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State Planning Office
Department of Treasury and Cabinet
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GPO Box 123
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By email to: STRLUSupdate@hobartcity.com.au

Re: Southern Tasmania Regional Land Use Strategy

To whom this may concern,

The Tasmanian Chapter of the Australian Institute of Architects (the Institute) would like to thank the STRLUS project team and the State Planning Office for the opportunity to provide feedback on the review of the *Southern Tasmania Regional Land Use Strategy* (STRLUS), including the *STRLUS State of Play Report* (the Report) and the *STRLUS Shaping a positive Tasmania Conversation Toolkit* (the Toolkit).

The Tasmanian Chapter is committed to helping create a positive future for our state that benefits all Tasmanians. The Institute advocates for the built environment, and works to shape policies, foster collaboration, and promote design excellence that benefits society as a whole. Strategic planning is a critical component in this, and we are pleased to see this being enacted through land use planning.

The Institute's policy team and members of the Tasmanian Chapter have reviewed the material and provides the following response. The response contains some over-arching and general comments, and then primarily focusses on 'Theme 3: People Communities and Growth,' as outlined in the Report (which is mostly contained within the 'Housing, Placemaking and Social Infrastructure,' section of the Toolkit), with also some comments in relation to 'Theme 1: Cultural Values, Climate, Landscape, Natural Hazards and Environmental Risks,' (as outlined in the Report, but also in response to the 'Climate Change' and 'Landscape and natural values' section in the Toolkit).

The Institute is pleased to see the positive ideals outlined in the Report and is supportive of those that have been put forward. The Institute would also like to convey the usefulness of the Report, and how valuable this document is. The Institute questions how the Tasmanian Government will ensure that the ideals included in the report are implemented. While it is understood that the STRLUS is linked to the State Planning Provisions (SPPs) and Local Provisions Schedule (LPS), through these being the mechanisms for implementation, it would be useful to have this clearly outlined, along with information on how and when the SPPs and the LPS would be changed to be in line with the update to the STRLUS.

Members of the Institute have questioned what is likely to change from the existing STRLUS, as part of this review. They have also questioned if there is any analysis as to how the existing STRLUS is working, and any measure or analysis of its effectiveness.

The Institute would like to clearly iterate its stance on the Urban Growth Boundary and does not believe that this boundary should be increased. The Institute is also supportive of the existing density targets in the STRLUS, and notes that these should be maintained. Further comment regarding this can be found below under Theme 3.

The Institute suggests that it would be useful to consult the Government's Strategic Architectural and Urban Design Advisor in the review and drafting of the STRLUS.

Theme 1: Cultural Values, Climate, Landscape, Natural Hazards and Environmental Risks

While the Institute notes that the aspirations included in this section are all commendable, and supported by the Institute, decarbonisation should be included as an explicit goal. This is to ensure that decarbonisation is foundational to land use strategy in every form of land use.

Members with expertise in the planning sphere have noted that the section on 'Landscape and natural values,' in the Toolkit makes 'landscape' appear as an environmental value only, not as an urban value. Regional landscape values in this dwelling region should refer to the form of the natural landscape, and it is also noted that settlement should be a response to landform and setting, as citizens orient themselves by this landform setting.

The 'planners toolkit,' as mentioned in the Toolkit section should accordingly include how to incorporate 'our' regional landscape values into judgements made about settlement – the expansion (and need for containment) of its footprint, and the way in which landform (and water-planes) shape settlement.

The Institute suggests that the language used within the 'Climate Change' section of the Toolkit, which refers to 'Gather[ing] insights from the palawa/Tasmanian Aboriginal people,' could be reconsidered. Rather than 'gathering insights,' it is important to actively work together with the palawa/Tasmanian Aboriginal people in an ongoing manner.

The Institute is supportive of the preserving of recognised historic heritage places, and notes that there is more recent built heritage that should also be formally recognised (for example, mid-century buildings), otherwise there is the risk of our more recent heritage being lost for future generations. It is also important to ensure that heritage buildings can be maintained to ensure their appropriateness of use for modern living and uses, and to also allow for innovative responses to redevelopment by suitably qualified experts.

Theme 3: People Communities and Growth

As stated earlier in this submission, the Institute strongly supports the maintaining of the Urban Growth Boundary (the Boundary), and other measures to discourage urban sprawl that results in 'hidden costs' to society in terms of the infrastructure required, the associated negative outcomes that come with living on the outskirts of urban centres, and not to mention the impact that urban sprawl has on natural and/or agricultural land. The Institute does question the effect the Boundary may play in development in regional centres, and whether it may play a role in greenfield sites being developed (poorly) on the fringes of these centres, such as Sorell and New Norfolk (for example). The Institute suggest mechanisms to counter this should be considered.

While the Institute supports the density targets in the STRLUS, we suggest that these densities should be tested against the planning scheme to ensure they can be practically facilitated. Institute members, in their role as architects, have found that there has sometimes been a disconnect between the priorities outlined in the STRLUS and the practicalities that are required by the Tasmanian Planning Scheme, along with the existing land uses as defined by zoning within the Scheme, which makes development at appropriate scales and densities difficult.

The impact of density on ecosystems in urban areas, in relation to heat sinks, surface water planning etc., should be considered, and good design, through the use of built environment experts, is crucial to ensuring that these issues are adequately considered to ensure adverse outcomes are avoided. The incorporation of Indigenous ecosystems, corridors and nodes would also assist with these issues, and should also be considered in its own regard.¹ In short, this means providing linked habitats, to ensure the viability of

¹ Find out more about IEC+N here:

<https://acumen.architecture.com.au/environment/place/habitat-and-ecology/four-strategies-to-design-for-ecological-connectivity/> & https://www.uia-architectes.org/wp-content/uploads/2022/03/20201027_uia_ifla_iec_n_website_plan_ar_tw_ar2.pdf

native flora and fauna now and into the future, both within and alongside the built environment.

The Institute notes that urban design plays a critical role in ‘placemaking’ and cannot understate the importance of using multidisciplinary teams of planners, architects, and landscape architects for designing precincts and neighbourhoods. The design of, and investment in, the public realm should be used to leverage placemaking. To ensure the quality of these precincts and neighbourhoods, and individual buildings and built forms (for example, urban infrastructure), the Institute suggests that design review panels could be commissioned for expert review and assessment. These must be composed of appropriately skilled experts in a variety of design disciplines and be independent in their ability to make decisions.

To ensure quality placemaking that does not result in a compromise of patchwork development but ensures that urban greenspace is adequately incorporated early into developments (not simply as an afterthought), the Institute suggests that the Government could consider allotment consolidation, and potentially using any government compulsory acquisition powers. The incorporation of urban greenspace is essential for brownfield redevelopment.

Similarly, the Institute suggests setting aside well thought out easements for public transport infrastructure corridors that are locked in for up to 100 years so that car dependency can be reduced. The principle should be one of a well-connected Tasmania where population growth does not create an adverse impact through unmitigated urban sprawl and traffic jams. These easements could be scaled for heavy rail (trains), but the actual infrastructure required over the medium term (next 20-50 years) might be delivered cost effectively through light rail rolling stock and tracks.

The Institute suggests that there should be consideration for very considered flexible design responses in respect of housing – allowing for demographic cycling over a 50-year period. For example – this could even include the ability to adaptively re-use small single occupancy units in apartments into larger apartments for multigenerational or family households, and vice versa. If older people can either live nearer to, or in the same building or complex as families, or in connected communities with other similar age adults, this could provide an opportunity for successful ageing in place as informal family and friend supports reduce the reliance for government funded supports. It is critical that all new housing is designed at Livable Housing Design Guidelines Silver Level so older people can successfully age in in their home. The public realm also must be highly accessible for the same reason. Ensuring that social infrastructure and housing enables a good demographic mix can prevent some smaller towns or villages becoming grey ghost towns as they provide nothing for younger families and are isolated from employment by long car commutes.

The Government must ensure that social infrastructure is in lockstep with housing development, instead of lagging for years.

The Institute also continues to advocate for the development and finalisation of the Apartment Development Code, and notes the Institute's response to the [Improving Residential Standards in Tasmania](#) submission, made in September. The Institute would like to reference the response to the [30-Year Greater Hobart Plan](#), submitted in June 2022.

Thank you for the opportunity to provide input into the current review. The Institute looks forward to seeing how this project progresses, and for the opportunity to provide comment on the reviewed STRULS when it is drafted. Please don't hesitate to contact us if you would like to discuss any of the points raised further.

Kind regards,



Daniel Lane
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The Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation with over 14,600 members across Australia and overseas. The Institute exists to advance the interests of members, their professional standards and contemporary practice, and expand and advocate the value of architects and architecture to the sustainable growth of our communities, economy and culture. The Institute actively works to maintain and improve the quality of our built environment by promoting better, responsible and environmental design. To learn more about the Institute, log on to www.architecture.com.au.