



**Australian
Institute of
Architects**

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Neil Noye
Director City Planning
Hobart City Council
Elizabeth St
Hobart 7000

Date: 13.04.2021

By email to: noyen@hobartcity.com.au

Dear Neil,

We write on behalf of the Tasmanian members of the Australian Institute of Architects (the Institute), with respect to the assessment of planning applications with heritage listed buildings within the City of Hobart.

In the last 24 months, we have received a growing number of calls from our members, expressing their concern for the way in which heritage listed properties are being assessed under the planning scheme.

The primary area of concern is with respect to the interpretation of the criteria set out in the planning scheme; the wording of which is very similar to the wording of the Burra Charter. Whilst the language within the Hobart Interim Planning Scheme 2015 (the Planning Scheme) is also very similar to that of the Burra Charter, the interpretation differs greatly.

Specific wording is being pulled apart within the Planning Scheme, and often the interpretation contradicts the corresponding section of the Burra Charter. This was not the case previously and makes it very difficult, and at times impossible, for an architect to produce a compliant design.

As you are aware, the Burra Charter is widely regarded as the gold standard for assessment of any heritage-listed development. Given the similarities in the wording it would be reasonable to conclude that the City of Hobart's Planning Scheme Historic Heritage Code has been based largely on the Burra Charter. As such, we would like to ask how the interpretations of heritage codes and guidelines can vary so significantly.

The issues with interpretation become more acute when a proposed site is listed on both Heritage Tasmania's Tasmanian Heritage Register and the City of Hobart's list of Heritage Places. Our members are then asked to produce a design that complies with incompatible heritage criteria. We note that Heritage Tasmania encourages development that is consistent with the Burra Charter.

It has also been suggested that projects of state or national significance have less stringent heritage restrictions than projects that are listed with City of Hobart.

Our members are also concerned with the apparent lack of consideration given to other parts of the Planning Scheme when assessing the heritage impacts of proposed developments. We would urge the City of Hobart to consider a proposed design response in relation to height, form, siting, energy efficiency/solar orientation, streetscape... etc, as well as heritage to truly achieve a good design outcome for the city and not an outcome that responds in isolation to a particular section of the Planning Scheme.

The Institute suggests to ease confusion and provide clarity to all, that the definition of terms in the City of Hobart's Planning Scheme could be aligned with those within the Burra Charter so that there isn't any contradiction between the two documents.

We would welcome an opportunity to discuss our this further with you and your heritage team in an appropriate setting.

Kind regards,

A handwritten signature in cursive script, appearing to read "Jennifer Nichols".

Jennifer Nichols

Executive Director, Tasmanian Chapter
Australian Institute of Architects