *Action on homelessness*, City of Hobart, <https://www.hobartcity.com.au/Community/Action-on-homelessness>, accessed 31 Jul 2024.

⁴¹ *Hobart council implements higher rates, adds 'Airbnb tax' to tackle housing crisis*, Pulse Tasmania, 20 Jun 2023, <https://pulsetasmania.com.au/news/hobart-council-implements-higher-rates-adds-airbnb-tax-to-tackle-housing-crisis/>, accessed 1 Aug 2024.

⁴² *Impact of Short-term Rentals on Tas Housing Evidenced in New Report*, Media Release, Shelter Tas, 1 Jul 2022, via Tasmanian Times, <https://tasmaniantimes.com/2022/07/impact-short-term-rentals-tasmania-housing-evidenced-in-new-report/>, accessed 5 Aug 2024.

⁴³ *Hobart dwellings 2016*, ABS, <https://www.abs.gov.au/census/find-census-data/quickstats/2016/60105>; *Hobart dwellings 2021*, ABS, <https://www.abs.gov.au/census/find-census-data/quickstats/2021/60105>; *Melbourne dwellings 2016*, ABS, <https://abs.gov.au/census/find-census-data/quickstats/2016/206>; *Melbourne dwellings 2021*, ABS, <https://abs.gov.au/census/find-census-data/quickstats/2021/206>; and *Short-stay accommodation data*, CBOS https://cbos.tas.gov.au/_data/assets/pdf_file/0006/760317/Short-Stay-Accommodation-Report-16-Quarter-3-2023.PDF, accessed 1 Aug 2024.

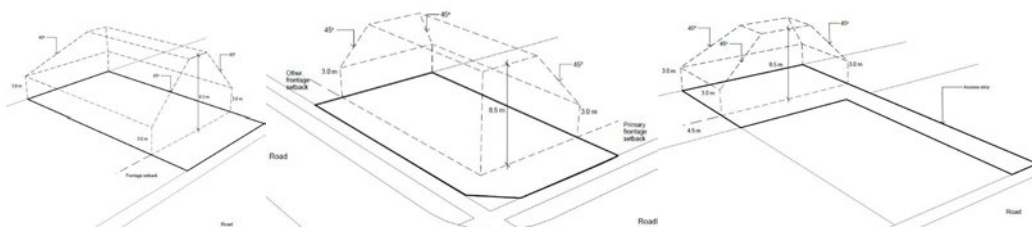
more Acceptable Solutions (A1, A2...) and Performance Criteria (P1, P2...). I have chosen to mainly focus on the objectives contained in section 8.4, but many of the points I raise are also applicable to the other residential zones.

8.4.1 Residential density for multiple dwellings

Objective (a) is to ‘make efficient use of land for housing,’ and *Objective (b)* is to ‘optimise the use of infrastructure and community services,’ yet Acceptable Solution A1, perpetuates the under-utilisation of land and infrastructure by setting a minimum site area of ‘not less than 325m² per dwelling’. The Performance Criteria are a little more permissive, but under clause 6.61(b) of the *Tasmanian Planning Scheme*, relying on Performance Criteria makes it a discretionary development that the Planning Authority has the discretion to refuse. Performance Criteria P1(a), which applies to anywhere more than 400m from a bus stop or higher-density development zone, is quite restrictive too, requiring new development to be ‘compatible with the density of existing development on established properties in the area’. The intention of heavily restricting medium to high-density development more than 400m from the identified zones is clearly to promote public and active transport, but it would undoubtedly reduce the number of dwellings constructed. And there are ways of achieving increased public transport usage without restricting development, such as park & ride facilities and modal cross-subsidisation. And there are better ways of steering development into such zones, such as public housing, and cross-subsidisation (higher council rates on low-density land use in Densification Areas, used to subsidise medium to high-density affordable development in those areas).

Recommendation: Abolish the density limit as it stands. If a service capacity would be exceeded, the development may only proceed if they’re willing to pay for an upgrade of the network capacity.

8.4.2 Setbacks and building envelope for all dwellings



Objective (a): ‘provides reasonably consistent separation between dwellings and their frontage within a street.’

When a frontage has a driveway, a certain amount of setback can improve pedestrian safety, but the required setbacks in the General Residential zone go far beyond what is required for pedestrian safety. Spread of fire can be an issue that setbacks aim to solve, but firewalls can potentially solve it more economically where there’s a shortage of well-located land for housing. Setbacks also preserve and enhance streetscapes and property values and potentially improve access to sunlight, views and ventilation, but setbacks often mean fewer dwellings can fit on a block of land, which impacts housing affordability, especially at the bottom end of the market. The requirement for setbacks on well-located land also impacts the viability of active and public transport.

Objective (b): ‘provides consistency in the apparent scale, bulk, massing and proportion of dwellings.’

Like most of the planning scheme, this provision puts the interests of property owners before the interests of the homeless by artificially creating a housing shortage by locking in the housing density status quo.

Objective (c): ‘Provide separation between dwellings on adjoining properties to allow reasonable opportunity for daylight and sunlight to enter habitable rooms and private open space.’

In the age of LED lights that can provide sunlight-like light very cheaply, this objective is antiquated. Removing this objective would not deprive people of light, but it would make a difference to housing affordability.

Objective (d): ‘Provide reasonable access to sunlight for existing solar energy installations.’

This objective goes too far. The winter solstice midday sun is roughly only 23.6° above the horizon in Hobart, so there are going to be a lot of houses, particularly on hills that slope downwards to the South, and small blocks, where almost any development at all could impact a solar installation. People should be expected to consider the possibility of future development within the Acceptable Solution building envelope before installing solar.

Objectives such as these fail to balance the rights of property owners with the rights of the homeless and those who struggle to pay rent. And they fail to exploit the potential for mutually beneficial arrangements involving compensation for loss of amenity.

Recommendation: Instead of having restrictions on development like these, appoint an arbiter to determine the compensation payable by a developer to neighbours for the estimated loss of property value if the development would've likely been disallowed under the old planning scheme. If the neighbouring properties are rented, share the compensation between the owner and the tenant in proportion to their loss.

8.4.3 Site coverage and private open space for all dwellings

Objective

That dwellings are compatible with the amenity and character of the area and provide:

- (a) for outdoor recreation and the operational needs of the residents;*
- (b) opportunities for the planting of gardens and landscaping; and*
- (c) private open space that is conveniently located and has access to sunlight*

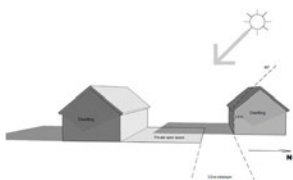
The requirement for private open space undoubtedly significantly increases the minimum cost of housing and directly causes poverty and homelessness and negatively impacts health and wellbeing. The poorest members of society cannot afford to devote any of their accommodation budgets to private outdoor space, yet our current planning scheme tries to force them to anyway, making a bad situation worse. The poor would be much better off if we left it to the market to decide what proportion of properties have private open space, or better yet, do the exact opposite of this objective: bias the system in favour of medium to high-density development.

We need to radically rebalance our housing mix and land use to provide much more well-located minimum-cost housing. Between 2001 and 2021, the proportion of single-person households in Tasmania increased from 26.1% to 29%, while the proportion of dwellings that are apartments fell from 6.9% to 5.3% – the lowest in the country.⁴⁴ We have an ageing population, and many elderly people are unable to maintain gardens. Many childless professional couples also neither have a passion for gardening nor have the time to maintain a garden, let alone want to bear the burden of the consequent higher housing costs and the higher transport costs and council rates resulting from lower urban density.

There's no way the government should be dictating that residences must have private open space, particularly in a city where most residences currently have private space, so it's not at all hard for anyone who is particularly keen on private open space to find a dwelling that has some. It's like requiring all new cars to come with a trailer, or all ice-creams to be double-scoops. Too bad for anyone who doesn't want one or can't afford one.

Recommendation: Abolish this objective

8.4.4 Sunlight to private open space of multiple dwellings



Objective: That the separation between multiple dwellings provides reasonable opportunity for sunlight to private open space for dwellings on the same site.

Recommendation: Abolish this objective (for the same reasons as those outlined in the previous section).

⁴⁴ *Improving Residential Standards in Tasmania, Draft Report*, p.9, ERA Planning and Environment, 15 Jul 2024, commissioned by the State Planning Office, https://www.stateplanning.tas.gov.au/_data/assets/pdf_file/0028/367444/Improving-residential-standards-in-Tasmania-Draft-recommendations-report-15~final-16-July-2024.PDF, accessed 6 Sep 2024.

8.4.5 Width of openings for garages and carports for all dwellings

Objective: To reduce the potential for garage or carport openings to dominate the primary frontage.

This objective unjustifiably disadvantages the poor, especially those who live in sharehouses and apartments, and people who have adult or adolescent children living at home who are looking to rent, buy or build somewhere close to an urban centre that is compact and affordable yet accommodates three off-street parking spaces. Planning objectives like this lead to scenes like the one from the 1997 Australian comedy/drama classic 'The Castle' where Darryl says: 'Steve, can you move the Camera, I need to get to the Torana out so I can get to the Commodore,' and Steve replies: 'I have to get the keys to the Cortina if I'm gonna move the Camera.'

Recommendation: Abolish this objective from the General Residential zone standards. Consider instead using Specific Area Plans for the preservation of certain streets that currently have exceptional streetscapes.

8.4.6 Privacy for all dwellings

Objective: To provide a reasonable opportunity for privacy for dwellings.

The objective is OK, but the Acceptable Solutions and Performance Criteria don't address the worst privacy issues while wasting money addressing things that are non-issues for most people, like the neighbours being able to see into the outdoor part of the property. Most people are only concerned about privacy behind closed doors and will hang some opaque lace in front of windows the neighbours can see into. The real issue with privacy for dwellings is soundproofing for conjoined or very close dwellings, particularly older buildings. In one property I rented, the neighbour's bedroom which was directly above ours was only separated by drafty floorboards, and in another, I could hear the neighbour's bedroom clock ticking through the wall from our bedroom.

Recommendation: Remove the existing Acceptable Solutions and Performance Criteria from this objective, and instead require privacy options for windows, such as fixing points for lace curtains. Require solid-core doors and double-glazing for soundproofing on doors and windows less than 3m from a shared walkway/driveway, or neighbouring property, and soundproofing for all shared walls, floors & ceilings in conjoined dwellings. Implement measures to get the rental vacancy rate above 3% ASAP, and once it is above 3%, raise the minimum standards for rental dwellings, and fund a program of government acquisition and renovation or demolition and rebuilding of old rental properties to address issues such as soundproofing, condensation, inadequate water pressure, inadequately sized hot water cylinders, lack of a heat-pump, inadequate insulation, and asbestos.

8.4.7 Frontage fences for all dwellings

Objective

The height and transparency of frontage fences:

- (a) provides adequate privacy and security for residents;*
- (b) allows the potential for mutual passive surveillance between the road and the dwelling; and*
- (c) is reasonably consistent with that on adjoining properties.*

The sections dealing with fences seem unnecessarily detailed and complicated – for example, there are no Acceptable Solutions listed, however, there is a Performance Solution. And instead of offering an Acceptable Solution, the reader is referred to the planning permit exemptions in Table 5.6. The subclauses on fences within that table are hard to interpret, for example, it's not immediately obvious when paragraph 5.6.2 (b) would apply. After a couple of readings, I gather it only applies to fences within 4.5m of a frontage in zones other than the General Residential and Inner Residential zones. It would be much easier to interpret if there were separate subclauses for each of the combinations of zone (or group of zones) and proximity to the frontage, rather than requiring double application of the words 'within' and 'excluding' as well as a reference to another subclause.

From the *Table of planning permit exemptions*:

5.6.2	fences (excluding fences within 4.5m of a frontage in the General Residential Zone or Inner Residential Zone)	The construction or demolition of: (a) side and rear boundary fences not adjoining a road or public reserve or not within 4.5m of the site's primary frontage and not more than a total height of 2.1m above natural ground level; (b) boundary fences adjoining a road or public reserve or within 4.5m of the site's primary frontage (excluding a fence under subclause 5.6.3) and not more than a total height of 1.2m above natural ground level;
5.6.3	fences within 4.5m of a frontage in the General Residential Zone or Inner Residential Zone	Fences (including free-standing walls) within 4.5m of a frontage, if located in the General Residential Zone or Inner Residential Zone if not more than a height of: (a) 1.2m above existing ground level if the fence is solid; or

Recommendation: Rewrite the sections on fences to make them easier to interpret.

8.4.8 Waste storage for multiple dwellings

Objective: To provide for the storage of waste and recycling bins for multiple dwellings.
Pretty self-explanatory really, and perfectly reasonable.

For a more in-depth review of current and proposed future development standards for dwellings in residential zones, see:

- Appendix A: My submission to the State Planning Office's review of Tasmania's residential use and development standards within the State Planning Provisions (SPPs);
- Appendix B: My submission to the Greater Hobart Committee's *July 2024 Draft Medium Density Design Guidelines*; and
- Appendix C: My comments on the *Draft Tasmanian Planning Policies*.

Part B: My submission to the Greater Hobart Committee's *July 2024 Draft Medium Density Design Guidelines*.

Primary Resources:

- Feature Document: *Medium Density Design Guidelines, Draft, Jul 2024*.⁴⁵
- Draft Medium Density Design Guidelines, submissions webpage.⁴⁶
- Enquiries: contact@greaterhobart.tas.gov.au

Chapter 2 of the *July 2024 Draft Medium Density Design Guidelines*, presents what the authors consider to be a model context analysis for medium-density residential development, and while they may have raised some good pointers for building designers to consider, these certainly shouldn't flow through to development standards or planning permit decisions, because of the adverse effect it would have on dwelling supply and affordability.

The most important contextual information for those drafting or administering our residential development standards is that Greater Hobart has had a persistent shortage of housing for over two decades, and it has caused homelessness, poverty, and misery, and our planning schemes and discretionary planning decisions (both locally and nationally), have reduced the number of dwellings built and increased costs (including transport and building services costs due to urban sprawl).

The average rental vacancy rate in Australia from 2011 to 2023 was 3%.⁴⁷ Hobart's rental vacancy rate was estimated to be 1.5% in June 2024,⁴⁸ and Australia-wide it was 1.3%.⁴⁹ We need an immediate increase in the housing stock of around 1.5% to get Hobart's rental vacancy rate back in line with Australia's historical average rental vacancy rate of 3%.

In my opinion though, the *Draft Medium Density Design Guidelines*, as well as the *Improving Residential Standards in Tasmania, Draft Report*, will not have anywhere near sufficient impact on the housing stock and affordability to eliminate homelessness and lift Tasmanians out of poverty. Even with the proposed reforms, the balance will still be weighted far too far in the interests of existing property owners and other well-to-do people, at the expense of those who won't be able to afford to buy or rent a self-contained dwelling close to their place or work or study without suffering extreme deprivation, if at all.

Both documents make baby steps towards densification and affordability. They introduce what they call 'dwelling diversity,' but I'd call it fake diversity – diversity within a very narrow spectrum that's a long way from the kind of dwelling diversity needed to provide affordable self-contained National Construction Code-compliant dwellings for everyone who needs one. The *Improving Residential Standards in Tasmania, Draft Report's* proposal to introduce 'plot ratios' is a tiny improvement over the existing planning scheme's 'acceptable solution' building envelope. The plot ratio is the ratio of floorspace to plot size. The *Draft Guidelines* specify a plot ratio of 1.0 for Inner residential, and 0.6 for General Residential, with a 10% density limit bonus for townhouses and social housing outside of the densification zones and a 20% density limit bonus for social housing inside the densification zones.

I'd like to see the proposed plot ratio limits increased by an order of magnitude, however, I concede that that's unlikely to happen this century, so below I discuss some possibilities for more incremental improvements.

Social housing isn't defined in either document, and I fear that the most natural interpretation of the term would favour a very narrow definition such that one would have to be very lucky indeed to benefit from it. The proposed plot ratio limits

⁴⁵ *Medium Density Design Guidelines, Draft, Jul 2024*, Department of State Growth in collaboration with Councils of the Greater Hobart region, https://hdp-au-prod-app-sgtas-engage-files.s3.ap-southeast-2.amazonaws.com/3817/2067/2222/Draft_Medium_Density_Design_Guidelines_-_print_version.pdf, accessed 27 Aug 2024.

⁴⁶ *Draft Medium Density Design Guidelines, Jul 2024, submissions webpage*, <https://engage.stategrowth.tas.gov.au/medium-density-design-guidelines>, accessed 27 Aug 2024.

⁴⁷ *Statement 4: Meeting Australia's Housing Challenge*, Budget Paper No. 1, 2024-25, https://budget.gov.au/content/bp1/download/bp1_bs-4.pdf, accessed 4 Aug 2024.

⁴⁸ *Residential Vacancy Rates, Hobart*, SQM Research, https://sqmresearch.com.au/graph_vacancy.php?region=tas-Hobart&type=c, accessed 4 Aug 2024.

⁴⁹ *Residential Vacancy Rates, National*, SQM Research, https://sqmresearch.com.au/graph_vacancy.php?national, accessed 11 Aug 2024.

would deliver far greater and broader benefits to housing affordability if we substituted the phrase ‘more affordable housing’ in place of ‘social housing,’ and defined it as any development where the estimated price per dwelling is below the 25th percentile dwelling price in Greater Hobart. Data on the 25th percentile dwelling price is freely available.⁵⁰

We could more efficiently use plot ratio limits to encourage more well-located affordable development if rather than having plot ratio limit bonuses for social housing and townhouses, we instead had a fixed and a variable component to the plot ratio limit, with the variable component being proportional to the number of dwellings. For example, in the Inner Residential zone, we could make the maximum plot ratio $0.6 + 0.3x$, where x is the number of dwellings. Similarly, in the General Residential zone, we could make the maximum plot ratio $0.4 + 0.2x$, where x is the number of dwellings.⁵¹ In addition, we could retain the proposed 10-20% bonus for well-located affordable housing, however, I think a 25-50% bonus is more appropriate.

The followers of certain guru planners promote the idea of a so-called ‘missing middle,’ (conjoined double-storey dwellings and small apartments) in Hobart. I’m not a fan of low-rise apartments though, because it’s generally not economical to provide an elevator, and certainly not economical to provide multiple redundant elevators to residential buildings with less than five floors. What we’re missing most in Greater Hobart is well-located minimum-cost self-contained dwellings, i.e. medium-to-highrise apartments like the University’s inner-city student accommodation towers. Nowhere near enough land is available for these types of developments in Hobart, and decisions on medium-highrise developments are far too politicised and dominated by dogmatists who won’t tolerate highrises anywhere no matter the cost; people who want to stop population growth; economically naïve idealists who expect the government to build thousands of hectares of low-density public housing all serviced by trains; and petty, selfish whingers who genuinely care more about things like shadows and the colour of a building’s façade than they do about homelessness. I think most of the Densification Areas identified in Attachment 1 of the *Southern Tasmania Regional Land Use Strategy 2010-2035* should be made available for apartments that are large enough for multiple redundant elevators to be economical, and I think that the ‘missing middle’ paradigm runs counter to federal and state government accessible housing policies. From an accessibility perspective, we’re much better off allowing buildings that are large enough for elevators to be economical.

I also think there should be some refinement of the Densification Areas. Given that we want to encourage public and active transport, the walking distance to the nearest high-frequency bus stop is more relevant than whether or not a plot of land is within a given distance from *any point on the corridor*. The only drawback of defining the Densification Areas that way is that it would shrink them, however, we can compensate for this by increasing the distance. The *Southern Tasmania Regional Land Use Strategy 2010-2035* allows up to 800m:

‘LUTI 1.2 Allow higher density residential and mixed use developments within 400, and possibly up to 800 metres (subject topographic and heritage constraints) of integrated transit corridors.’⁵²

I recommend the following refinement to the above land use strategy...

LUTI 1.2 (revised) Provide extensive Planning Scheme exemptions to things like the building envelope and setbacks to facilitate more of the following types of development:

- Medium-density residential development within 400m of a business district in North Hobart, New Town, Moonah, Claremont, Rosny, or Kingston; or
- Medium to High-density residential development within:
 - 600m walking distance of high-frequency public transport route stops from Hobart to Glenorchy; or
 - 800m of the Hobart CBD.

One of the reasons I suggest this change is that it would be a lot cheaper to upgrade the link from Hobart to Glenorchy by a lane each-way than it would be to upgrade the link from Hobart to either Rosny or Kingston.

⁵⁰ *Monthly Housing Chart Pack*, p.7, CoreLogic. May-Jul 2024: Aug 2024 report, https://content.corelogic.com.au/l/994732/2024-08-07/21m1sv/994732/1723026908koqEMAA/202408_monthly_chart_pack_2.pdf. For an explanation of the index see *Hedonic Home Value Index*, p.8, CoreLogic, https://www.corelogic.com.au/data/assets/pdf_file/0028/22969/CoreLogic-HVI-JUN-2024-FINAL.pdf, accessed 11 Aug 2024.

⁵¹ In the case of non-residential development in residential zones, set x to 1.

⁵² *Southern Tasmania Regional Land Use Strategy 2010-2035*, p.54, Southern Tasmanian Councils Authority, <https://www.stca.tas.gov.au/wp-content/uploads/2023/10/Southern-Tasmania-Regional-Land-Use-Strategy-2010-2035-Effective-17-May-2023.pdf>, accessed 14 Aug 2024.

Ideally though, I think we should completely abolish the discretionary right of councils to reject development applications based on them exceeding restrictions like plot ratio and building height or infringing on a neighbour's sunshine or privacy, and instead, appoint an arbiter to estimate the reduction in the resale value of neighbouring properties due to the development being outside that of the legacy planning scheme's acceptable solution, and have the developer compensate the owner of the neighbouring property for their loss, with a portion going to renters who are on a lease.

The *Draft Medium Density Design Guidelines* state: 'In areas experiencing change and increased density, align front setbacks with the desired future character of the street.' This is at least a small improvement on the existing planning schemes which locked us into ridiculously excessive setbacks, however, I think it doesn't go nearly far enough. I believe setback requirements should generally only be what is required for pedestrian safety.

The *Draft Medium Density Design Guidelines* state: 'Ensure separation in proportion to building height and the location of open space.' – This restriction on development would have a significant adverse effect on housing affordability, poverty, health, and well-being. We can't provide housing that's affordable for the poor if we have an "amenable housing or nothing" approach. We ought to think about how unpleasant it is for people to have to live in a car or a tent, or with an abusive ex-partner because they can't afford a home of their own before coming up with development restrictions like these, same with things like recommending every property has landscaping and a deep-soil area for a large tree. With any provision that increases the cost of housing or reduces the number of dwellings that can be built on a block of land, we should ask ourselves, 'Would most homeless people consider it more important than housing affordability?'

The entire section on Streetscape serves to substantially increase the cost of housing. Landscaping costs money. Reserving land for frontages sometimes reduces the number of dwellings that can be built on a property. The interests of the homeless and those struggling to afford a home are not being given due consideration. I'd limit these aesthetic considerations to Specific Area plans applying to a few fully-developed streets that aren't likely to be redeveloped for several generations, that the poor aren't going to be able to afford to live in anyway, which currently have an exceptional streetscape.

There's no need for biodiversity and landscaping to be part of our urban design guidelines. The urban areas of Tasmania account for a minuscule proportion of the state, so our settlement's impact on biodiversity in Tasmania would be minuscule too, so it's perfectly reasonable to put humans first in the tiny little patch that we've claimed for ourselves. And there will always be plenty of houses for those who can afford them that have gardens. Those who can't afford or don't have the time or ability to maintain a private garden can always visit the Botanical Gardens or similar attractions. Gardens are nothing but a chore to maintain for many, possibly most people, and gardens, particularly large trees, can cause trouble with building foundations, clog drains, create a bushfire and hurricane hazard and impinge on neighbour views, sunshine & solar power, and can even affect motor vehicle and pedestrian safety if at the front of the house. Requiring, or even advising that biodiversity and landscaping should be considered in every medium-high-density development would substantially and unjustifiably increase the minimum cost of housing.

The *Draft Medium Density Design Guidelines* state on page 43:

*'The City of Hobart has an ambitious target of increasing tree canopy cover across its urban areas to 40% by 2046. The benefits of urban greening and canopy cover are vast - not only for the environment but also for the economy, for physical and mental health, and for future generations.'*⁵³

The so-called 'City of Hobart' are in fact the representatives of a small portion of Greater Hobart from the privileged inner-Hobart and south-central suburbs, and I believe this policy, more than most, would be significantly misrepresentative of the interests and opinions of Greater Hobart. I think wanting to increase Hobart's tree canopy cover is a ridiculous priority when we've got a massive shortage of housing, homelessness, and poverty. And it's not even an environmentally friendly policy, because it causes urban sprawl, car dependence, and longer commutes that emit more CO₂.

The second sentence of the above quote claims "vast benefits," yet as is the case with most of the bold claims in the *Draft Medium Density Development Standards*, there are no supporting references or even any attempt to prove the claim. It's

⁵³ *Medium Density Design Guidelines, Draft, Jul 2024*, Department of State Growth in collaboration with Councils of the Greater Hobart region, https://hdp-au-prod-app-sgtas-engage-files.s3.ap-southeast-2.amazonaws.com/3817/2067/2222/Draft_Medium_Density_Design_Guidelines_-_print_version.pdf, accessed 27 Aug 2024.

not evidence-based policy, it's pure fantasy and enthusiast dogma. It's an obsession. And it's a blind imitation of policies that were designed for cities that are very different to Hobart – metropolises, concrete jungles with serious air pollution and heat-island problems.

On a per-capita basis, Hobart has vastly more parkland and reserves than most cities do, and we're even more overburdened with parkland and reserves relative to our income. And the value of the foregone revenue (the revenue that we would've had if the land had been developed) would be staggering. So no, there are no vast benefits for the economy of urban greening in Hobart, quite the opposite.

Hobart currently sits at the extreme-green end of the spectrum for the accessibility of nature. In many metropolises, people have to drive for nearly an hour at times to access the kinds of public gardens and bushwalks that are accessible from most parts of Greater Hobart within 15 minutes. And there are diminishing returns to all things, including urban greening.

The above quote from the *Draft Medium Density Design Guidelines* claims "vast benefits" to physical and mental health from urban greening. Elsewhere, (p.41) it claims '*Access and exposure to green spaces and mature trees provide endless benefits.*' "Endless benefits," seriously! This is not science, it's not even a professional manner of speaking. It's propaganda.

The *Draft Medium Density Design Guidelines* state on p.37:

'Access to adequate daylight is vitally important to resident health and wellbeing. Studies have found links between levels of natural light in homes and physical and mental health of residents.'

Studies have found benefits of natural light in homes,⁵⁴ and the same with greenery, however, we also need to take account of local conditions before jumping to conclusions – local conditions such as Hobart's existing very high level of connectedness to nature, our exceptionally good air quality, our more than sufficient levels of sunlight and vitamin D, our exceptionally high proportion of existing housing stock that has a large amount of private outdoor space, and our severe and persistent shortage of affordable housing. And we need to acknowledge that research on the benefits of residential amenities rarely if ever considers that amenities don't come for free. They require financial outlay, maintenance, and a sacrifice of some of the best-located residential land. They create gentrification, poverty, dispossession, displacement, urban sprawl, increased transport emissions, and homelessness, and at a certain point, these negatives would dwarf the benefits, and I'd say that Hobart has gone way past that point already. Hobart's extreme prioritisation of the preservation of nature, built heritage, streetscapes and sunlight over housing affordability has made us one of the most unaffordable cities in the country.⁵⁵

The amenity-prioritising objectives of the *Draft Medium Density Design Guidelines* work against certain objectives of the *Southern Tasmania Regional Land Use Strategy 2010-2035*, such as policy SRD 2.11 'Increase the supply of affordable housing.'⁵⁶

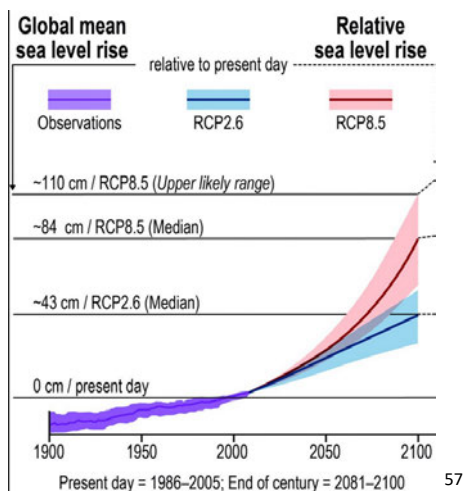
Regarding the benefits of shade from trees, most sidewalks and private open spaces in Tasmania's residential zones are so sparsely/infrequently occupied that the benefits of shade provided by trees would in most cases be dwarfed by the costs. From a housing affordability perspective, without a doubt, the best way to provide shade is to allow taller buildings and reduced offsets. There is however a significantly impactful lack of shade on many of Tasmania's beaches and bus stops and that's something local and state governments as well as Metro could address.

Regarding sea-level rise, the Intergovernmental Panel on Climate Change's 2022 upper bound estimated sea-level rise, in the case of limited global action on CO₂ emissions, was just 1.1m by 2100. This would affect a relatively small proportion of developed land in Hobart.

⁵⁴ *Lighting in the Home and Health: A Systematic Review*, National Library of Medicine, US Government, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7828303/>, accessed 14 Aug 2024.

⁵⁵ *Rental Affordability Index: research report*, SGS Economics & Planning, <https://sgsep.com.au/projects/rental-affordability-index>, accessed 11 Aug 2024.

⁵⁶ *Southern Tasmania Regional Land Use Strategy 2010-2035*, p.99, Southern Tasmanian Councils Authority, 17 May 2023, <https://www.stca.tas.gov.au/wp-content/uploads/2023/10/Southern-Tasmania-Regional-Land-Use-Strategy-2010-2035-Effective-17-May-2023.pdf>, accessed 5 Aug 2024.



Although climate change is expected to increase extreme-rainfall events, Hobart is not particularly vulnerable. The cost of the 2018 Hobart one-in-a-hundred-year flood was put at ‘over \$137 million’ by the Insurance Council of Australia,⁵⁸ while the cost of the 2022 flooding in south-east Queensland and northern New South Wales was estimated to be \$6 billion,⁵⁹ (around 39 times as much after adjusting for inflation).

Several planning and building policies, guidelines and related documents, if followed, provide quite adequate mitigation of flood risk:

- CBOS Director’s Determination: *Building in coastal inundation hazard areas*.⁶⁰
- CBOS Director’s Determination: *Building in riverine inundation hazard areas*.⁶¹
- National Construction Code 2022, vol.2, sections *H1P2 Buildings in flood areas* and *H1D10 Flood hazard areas*.⁶²
- Australian Building Codes Board Standard, *Construction of buildings in flood hazard areas*.⁶³
- *Construction of Buildings in Flood Hazard Areas, 2012.3 Handbook*, ABCB, (non-mandatory document).⁶⁴
- Section 159. *Land subject to flooding* of the *Building Act 2000* (applying as a transitional provision until all councils adopt the Tasmanian Planning Scheme).⁶⁵
- State Emergency Service Local Community Flood Guides.⁶⁶

⁵⁷ *Special Report on the Ocean and Cryosphere in a Changing Climate*, ch.4, Sea Level Rise and Implications for Low-Lying Islands, Coasts and Communities, p.328, United Nations’ Intergovernmental Panel on Climate Change, 24 Sep 2019, https://www.ipcc.ch/site/assets/uploads/sites/3/2022/03/06_SROCC_Ch04_FINAL.pdf, accessed 31 Aug 2024.

⁵⁸ *Hobart flash flooding, 2018*, Australian Institute for Disaster Resilience, <https://knowledge.aidr.org.au/resources/2018-flood-tas-hobart-flash-flooding/>, accessed 24 Aug 2024.

⁵⁹ *Insurance costs reach record high as floods, storms become more severe*, ABC News, 19 Aug 2024, <https://www.abc.net.au/news/2024-08-19/home-insurance-costs-unaffordable-floods-storms-increase/104242714>, accessed 24 Aug 2024.

⁶⁰ *Director’s Determination - Coastal Inundation Hazard Areas*, Consumer, Building and Occupational Services, Department of Justice, Tas, 27 Sep 2021, https://cbos.tas.gov.au/_data/assets/pdf_file/0003/607008/Directors-Determination-Coastal-Inundation-Hazard-Areas.PDF, accessed 30 Aug 2024.

⁶¹ *Director’s Determination - Riverine Inundation Hazard Areas*, Consumer, Building and Occupational Services, Department of Justice, Tas, 8 Apr 2021, https://www.cbos.tas.gov.au/_data/assets/pdf_file/0014/607010/Directors-Determination-Riverine-Inundation-Hazard-Areas-v1_1-2021.pdf, accessed 30 Aug 2024.

⁶² *National Construction Code 2022, vol.2*, Australian Building Codes Board, <https://ncc.abcb.gov.au/editions/ncc-2022/adopted/volume-two/h-class-1-and-10-buildings/part-h1-structure>, accessed 3 Sep 2024.

⁶³ *Construction of buildings in flood hazard areas*, ABCB Standard 2012.3, Australian Building Codes Board, <https://www.abcb.gov.au/sites/default/files/resources/2022/Standard-construction-of-buildings-in-flood-hazard-areas.pdf>, accessed 25 Aug 2024.

⁶⁴ *Construction of Buildings in Flood Hazard Areas, 2012.3 Handbook*, Australian Building Codes Board, <https://ncc.abcb.gov.au/sites/default/files/resources/2022/Handbook-flood-2012.pdf>, accessed 25 Aug 2024.

⁶⁵ s.159 *Land subject to flooding*, of the *Building Act 2000* (Tas), <https://www.legislation.tas.gov.au/view/html/inforce/2010-07-01/act-2000-100#GS159@EN>, accessed 30 Aug 2024.

⁶⁶ *Local Community Flood Guides*, State Emergency Service (Tas), <https://www.ses.tas.gov.au/plan-prepare/flood-plan/>, accessed 30 Aug 2024.

- Tasmanian Planning Scheme/flood-prone area LISTmap layers.⁶⁷

The Tasmanian Planning Scheme flood-prone areas overlay is extremely conservative. It shows the estimated bounds of a 1% AEP flood based on the climate and sea level we're expected to have in 2100, but no flood hazard level is specified and I can only presume based on the vast areas unaffected by the 2018 1-in-a-100-year flood that are classified as "flood-prone", that the threshold for surface-water depth and velocity was set extremely low. Ideally, flood modelling should classify flood hazards ranging from H1 to H6 as per the advice from the Australian Disaster Resilience Knowledge Hub,⁶⁸ similarly with the bushfire hazard zone – we really ought to have one planning scheme overlay for each BAL rating from 12.5 to FZ. Having non-delineated planning scheme overlays / LISTmap layers for Flood-prone areas and Bushfire-prone areas unnecessarily increases the costs of building in low-hazard areas, while also not providing adequate levels of warning for those who are in higher-risk areas. It could also have a 'boy who cried wolf' effect. It also seems unlikely to me that it would be more economical to have such detailed hazard information privatised and collected on an ad-hoc basis than it would be to maintain a detailed hazard map with BAL and flood hazard levels that are publicly available. There's an opportunity to do this, as well as to produce wind classification maps as part of the \$4,499,531 Natural Hazards Atlas project, which could save developers having to have an assessment done by a geotechnical engineer, hydrologist, or bushfire hazard practitioner.⁶⁹

The City of Hobart's Municipal Emergency Management Coordinator advised the Senate Select Committee on Australia's Disaster Resilience:

*'... our city's critical stormwater infrastructure, some of which dates back to colonial times, needs investment to build our flood resistance.'*⁷⁰

However, it will undoubtedly take us significantly longer to find the money to pay for flood prevention infrastructure investment if we continue to blow millions on beautification and local native species repopulation projects as the City of Hobart plans to. For example, they've budgeted \$2.15 million⁷¹ to rewild the New Town canal downstream of the highway in partnership with the Glenorchy City Council.⁷² The area experiences significant upstream flooding which will likely get worse with global warming. The rewilding Project Manager said that the culverts under the highway create a hydraulic constraint which causes flooding upstream and adjacent to the site.⁷³ In the 2018 1% AEP flood event, the Brooker Hwy was impassable in the vicinity of the New Town canal, yet even after this issue was revealed, remedying the flooding problem continued to remain out of scope for the rewilding project.

The number 1 problem is the flooding. The condition of the embankment poses far less risk, given the substantial distance between the canal and the nearest house, the relatively slow flow, the very slow rate at which the concrete batters have been deteriorating (they were constructed in the 1960s), and the relative ease with which it could be patched up if a section of the concrete batter did wash away in a storm, but of course, it would be cheaper to patch it up now than after a section washes away. The lack of amenities or biodiversity also isn't nearly as big a problem as vehicles not being able to use the

⁶⁷ LISTmap Planning Scheme layers: <https://www.planning.tas.gov.au/other-resources/Tasmanian-planning-scheme> and <https://www.planning.tas.gov.au/other-resources/Interim-planning-schemes-in-effect>. The City of Hobart's Flood Risk Areas LISTmap layer (<https://maps.thelist.tas.gov.au/listmap/app/list/map?bookmarkId=878873>) seems to be broken at the moment, however it's still available on ArcGIS: City of Hobart: Potential Inundation Hazard Areas – Modelled 2100 1% AEP Flood Areas, <https://www.arcgis.com/apps/View/index.html?appid=3951383333b4476f9bc788d6d1ce0ba1&extent=147.1309,-42.9425,147.4605,-42.8247>, and C12 0 Flood Prone Hazard Areas Code, City of Hobart Open Data, <https://data-1-hobartcc.opendata.arcgis.com/datasets/04752f5072264b4d9c4af62a69feb056/explore?location=-42.891780%2C147.342783%2C12.00>, accessed 31 Aug 2024.

⁶⁸ Delineating hazardous flood conditions to people and property, Australian Disaster Resilience Knowledge Hub, <https://knowledge.aidr.org.au/media/5662/delineating-hazardous-flood-conditions-smith-mcluckie.pdf>, accessed 30 Aug 2024.

⁶⁹ Natural Hazards Atlas kicks off with call for community participation, University of Tasmania, <https://www.utas.edu.au/about/news-and-stories/articles/2024/natural-hazards-atlas-kicks-off-with-call-for-community-participation>, accessed 1 Sep 2024.

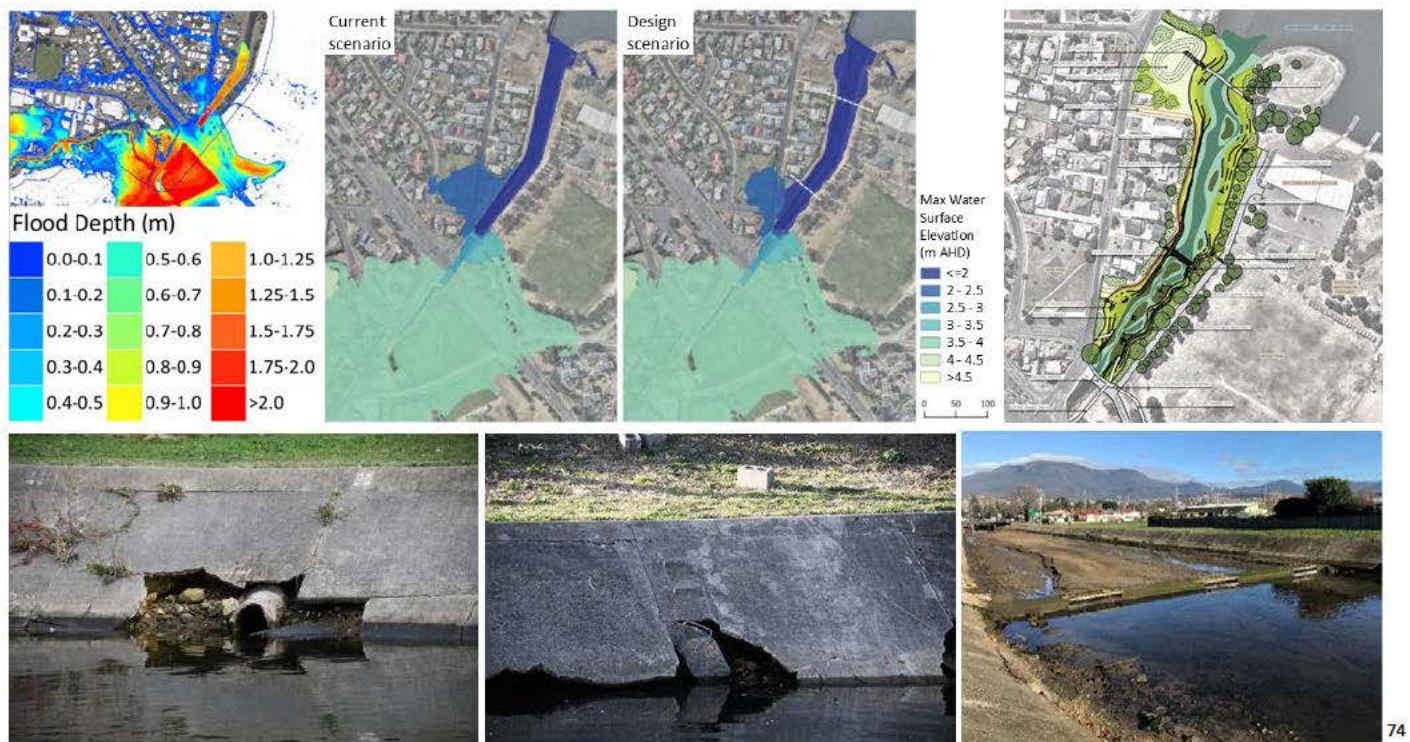
⁷⁰ Senate Select Committee on Australia's Disaster Resilience, p.26, Aug 2024, <https://parlinfo.aph.gov.au/parlInfo/download/committees/reportsen/RB000053/toc.pdf/BootsonthegroundRaisingresilience.pdf>, accessed 3 Sep 2024.

⁷¹ City of Hobart to deliver a strategic and community-focused budget, City of Hobart, 25 Jun 2024 <https://www.hobartcity.com.au/Council/News-publications-and-announcements/Media-centre/City-of-Hobart-to-deliver-a-strategic-and-community-focused-2024-25-budget>, accessed 4 Sep 2024.

⁷² New Town Rivulet - Estuary Restoration Project, City of Hobart, <https://yoursay.hobartcity.com.au/new-town-rivulet>, accessed 24 Aug 2024.

⁷³ New Town Rivulet project, Tasmania: Nigel Vivian, Sugden & Gee, Water Sensitive SA, 29 Aug 2023, https://www.youtube.com/watch?v=C2Cj_BgQUBE&t=119s, accessed 3 Sep 2024.

highway in a major flood. I used to live less than 200m from the canal, hardly anyone walks past it, and even fewer would give it a second thought.



74

The rewilding Project Manager claimed that the ‘primary driver’ of the project is the deterioration of the concrete batters and weir abutments. They even used the term ‘end of their life,’ but the above photos are the only evidence that was offered in support of that claim. Two of the photos show minor damage (probably less than one square metre of damaged concrete) where the concrete batters were weakened by the installation of a pipe and a ladder. It certainly doesn’t look like a \$2.15 million repair bill. It’s possible to get a ready-mix spray-on concrete (shotcrete) like SikaGunitite, which is recommended for repair of concrete canals,⁷⁵ or you if you have a large volume of repair work, you could make something similar from its constituent ingredients for an insignificant amount of money. It may also be necessary to pin the repaired section into the bank with ridged galvanised rebar, and/or to dig a footing. Consult an engineer for the details.

The condition of the weir abutments is a side issue (i.e., it shouldn’t affect the decision on whether to demolish and/or rebuild the concrete batters). The plan is to fix the abutments and keep the weir regardless. The silt build-up behind the weir just proves that it’s doing its job, however to continue doing its job, it needs to be dredged/bulldozed/excavated periodically to prevent the silt from spilling over the top and entering the Derwent. Allowing an island of silt to build-up, whether it’s planted with vegetation or not, is essentially the same as having no weir from the perspective of silt transportation. The only difference is that it would have a higher flow capacity without a weir or a silt-island. The other issue is that the built-up silt that they plan to plant vegetation in is contaminated soil, so that certainly diminishes the merits of transforming it into a habitat for aquatic and riparian-dwelling animals. Another option is to simply get rid of or lower the height of the weir and allow the built-up silt to naturally erode. It would certainly be the cheapest option. The NSW government has a policy of generally removing weirs or reducing the crest-level, except in some very specific circumstances that don’t apply to the New Town canal.⁷⁶

Curvy vegetated channels are not as hydraulically efficient as straightened concrete-lined channels due to their increased length and roughness,⁷⁷ which is fine if you’ve got the room to just make it wider, but space is a little constrained – there’s

⁷⁴ New Town Rivulet Estuary Restoration Project update August 2023, Nigel Vivian (Project Manager), Water Sensitive SA, <https://www.watersensitivesa.com/wp-content/uploads/Nigel-Vivian-New-Town-Rivulet-Estuary-Restoration-.pdf>, accessed 4 Sep 2024.

⁷⁵ SikaGunitite GP, One component Gunitite dry spray applied repair mortar, Sika Australia, <https://aus.sika.com/en/construction/concrete-repair-protection/concrete-repair-mortars/cementitious-repairmortars/sikagunitite-gp.html>, accessed 4 Sep 2024.

⁷⁶ NSW Weirs Policy, https://www.dpi.nsw.gov.au/_data/assets/pdf_file/0006/633507/nsw_weir_policy.pdf, accessed 6 Sep 2024.

⁷⁷ Flood Risk Management Measures, p.60, Department of Planning and Environment, NSW Government, Feb 2022, <https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Water/Floodplains/flood-risk-management-measures-220056.pdf>, accessed 4 Sep 2024.

housing on one side, and swift-parrot habitat on the other, and they're already going to take up virtually all of the available space just to ensure that they don't make flooding any worse, so if we ever want to fix the flooding, then we may have to line it with concrete again!

If it turns out the whole concrete batter does indeed need to be replaced, and it's not just spin, (as it appears to be), then I suggest concurrently fixing the hydraulic constraint under the Brooker Hwy, while widening the canal by a few metres, particularly at the highway end where its narrowest, and also smooth-out the kink in the middle of the canal, so that it can handle more intense flooding and so it can tolerate more silt build-up before it needs to be dredged.

Things like green roofs, permeable pavement, gardens, rainwater harvesting, and underground stormwater retention tanks can reduce flooding, however, in a really large downpour, most water retention systems will be filled within five minutes, and although a five-minute delay in the discharge of water from properties in the upper portion of catchment areas could be quite beneficial, in lower areas, which is where most medium density development will be, the onsite water storage systems could easily fill just as the water from further up the catchment is arriving, rendering them virtually useless. These types of systems can also improve water quality, however, there's no strong case for recommending evermore 'water-sensitive urban design' in Hobart. The 1997 *State of the Derwent Estuary* report noted: 'The Derwent River catchment is very large and sparsely populated. Water quality from the catchment is generally good.'⁷⁸ From 1997 to 2008, there were 'significant reductions in pollutant loads,'⁷⁹ and it hasn't changed much since then.⁸⁰ The most harmful sources of contaminants for Hobart's beach users today would still be the paper mill, the zinc refinery, and the sewage treatment plant discharge. The *State of the Derwent Report Card 2022* lists stormwater as a relatively minor contributor to pollution on all criteria except for sedimentary suspended solids, and even on that criterion, it only accounts for about a third, and stormwater pollution isn't broken-down into residential and other sources,⁸¹ but it's safe to presume residential runoff accounts for only a fraction of total stormwater pollution. Probably the most harmful form of residential runoff from the perspective of people who swim at Hobart's beaches, would be from people who allow their dogs & cats to defecate outside and from gardeners who use weed spray, manure, or fertilizer, so I can't imagine more gardens would help. We would undoubtedly get far more bang for our buck by improving the quality of water treatment or pumping the effluent further out to sea and infrastructure solutions to flooding than we would from creating expectations of evermore so-called water-sensitive residential design.

The Flood Mitigation section of the Hobart Rivulet Strategic Plan is literally less than three lines out of a 153 page document, and the document doesn't propose any infrastructure solutions. On page 11 they advise that Council has 'a view to retarding the volume of water entering the system from upstream through the use of water sensitive urban design principles applied to public and private developments.'



2.3.5 Flood Mitigation

The Hobart Rivulet allows for an outlet for stormwater and conveyance of flood waters. Council has in place flood gauges and a flood warning system as well as an Emergency Action Plan when a flood occurs.

2.4 SIGNIFICANCE OF THE HOBART RIVULET PARK

82

⁷⁸ *State of the Derwent Estuary, Supervising Scientist Report*, Christine Coughanowr, National Heritage Trust / Tas Government collaboration, <https://www.dcceew.gov.au/sites/default/files/documents/ssr129-contents.pdf>, accessed 25 Aug 2024.

⁷⁹ *State of the Derwent Estuary 2009*, Derwent Estuary Program, DPIPWE, Tas, https://www.derwentestuary.org.au/assets/State_of_the_Derwent_Estuary_2009.pdf, accessed 30 Aug 2024.

⁸⁰ *State of the Derwent*, Derwent Estuary Program, DPIPWE, Tas, <https://www.derwentestuary.org.au/state-of-the-derwent/?target=state-of-the-derwent>, accessed 30 Aug 2024.

⁸¹ *State of the Derwent Report Card 2022*, Derwent Estuary Program, DPIPWE, Tas, <https://reportcard.derwentestuary.org.au/2022/#section-pollution-1>, accessed 31 Aug 2024.

⁸² *Hobart Rivulet Park Strategic Master Plan*, Inspiring Place Pty Ltd, adopted by City of Hobart, 11 Aug 2011, <https://www.hobartcity.com.au/files/assets/public/v/1/strategies-and-plans/hob-riv-park-strat-mast-plan.pdf>, accessed 6 Sep 2024.

The City of Hobart managed to get \$550,000 from the *Australian Government Disaster Ready Fund*,⁸³ and has budgeted to spend and additional \$550,000 of its own money to remove willow trees from their rivulets, however, whether the true motivation was to reduce flooding rather than merely to remove an invasive species for cultural and indigenous species protection reasons, is dubious, and it remains to be seen whether it will make any difference. Numerous other councils applied for grants for infrastructure solutions to flooding.

Bushfires are expected to get a little worse due to climate change, but the City of Hobart's intention to expand urban forests and green canopy and resistance to land-clearing is only going to increase the damage done by bushfires and increase the cost of mitigating the bushfire threat. We should be much more permissive of land-clearing to lower bushfire threat / BAL levels, to make housing more affordable and durable/sustainable, and to allow the construction of more dwellings close to the Hobart CBD, including allowing land clearing in Threatened Native Vegetation Communities, Priority Vegetation and Biodiversity Protection Areas, and removal of lesser so-called "significant trees." I expect that investment in better firefighting equipment, including larger firefighting aircraft and automated fire monitoring systems could more than offset the risk to endangered species posed by land clearing while unlocking hundreds of millions of dollars of development and delivering more well-located and affordable dwellings.

Climate change also brings with it uncertainty regarding future maximum wind speeds, and the following line from a report by the United Nations' Intergovernmental Panel on Climate Change is concerning:

*'by the end of the century... the number of ETCs [Extra-Tropical Cyclones] associated with extreme winds... will significantly increase [+20-50%] ... in the Southern Hemisphere (Section 11.7.2.4; Chang, 2017).'*⁸⁴

We should bear in mind the risk of climate change increasing the severity of extreme winds and the potential for fallen trees to cause expense to individuals, businesses, and governments by damaging buildings and vehicles, severing power, communications, gas, sewer, and water lines, blocking roads, and potentially causing injuries or fatalities, before blindly and enthusiastically pursuing policies of preservation of existing trees and tree-planting in urban environments. And we should certainly strike-down this push to make deep-soil areas for large trees an expectation in medium-density development.



Above: Trees blown over in Tasmania on 1 Sep 2024.⁸⁵

There's also a case for periodically making small adjustments to the Australian standards *AS 4055-2021 Wind loads for housing*, and *AS/NZS 1170.2:2011 Structural design actions Wind actions*, to ensure that buildings remain structurally adequate for future climates, and it would be reasonable for the state government raise this with Standards Australia.

⁸³ *Australian Government Disaster Ready Fund*, National Emergency Management Agency, <https://nema.gov.au/disaster-ready-fund>, accessed 1 Sep 2024.

⁸⁴ *IPCC Sixth Assessment Report*, section 11.7.4 Weather and Climate Extreme Events in a Changing Climate/Extreme Storms/Extreme Winds, p.1598, United Nations' Intergovernmental Panel on Climate Change, 20 Mar 2023, https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_Chapter11.pdf, accessed 3 Sep 2024.

⁸⁵ *Tasmanian wild weather eases but thousands still without power and flooded rivers inundate properties*, ABC News, 3 Sep 2024, <https://www.abc.net.au/news/2024-09-02/tas-severe-weather-flooding-impact-across-state/104298890>, accessed 3 Sep 2024.

Part C: My comments on the Draft Tasmanian Planning Policies (TPPs).

Primary Resource:

- *Draft Tasmanian Planning Policies Mar 2023.*⁸⁶

This section also pertains to the Draft Medium Density Design Guidelines because they both fall for ineffective adaptations to climate change, not suited to our cold climate, that will only worsen housing affordability and create urban sprawl.

The *Draft TPPs* are a bit of a mixed bag for the cost of living and are somewhat internally inconsistent. Some sections are good, for example:

Section 1.1.3 Settlement/Growth/Strategies:

'2. Plan for growth that will:

a) prioritise and encourage infill development, consolidation, redevelopment, re-use and intensification of under-utilised land... and

b) prioritise the development of land that maximises the use of available capacity...

*5. Actively address impediments to infill development, particularly in the major urban centres.'*⁸⁷

Section 1.2 Liveability/Strategies:

'1. Promote the location of residential use and development in areas that are close to, or are well connected to, activity centres or secure and reliable employment sources.

*2... a)... and access to, safe and efficient public transport.'*⁸⁸

Section 1.5.2 Housing/Objective:

'To provide for a sufficient supply of diverse housing stock, including social and affordable housing, that is well-located and well-serviced to meet the existing and future needs of the Tasmanians.'

And section 1.5.3 Housing/Strategies:

'4. Plan and provide for a diverse range of quality housing types that meet the needs of the community...

*5. Encourage higher density housing in suitable locations...'.*⁸⁹

However, some sections of the *Draft TPPs* would unjustifiably adversely affect housing affordability and waste residential land, pushing people into more remote locations where transport costs are higher, for example:

Section 1.2.3 Settlement/Liveability/Strategies point 7:

*'Support measures to mitigate the impacts of climate change on urban environments by encouraging urban forests, community gardens, street plantings, garden roof tops (green roof), water sensitive urban design and integration of shade and water features into public spaces.'*⁹⁰

⁸⁶ *Draft Tasmanian Planning Policies*, Mar 2023, https://www.stateplanning.tas.gov.au/data/assets/pdf_file/0022/342067/Draft-Tasmanian-Planning-Policies-March-2023.pdf, accessed 6 Sep 2024.

⁸⁷ *Ibid.*, p.10.

⁸⁸ *Ibid.*, p.12.

⁸⁹ *Ibid.*, p.16.

⁹⁰ *Ibid.*, p.13.

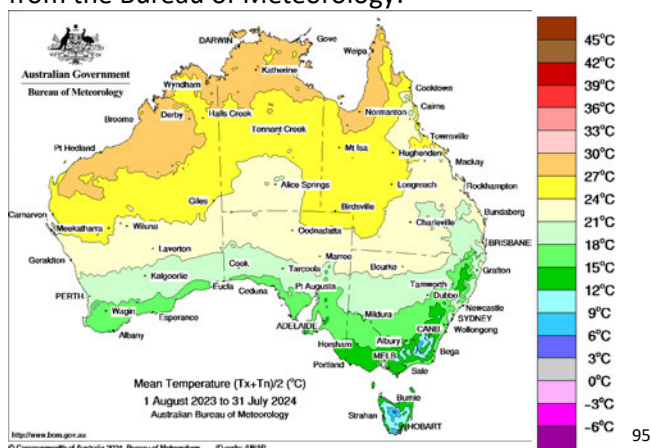
And section 1.6.3 Design/Strategies, point 3:

'Support sustainable design practices that are energy and resource efficient, address temperature extremes and reduce carbon emissions, including:

a) reduce the urban heat island effect by promoting the greening of streets...'⁹¹

Greenery provides cooling, and while that may be great for warm to hot climate cities like Brisbane or Barcelona, in Hobart, based on casual observations from having lived here for 47 years, there are typically only around 24 hours per year when it's significantly hotter than optimal. Most of the time, it's uncomfortably cold without heating. Globally, the rate of warming since 1982 has only been 0.2 degrees per decade.⁹² And even an additional four degrees of warming over the next century or two would still leave us significantly colder than Sydney is now.⁹³ In terms of amenity and pleasantness of the climate, we have nothing to fear from global warming. Most of us would be happier, healthier, more productive and go outside more in a warmer climate. A 2015 study published in the UK medical journal *The Lancet*, using daily mortality and temperature data from 384 locations across approximately 20 years attributed 7.29% of deaths to cold weather and 0.42% to heat. The data collected from three Australian cities (Brisbane, Melbourne, and Sydney) showed that the mortality minimising temperature (location-specific average over 24 hours) was 18.1 degrees,⁹⁴ (some 4.6 degrees hotter than Hobart has averaged over the last 20 years). It's frankly mind-boggling that the authors of the Draft TPPs, the City of Hobart's urban planners, and the authors of the *Draft Medium Density Design Guidelines* are all pushing policies copied from cities in warm climates. It's not evidence-based policy, it's bandwagonism. If anything, our present and likely future cold-to-cool climate is a reason to deliberately create heat islands via higher-density development, rather than trying to cool the city with greenery.

The stark difference between Hobart's climate and that of mainland cities is also pretty clearly shown in the below graphic from the Bureau of Meteorology:



And while there will be an increasing need for cooling of dwellings, even in Hobart as global warming worsens, the only truly effective way to deal with it is to mandate reverse-cycle air-conditioning or hydronic heating & cooling on new builds and rental properties, and to at some point, start funding government acquisition of and renovation or redevelopment of sub-standard rental properties, however, for the time being, the money would be better spent on policies to increase the stock of minimum-cost well-located housing as fast as possible.

⁹¹ *Ibid.*, p.17.

⁹² *Climate Change: Global Temperature*, US Government, National Oceanic and Atmospheric Administration, 18 Jan 2024, <https://www.climate.gov/news-features/understanding-climate/climate-change-global-temperature>, accessed 30 Aug 2024.

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Global warming is a serious problem, but most of the main effects of global warming on Hobart will not be things that state and local governments can mitigate. Planning schemes and development guidelines can't fix things like global resource shortages, higher insurance costs, more refugees, and other globally caused government budget and cost-of-living pressures. The fact that climate change will likely bring with it higher costs of living, and a greater need to provide housing for refugees only makes it all the more important that our planning policies, planning scheme and design guidelines serve to maximise the supply of well-located affordable housing, rather than being hijacked by people who don't care one iota if their priorities restrict supply, significantly raise the minimum cost of housing, and cause urban sprawl.

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6th September 2024

Submission to the Medium Density Design Guidelines

I became interested in planning and the associated issues when the State Planning Policies were introduced. My husband and I designed and supervised building our own home in the north of the state on a rural property in 1980 so I have some understanding of building issues.

As a Member of TasPIN and Hobart not Highrise I have read, discussed and made submissions on most issues in the planning area. Experience on our farm and in recent years in suburban Hobart has made me aware of the vital importance of being aware of the impacts of climate change on our future living conditions. Medium density housing in areas close to public transport, shopping facilities and community facilities benefits residents and makes provision of public services cheaper.

I am pleased to find a set of guidelines that reflect the considerations of the Draft Tasmanian Planning Policies expectations including the risks from climate change.

The Report on Improving Residential Standards in Tasmania suggests incorporating these Medium Density Design Guidelines within Residential Standards in the State Planning Policies. I strongly support that proposal. Legislative inclusion in the State Planning Policies is the only way to ensure the guidelines are applied so I hope they will be part of the regulatory documents.

The guidelines are clear and easy to understand. This has been achieved by including pictures that provide examples of expectations, diagrams of how the guidelines can be applied, along with detailed context questions and design responses.

The guidelines align with my expectations of medium density housing in Tasmania because they recognise that most residential zones in Tasmanian urban areas are suitable for 2 and 3 storeys in appropriate areas but not for 10-15 storeys or more. The varieties of building form in medium density opens the possibility of good design and suitability in a variety of urban areas.

The guidelines are practical for developers, designers and planners to use because they are clear in intention and provide good sample pictures and diagrams showing implementation. It is possible that extra diagrams may be valuable in demonstrating the variety of possibilities.

There is one major barrier to delivering housing that is consistent with these guidelines and that is increasing costs. I wonder if a few basic plans could be provided that would not require new architectural designs. Level sites could use standard plans that meet the criteria and are easier for Local Councils to pass.

One can only support guidelines that have been prepared for diverse inhabitants and are intended to facilitate a higher standard of medium density residential development in Tasmania, particularly Greater Hobart.

Consideration of the natural environment and a conscious approach to resource use can only benefit residents and the broader community. Hopefully there will be more developments that take advantage of passive heating and cooling to reduce costs and enhance amenity.

Building mass must be one of the important considerations with increasing densification so I am pleased to see consideration of this factor in the guidelines.

Wheelchair or pram access into entrances, hallways and doorways are less difficult and costly dealt with in the design stage rather than retrofitted after the build so I am pleased to see the design guidelines for the range of users with different needs.

The work on stormwater management is essential and covers many aspects that have not been incorporated in earlier systems like swales and rain gardens. Avoiding expansive

concrete driveways which encourage stormwater runoff will benefit surrounding properties. The design suggestions for increasing permeable surfaces are vital for the future.

As the climate warms and Tasmania experiences extended summer periods, the design process will need to place a greater focus on cooling solutions. The design responses will prove valuable in future climate scenarios.

Other considerations:

Flat roofs should be discouraged because they frequently cause drainage problems and they do give a bulkier look to a development

On page 54 there are large areas of concrete which will inhibit good waterflow. If a more permeable surface cannot be provided perhaps the concrete sections could be separated with small drainage facilities without hindering the driveway experience.

The design process in dealing with heat and fire risk could encourage the planting of fire resistant species even if they are not native species.

Most urban residents would support these proposals. There are concerns as to where the medium density would be sited.

It is important that the Regional Land Use strategy gives clear criteria for appropriate siting of medium density housing. I support medium density residential densification being applied to land inside settlements close to good public transport, infrastructure, public open space, green space, employment and services like shopping centres, schools and medical facilities.

Sincerely

Margaret Taylor

A solid black rectangular box used to redact the signature of Margaret Taylor.

6 September 2024

Department of State Growth

contact@greaterhobart.tas.gov.au

Submission – Medium Density Design Guidelines

Thank you for the opportunity to make a submission on the draft Medium Density Design Guidelines.

PIA is the peak body representing planning professionals and supports reform that improves planning processes and outcomes, especially through well-resourced strategic planning based on a strong evidence base consistent with PIA Australia's positions on liveability, health, [national and local settlement strategies](#), [climate conscious planning systems](#) and management of risk in a changing environment¹.

PIA Tasmania is very pleased to see the development of these design guidelines along with the comprehensive review of the residential standards being conducted by the State Planning Office. With the overriding need for a diversity of housing choices in Tasmania these reviews need to be progressed as a matter of urgency.

The guidelines are clear and easy to understand and cover the range of matters that are relevant to this form of housing development in Tasmania. PIA has no specific comments on the guidelines and encourages the State government to adopt them as part of the residential standards review.

Thank you for the opportunity to make a submission.

Yours sincerely,



Mick Purves
President Tasmania
Planning Institute Australia

¹ <https://www.planning.org.au/ourcampaigns>



Medium Density Design Guidelines

Shelter Tas Submission
September 2024

Contact us



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Shelter Tas is the Tasmanian branch of the
Community Housing Industry Association (CHIA)



Shelter Tas acknowledges the Traditional Owners
of country throughout lutruwita/Tasmania and
their continuing connection to the land, sea and
community. We pay our respects to them and their
cultures, and to elders past and present.



Shelter Tas welcomes and supports people of
diverse genders and sexual orientations.

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Contents

About Shelter Tas.....4

Our submission..... 4

Recommendations 5



About Shelter Tas

Shelter Tas is an independent, not-for-profit housing and homelessness peak organisation that represents the interests of low to moderate income housing consumers, not-for-profit Community Housing Providers and specialist Homelessness Services across Tasmania. We are a trusted conduit between the housing and homelessness sector and government, providing expert and independent advice that can influence government policy and grow public awareness to effect positive change for the benefit of low to moderate income housing consumers.

Our submission

Shelter Tas welcomes the opportunity to provide comment on the draft *Medium Density Design Guidelines*. We note that these guidelines are intended to provide best-practice guidance to planners, councils and developers in the preparation and assessment of medium density development proposals from the earliest stages. They are also intended to provide the community with insight into what quality medium density housing looks like and how such developments can occur within existing built-up areas without adversely impacting on local heritage and character.

When considering **dwelling design and dwelling mix**, we support the inclusion of consideration of social and affordable housing demand and the needs of different cultural and socioeconomic groups.

We would like to see the definition of “affordable housing” amended to reflect the standard 30:40 standard definition of affordable housing. The standard definition of affordable housing is where a household in the lower two quintiles (40%) of Australia’s income distribution is paying less than 30% of their income for their housing costs.

The current definition in the guidelines uses the very word that needs to be defined i.e “affordable” in the description; which makes it unclear for readers. The definition in the guidelines is also inconsistent with the definition of affordable housing in the *Improving residential standards in Tasmania: draft report*. In this report, affordable housing “Refers to rental homes or home purchases that are affordable to low income households, meaning that the housing costs are low enough that the household is not in housing stress”. And housing stress is defined as “The lowest 40 per cent of income earners who pay more than 30 per cent of their gross income on housing costs. This is known as the 30/40 rule and is the benchmark measure of housing affordability”.

We would also like to see the guidelines specify that there should be no difference in amenity (including the design, size and location) between social and affordable dwellings and market-rate dwellings within the same medium-density development. This will help to avoid the clustering of affordable units in less desirable parts of a building (such as those with limited access to sunlight) and help foster a sense of equity between people living in the same residential space.



Recommendations

1. Amend the definition of “affordable housing” to “affordable housing is where a household in the lower two quintiles (40%) of Australia’s income distribution is paying less than 30% of their income for their housing costs.”
2. Include guidance that there should be no difference in amenity (including the design, size and location) across market-rate and social and affordable housing tenures within the same medium-density development.

Conclusion

For any further information on this submission, please contact:

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TasPIN Submission

6 Sept 2024

Improving Residential Standards in Tasmania, Draft Report July 2024

TasPIN understands the push for increased density in our residential zones, cities, suburbs, and townships. However, this must not be at the expense of what matters for Tasmanians and future proofing for climate change. Character, sense of place, climate resilience, quality design and building, housing choice, affordable housing, and retaining the comparative advantage of Tasmania: all these are critical as the planning reforms push for increased density.

We consider that one of the main reasons for the recent rapid increase in house prices and the shortage of residential accommodation is the Tasmanian Government's refusal to prevent the unfettered spread of Short-stay Accommodation. For other factors, please see p 10 below.

Amenity Recommendations

There are many positive recommendations about amenity and liveability in the Draft Report and the Medium Density Guidelines. We support requirements for common open space and the inclusion of deep soil areas, improved landscaping, storm water management and improved subdivision standards for example. It is hoped that whilst at the moment many will only take effect through Performance Criteria, they will form the basis of revised Acceptable Solutions which will be mandated at some stage in the near future.

Improved Acceptable Solutions

TasPIN considers that the Acceptable Solutions currently set a low bar. The Medium Density Design Guidelines (MDDG) only apply to Performance Solutions or discretionary development. They are a good start, but are not mandatory. In our view, more needs to be done to improve the Acceptable Solutions to mandate good design, and improve amenity. The Acceptable Solutions do not deliver different typologies of housings, neither do they incentivise good design.

We would like to see residential amenity standards reinstated from the Interim Schemes. Things like passive solar to habitable rooms, direct connection of habitable rooms to private open space, no more building up on the side, rear boundary in GRZ, no increases in total hard surface coverage of a lot.

TPC Recommendations from 2016

The TPC in 2016 suggested various aspects of the SPPs needed review. Hence a review of the Residential Standards in SPPs should be broad ranging, and it seems very limiting to make it all about Medium Density. "The housing we need to have" is very important of course, but not the only aspect of the SPPs residential standards needing review.

Local Area Objectives (LAO)

We consider that:

- LAOs could usefully be adopted in all zones, given the absence of Desired Future Character Statements under the SPPs.
- the Local Area Objective at SPPs 6.10.2b should be changed to allow the LAO to guide all discretionary use and development, not just discretionary land use. This change would assist in retaining the character, built and natural heritage for which Tasmania is deservedly recognised and which locals cherish,



The 3 Options

TasPIN has considered all 3 options.

Option 1 This may be less effective in enabling denser housing along with liveability. We note the paper suggests it may be possible to start off with Option 1 and then establish new zones (Option 2) over time. This would seem to add to the complexity and delay implementation.

Option 2 This might work but would depend on the following critical factors

- That strategic work is done first, as with the RLUS and TPPs
- That zone purposes/intent and exact criteria are finalised, to determine where the 2 new zones of Urban Residential and Neighbourhood Residential might apply
- That Local Government can actually spatially apply the 2 new zones.
- That Local Government has the appetite to re-work the zones, after 10 years of planning reforms, and the inevitable planning fatigue.

Option 2 Transfer of Mount Stuart to Urban Residential Zone/Inner Residential Zone

Mount Stuart is a suburb which has bus-stops within 400 m of every house in the suburb. It will likely be a candidate for transfer from General Residential to Urban Residential, but the infrastructure will not support increased density, particularly multi-unit developments, as many of its streets are just two car-widths wide. This will result in issues during and after construction.

Option 3 The Overlays or Codes may be easier to apply than re-working the IRZ and GRZ. However, we consider that the Codes, should remain as overlays for natural threats like fire, coastal erosion, landslip etc. Assessment against codes as in Option 3 could involve more paperwork and a longer time for assessment against firstly the zone, then the code, so may not fit with the aims of the planning system of cheaper, faster, fairer etc.

Criteria for deciding a Zone

We have suggested in earlier submissions that Zone purpose statements for the suggested Residential Zones (in this case URZ and NRZ) could examine criteria such as location, specific figures for desired density, infrastructure and services, green open space and public transport capacity. This demands strategic work be done up front.

Alignment with Tas Planning Policies (TPPs)

We are concerned that the Medium Density Guidelines may not be aligned with many of the TPPs.

It is absolutely critical in our view that the State Policies, TPPs, Strategic planning such as Land Use Strategies cascade down and take effect through the SPPs. The fact that all the planning reforms since 2013 have operated from the bottom-up is appalling. We do not want the TPPs and other high level planning instruments retro-fitted to align with the SPPs. We want high level planning policies and strategic work which drive the lower planning instruments and produce good on- ground outcomes.



Incorporated documents

TasPIN endorses the preparation and/or inclusion of the “design guides as incorporated documents in the SPPs detailed in Section 7.2.1.2 of this report, summarised as:

- (a) Medium Density Design Guidelines (finalisation of draft guidelines required)
- (b) Subdivision design guidelines (new guidelines required)
- (c) Liveable housing design guidelines (existing guidelines by Liveable Housing Australia)”

The Medium Density Design Guidelines (MDDG) should also apply to apartments in business zones as an interim measure until a standalone apartment design guide is created, for high rise living in mixed use developments.

At this stage the MDDG are not mandated so whilst containing some good ideas, they can be ignored.

We are of the opinion that for DA assessment purposes, a new clause could be added in respect of compliance with Acceptable Solutions provisions to the effect that “Compliance with the recommendations of the Medium Density Design Guidelines shall be demonstrated” as part of any residential planning permit application.

It is absolutely critical that MDDG and Subdivision Guidelines are completely aligned with the TPPs.

Section 3 Definitions and terms

TasPIN thinks many of the terms need clarification. Sample pictures or diagrams would be helpful and assist in future assessments relying on these definitions.

3.2.1.2 Common open space – should structures that residents may want, such as covered areas to protect from adverse weather over a BBQ, be allowed? This needs to be clear or residents may end up covering all the open space. Should vegetation be the only covering allowed?

Driveways and carpark must not be considered as common open space.

3.2.1.3 Deep soil area, is likely to ‘form part of the common and/or private open space area for the site’. The potential definition for deep soil area states ‘not impeded above or below’ so that area could not be covered.

3.2.1.4 Replacing existing reference to **laundry facilities** in the definition of a dwelling raises concerns. The idea should only apply to certain medium density developments and so could be considered in Apartment Guides rather than Residential Standards.

3.2.1.5 Images need to be produced which show how the grouped and multiple dwellings satisfy the new deep soil, greenspace, stormwater run-off and common open-space provisions.

3.2.1.7 As per our comments at 3.2.1.5, it would be most beneficial if visual examples of the different typologies could be provided to show how plot ratio is assessed for the different built forms. Examples of single dwellings, grouped dwellings and apartment buildings would be most useful.

3.2.1.8 Workers Accommodation – potential **definition for workers accommodation** addresses key workers being accommodated on a temporary basis while they carry out their employment. This needs more definition. What is temporary? Are there to be limits on numbers or definitive timeframes?



On page 23 **The nesting table** needs to include the building classifications [1,2,3,4] to be clear as to which typology is included. Builders use those classifications so it would ensure everyone is aligned and on the same page.

Section 4 Residential Standards

TasPIN strongly endorses the inclusion of the following considerations in Residential Standards:

- Landscaping and deep soil areas
- Common open space for multiple dwellings; driveways etc not counted as COS
- Front elevations and passive surveillance
- Stormwater
- Plot ratio
- Environmental performance (including solar access, ventilation, noise, and water sensitive design)
- Lot size diversity
- Public open space and developer contributions

TasPIN members have experience in Hobart, Kingborough and Clarence municipalities. We do not understand or agree with the assertions that 'proponents are being discouraged from using performance based solutions that achieve good design and amenity outcome due to the narrow basis for discretion by Planning Authorities under the performance criteria and the broader perception in the industry and community that reliance on a performance criterion means that the application does not comply with the planning scheme and requires a higher level of scrutiny.' [p27]

Our experience is that developers commonly push the envelope and use Performance-Based solutions in applications to achieve relaxations. This delivers less than optimal results for liveability.

4.2.3.1 Plot Ratio

It would be useful to have fully compliant NPR Plot Ratio diagrams for each zone.

TasPIN strongly endorses setting a maximum amount of development (gross floor area) which relates to the area of the lot or the site. The old understanding of Plot Ratio.

Whilst the basis for improved development standards for plot ratio is to enable increased housing diversity and encourage design that responds to the site context, this **MUST** give regard to neighbourhood character, heritage places, precinct and streetscape.

TasPIN does not endorse full site coverage in any Residential Zone. Residences need setbacks and open space.

Diagrams on page 32 should be supplemented with pictorial examples

Section 4.2.3 Heights

Separating height and setback standards is supported as simplifying the assessment process.

The height parameters on page 33 are appropriate to Tasmanian residential needs but they must be in defined zones and provide amenities to the residents – close to transport, shopping centres, medical facilities, schools etc.

One of the advantages is that it may remove the apparent incentive to build “bulky boxes”, and fill the building envelope which seems to have prevailed since the de facto introduction of the SPP's through councils' interim planning schemes.



Section 4.2.3.3 Setbacks

Setbacks are to be considered in context of plot ratio, height, and solar access and the potential parameters on p35 seem appropriate. Zone applications will say where provisions apply. Setback greatly impacts privacy requirements and horizontal separation distances.

A new development on a northern boundary which could overshadow an existing building on the southern boundary needs a greater side setback.

Section 4.2.3.4 Landscaping

Green streetscapes, open space and tree cover are important for amenity. This includes countering urban heat in a warming climate. Co-ordinated investment in green infrastructure can also unlock new economic opportunities for our cities.

Significant policy and institutional reforms, guided by a new vision, are essential to ensure a healthy environment, community well-being and the liveability and prosperity of our cities for decades to come.¹

TasPIN has long campaigned on the need for urban planning to prepare for future liveability and amenity in Tasmania. Landscaping, which includes private and common open space, is a vital part of new planning, with other residential standards such as height, setback, amenity considerations etc

Implementation of these residential standards may require legislation that answers these questions:

- What is to stop a property owner from concreting over a “deep soil” area?
- Will there be a requirement for owners to maintain a percentage of the site as “deep soil” or “open space”?
- How will this be enforced?
- What happens when a large tree dies?

TasPIN would expect controls of the minimum landscaped area on a site, ensure that there is sufficient deep soil area for the planting or retention of trees, and require a minimum provision of soft landscaping, including trees.

TasPIN supports a minimum landscaping area covering 25% of the site, and deep soil area covering 10% of the site.

Landscaping would generally refer to common open space. Private open space is part of the building structure and must maintain the minimum standards adopted elsewhere.

Section 4.2.3.5 Solar Access

Simplification that a new solar access standard offers is a good idea. The objective would be to ensure that 2 to 3 hours of direct sunlight access to a habitable room is achieved in mid-winter. There will be issues with achieving this, but the introduction of separate parameters is a worthwhile idea. Sunlight access will need to be considered in conjunction with other parameters.

One aspect which appears to have been overlooked in the review is ensuring that solar panels on neighbouring properties are not overshadowed by a development.

P37 There are two primary objectives for the new solar access standard. Firstly, that building layouts optimise sunlight and daylight access within a development. Secondly, that built form and

¹ https://theconversation.com/our-legacy-of-liveable-cities-wont-last-without-a-visionary-response-to-growth-93729?utm_medium=email&utm_campaign=The%20Weekend%20Conversation%20-%2098618559&utm_content=The%20Weekend%20Conversation%20-%2098618559+CID_2f62ad13fb55cd882a240911852bdabc&utm_source=campaign_monitor&utm_term=Our%20legacy%20of%20liveable%20cities%20wont%20last%20without%20a%20visionary%20response%20to%20growth



siting minimises unreasonable overshadowing of neighbouring properties and their solar panels in mid-winter.

Together, the new standards should address parameters for solar access to dwellings, solar access to open space, and the impact of a proposal on adjoining properties solar access needs.

Section 4.2.3.6 Frontages

There are some issues with the current standards for fencing and street-facing garages. Introduction of a new standard for frontages should ensure that fencing, openings for garages and carports, passive surveillance and parking are of a higher standard. Frontages should be reviewed in conjunction with other property development standards.

4.2.3.6 Frontage elevations – the potential frontage elevation parameters through the permitted pathway excludes existing vehicle parking spaces. These may include open bays

Section 4.2.3.7 Privacy

Privacy considerations need to be coordinated with other planning standards. TasPIN considers mechanisms to prevent intrusion on neighbours' private spaces are essential to community amenity and so supports

- new windows in the IRZ, GRZ and LDRZ to have a setback of 3m from side and rear boundaries. These usually should include both glazed doors and windows.
- A balcony, terrace, parking space, or habitable room window that has a finished floor level more than 1 metre above existing ground level must be screened or otherwise designed to minimise overlooking of habitable rooms and private open space of dwellings on adjoining properties and on the same site, having regard to
 - (i) the design quality of the proposal referring to best practice design guidance in the Medium Density Design Guidelines, and
 - (ii) the prevailing topography, the location and site characteristics.

Section 4.2.3.8 Storage

The minimum provision of 1.5 m² appears to be an underestimation for City of Hobart residential properties as most of them have three waste bins. Each of these bins could be up to about 0.6 m x 0.75m, which means that you would need an area of at least 2.7 m² with a minimum width of 1.8 m and minimum depth of 1.5 m to accommodate three large bins with provision for manoeuvrability in a walled area.

Section 4.2.4.2 Movement Networks

Street design options can better provide and facilitate active transport as discussed within the sustainable transport paragraph. Provision of roads and driveways need further investigation. Emergency vehicles must be able to access multi-unit sites.

Subdivisions

TasPIN considers all Strata-titling should be considered a form of subdivision. Approvals for strata-title developments should be subject to the same development standards as subdivisions. The current definition excludes the strata title form of subdivision from the requirement to contribute to the provision of new or provide financial contributions for Public Open Space to cater for this increased demand. Accordingly, it is not considered to be aligned with the LUPAA *objective 1 (b) to provide for fair, orderly and sustainable use and development of air, land and water*”.



4.2.4.1 The overarching objective of the new lot size diversity parameter is to ensure that a subdivision delivers a range and mix of lot sizes suitable for development of diverse dwelling typologies including single dwellings, grouped dwellings, townhouses, apartments, and communal residences.

TasPIN queries how this fits with private and common open space? Are they part of the lot size?

4.2.4.2 Movement and transport and street design need considerably more work. We know of cases where emergency vehicles such as a fire truck cannot access the unit at the rear because of narrow driveways.

An improved roads standard is needed to encompass the broader scope of planning requirements essential for a successful subdivision movement network. This includes the parameters outlined below for subdivision structure, sustainable transport, and street design. A standardised road hierarchy is often defined in planning schemes and policies in other Australian jurisdictions. This enables clear and transparent expectations for proponents and assessment authorities for subdivisions.

In the SPPs there is no standardised road hierarchy to form a basis for consistent decision making.

4.2.4.3 Urban greening and public open space should be a major part of any residential area and any residential development including subdivisions. This is particularly important as dwelling density increases.

TasPIN supports the public realm of roads and open space must

- provide for a range of users and activities,
- contribute to an attractive streetscape,
- link between existing or proposed areas of open space,
- include landscaping that contributes to improved canopy cover and ecological functions, and be compatible with any open space strategy or policy adopted by Council.

The assessment test is to have regard to (i) the design quality of the proposal referring to best practice design guidance in the Subdivision Design Guidelines; and (ii) compatibility of the proposal with any relevant Local Area Objectives.

4.2.4.4 Services

The current services standards for residential subdivision need revision, especially stormwater management. All area of urban development require permeable surfaces that absorb stormwater and thus reduce flooding.

TasPIN agrees that subdivisions should ensure stormwater meets quality and quantity targets in the State Stormwater Strategy 2010, including all matters referred to in the report.

TasPIN supports the recommendation to:

Substitute the suite of residential subdivision standards in the IRZ, GRZ and LDRZ by implementing the improvements detailed in Section 4.2 of this report, summarised as:

- Add lot size diversity provisions into the lot design standards at clause 8.6.1, and 9.6.1.
- Replace the roads standards at clause 8.6.2, 9.6.2, and 10.6.2 with a new movement network standard.
- Include a new standard for urban greening, including provisions for public open space.
- Landscaping of the public realm.
- Add stormwater management provisions into the services standard at clause 8.6.3, 9.6.3 and 10.6.3.

Chapter 5 Homes in Business Zones

TasPIN supports the recommendation to:



- Substitute the suite of residential development standards in the UMZ, LBZ, GBZ and CBZ by implementing the improvements detailed in Section 5.2 of this report, summarised as:
- Replace the private open space provisions in the dwellings standards at clause 13.4.6, 14.4.6, 15.4.6, 16.4.6 with a new landscaping standard.
- Include a new standard for solar access, including parameters for solar access to habitable rooms, solar access to private open space, solar access to common open space, and impacts to adjoining dwellings solar access needs.
- Include a new standard for privacy, including parameters for visual privacy, acoustic privacy, and dwelling separation.
- Replace the dwelling storage provisions in the dwellings standards at clause 13.4.6, 14.4.6, 15.4.6, 16.4.6 with a new storage standard, including parameters for dwelling storage and waste storage.
- Include a new standard for dwelling mix, including parameters for dwelling mix and liveable housing.

Chapter 7

TasPIN opposes a new general provision at clause 7.0 of the SPPs permitting subdivision occurring along a zone boundary; detailed in Section 7.2.1.1 of this report. The given example of a residential block near a landscape conservation zone would meet with our strong opposition.

There is some support for amending Table C2.1 of the Parking and Sustainable Transport Code to reduce the minimum onsite parking rates for the right housing in the right place, such as social housing and development close to activity centres; detailed in Section 7.2.1.3 of this report.

7.2.1.4 Expanded application requirements for subdivision

TasPIN supports the recommendation that:

A robust assessment of a subdivision application is reliant on documentation of key information including:

- Site analysis plan demonstrating existing conditions
- Subdivision plan demonstrating an appropriate design response
- Street sections and plans communicating the role and function of streets
- Landscape plan demonstrating the location of canopy vegetation in streetscapes and public open Space.

TasPIN supports the recommendation to:

Insert new application requirements for subdivision at clause 6.0 of the SPPs, including landscaping and street design plans; detailed in Section 7.2.1.4 of this report. Section 7.2.1.4

TasPIN considers it is essential to adopt tools to assist with the implementation, interpretation, and useability of the new standards, including those detailed in Section 7.2.1.5 of this report, summarised as:

- (a) Fact sheets (utilise fact sheets supplementing this report)
- (b) Technical guides with explanatory figures (new technical guides required; part of Improved Guidance Project)
- (c) Model conditions (new model conditions required; part of Development Manual Project) Medium priority

The technical guidance should have diagrams with figures to maximise usability of the improved standards. Some of the figures could then be included and referenced directly in the relevant standards, although this is not considered essential for the initial implementation phase.



7.2.2 Additional considerations

Larger and more complex matters warrant additional work to develop a considered response before implementation into the SPPs. There is a high degree of risk involved in prematurely applying changes regarding the matters highlighted below.

7.2.2.1 Inclusionary zoning

TasPIN supports the recommendation to:

Undertake additional work to investigate opportunities and feasibility for inclusionary zoning; detailed in Section 7.2.2.1 of this report.

Also to introduce the concept of employing a development bonus for social housing providers, through a voluntary inclusionary housing approach. The dwelling mix standard in the improved dwelling standards for the business zones also contemplates a height bonus for social housing.

7.2.2.2 Infrastructure contributions

TasPIN supports the integration of developer contribution systems in the planning process, though a comprehensive scheme must first be conceived, including cohesive legislative frameworks, backed by strategic infrastructure planning.

TasPIN supports

- the urban greening standard in the improved subdivision suite introducing the concept of a development contribution for public open space into the SPPs.
- introducing open space contributions for all multiple dwelling strata development as canvased in Section 4.2.4.3.



TasPIN Recommendations

TasPIN supports the use of **plot ratio** to set the overall scale of development by managing the scale and coverage of buildings on a site and as an alternative to the current density and building envelope controls. It would work with other requirements for building height, setbacks, landscaping, and solar access.

TasPIN supports the use of **separate building height** and **setback controls** to simplify this part of the assessment process.

TasPIN supports **landscaping, deep soil and open space controls** including private and shared open space, as an important factor in housing development.

TasPIN supports a potential new requirement for **solar access** to ensure dwellings and solar panels get appropriate access to sunlight and to also protect adjoining developments and their solar panels from overshadowing.

TasPIN supports the potential improvements proposed for the existing suite of **subdivision standards**. These include lot design, urban greening, movement networks, and services.

TasPIN supports **re-instatement of Local Area Objectives, and a focus on building quality and design**.

TasPIN strongly supports the return of privacy and solar access provisions to the SPPs.

TasPIN supports the introduction of **developer contributions**, as happens in other states.

TasPIN supports the view that when a discretion is triggered, consideration must be given to how well it balances with all other performance criteria. Any bonuses or relaxations granted to a developer under Discretions could possibly be linked to **delivering improved amenity standards**.

TasPIN considers that the **housing crisis** is more complicated than the overview in this Report. Much more work is needed. Short stay accommodation is a massive issue. Other factors include labour shortages, materials supply, finance costs, the taxation/economic system, and the fact that large scale infrastructure projects are reducing the available workforce for building housing. Migration which increases demand is also a factor.

We recommend increased **storage areas** and waste space allocation. 3 garbage or recycling bins need more space than that allocated in the Report.

TasPIN supports the view that **Climate Change risks** must be a major consideration in all planning documents

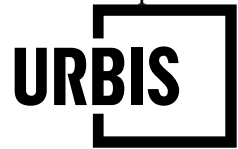
Pictorial examples included in the Draft Report rely on Performance Criteria. Does this suggest that the Acceptable Solutions are too minimal? We would like to see many more examples or diagrams for NPR (No Permit Required) and Permitted development.

TasPIN considers that all **subdivisions should be discretionary**, as they used to be, so any environmental constraints can be assessed at the subdivision stage.



SUBMISSION TO MEDIUM DENSITY DESIGN GUIDELINES

Prepared for
THE DEPARTMENT OF STATE GROWTH (TASMANIA). SEPTEMBER 2024



8 September 2024

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Urbis Ltd
ABN 50 105 256 228

Submission to Draft Medium Density Design Guidelines

Urbis is pleased provide this response to the Department of State Growth's draft Medium Density Design Guidelines (the Guidelines). Urbis has one simple goal – to shape the cities and communities of Australia for a better future. We are deeply committed to supporting Australia's growth and we celebrate the breadth of diversity that exists within Australian society: from our nation's first people to its most recent arrivals.

We are united and focused on addressing the significant issues facing Australia's cities and regions and believe there is a link between strong cities and prosperous regions. Australia's future prosperity depends on government, business and the community working together to support our cities and towns – and the people that inhabit them – no matter how big or small.

We look forward to ongoing collaborative engagement with the Department of State Growth and welcome the opportunity to participate at a public hearing if required.

Kind regards,

A handwritten signature in black ink, appearing to read "Julia Bell".

Julia Bell
Director (Design)



CONTENTS

1. Introduction2

2. General comments3

2.1 Scope3

2.2 Structure4

3. Feedback on content5

3.1 Introduction5

3.2 Context Analysis5

3.3 Design elements5

4. Conclusion7

1. INTRODUCTION

This submission has been prepared by Urbis in response to the draft Medium Density Design Guidelines (the Guidelines) dated July 2024.

Our submission responds to the Tasmanian built form and housing context, including consideration of the urban and residential use and development standards in the State Planning Provisions.

Currently, the Tasmanian planning system lacks design guidance in relation to multi-dwelling housing and in particular, apartments. The Guidelines are important to setting new benchmarks for high quality and locally responsive design outcomes.

Firstly, we confirm our strong support for the development of the draft Guidelines and their importance in guiding high quality and amenity medium density housing in Tasmania.

Through our experience crafting and responding to design guidelines and codes in other states, this submission has been drafted to highlight key areas where the guidelines could be clarified/strengthened for ease of use to have a positive impact on medium-density housing delivery in Tasmania.

2. GENERAL COMMENTS

Our general comments are grouped into two broad themes including scope – which includes discussion on the focus of the guidelines, intended audience and use of the Guidelines, and structure – which includes discussion on document layout.

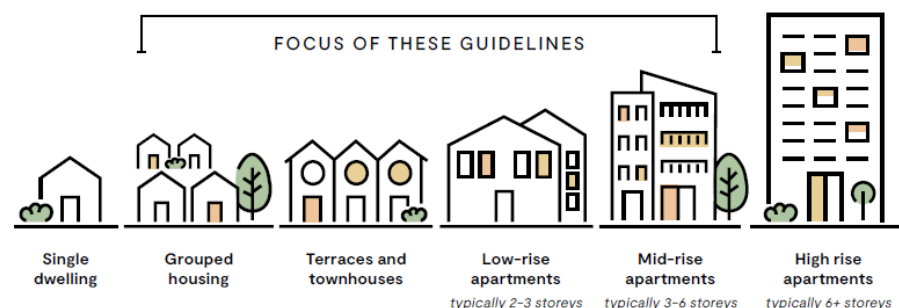
2.1 Scope

2.1.1 Definition of housing types and focus of draft guidelines

The figure below taken from the draft Guidelines defines their focus and housing types which may be considered as medium density. The spectrum of housing is wide ranging in terms of typology and scale. As compared to Victoria, medium density housing typically applies to multi-unit dwellings, townhouses and low-rise apartments of 2-3 storeys.

It is our assessment that the broad spectrum of housing typology the Guidelines apply to may be weakening their intent. As an example, design approaches to site layout, car parking and massing are likely to be quite different to deliver a townhouse development versus a 6-storey apartment building.

SPECTRUM OF HOUSING TYPES



Furthermore, the content of Section 3 'Design Elements' appears to be mostly centered on residential development of 1-3 storeys. The draft Guidelines make almost no reference to mid-rise apartments and contextual response.

To ensure the effectiveness of the draft Guidelines, it may be beneficial to narrow the spectrum of housing types they apply to. It may also be beneficial to provide clarity on the context they apply within. For example, the draft Guidelines and associated diagrams appear only to show examples of development in residential areas up to 3 storeys. The draft Guidelines should also show examples of mid-rise development occurring in accessible locations such as near activity centres or along transport corridors.

This would make it more intuitive for users to understand how the guide should be interpreted and accurately applied.

2.1.2 Local/statewide focus

It is not clear how the draft Guidelines are linked to the Tasmanian Planning Scheme and where they should be applied. On page 6 'Introduction', the draft Guidelines are described as *"a non-statutory document developed as part of the implementation of the Greater Hobart Plan"*. It then goes on to state that the draft Guidelines *"are intended to facilitate a higher standard of medium density residential development in Tasmania, particularly in Greater Hobart"*. Without statutory weight, it's unclear how a higher standard of housing will be achieved and how the draft Guidelines will be enforced.

Additionally, the draft Guidelines should be clear about their applicability to Greater Hobart or the broader state.

2.1.3 Intended audience

The draft Guidelines state that they aim to reach a diverse audience, ranging from professionals to community members. Consistent with this, the draft Guidelines currently have a warm visual style that is appropriate for a public-facing document.

However, the intention to appeal to a broad audience has at times, resulted in the draft Guidelines not synthesising complex urban design concepts successfully.

To ensure the useability of the draft Guidelines, their intended audience needs to be clarified. More specific recommendations and directive language and diagrams are needed to be able to influence designers, developers and professionals in Tasmania. Alternatively, the use of less detailed content with a more artistic drawing style and aspirational language could be used to reach a broader, community-based audience.

2.1.4 Guidelines versus Codes

The draft Guidelines are described as a non-statutory document that provides best practice design guidance for the site, building, environment and services. Unlike a design code or design standards, which specify numeric setbacks and standards that must be met to achieve compliance.

For the most part, the draft Guidelines have avoided the use of metrics and technical standards. However, there are some examples of the use of numerics in the design response. For example, under dwelling amenity, the design response seeks to ensure room depths allow for good daylight penetration and avoid dark interior spaces. A maximum depth of 7m is recommended for living areas and kitchens.

The draft Guidelines provide no reference documents. Therefore, it is unclear where the 7m maximum floor depth has been derived from. In Victoria, the maximum floor depth of a single aspect apartment is 9m, subject to meeting a series of requirements. The draft Guidelines should use a consistent approach, where metrics are referenced in the guiding figure diagrams only. Reference documents that have informed the draft Guidelines should also be listed.

2.2 Structure

2.2.1 Linking to overarching principles

The broader structure of the document which includes, how to use the guidelines, context analysis, design elements and design responses is logical. However, we've identified a few missing links between the spectrum of housing typologies, design themes and responses.

It is not clear that the draft Guidelines cover off the broad spectrum of housing types, which is inclusive of grouped housing through to mid-rise apartments. As an example, none of the design element diagrams and preferred outcomes reflect on mid-rise apartment buildings. A 6-storey apartment building will derive a different building envelope and potentially greater off-site amenity impacts than a low-scale apartment building.

Most of the diagrams and site response examples appear to be directed at townhouse or low-scale (up to 3 storeys) apartment typologies in a residential context. To avoid diluting the effectiveness of the draft Guidelines, it may be beneficial to reduce their scope of application in terms of typologies and context.

Each of the Design Elements have a clear "objective" as listed on pages 18 and 19. However, this doesn't carry through to each topic. Instead, the first sentence under each relevant topic defines what it is, rather than the desired outcome to be achieved by a medium density development. The design responses also quite often read as statements, rather than a "how to guide" to achieving a high-quality design outcome. This at times, means that the design elements and responses are not well linked back to underlying intention of the document.

Based on the above, we have some suggestions for clarification of content:

- The draft Guidelines should either have a reduced focus in terms of the spectrum of applicable housing typologies or provide design advice across the applicable spectrum of housing types as outlined at page 8.
- The draft Guidelines should provide an objective under each topic and ensure the design responses provide a "how to guide" to meeting the objective, with direct reference to relevant figures that illustrate the response.

2.2.2 Connections between drawings and text

The graphic style of the drawings is both clear and consistent. However, they sometimes lack a clear connection to the relevant text. At present, drawings are laid out ambiguously, making it difficult to discern which written guideline they relate to. Furthermore, the content of the drawings does not necessarily action the guidance specified.

There should be a balance between the use of text and drawings, where legibility to the reader is emphasised, and drawings help to illuminate clear and directive guidance. This could be achieved through creating more detailed, annotated drawings that speak to more directly to the range of concepts listed in the design response. Where possible, the figures should be placed adjacent to the relevant text they are illustrating. In-text references to relevant figures would also be useful.

3. FEEDBACK ON CONTENT

This section provides feedback on the content of the draft Guidelines.

3.1 Introduction

The introduction includes a “How to use the guidelines” section (p. 7) that describes the intended audience of the document and the document structure. However, it doesn’t explain to the user how to use the draft Guidelines, and the relationship between the context analysis and design elements. The usability of the draft Guidelines could be improved by:

- stating how different typological outcomes are addressed in the document or reduce the focus of the Guidelines.
- better linking the conclusions of the context analysis with the design elements and preferred outcomes.
- ensuring each design element topic has a clear objective aligned to best practice, followed by design responses which explain how to achieve the objective.

3.2 Context Analysis

This section is useful for an inexperienced designer or developer as it provides simple and clear guidance for early analysis and design considerations. To be improved, it could be linked back to the design and development process, and “How to use the guidelines” section. This would allow the inexperienced designer or developer to comprehend how a context analysis allows them to deepen their understanding of the site, produce a higher quality outcome and satisfy planning policy requirements for site analysis and understanding.

3.3 Design elements

3.3.1 The site

Page 8 of the draft Guidelines states that they extend to mixed use development where residential and non-residential uses co-exist. However, the diagrams and guidance all appear to be directed to a purely residential context. The Design Prompts on page 20 require consideration of the equitable future development of adjoining sites. However, the draft Guidelines do not define equitable development, and the relevant design responses do

not describe what an equitable response is. There is a strong relationship between setbacks, building separation and visual privacy/overlooking. This is not evident in the draft Guidelines.

Under Site layout, the relationship between the design responses and the diagrams could be strengthened. We have noted the following instances which require additional clarity and refinement:

- The positioning of the drawings makes it unclear what written guidance they relate to. There are three elements on the spread: (1) Site cover, (2) Setbacks and (3) Building separation, with the drawing positioned directly above building separation on a single page. Yet, the drawings refer to Site cover and Setbacks, with Building separation not addressed in the supporting graphics.
- The inconsistent application of design principles in the drawings makes it unclear what the guidance is proposing.
- The site cover diagram could be improved to explain the site cover design response directed, particularly in relation to communal open space, solar access, contextual responsive and private open space.
- The varied side setbacks in response to adjacent buildings is not clearly expressed in the diagram.
- Reference to “land use compatibility” under building separation is not reflected in the diagrams. Setbacks and amenity standards will vary depending on different land uses and development outcomes.

To better articulate the relevant design responses, it would be beneficial to provide a corresponding diagram for each individual topic. For example, site coverage could show the COS and solar access resultant from good design decisions. Building separation could show how greater heights require greater separation, and setbacks could show how the building is setback to allow for canopy tree planting and to soften the buildings bulk and mass. Additionally, different typologies and sites require different site layout responses. Drawings should consider how to incorporate this.

3.3.2 The building

In the dwelling design section (p. 30-35), the dwelling layout diagram (fig. 6) shows a bedroom with no direct access to an external window, which is a poor design outcome. Similarly, in dwelling amenity (p. 36-39), room ventilation drawings (fig. 9) demonstrate how ventilation is affected by the placement of windows, but do not explain which outcome is best practice or preferred.

For the readers benefit, diagrams should be annotated to whether they are preferred/best practice outcomes or not. The dwelling layout diagram at Figure 6 would benefit from further clarity to the typology it applies to (eg. apartment of townhouse) and available outlook/external walls. For ventilation, lower quality outcomes, such as single-sided ventilation, should be clearly highlighted as suboptimal compared to cross-ventilation.

3.3.3 The services

The diagrams at Figure 12 that demonstrate good and bad examples of car parking do not necessarily link to the design response. It is also noted that the photo at page 54 appears to illustrate a bad car parking outcome as per diagram 4 of Figure 12. The diagrams should illustrate how spatial decisions can positively or negatively influence other design outcomes. Additional annotations could be used to express what's good or bad about the design outcome, with intext references back to the design responses.

4. CONCLUSION

Thank you for this opportunity to provide feedback on the draft Guidelines. We are supportive of their preparation as they represent a significant opportunity to positively influence development outcomes in Tasmania's urban environments and we commend the Tasmanian Government for their leadership and approach on this matter.

We are excited by the prospect of being involved in the next steps in the finalisation and publication of the Guidelines and welcome the opportunity to meet and discuss our feedback further as required.



Our Ref: ME | SJ

13 September 2024

David Laskey
Director
Urban Renewal and Development Team
Department of State Growth
GPO Box 536, Hobart TAS 7001

Via email: contact@greaterhobart.tas.gov.au

Dear David

Draft Medium Density Design Guidelines

Thank you for the opportunity to provide a submission on the Draft Medium Density Design Guidelines (MDDG).

We welcome the investment in the Draft Guidelines that will position Tasmania to support three key outcomes:

1. Improved housing diversity and design, responding to our housing crisis.
2. Improved housing density, adding to Tasmania's lifestyle options and supporting efficient urban living.
3. Improved guidance for development proponents, improving compliance and supporting the statutory development assessment process.

The Local Government Association of Tasmania (LGAT) has been advocating for all of these, but particularly for completion of our planning framework with helpful best practice guidelines to assist proponents¹.

Our submission is focused on recommendations around communicating this guideline to the public and to proponents. We will leave councils, who host substantial planning expertise, to comment on the specific elements within the MDDG.

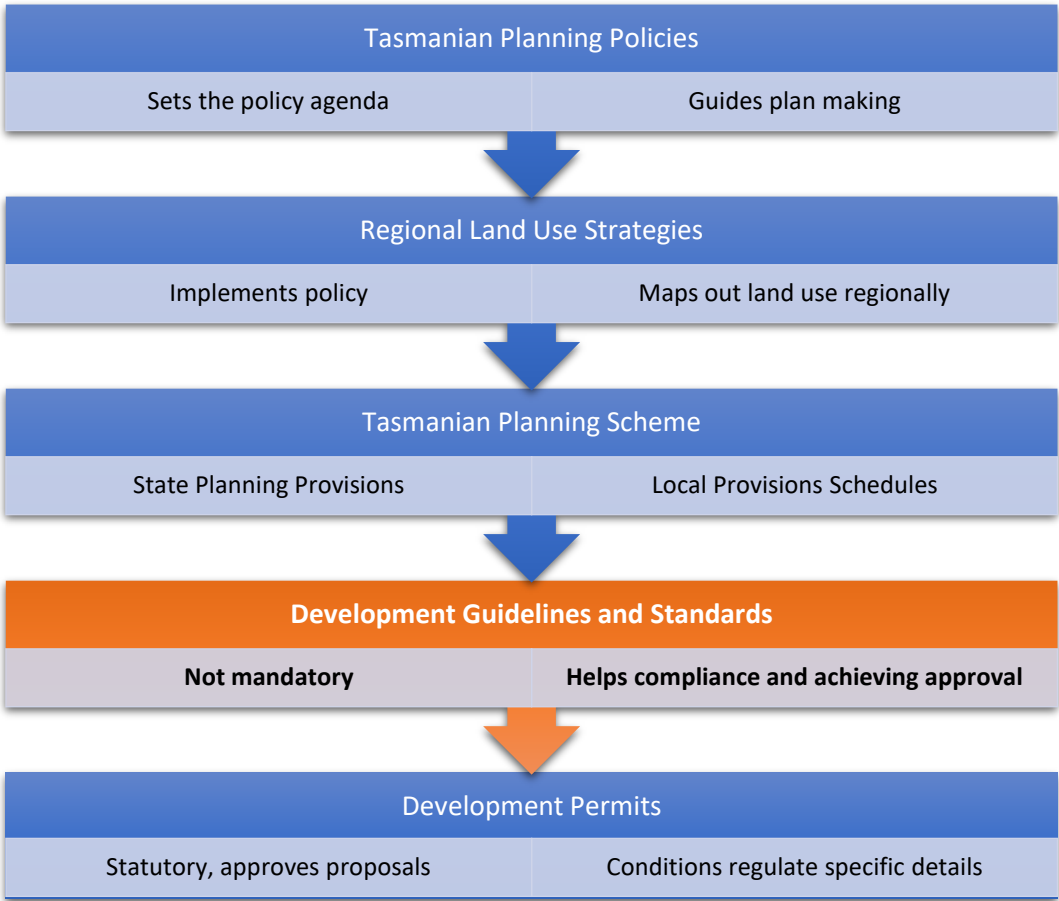
We recommend that the MDDG better communicate its non-statutory role in the planning system, in particular what it can and cannot do, or be used for. In its

¹ See: LGAT's [State Budget Priority Statement 2024-25](#)

introduction on pages 6-7, the Guidelines should explain what it means to be non-statutory, especially that they:

- Are intended to support the statutory development assessment system, improve certainty and the likelihood of favourable assessment against the Tasmanian Planning Scheme.
- Are not intended to be used as the basis of a refusal – i.e. the MDDG does not preclude alternate design options being proposed and approved, where they meet planning scheme requirements.

The Guidelines should communicate where they sit within the planning system, ideally in a straightforward and visual way. This helps convey how it relates to other planning instruments. For example:



We welcome additional development guidelines and standards, such as these, alongside the core, statutory planning instruments. It is important that these are presented together so proponents are aware of them and can incorporate them into their designs. At present, these documents are hosted by the agencies that produce them, fragmented across a range of websites. For example, the [Tasmanian Municipal Standards](#), the Department of Natural Resources and Environment’s [Conservation Assessments and](#)

[Development Planning](#), the Department of State Growth's [Standard Drawings](#), TasWater [Technical Standards](#), and TasNetworks [Developer's Toolkit](#).

We are currently developing the Tasmanian Development Manual and are looking at ways to properly connect disparate documents and convey this information efficiently and helpfully to proponents. We invite the Tasmanian Government to collaborate with us and councils in doing this.

Thank you again for the opportunity to provide comments. Please contact Michael Edrich if you have any questions or would like further information, at [REDACTED] or [REDACTED].

Yours sincerely



Dion Lester
CHIEF EXECUTIVE OFFICER



City of **HOBART**

13 September 2024

David Laskey
Director
Urban Renewal and Development
Department of State Growth

Dear David,

RE: Medium Density Design Guidelines – Draft July 2024

Thank you for providing an opportunity to comment on the Medium Density Design Guidelines – Draft July 2024 ('the Guidelines'), which form a critical element of the implementation of the 30 year Greater Hobart Plan and more broadly, the State Government's planning reform agenda.

The City of Hobart ('the City') welcomes this strategy at a time when the need for improving housing design could not be more significant in shaping and delivering a more compact city through high-quality built form responses that adequately serve the City's residents and visitors.

As an active partner and collaborator in driving planning system reform, the City looks forward to seeing the Guidelines' implementation through the *Improving Residential Standards in Tasmania* project, ultimately leading to amendments to the State Planning Policies. Furthermore, the City anticipates that this process may afford appropriate statutory weight where necessary to design excellence to guide medium density housing and encourage increased housing diversity in the market including affordable, social and key worker housing.

Please note the City's Urban Design Advisory Panel (UDAP) have prepared a separate submission that we enclose along with this officer submission.

General comments

Urban Design Excellence

It's generally accepted that medium-density housing design in Tasmania would benefit from a more focused approach to understanding how processes that enable good design—through iterative, open, and thorough examination of early design ideas—can lead to better outcomes for developers, neighbouring properties, and the broader community.

The City's draft Urban Design Guidelines will be an important City Strategy with urban design parameters having already been incorporated into the Central Hobart Plan and draft North Hobart Neighbourhood Plan. They will provide an innovative, place-based guide, outlining urban design principles and strategies which will apply equally to the public realm and private development in the municipality to help shape better places for all.

The City's urban design guidelines in development have commonalities with the Medium Density Design Guidelines but they will be applied to all types of development within the City, including commercial, public open space (e.g. provision of new streets). They also seek to reinforce the guidance contained in the Medium Density Design Guidelines, as it is about incorporating good practice into design and development in our City.

Housing typologies

While the Guidelines aim to apply to a wide range of housing typologies they appear to focus mostly on terrace and townhouses. These may indeed be preferable and easier to be delivered across the state, however, they are not the only form of medium density housing. This could be addressed by either circumscribing more clearly what typologies the Guidelines apply to or by having more variety in relation to the diagrams, photos and design responses.

There is a somewhat inconsistent level of design in the suggested different sections dedicated to the Design Elements such as open space and storage, provide concrete numeric suggestions, whereas others, like site structure (page 24) are very broad and could be more difficult to interpret/consider.

1. Introduction

Page 8. What is medium density housing

There appears to be a definition error on page 8. The definition of 'multiple dwellings' in the TPS is two or more dwellings on a single site not a 'lot' as currently documented on page 8.

This section is succinct and effective but could benefit from mentioning how the Guidelines should be interpreted and used, that is, how they are going to be implemented.

The Introduction might benefit from including one or two paragraphs that provide more context. For example, that the predominant housing stock in Tasmania is detached, even within or immediately adjacent to our town and city centres, and the impacts of this model of development if it continues. It would also be beneficial if this section more clearly articulated how the Guidelines aims are met and referred to in the rest of the document.

2. Context Analysis

The context analysis appears to be premised on a very simplified representation of the natural and built environment, in particular, the example diagrams.

This, in itself, would not be an issue if the analysis also incorporated other tools and approaches that are now common practice such as the use of 3D models, movement and dwell data, etc. especially for larger and more complex proposals.

At the very least there should be requirements to include:

- Streetscape elevations
- Front and side elevations
- Typical cross-sections.

It may be worthwhile to include encouraging developers to engage a professional consultant, whether it be an architect and/or planner to undertake much of this work prior to purchasing a property. The Neighbourhood (page 12) and Streetscape (page 14) analysis helps establish whether the site is appropriate for the intended use/development. If it is not appropriate, then an alternative site should be considered.

Site layout (page 22) discusses site cover. However, the Improving Residential Standard Draft Report looks at Plot ratio, is it worth revising this section so that the two projects align.

The neighbourhood-level context analysis lacks consideration of its location relative to other neighbourhoods, jobs, and activity centres. This could be a small map that shows the structure of the city/town. Alternatively, a short section could be added to this section of the Guidelines about cityscape/townscape and their functional structure. This is important because it is this level where the benefits of a good location for medium density are the most evident.

Finally the use of pedestrian catchments as a radius can be misleading as it does not represent the paths of travel, which is mostly determined by the street layout, amenity and quality. It is suggested that a more precise pedestrian catchment using the lengths of streets from the site, this could be done through an isochrone.

3. Design Elements

The Site

The page dedicated to 'site structure' could lead to confusion because of the use of the terminology mass, form and scale. Mass can be more easily understood as the result of building form + scale.

In addition, these concepts have not been illustrated through any diagram. This section could be simplified, which would likely improve understanding and practicality.

The document could benefit from passive surveillance being added to the building (page 28) checklist, whilst it is referenced in other parts of the document, its inclusion in the checklist is important as well as being illustrated in the Dwelling layout diagram (page 31)

It is contended that the Dwelling layout diagram (page 31) could be interpreted as being an apartment layout which includes an internal bedroom with no external windows. This diagram does not appear to adequately illustrate the need for a window in the second bedroom to provide necessary daylight and ventilation.

The diagram could be shown with some surrounding context to ensure that it is correctly interpreted. E.g. another unit or conjoined dwelling on the wall abutting the living room could work. Alternatively, windows could be shown on the diagram, or the second bedroom could be relocated to a wall which is clearly illustrated as an external wall with no adjoining building.

Ventilation flow could potentially be illustrated flowing through the building envelope. A sun path could be used to better illustrate how sun can shine into other parts of the dwelling layout.

The Site, Landscaping and Greening

The City strongly supports more innovative, compact massing of buildings that the introduction of a plot ratio can deliver (which is set out in the draft Improving Residential Standards Report) to support more meaningful allocation of land to deep soil areas, gardens and more 'shared streetscapes' particularly in areas where streets are narrow and street tree planting options are limited.

Landslip risks & Code overlays

Page 25. Sloping sites would benefit from a reference to the Landslip Hazard Code at the bottom of the page as the current illustrations deviate from the landslip code and could be misleading depending on the site conditions. This could also be potentially included where other hazards are mentioned. (Pages 10 and 12).

General references to associated codes would be useful throughout the guidelines.

Survey Questions

1. Do you find the guidelines clear and easy to understand?

Yes, with the exception of some of the diagrams and the use of ambiguous architectural terminology (e.g. building massing, composition, etc.). These may require further clarification and/or a definition in the glossary.

2. Do the guidelines align with your expectations of medium density housing in Tasmania?

To a degree. The guidelines appear to focus on 2-3 level townhouses and terraces which would be consistent with the broader developer context. However, the focus of the guidelines stated on page 8, show a broader range of typologies and this may not be sufficiently illustrated or explored in the guidelines to ultimately assist users of the guidelines.

However, it is important to note, that the work aligns with the Improving Residential Standard Draft Report. Setbacks illustrated in Fig. 4 (page 23)

3. Are the guidelines practical for developers, designers and planners to use?

The City finds the guidelines practical to use with some further suggestions below:

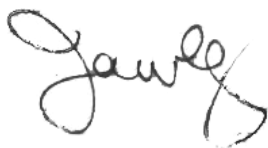
It may be worthwhile encouraging developers to engage a professional consultant, whether it be an architect and/or planner prior to purchasing a property. This would also be in line with the design response suggestion to engage the services of a landscape architect (page 43).

The Neighbourhood (page 12) and Streetscape (page 14) analysis helps establish whether the site is appropriate for the intended use/development. If it is not appropriate, then an alternative site should be considered.

4. Are there any barriers to delivering housing that is consistent with these guidelines?

Finding builders who are qualified to undertake this scale of building (three storeys and over) are a potential barrier. Many Tasmanian builders are only qualified/insured for up to 2 storeys.

Yours faithfully,



Jennifer Lawley
**MANGER LAND USE AND
DEVELOPMENT PLANNING
CITY FUTURES**



Phillip Holliday
ACTING DIRECTOR CITY FUTURES

Medium Density Design Guidelines:

UDAP submission

The City of Hobart's [Urban Design Advisory Panel](#) (UDAP) wishes to thank and show their support for the Medium Density Design Guidelines (MDDGs) project being undertaken by the Tasmanian Government. Helping deliver better housing outcomes is fundamental in achieving the vision for a compact city as contained in the 30-Year Greater Hobart Plan.

UDAP provides independent and professional urban design advice on proposed projects within the City of Hobart local government area. The panel has a key role in improving the design quality and discourse within Tasmania's capital city by encouraging better design for developments exceeding 2,000m² in floor area or 3 storeys in height within the Central Business, Commercial, and Urban Mixed Use Zones.

UDAP is often called on to provide considered design advice on medium- and high-density residential developments, and therefore the panel has an interest in the MDDGs. The panel includes practicing architects with a wealth of knowledge and experience designing residential developments in the Tasmanian context.

This submission presents UDAP's professional views, as both individual members and as collective, on the draft Guidelines as published in July 2024.

SUMMARY: key feedback

The Guidelines are generally clear in structure and content and, for a design literate audience, will be easy to follow and understand. Likewise, the design prompts provide a useful instrument/tool to guide better design outcomes.

However, the DMMGs would be improved with an emphasis on principles (the what and why) rather than the prescriptive details (the how). This is because principles are inherently more adaptable to project-specific considerations arising from the context, site, budget and brief. Some of the diagrams veer towards a one-size-fits-all 'acceptable solution', which risks unintended poor outcomes. The role of the design

process is to work through options to identify solutions that best balance the constraints to achieve agreed principles and desired outcomes.

It's considered that the scope of the document (shown on page 8 as grouped housing, terraces and townhouses, low rise apartments and mid-rise apartments) may be too broad, as the guidelines don't cover each of these typologies equally. It would probably be better to:

- 'lift' the document to focus on the principles and outcomes, which are applicable to all medium density typologies, or
- narrow the focus to the housing type that is most in need of design guidance or,
- create sections within the document where guidelines are provided specifically for that typology (e.g. design considerations for mid-rise apartments will be very different to grouped housing in many respects).

Finally, while there are many commonalities in how to approach good design for medium density housing, regardless of the locale, the present document does not address the particularities of the Tasmanian context. For future iterations of the document, it is suggested that more emphasis be placed on responding to our local climate, topography and our cities and towns urban morphologies.

1/ Do you find the Medium Density Design Guidelines (the Guidelines) clear and easy to understand?

- A well-designed, legible and visual document that should be easy, in particular for a design literate audience, to read. Good framework of Design Elements: site, building, environment, services. The glossary and use of images and diagrams will assist non-expert audiences to access the guidelines.
- However, clarity could be improved with a stronger hierarchy of information, prioritising design principles and outcomes with less emphasis on detailed and specific directions.

- UDAP question the definition and scope of the Guidelines (refer to page 8). The housing typologies shown appear to be about the 'missing middle' and maybe less so about medium density. Also, different typologies would have different parameters.
- Whilst housing is very much about the human experience, the people and their interactions are not necessarily at the fore of the document.
- The interface between dwellings, and between private and public land is not as strong as it should be considering how much this shapes people's experience and relationship with housing, and how well housing developments fit within their neighbourhood contexts.

2/ Is the structure and supporting content (such as the diagrams) for the Guidelines helpful?

- While the structure is generally clear it could be improved with a hierarchy and an emphasis on principles (the what and why) rather than the prescriptive details (the how). The aims of the draft guidelines are identified on page 6 but these have not been developed into any form of design principles to be applied throughout the design process and elements. Overarching design principles would give greater coherence and continuity to these guidelines and provide a basis for evaluating and recognising successful outcomes.
- The DMMGs could benefit from additional supporting content, which should include a response to the Tasmanian terrain and climate, and the way this influences the public domain, neighbourhood sociability, accessibility and comfort of the built environment, and by association 'medium density' living.
- The document has some internal inconsistencies where exemplar images are demonstrating an outcome that has been labeled as 'wrong' approach (compare bottom diagram of fig 12 is expressed in exemplar images on pages 51 and 54).
- Some supporting diagrams would benefit from further development, such as Fig.6 on page 31.

Another suggestion is that instead of having single, general plan illustrations there could be 'extracts' of plan precedents with annotations about the aspects



that are either good or bad (i.e. to more strongly associate the illustrations with the text of the Guidelines).

- It is also noted that the content of the document is limited in comparison with similar documents in other Australian states such as the **Better Apartment Design Standards** in Victoria and the **Housing SEPP** in NSW (previously referred to as SEPP65) – albeit noting that these examples are for apartment housing.

3/ What do you think of the design prompt questions at the end of each section (e.g. page 20, 28, 40, 50)? Will they facilitate a better understanding of how to approach medium density dwelling design?

- Design prompts checklists take the form of questions which encourage a more probing response than the more prescriptive Design Response dot points. Checklists encourage proactive engagement with the guidelines making them a working document for designers rather than merely a prescriptive document.
- As a checklist they are a means of cross-referencing design thinking. They are a positive inclusion given the broad audience intended beyond those more accustomed to design-thinking (i.e. clients, developers etc.). Suggest each one is strongly foregrounded by the need to understand the specific location of the site in question, and how it relates to the more generic design response lists.
- Design prompts would be more beneficial if there were more diagrams supporting them. Examples of good and bad design for different typologies could assist designers in understanding further opportunities for design response configurations.
- The design prompts checklists will be useful for UDAP as a set of questions – it will be interesting, and a measure of their potential success, if they become a framework for proponents (e.g. developers, designers, etc.) to present their ideas and proposals.

4/ Do the guidelines align with your expectations of medium density housing in Tasmania?

- In the absence of distinct regional morphologies, topographic diversity, climatic considerations and more Tasmania examples in the imagery offered, it is difficult to suggest the guidelines will align with the local conditions.
- Furthermore, there is a need to be clear and factual about the definition of medium density, or even to use a different term. Medium density can be measured in dwellings per hectare for example, but as the document is focused more on missing middle housing typologies rather than 'density' per se. Consequently, it may be useful to reconsider the language in the Guidelines or be more explicit about definitions.
- One way to 'bridge' the gap between the strategic intent of increasing density and still refer to missing middle housing typologies is to use the term "gentle uplift in density" or, as it is referred to on page 8, "gentle increase in urban density". This often-used term could be a good reminder, if used more frequently in the Guidelines, of the aspirations of the MDDGs towards an improved standard of infill housing in urban areas.
- However, it is positive that the illustrations of different housing typologies in the Spectrum of Housing Types (page 8) is useful to rebuke the often-common inference that mid-rise is medium density.
- Diagram on page 31 is a bit confusing if it is intended to be an apartment design. If this plan was repeated the second bedroom would have no window. This diagram only works for particular configurations hence consideration should be given to removing or replacing it.

5/ Do the Guidelines adequately cover the design process and considerations for medium density dwellings?

- The MDDGs address the main elements of the design process in the Context Analysis and in the Design Elements sections. Despite this the design process could be more explicit in the Guidelines; as noted in the Darebin Good Design

Guide 2020 (page 5) "Good design is as much about the process as it is about the outcome."

- In relation to this an important part of the design process is to have early consultation with local authorities and the occupants and local community living in the neighbourhood. This is essential in gaining 'social license' and potential support for the development.
- The guidelines appear to focus on 2-3 level townhouses and apartments which would be consistent with the broader developer context. However, the focus of the guidelines stated on page 8, show a broader range of typologies and this may not be sufficiently illustrated or explored in the guidelines to ultimately assist users of the guidelines.
- Perhaps considerations of different rules of thumb for different scales. Page 8 indicates a range of types, and the design considerations for each would be quite different, particularly related to privacy and adjacency which is very different in groups housing to mid-rise apartments.
- The Guidelines don't address the good design of the various typologies illustrated on page 8. Good design of an individual dwelling in a group house model is different to a dwelling in an apartment block. Circulation, cores and number of units to the core, identity of street address and urban interface are key elements of apartment design, a key aspect of medium-density housing.

6/ Are there any areas/considerations missing? could some be better expressed/conveyed?

- While there are many great examples of medium density design guidelines from other jurisdictions there is an opportunity to look at local conditions more specifically. Climate, topography, settlement patterns (i.e. our regional urban morphologies) and vegetation are all distinct elements that could influence a design response that is specific to Tasmania.
- Some specific aspects that are not well addressed in relation to the public realm interface and landscape are:
 - Trees are best prioritised in front yards/setback areas, to enhance their neighbourhood contribution while making use of deep soil.

- Street facing buildings should have windows for passive surveillance, and elements such as verandahs for a good private/public threshold connection (avoid blank walls, high fences, etc.).
- Opportunities to provide pedestrian connections through sites, particularly large sites, should be considered as they improve the walkability and permeability of large blocks and sites.
- When aggregating sites to provide bigger development sites for medium density housing, opportunities should be explored for new through-block access laneways for pedestrians, or better connections to open space corridors, consolidated shared open spaces and greater site design flexibility to maximise amenity such as sunshine.
- It is important that structure plans, and other land use and urban design strategies, are identifying future development sites, open space and pedestrian links so that progress can be made over time.
- Water sensitive urban design (WSUD) is concerned with the sustainable management of rainwater in urban developments. WSUD principles include avoiding excessive impervious surfaces, including green space and permeable pavements, and capturing and reusing rainwater through tanks, among others. All of which are relevant to medium density housing that tends to have higher site coverages.
- The guidelines may benefit from including a specific section/s on building typologies and/or site configurations with illustrative examples and diagrams.
- There are no references and resources cited in the overall document which would facilitate further research for in-depth consideration of select issues referred to in the text. These would potentially facilitate a greater impact and provide a framework for better informed, significantly more rigorous design that many new developments currently lack.
- CPTED (Crime Prevention through Environmental design) is not referred to at all in the MDDGs. This is an important omission considering how established this practice is in the design of medium and higher density developments.
- The construction industry's impact on climate change is considerable (e.g. **approximately 1/5 of all emissions in Australia come from the built environment**) so there is an opportunity to clearly express the need for its mitigation through

design, which would be in keeping with the educational nature of the Guidelines.

- Health impacts of outgassing and the benefits of low toxic materials/finishes selection is not referred to at all – both for the benefits of those working in the industry and the occupants.
- No guidance about shared horizontal and vertical circulation, particularly light into shared corridors. Some guidelines from other jurisdictions have interesting diagrams of different patterns of arrangement, and rules of thumb about number of apartments of a single core.

7/ Are the guidelines practical for developers, designers and planners to use?

- There is value in having an educational document to raise the expectations of good design outcomes and give parties a common ‘language’ to refer to and discuss. However, ideally, the document would be clearer about the design principles, (and this requires an understanding about the problems we are trying to solve with these guidelines). The document may be impractical if the guidelines are at odds with planning scheme, or the particular constraints or context of a given site.
- It is unclear how useful the MDDGs would be for planners or developers as they don’t necessarily assist with some of the tricky issues of development relating to yield, diversity of apartment types and considerations of diverse zoning in the neighbourhood.

8/ How do you think UDAP will use the Guidelines?

- Potentially as a check list or reference to access in discussion with proponents. As UDAP may use these as a checklist with the proponents of medium density developments it is important to provide additional examples and include all the

housing typologies in the Guidelines (see page 8) to illustrate aspects of good design for each.

- It would also assist to provide more reasons, examples and simplified communication for general market builders and developers reflective of suburban typologies (such as grouped housing, see page 8) in greater Hobart who may utilise these guidelines.

9/ Are there any barriers to delivering housing that is consistent with these guidelines?

- The reality is that all sites are different so, on many occasions, guidance and the design response will need to change.
- Housing typologies that are lower priced in the market and reflective of the standard of developments generally delivered in outer suburbs for multi-unit, single level developments (as illustrated by the diagrams illustrated on page 55) are the most efficient method of construction. In order to deliver better density outcomes, improved education and awareness need to be made within the construction industry itself about other benefits that medium density development brings (e.g. improves the viability of our local town centres).
- Unless regulated their application will be difficult for architects/designers to champion without a committed developer.
- Perhaps the proof of this would be to do an evaluation of some of the recently approved medium density residential projects – both good and not so good – to see how they comply. Of particular interest would be to see how some of the “less good” projects would comply with these guidelines, or not.

10/ Are there other additional resources that would support the guidelines and further encourage medium density housing developments?

- Detailed neighbourhood action plans and character studies supported by strategic urban design analysis underpinned by local area structure plans and

regional strategic planning. These would identify the appropriate areas (near to activity centres, etc.) for greater infill densities.

- In some areas it would also be useful to consider opportunities for consolidating lots, to optimise yields, to create new pedestrian connections and provide better amenity outcomes on larger sites. In essence this work would help communicate the desired 'future character' of these areas.
- There is also the opportunity to use this document to strengthen the leadership the Government has in supporting infill and medium density housing, such as; the role of "design champions" within government, advocating for quality design, mandatory use of UDAP pre-application process for social housing where applicable, etc.
- Development and housing Standards Guidelines are needed for the greater Hobart area and across the state. However, these do need to be mandated to affect a greater beneficial outcome.
- It may be useful to see the analysis and application of the Guidelines against a range of development proposals so that we can understand how they comply, or not.
- Apartment design guidelines and promoting examples of good design at the medium-density scale of projects would be a useful addition.

11/ Do you think the Guidelines assist UDAP's work in improving the level of design and quality of the urban environment in the City of Hobart?

- UDAP may assist in their implementation by referring to the Guidelines when undertaking development reviews for medium density housing projects. In that regard they can be useful additional tool to improve design outcomes and quality in the City of Hobart.

12/ Other Comments

- There is a tension between the guidelines being a 'statement of intent' for medium density housing generally and offering a checklist of features of

medium density housing specifically. In this respect it would be useful to populate the document/ guidelines with examples over time, or even that they become 'interactive'. Currently the photographic examples are somewhat generic and static, rather than accommodating specific intentions. This may mean more examples with text / diagrams/ descriptions overlain, use of web technologies, etc.

- Considering past projects that UDAP has reviewed the MDDGs should consider:
 - Adding more on the value of communal open space to contribute to the public realm, such as extending green/open space from outside deep within sites, or providing opportunities for passive surveillance.
 - Discussing and illustrating positive opportunities for better incorporating mains infrastructure (such as kiosk substations and their required accessible path clearances), waste storage, etc. often within developments with limited budgets and site constraints.
 - How to activate the ground plane interface of the streets, in the absence of (say) commercial activity for low and mid-rise developments, in particular in urban areas (i.e. as our city residential populations grow, there won't be the immediate economic conditions to provide cafes or similar to the ground floor of every development).
- Inclusion of reference and more guidance on climate resilience and stormwater management would be useful.
- The diagrams on page 55 about how site layouts can influence the impact of parking on the landscape and street are useful. It is suggested that there should be more diagrams of this nature (e.g. those in the **Moreland Apartment Design Code** are very good in this respect).

13/ Suggested minor edits

INTRODUCTION

Page 7 – bullet point two: Local government has more than planning professionals involved in assessing and encouraging good medium density, such as open space planners, urban designers, development engineers, heritage experts, etc. This sentence should not be profession specific.

Page 9 – benefits: it is missing the improvements in the quality of life of residents (e.g. good air in the interior space), so that they have a true alternative for detached housing in terms of a desirable lifestyle. Maybe this point could be incorporated with a slight rewording of the 2nd bullet point.

Page 9 – bullet point two: what types of spaces is this referring to? Open space, interior dwelling spaces, all?

Page 9 – bullet point five: when creating homes for all ages and abilities, is this also about not only their current use but being adaptable/convertible to future uses? (partly as per stated in the Livable Housing Design Guidelines).

CONTEXT ANALYSIS

General comment: The context analysis is premised on a very simplistic way of representing the environment. What about 3D models? Or, at the very least, more interesting drawings and analysis? (you could also have people movement data for larger housing projects, etc.).

Page 10 – paragraph two [comment]: “The level of detail provided in a context and site analysis should match the scale and complexity of the proposed development.” - The analysis should match the complexity of the context and site in/on which the proposed development will be located. A small scale, “simple” development could have a significant impact.

Page 10 – paragraph two: the context analysis should not only consider the planning scheme but also policies, strategies and masterplans that may apply. In addition, are there infrastructure requirements such as open space and stormwater, influenced by the location?

Page 10 – paragraph three: This list should also include architects, urban designers, engineers, heritage experts (both European and Palawa), etc.

Page 12 – Context Queries [suggested addition]: This is missing the consideration of where the neighbourhood is located in relation to other neighbourhoods, jobs and

the activity centres. This could be a small map that shows the structure of the city, or the city scale.

Page 13 – Figure 1: This example diagram would benefit from incorporating topography, even is just the high and low points.

Page 13 – Figure 1: Instead of walking radius this should be real travel distances, an isochrone map. This is imminently doable with present automated mapping technology, and far more realistic and practical.

Page 14 – Context Query one: An approximate area/distance should be included here. What about two adjoining blocks or a maximum of 200m to 250m in length.

Page 14 – Context Query three: These should refer to the adjoining and/or predominant, otherwise it is probably too ambiguous.

Page 14 – Context Query six: what about public transport? Such as bus stops in close proximity.

Page 14 – Context Query six: “and/or persons with limited mobility.”

Page 15 – Streetscape Context Plan [suggested addition]: There should also be a streetscape elevation or longitudinal cross-section. They are fundamental in understanding how new proposal will relate to the existing built environment.

Page 16 – Context Query eight: Active and passive should be defined in the glossary.

Page 16 – Context Query ten: Composition is a bit of an ambiguous term, it is probably best to describe the materials, width, landscaping, street furniture, etc.

Page 16 – Context Query eleven: What about bicycle parking?

Page 17 – Site Context Plan [suggested addition]: There should also be a street elevation, and at least two side elevations drawings. Ideally a cross-section should also be used to better understand the topography of the site.

Page 17 – Site Context Plan: The sun path should include the sun angles as of the solstices and the equinoxes.

DESIGN ELEMENTS

Page 20 – Design Prompt [suggested addition]: There is a need to discuss site porosity in this section (i.e creating Neighbourhood / Communal links and through routes).

Page 23 – Figure 4: Consider including a non-flat ground plane in the diagram, as this is a common topographic condition in Tasmania that should be carefully considered.

Page 23 – Figure 4: Consider showing some single storey existing dwellings, this is because they are, by far, the most prevalent building height even in many existing activity centres.

Page 24 – Site Structure general: This whole section is somewhat unclear. The terms scale and mass are nearly interchangeable (one can argue that mass is really the result of a building form + scale). In addition, these abstract concepts have not been illustrated through any diagram or photo. Consider simplifying the terminology used to improve understanding of the design responses for this section.

Page 26 – Public Domain Interface design response [suggested addition]: Thresholds are transition zones. Carefully design thresholds that are readily identifiable assist the legibility of the development and wayfinding by users and visitors.

Page 26 – Public Domain Interface design response one: This bullet point adds little value to the Guidelines, it is mostly a description of the point below. Consider removing and expanding design response below to mention adjoining properties.

Page 26 – Public Domain Interface design response two [extra text]: “activating the public/private boundaries and transition zones and applying CPTED (Crime Prevention through Environmental Design) principles to design of the public domain.”

Page 28 – The Building first paragraph: The use of the term ‘ingredients’ as a metaphor appears to signify that the document is not for professionals. Consider using the term ‘elements’ instead.

Page 31 – Figure 6: This diagram is poor and does not illustrate the relationship between different zones but rather designated room uses which is not what is being discussed in the text. A replacement diagram needs to illustrate public vs private zones; active vs passive zones, outdoor vs indoor zones while avoiding naming rooms/specific uses.

Page 32 – Material Selection [suggested addition]: “Material selection for a development should aim to achieve a carbon zero footprint and contribute to the reduction of the construction industry’s impact on climate change.”

Page 32 – Material Selection [suggested addition]: “Utilise materials with low/no toxic emissions for the health and safety of residents and those in the construction industry.”

Page 32 - paragraph 3: omit “This is particularly relevant in heritage areas.” as it conflates the heritage planning scheme controls with adaptive reuse of buildings and their materials. There are already significant controls for heritage listed properties that go above and beyond the guidance in the MDDGs.

Page 33 – Façade Design design response two: This guidance reads more like an aesthetic choice and less about the functionality and benefits of a design. Consider the utility of having this design response in the MDDGs.

Page 33 – Roof Design design response: as above, it is not clear how this can be usefully interpreted.

Page 33 – Roof Design design response [suggested addition]: In a context of sloping topography design the roof as the fifth façade which is often viewed from above from adjacent/ other elevated properties.

Page 35 - Call out box bottom left of the page refers to; “Adhering to the Livable Housing Guidelines...”. This is a general reference. The LHA has three levels of adherence; Silver, Gold and Platinum. Recommend the note is modified to acknowledge this.

Page 38 – Room Ventilation design response [suggested addition]: Side hung casements and sliding sash windows facilitate better ventilation than top hung windows.

Page 40 – The environment design prompts nine: This prompt about climate impacts is equally important for other parts of the Guidelines. Consider including it under other design elements such as ‘the building’.

Page 42 – Landscaping second paragraph: “The best results come from a collaboration between designers, developers and builders to ensure that landscaping is a design priority [insert - integral to the building design] and never an afterthought.”



Page 42 – Tree Plantings design response two and three: Consider merging them as they are, ultimately, about, considering climate.

Page 43 – Landscape Design design response [suggested addition]: Apply CPTED (Crime Prevention through Environmental Design) principles to Landscape Design.



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16 September 2024

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PMAT Submission: Improving Residential Standards in Tasmania, Draft Report July 2024 and associated Medium Density Design Guidelines

The [Planning Matters Alliance Tasmania](http://www.planningmattersras.org.au) (PMAT) welcomes the opportunity to comment on the [Improving residential standards in Tasmania Draft Report \(July 2024\)](#) (Draft Report) and the associated [Medium Density Design Guidelines](#).

State Planning Provisions poor residential standards

PMAT's founding platform seeks to improve the liveability and wellbeing of all Tasmanians.

One of PMAT's founding concerns was the poor residential standards of the State Planning Provisions. This concern was shared by the Local Government Association of Tasmania who resolved in 2018 to write to the then Minister for Planning Peter Gutwein to request a review of the State Planning Provisions for residential standards as they:

'...have led to confusion and anxiety in our communities with overshadowing, loss of privacy, solar access, height, private open space and site coverage to name a few. A review will highlight these concerns across the State and give the community some expectation of change that can ensure their concerns are heard'.

Professor of Environment and Planning Michael Buxton, RMIT University, Melbourne also shared our concerns when commenting on the Draft State Planning Provisions *'The Government argues the new [planning] system is vital to unlock economic potential and create jobs, but the state's greatest economic strengths are the amenity and heritage of its natural and built environments. Destroy these and the state has no future'*.

Many of Tasmania's residential areas are unique but more recent suburbs are becoming the same as the bland, boxed, non-descript, and squashed suburbs of mainland Australia.

Five-yearly review of the State Planning Provisions and re-submitting previous PMAT submissions

Improving residential standards is a core component of the current five-yearly review of the State Planning Provisions.



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PMAT has been advocating for improving Tasmania's residential standards for eight years - since 2016.

PMAT made a submission as part of GHD's survey on residential standards in July 2020.

PMAT made a comprehensive submission in 2022 to the review of the State Planning Provisions including separate consultancy reports prepared to support key aspects of PMAT's position. This submission – and especially the *Plan Place Pty Ltd* report - cover many of the issues canvassed in the current residential standards review. The 2022 submission reflects PMAT's position on key State Planning Provisions issues.

The Plan Place Pty Ltd 2022 submission covered the following zones: General Residential Zone (GRZ); Inner Residential Zone (IRZ); and Low Density Residential Zone (LDRZ). The terms of reference of the submission considered these zones and their statutory function in the context of the below dot points and they equally apply to this current project which aims to not only *improve housing supply, affordability and diversity* but aims to ensure the residential standards are fit for purpose and can '*improve liveability, equity, healthy spaces and sustainability*':

- Adapting provisions to respond to climate change in urban and sub-urban settings (e.g. to reduce flood risk and heat island effects);
- Improving residential amenity and the liveability for Tasmanians;
- Subdivision standards and improving the quality of new residential lots through the provision of street trees;
- Improving the quality of densification;
- Improving health outcomes, including mental health for Tasmanians;
- Facilitating an increased supply of housing choice and social justice;
- Achieving a higher standard of building design, to provide community with more certainty in the planning process;
- Supporting and encouraging the long-term security of natural biodiversity, regenerate native endemic habitat, protect old-growth trees, bush and forests, and value and encourage space for gardens, food security and nature, by offering incentives and planning gains, as appropriate;
- Improving terms and definitions within the *State Planning Provisions*;
- Benchmark the above against the world's best practice residential standards (e.g. [The Living Community Challenge](#)); and
- Exemptions at Clause 4.0 of the *State Planning Provisions*.

In February 2024 PMAT submitted a response to the *Discussion Paper to inform the Improving Residential Standards in Tasmania Project*.



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As PMAT's concerns raised in the above submissions remain current, we wish to resubmit these documents as part of our response to the *Draft Report*. Specifically, the documents are:

- *State Planning Provisions (SPPs) – Scoping Review submission (August 2022)*. The submission and associated consultant's reports can be found [here](#) and [here](#).
- *Discussion Paper to inform the Improving Residential Standards in Tasmania Project response (Feb 2024) – see Attachment 1 - Attach 1 PMAT Improving Residential Standards in Tas Feb 2024 FINAL*.

PMAT's Density Principles

PMAT's position is that increased density must be underpinned by three key principles:

1. Improved design;
2. Increased liveability; and
3. Ensuring the community has a right of say over what is built next door to them and in their suburbs (including merits-based planning appeals with opportunity for mediation to ensure good planning outcomes for all). Having the opportunity to engage with the planning system not only builds confidence in the system but is consistent with PART 1 - Objectives of the Resource Management and Planning System of Tasmania to '(c) to encourage public involvement in resource management and planning'.

The *Improving residential standards in Tasmania Draft Report* has a strong emphasis on increasing density as a means of meeting housing supply targets. PMAT recognises the severe problems being caused by the current housing crisis. Although the causes of the housing crisis are complex – and largely unrelated to the planning system – good planning has an important part to play in the solutions. Increasing residential density must only be encouraged where it is part of overall good neighbourhood and building design that promotes liveability and sustainability.

Tasmania's suburbs are by in large single dwellings on relatively large sites. Providing increased density and housing choice in Tasmania's suburbs inevitably means change and impacts on the character of those suburbs. It would be very welcome if the existing and future housing needs of Tasmanians could be met while maintaining character and liveability whilst also ensuring the community has a right of say on developments in their communities.

The [Medium Density Design Guidelines](#) released for comment in association with the residential standards *Draft Report* includes many positive elements. However, to be effective they must be incorporated in the residential standards in a way that will require new housing developments to comply with them. At the same time the Guidelines must be consistent with the draft Tasmanian Planning Policies (TPPs) and at this stage there appear to be some discrepancies.

PMAT provisionally endorses the issues and recommendations raised in the submission by the Tasmanian Planning Information Network (TasPIN). The Submission can be viewed here as



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Attachment 2 - TasPIN Improving Residential Standards Sep 2024. However, PMAT is concerned by the suggested three implementation options in the *Draft Report*. Further to TasPIN's submission we recommend the consideration of a fourth implementation option which is outlined below.

Implementation options for increasing housing density

The *Draft Report* identifies three options for increasing housing density in Tasmania:

Option 1 – through existing zones

Option 2 –through new zones, and revised spatial application

Option 3 – through codes

PMAT is concerned with all three options as they are not underpinned by our three key principles of improved design, increased liveability and ensuring the community has a right of say including merits-based appeals and opportunities for mediation to improve planning outcomes. Some of our concerns are highlighted below.

Option 2 – create new zones

We note Option 2 would include the creation of a new **Urban Residential Zone made up of the existing Inner Residential Zone and General Residential Zone and that there will be 'No Permit Required' for all dwelling types in this new zone.** A new Neighbourhood residential zone (all GRZ not converted to URZ) would be created where single dwellings were also **'No Permit Required' for all single dwellings.**

It is our understanding that 'No Permit Required' developments provide a pathway to demonstrate to a building surveyor that the proposed building work does not require consent from the council as planning authority, as the work is exempt or 'no permit required'. This would most likely mean there would be a level of self-certification which lacks accountability.

This is a worse scenario than what we have now as it removes public involvement in resource planning and is undemocratic. No Permit Required would mean that the public could not comment/appeal/mediate on developments. How could we ensure that liveability standards are required and prioritised? Will it be up to the developers to ensure liveability standards are met? How would standards be prioritised?

It is our view that introducing a 'No Permit Required' pathway is unjustified. In terms of timeframes, our planning system is ranked well nationally. The *Project Overview July 2024 Engagement Factsheet for the consultation on the Draft Report* states itself that *'The Business Council of Australia's national review of planning systems shows that Tasmania's system ranks well among the other states and territories. Specifically, its speedy approval timeframes, and consistent statewide standards.'*

It is also noted that the majority of merits-based planning appeals are mediated showing that our current systems works to ensure better planning outcomes for all. The planning appeals process also



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helps build confidence in our planning system as people have a fair right of say and opportunity for hearings via the independent Tasmanian Civil and Administrative Tribunal. This option is also inconsistent with PART 1 - Objectives of the Resource Management and Planning System of Tasmania to '*(c) to encourage public involvement in resource management and planning*'.

Option 3 – create new codes

The Tasmanian Planning Scheme has 16 Codes. The Codes set out standards for use or development for matters which are not necessarily confined to one Zone area and can apply over and above Zone provisions, eg natural assets (biodiversity), bushfire-prone, scenic protection, telecommunications, parking etc. Where there is a conflict, Codes provisions override Zone provisions. While Codes address issues which may transcend Zone boundaries, Codes must not be used to distort the underlying zoning of land. Therefore, a Code should not alter the Zone's purpose but it may limit or alter the manner in which a use or development can occur. Under the Tasmanian Planning Scheme, Councils are required to consider the purpose of any applicable Codes in determining an application for a discretionary use.

PMAT is concerned that introducing new codes into the planning system will increase not only the complexity of the planning system but will introduce a new way that codes are applied.

The codes are for example for safety issues, environmental protection, heritage, infrastructure and amenity. Codes identify areas or issues that cross boundaries of properties or zones. They apply in addition to zone requirements.

Fourth Option

A fourth implementation option for increasing housing density could be via SAPs – Specific Area Plans. The major benefit of this is there would be some control of local character and amenity rather than an anything goes approach. This idea is expanded in more detail below.

PMAT's Key Issues/Recommendations

1. PMAT's position is that increased density must be underpinned by three key principles:

ONE: Improved design;

TWO: Increased liveability; and

THREE: Ensuring the community has a right of say over what is built next door to them and in their suburbs (including merits-based planning appeals with opportunity for mediation to ensure good planning outcomes for all). Having the opportunity to engage with the planning system not only builds confidence in the system but is consistent with PART 1 - Objectives of the Resource Management and Planning System of Tasmania to '*(c) to encourage public involvement in resource management and planning*'.



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2. Option 4 - Increased housing density and liveability could be achieved via the use of SAPs

At present there are three options for varying the State Planning Provisions to protect or enhance local character via Special area Plans (SAPs), Particular Purpose Zones (PPZs) and Site Specific Qualifications (SSQs).

Increased housing density and ensuring liveability could be achieved via the use of SAPs.

A SAP enable provisions for a particular area of land to be included in a Local Provisions Schedule that provide for use or development with significant social, economic or environmental benefit to the State, a region or a municipal area [section 32(4)(a) of the Act].

Applying a SAP would have the benefit of being more flexible in its application and could be applied over specific Zones and in specific areas where increasing density might be appropriate.

- 3. The *Draft Report* places too much emphasis on promoting medium density housing.** While this may be important, it should not detract from the other work required to make the State Planning Provisions overall a more effective planning instrument.
- 4. Residential standards that promote liveability must be given equal weighting.** The *Draft Report* is trying to introduce new standards to improve liveability like green spaces and tree cover, deep soil and solar access to reduce the impact of great height and plot ratio standards. However, the big question is how to ensure that it will have the desired outcomes. Experience indicates it is difficult to give the residential standards equal weight. Numeric standards like minimum lot size, plot ratio, setback and height are prioritised over the elements that support liveability and make the difference to making high density acceptable and less of a negative to the existing character of an area and to the existing inhabitants. Thus, it is essential that the suggested standards for aspects like common open space, landscaping, solar access, and privacy are given the same weight and importance of traditional numeric standards like setback and height.
- 5. The Performance Criteria need to be tightened by removing such words as ‘unreasonable impact’.**
- 6. Maximum permitted height limits on a block that is on the north side of an existing dwelling should not be automatically permitted** unless a generous setback is possible that maintains their existing solar access to their habitable rooms and solar panels.
- 7. Local Area Objectives/character statements for all areas/zones must be reinstated to guide planning decisions.** Local Area Objectives (LAOs) are created by the SPPs (clause LP1.3) and set out the planning objectives for particular localities. They may be included in a zone or SAP. It is not mandatory for planning authorities to include LAOs in their Local Provisions Schedule and it is our understanding that most Councils have not implemented Local Area Objectives. LAOs may be considered by a planning authority when determining an application for a discretionary use. This is especially important given the aims of this current project which is to not only improve housing supply, affordability and diversity but aims to ensure the residential standards are fit for purpose and can ‘*improve liveability, equity, healthy spaces and sustainability*’.
- 8. Quality design should be a central part of Residential Standards and broader planning system.** This is essential for liveability of new dwellings, neighbourhood amenity and environmental



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outcomes. Access to green space, private and communal open areas and design for water management and climate change mitigation are important in this context.

9. **While it is recognised that review of State Planning Provisions is still in progress, the current provisions provide limited scope for delivering good design in new residential developments, liveability, and neighbourhood amenity.** It can be argued that the 'lowest common denominator' approach of using acceptable solutions works against good neighbourhood design and optimum community outcomes. We do need significant reform of the State Planning Provisions.
10. **The Medium Density Design Guidelines should not have been released for public comment at the same time as the *Improving residential standards in Tasmania Draft Report (July 2024)* as it is difficult for the community to comment on both simultaneously.** The State Planning Office has been mindful in the past about not overloading the community with consultation. But this approach appears to have changed. We are currently being inundated with public consultation and sadly with little effect as the community is being routinely ignored. We sincerely this will not be the case with this submission.
11. **The draft *Medium Density Design Guidelines* are inconsistent with the Tasmanian Planning Policies.** The draft *Medium Density Design Guidelines* are a big step forward and include a lot of useful design guidance. However, they are not fully consistent with the Draft Tasmanian Planning Policies, which are expected to be implemented in the near future. The *Medium Density Design Guidelines* do not refer to some of the newer planning concepts being introduced by the Tasmanian Planning Policies. Specifically, there is no mention of sense of place, placemaking, green roofs, distributed energy resources or Aboriginal cultural heritage.

The Tasmanian Planning Policies will have a significant impact on the State Planning Provisions, Local Provisions Schedules (particularly Planning Scheme/Local Provisions Schedule amendments) and medium density residential development. If not made consistent with the Tasmanian Planning Policies, the *Medium Density Design Guidelines* will be out of date by the time they are finalised. This will be confusing for developers, designers, planners and the public.

In our view, for the *Medium Density Design Guidelines* to be considered best practice and fully integrated with contemporary Tasmanian planning concepts they should (at least) be made consistent with the following parts of the draft Tasmanian Planning Policies:

- 1.2 Liveability
- 1.5. Housing
- 1.6 Design
- 4.0 Sustainable Economic Development
- 4.4 Renewable Energy
- 6.1 Aboriginal Cultural Heritage
- 6.2 Non-Indigenous Cultural Heritage
- Glossary



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12. Development using a place-based perspective is likely to lead to better long-term outcomes for communities and cities. Rather than focusing on infill development, the emphasis should be on a regenerative place-based approach as per for example that taken by [Village Well](#). The Village Well difference is that it is:

- Human experience-led, not design-led
- Their ground plane experience visions create buy-in, attract investment and generate return
- Collaboration, not consultation
- Their regenerative urban strategies and engagement solutions position projects for enduring success.

13. State Planning Provisions must ensure the public has a meaningful right of say and access to appeal rights across the residential zones, in particular by amending what is “permitted” and “discretionary” use and development. The requirements for notifying an adjoining neighbour that a Development Application has been lodged should be reinstated. Our planning system must include meaningful public consultation that is timely, effective, open and transparent if the planning system is to be trusted by the community it is meant to serve.

14. The State Planning Provisions review should take a comprehensive approach to looking at residential standards. In this context it is also unclear how the review sees the future standards taking into account the varying requirements across the different residential zones (e.g. Low Density Residential compared with Urban Mixed Use).

15. Social connection constitutes the largest single factor in overall well-being and resilience. [Research](#) shows that social connection constitutes the largest single factor in the overall well-being and resilience. It is critical we create residential standards that encourage connection with each other and our environment.

16. Better regulation of short-stay accommodation. One key area where the State Planning Provisions can contribute to better housing outcomes for people on low incomes is to allow for better regulation of short stay accommodation by local government in ‘hot spots’ where short term rental is having a significant impact on long term rental availability and cost. Amending the State Planning Provisions to make short stay rentals discretionary and so allow each Council flexibility in approving and regulating short stay accommodation in the at least Inner Residential Zone, General Residential Zone and Low Density Residential Zone. This is likely to be the most flexible and effective way to limit the impact of short-term rental on housing availability/cost at the local level.

17. A community representative be placed on the Technical Reference Group. It is noted with disappointment that that the ‘Improving residential standards in Tasmania project’ is supported by a Technical Reference Group that includes no community representatives. We would like to re-submit our request that a community representative be placed on the Technical Reference Group.



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We are happy for our submission to be made public.

Yours sincerely,

Kerry

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