
From: Sarah Lindsay | LXN Architecture
Sent: Monday, 23 September 2019 4:58 PM
To: Contact Us
Cc: Sarah Lindsay | LXN Architecture
Subject: DA0306/2019 Community Meeting and Entertainment etc - 90-110 Cimitiere Street
Attachments: DA03062019_Representation.pdf

Dear General Manager,

Please find attached representation submission with regard to the above-mentioned planning submission.

Representors associated with this submission:

1. Josh Crossin
2. Sarah Lindsay
3. Libby Ross

Primary Contact Information:

Sarah Lindsay – LXN Architecture & Consulting

Kind regards,
Sarah



Tasmania
South East
Queensland

Sarah Lindsay
Director/ Architect (NSW 9661 TAS 1085)

lxn.com.au LXN Architecture & Consulting

This email and any attachments might be confidential and also privileged. If you are not the intended recipient please notify the sender and delete all copies of this transmission immediately, along with any attachments. You should not copy it or use it for any purpose, nor disclose its contents to any other person.



save a tree, please consider the environment before printing this email.

23/9/19

The General Manager
City of Launceston
PO Box 396
Launceston, Tas, 7250
contactus@launceston.tas.gov.au

Dear sir

Representation against proposal at 90-110 Willis Street: Community Meeting and Entertainment, Food Service & Hotel Industry - Construction of alterations and additions for a change of use for Art gallery, makers workshop, cafe, bar and restaurant (Council reference DA 0306/2019)

This representation to Council objects to the proposed development at 90-110 Willis Street comprising Vehicle Parking – Construction of alterations and additions for a change of use for Art gallery, makers workshop, cafe, bar and restaurant. It is focused predominantly on the impact that this development will have on the surrounding area, namely building height and scale, materials and colour, and disregard to the heritage places on the site. The following is a summary of some of the issues of concern regarding this proposed development:

Failure to comply with Planning Scheme Performance Criteria standards

The planning report supplied by Metier Planning & Development on behalf of the developer outlines in detail the extent of discretions sought by the proposed development. Many of these are development and use standards applicable for the Urban Mixed-Use zone. The proposal also seeks discretions under relevant Codes. Exercise of many of these discretions will have a considerable impact to visual impact the streetscape and disregard of heritage places.

Consideration of Heritage Places

Without having access to the report compiled by Davies (2003): "*Launceston Gasworks Conservation Management Plan*", it is not possible to discuss the statements in the architect's Heritage Response, stating that "the fact that [the No. 4 Gasholder] is not mentioned in the Conservation Plan means that it is considered a lesser building at the overall site." We recommend an internal investigation into the report as to whether or not this statement is accurate, as public documents such as the **Launceston Heritage Study: Summary Report and Recommendations** (Nov 2007, LCC), finds that "...perhaps the most significant and obvious industrial elements of the city are the railway yards and workshops, the *gasworks* site".

Tasmanian Heritage Council: Works Guidelines recommends that an appropriate outcome for Additions or Extensions "should be subservient to the main historic building. That is, an addition should not visually dominate the historic structure." It is our view that the proposed development enclosing the No. 4 Gasholder significantly dominates the existing heritage listed structure and diminishes the place's significance. Care and choice of materials chosen in the proposed addition has not been taken to minimise visual impact or other; it is ultimately unclear why the colours and materials have been chosen.

15.4.1 Building height, setbacks and siting

The proposal falls under P1 for building height.

The building height has not been formulated as per the equation (b) 1m greater than the average of the building heights on the site or adjoining lots. The developer's response references buildings that are not adjoining the site and therefore irrelevant to determining building heights of the surrounding area. The Albert Hall and Verge Hotel are not adjoining lots and should not be considered as a part of

their calculation. The building is not compatible with the character of the surrounding area when viewed from the public spaces and roads.

We have undertaken a preliminary assessment of the adjacent buildings and have determined that the mean height is 12.6m (see attached).

- *8 Boland Street (Centrelink) Height: Single Storey - 9 Metres (approx.)*
- *23-29 Tamar Street (Financial Focus and Tassie Tee's) Height: Single Storey - 4.8 Metres (approx.)*
- *31 Tamar Street (Multicap Tasmania) Height: Single Storey - 6 Metres (approx.)*
- *112 Cimitiere Street (Milledge Lane) Height: 3 Storeys - 12 Metres (approx.)*
- *90-110 Willis Street (vertical retort building / Hogs Breath Café) Height: 29 Metres (approx.)*

Cumulative Height: 60.8m / Number of Adjoining Lots 5 = 12.16 Average Height.

Overshadowing

The report notes overshadowing across City Park throughout winter. Though it is addressed as not significant, we believe that this is a downplayed response. After conducting a preliminary aerial measurement, the proposed dwelling overshadows approximately 1600m² of public amenity at City Park, as shown on the sun study at winter solstice. There is no evidence that this will not cause detriment to people enjoying the park.

The planning report also notes that the gasometer had a solid inner cylinder at the time of operation – and consequently had a significant overshadowing at the time – a irrelevant comparison when determining future overshadowing against the present situation.

E13.6.5 Height and bulk of Buildings

We believe the building bulk and form is not compatible with the historic cultural heritage significance of local heritage places and the surrounding setting of the Gasworks site, City Park and the Albert Hall. There are no performance criteria addressed under E13.6.5 objective - historic cultural heritage significance of a place and its setting, the assessment against the performance criteria is inadequate and should not be supported in this application.

E13.6.8 Roof form and materials

The form and material selection of this project is not complimentary to the local place and setting. The design dominates the heritage listed gasometer structure and surrounding context.

Summary

We believe that there are legitimate concerns about the scale, visual impact and heritage considerations of the proposed development, resulting in significant detriment to the immediate locality.

The proposed development is of a scale and intensity that is inappropriate for the subject site and surrounding area, which is characterised by heritage listed gasworks buildings, public amenity (City Park) and pedestrian-oriented laneways.

On this basis, we request that Council refuse to approve a proposal which is a development clearly inappropriate for the proposed site and surrounding area, demonstrated by the extent and number of relaxations sought in the Planning Scheme standards.

We are open to any queries that you may have and look forward to your consideration of this representation.

LXN Architecture and Consulting

Sincerely,
Sarah Lindsay

