

City of Hobart Chief Executive Officer  
City of Hobart  
GPO Box 503, Hobart 7001

Date: 30.06.2023

By email to: [representation@hobartcity.com.au](mailto:representation@hobartcity.com.au)

## **RE: HOBART DRAFT LOCAL PROVISIONS SCHEDULE**

The Tasmanian Chapter of the Australian Institute of Architects (the Institute) welcomes the opportunity to provide comments on the *Hobart Draft Local Provisions Schedule*. To prepare this submission, we have consulted with our membership and drawn from the expertise of our policy team.

The Institute has found that it is difficult to comment on the draft LPS written document within the timeframe available, especially considering its considerable length. If we were able to summarise and synthesise themes into a targeted response, we do not think it would be likely that the general comments would directly impact on the detail within the provisions themselves. By contrast, if we did comment on more specific provisions, due to the breadth of the document, and the number of our members with the expertise to provide feedback, would take a substantial amount of time, beyond the 2-month time limit provided for public consultation.

Another question the Institute would like to raise centres around the relationship with the draft Tasmanian Planning Policies (TPPs) and the Hobart Local Provisions Schedule. We have recently provided feedback to the TPPs, however we are not sure whether the feedback provided to this larger umbrella document, will then impact on Policies and Strategies that fall under it, such as the Hobart Local Provisions Schedule. By providing feedback to the Hobart Local Provisions Schedule now, will these then later be superseded by the public consultation provided for the TPPs?

While we do not have the capacity for a more detailed interrogation of the Hobart Draft Local Provisions Schedule, a theme that we can comment briefly on involves the manner heritage is addressed. We have noted that there is an emphasis throughout on compatibility for meeting the heritage qualities of built works. However, “compatibility” is a complex term that requires much more detail, and needs to be informed by deeper views of heritage. We are concerned that the way this issue is addressed in the document relates to the visual character of buildings (façade material used and roof pitches for instance), and this may be restrictive to architectural practices seeking to respond to heritage in more nuanced ways. What we are wary of is: how the provisions may promote an approach where new approaches to construction are mimetic, rather than being demonstrative of the era they are being constructed in – this would be consistent with broader perspectives on heritage that are promoted by

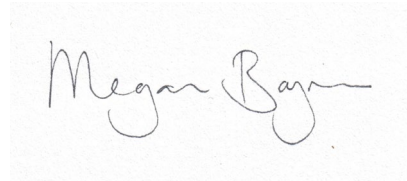
the *Burra Charter*<sup>1</sup> and the Tasmanian Heritage Council.<sup>2</sup> The Institute does support the protection of historical fabric, the limiting of demolition, and the promotion of conservation and repair, prior to undertaking design work. However, when architectural practices are developing designs in response to heritage, we would like to advocate for innovation when responding to existing built fabric, rather than imitation of heritage works.

Thank you for the opportunity to provide feedback on the draft Hobart Draft Local Provisions Schedule. We would be very happy to continue a deeper discussion around the Provisions in more detail, when convenient.

Kind regards,



**Jennifer Nichols**  
Executive Director, Tasmanian Chapter  
Australian Institute of Architects



**Megan Baynes**  
Chapter President  
Australian Institute of Architects

The Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation with over 13,000 members across Australia and overseas. The Institute exists to advance the interests of members, their professional standards and contemporary practice, and expand and advocate the value of architects and architecture to the sustainable growth of our communities, economy and culture. The Institute actively works to maintain and improve the quality of our built environment by promoting better, responsible and environmental design. To learn more about the Institute, log on to [www.architecture.com.au](http://www.architecture.com.au).

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<sup>1</sup> <https://australia.icomos.org/publications/burra-charter-practice-notes/>

<sup>2</sup> <https://heritage.tas.gov.au/tasmanian-heritage-council>