

HERITAGE PROTECTION SOCIETY (TASMANIA) Inc.

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18 September 2021

Mr. Michael Stretton
General Manager
Launceston City Council
Town Hall
St John Street
LAUNCESTON TAS 7250 By email to
contactus@launceston.tas.gov.au

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Dear Sir,

Re: Launceston Local Provisions Schedule (LPS) exhibited under section 35B of the Land Use Planning and Approvals Act 1993

Pursuant to advertisements published in The Examiner Newspaper we submit this representation.

We firstly express our disappointment, that in observing Council's obligation as a planning authority under *Land Use Planning and Approvals Act 1993* (LUPAA), it fails objectives of the LUPAA include furthering such objectives of the planning process as: "**to conserve those buildings, areas or other places which are of scientific, aesthetic or historical interest, or otherwise of special cultural value**" (Schedule 1 Part 2(g)).

A planning scheme can seek to achieve the objectives set out in Schedule 1 Part 2[g] of the LUPAA 1993, including heritage conservation (s.20).

Heritage Protection Society (Tasmania) Inc.

Heritage Protection Society (Tasmania) Inc. (HPS(T)) is a community-based organization that is formed to recognize the cultural heritage significance of what the Tasmanian community has inherited from the past and what we value enough today to preserve for future generations.

Cultural heritage is about people, society and the environment, and is represented by natural, indigenous and historic places with cultural heritage values; related objects and artifacts; and the records and stories of social history.

The aesthetic, historic, scientific, and social values comprising the cultural heritage significance of Tasmania, for its past, present and future generations, as established in the Australia ICOMOS Burra Charter, is a concept to which we aspire to further, promote and enhance.

We aim to communicate, educate and advocate for the protection of cultural heritage in Tasmania, and to participate positively in the planning system to seek to minimize the level of physical intervention in relation to cultural heritage fabric and practices, whilst sustaining dynamic continued adaptive uses.

Basic objects of HPS(T)

- Promoting or ensuring the preservation and maintenance for the public benefit, of places and objects of beauty or having an historical, scientific, artistic or architectural interest; knowledge of, interest in, and respect for those places and objects; and the provision and maintenance of activities and services to facilitate their enjoyment by the public.
- Recording and preserving the cultural heritage practices of Tasmanian communities; identifying the qualities for which Tasmania has become a focus of spiritual, political, national or other cultural sentiment to both majority and minority groups; and facilitating an educational program at the broadest possible level in these communities.
- Ensuring the public acquisition where only absolutely necessary for the protection and maintenance of cultural heritage places and artefacts, and assisting in this process in a material way.
- Supporting the common aims and activities of other like-minded organizations, such as and including historical societies, cultural groups and associations, the National Trust of Australia (Tasmania), and collaborating with national and international bodies to reach a collegiate outcome.
- Raising funds and seeking outside funding support from government and public agencies for the promulgation of the aims of the Association.

For too long State heritage continues to be in a state of peril.

Tasmanian heritage remains without an effective champion across all 3 levels of government, 61 years after a National Trust was established in this State. If governments do not take heritage seriously, they cannot expect business and individuals to do so.

There should be no conflict between heritage and development needs, if both sides think constructively, but where is the guidance to allow this to happen?

The Tasmanian community owes a great debt to the National Trust's Classification and Historic Committees headed up by such people as Bruce Wall, Geoffrey Stillwell, AJ Green, June Williams, Clifford Craig, Isabella Mead, Thomas Orr, Allan Orr, G Hawley Stancombe, Karl von Stieglitz, Roy Smith, Gary Forward, Michael Court, George Brown and many others.

Without the volunteer efforts of such people, Tasmania would have lost heritage buildings, not created Local Government and National lists or enabled the State Government to second the National Trust Register of 5,000+ places, to create its modern Tasmanian Heritage Register. Without these efforts, Tasmania would not have been encouraged to keep its built heritage and from that base, been able to present Tasmania as a cultural heritage tourism destination.

Local Government has a responsibility to keep their planning schemes and heritage lists up to date by reviewing them every 5 years, but Launceston, the largest and wealthiest municipality, has not delivered on these responsibilities.

When the Launceston Interim Planning Scheme was unveiled at the end of 2012, the following was evident:

- The heritage places schedule had not been updated since 1996
- The list of Significant Trees had not been updated since 1985 and tragically has now been deleted altogether;
- The heritage precincts list, part of the previous and earlier schemes has been deleted;
- Aspects of precincts located within roadways and nature strips, such as trees, landscaping, stone gutters and stone retaining walls, previously protected, were not protected at all.

New provisions of the model planning scheme that called for protection of archaeological sites, are blank pages;

- Launceston's burial grounds, some located under converted recreational grounds, both privately and publicly owned, and on private residential land, are not protected at all.
- Archaeology in Launceston is unprotected by the planning scheme, and where there are highly regarded sites with potential for important archaeological 'finds' identified as having buildings from the 1826 and 1835 surveys of Launceston, are disregarded.

There is no question that built heritage (as well as our natural heritage and scenic areas of beauty) is essential to attracting tourists to Tasmania and Launceston in particular. The entire State of Tasmania exhibits built heritage (notwithstanding Aboriginal heritage features, our food and wine attributes and our clean/green lifestyle), but also the safety of Tasmania as an international destination.

The role of governments at all 3 levels, is to protect and also to assist with funding.

Cultural landscapes are often assumed to be included under the heading of Natural Heritage, it is commonly sold short and deserves special identification and treatment. In specific reference to the identification of cultural landscapes, we direct you to Gwenda Sheridan gwendams@netspace.net.au and recommend that you contact her in the event that she has not already made a representation to you.

A recorded message rings incessantly in the ears of patient telephone callers to Launceston Town Hall that ***Launceston is one of the most intact and interesting early cityscapes in Australia***” lifted from the Introduction of **LAUNCESTON HERITAGE STUDY** by Paul Davies Pty Ltd, first presented to Council in April 2003.

But still not finalised or its information processed by Council's Heritage Officers by October 2018, The Examiner Newspaper's journalist Matt Dennien

posed the question ***‘how many of these properties could have been legally demolished in the 11 years to that date since the survey work had been published?’*** Embarrassingly, Dennien went on to report that even just by his own ‘google maps’ search he had found some, and posed the question ***“Has Council done enough since the release of the study to ensure the suggested sites and precincts are protected?”***

Well Councillors, and in due course Tasmanian Planning Commission Commissioners, the answer is **Nothing**, the City of Launceston Council has done nothing to advance the listings identified by Davies, and furthermore still **done nothing to advance them another 3 years after Dennien called out the Council’s appalling record!**

The Local Heritage Place List (Appendix 11a) is an incomplete schedule of buildings, areas or other places which are of scientific, aesthetic or historical interest, or otherwise of special cultural value, and needs to be peer-reviewed, expanded and completed, before this information forms part of a statutory planning document.

Consultant Paul Davies Pty Ltd has been commissioned on several occasions by City of Launceston Council to advise it on heritage matters.

In spite of researching and reporting on :

- The thematic history of the Launceston area;
- Field survey work to identify potential heritage items and conservation areas;
- The preparation of a (final report) inventory of the properties and conservation areas being recommended for inclusion [in the Planning Scheme] as items of heritage significance to Launceston;
- Launceston CBD Building Height and Massing Study,
- And, heaven knows what else, given the secrecy under which Council conducts such consultant engagements.

None of this material has been adopted by Council and embodied in any Planning Scheme process, including the present process.

At a well-attended Public Meeting convened by Council at Town Hall in 2018, it was notable that no-one in the audience spoke in favour of suggestions of increasing maximum height limits in Launceston. In fact, the contention that heights above 14-15M ought to be considered drew a resounding NO, and former, now retired Council City Architect, Tim Domeney drew resounding applause when he spoke against the proposition and stated that only with great reluctance ought a maximum height of even 15M be considered.

APPENDICES 11a, 11b & 12

The advertising period of a mere 6 weeks has not allowed sufficient time for this information to be checked or verified.

However, relatively cursory perusal of these appendices has revealed an alarming list of errors, mis-information and mis-identification.

Under no circumstances should these appendices be endorsed as statutory documents until accredited professional historians and researchers can certify the correctness of each item on the Local Heritage Place List, each Local Historic Heritage Places Datasheet, and the material detailing the Cimitiere Street Precinct.

There is material in the records available to Heritage Protection Society (Tasmania) Inc. that could assist in this professional review of this advertised information.

We look forward to being of assistance with finalising this review.

Yours faithfully,

Lionel J. Morrell

President

HERITAGE PROTECTION SOCIETY (TASMANIA) INC.

Footnote: Lionel Morrell is a practising architect and heritage consultant; 3 -term past State President of the National Trust in Tasmania and Director of the Australian Council of National Trusts. He served on the Trust's Classification and Building Advisory Committee for over 20 years, and is a Life Member of the National Trust. In 1998 he was selected as a Tasmanian delegate to the Prime Minister's National Heritage Convention, with a COAG outcome to set out the roles and responsibilities of the Commonwealth States/Territories to identify criteria, standards and guidelines for each level of government, to protect heritage places.

MR MICHAEL STRETTON
CITY OF LAUNCESTON COUNCIL
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DELIVERY BY HAND 18/9/2021
REPRESENTATION



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