

LAUNCESTON CITY COUNCIL

MEMORANDUM

FILE NO: DA0679/2019 Council Agenda - 23 January 2020 - Agenda Item 9.4
Attachment 4 - Heritage Planner Report
DATE: 18 December 2019 Cimitiere Willis and Boland Street Multi Storey Car Park
TO: Duncan Payton Town Planner
FROM: Fiona Ranson Heritage Planner

**Heritage and Urban Design Report - 90-110 Cimitiere Street
Launceston, Willis Street Car Park 8-10 Boland Street,
Launceston, 10 Willis Street Launceston, 2 Willis Street,
Launceston, 4 Willis Street, Launceston, 8 Willis Street, Launc -
Vehicle parking - Construction of a multi-storey car park;
SUBJECT: Subdivision - Subdivide Vol 175929 Fol 2 into three lots**

Dear Duncan,

I have reviewed the submitted documents and as expressed at the initial referral stage, and a subsequent meeting with you and the applicant, I have a number of concerns in regard to the proposal as described by the documents provided and the ability of the proposed development to meet the standards which deal with siting and building height and massing in the context of this highly significant industrial heritage site.

It is my opinion that the development of a substantial structure for parking to the rear/centre of this site could be justified, however the scale, form and detail design of the proposed structure and its setback from the existing buildings on this historic site are of paramount importance when considering the appropriateness of such a development.

The documents submitted do not justify the impacts of the proposed development in this important context so that it may be considered to meet the relevant performance criteria of the Local Historic Cultural Heritage Code (Heritage code) in its current form. Conditions which may be applied to decrease the height and/or footprint of the development in order to meet the planning requirements are likely to be outside of what is achievable without agreement between the parties and therefore would be interpreted as a refusal. In this context, in line with the Notice of Decision issued by the Tasmanian Heritage Council (THC), it is recommended that the development not be approved.

The THC have offered the following reasons for refusal:

The Tasmanian Heritage Council considers that the application in its current form would introduce a building of a massing and form that will to an unacceptable degree detract from the historic cultural heritage values of the Launceston Gas Works complex, and the degree of impact is directly related to the height of the proposed building and its close proximity to two of the heritage buildings at the place. The Heritage Council also considers that the external treatment of the proposed building does not to a sufficient degree positively reflect the built character of the surrounding heritage structures.

LAUNCESTON CITY COUNCIL

MEMORANDUM

The following advice was also provided as part of the THC Notice of Decision.

The Tasmanian Heritage Council remains supportive of the sympathetic re-development of the Launceston Gas Works, including the installation of a car park facility, as evidenced by its approval of the proposed Art Gallery.

However, it does expect such development takes into account the Heritage Council's reasons for refusal, reflects the feedback provided to the applicant in the preapplication process and involves further pre-statutory advice.

It is agreed that an amended proposal could be approved, but that the capacity of the carpark, the design approach, and/or the site layout would need to be altered so that development may be considered to be compatible with the historic cultural heritage significance of the local heritage place, as is required by the relevant clauses of the Local Historic Cultural Heritage Code.

Heritage Significance

The subject property includes a large part of the site now known as the former Launceston Gasworks which is known to be of heritage significance and its structures are widely appreciated by locals and visitors for their character and their ability to tell the story of the site which was important in the broader development of the city.

The property is listed at both local and state level, being included in Table E13.2 of the Launceston Interim Planning Scheme 2015 (the Scheme) and on the Tasmanian Heritage Register (THR). The Statement of Significance included in the THR registration is as follows:

*Launceston Gasworks demonstrates the development of services in early Launceston and northern Tasmania to provide light and power both publicly and privately. The site demonstrates the pattern of development of Launceston. The Launceston Gasworks was one of two major gasworks in Tasmania and is the only surviving plant in the State that retains buildings, engineering works and infrastructure in a largely intact form. **The surviving buildings and elements are rare and uncommon in Tasmania, and increasingly rare in an Australian context**, as gas production has changed from coal based to natural. The Launceston Gasworks has archaeological potential, due to the density and continuity of industrial and cultural activity on the site for over 150 years. The extant elements of the site have the potential to tell the story of gas production and reticulation from the earliest production in 1859 through to the 1960s, when coal powered production ceased, and to the 2000s, when only gas supply is provided at the site. The built structures in the Launceston Gasworks site demonstrate the traditional methods of gas production that were widespread throughout Australia and the Western world. Various elements of the Launceston Gasworks **demonstrate high levels of technical achievement shown through the Horizontal and Vertical Retorts, equipment housed in various buildings, site layout and engineering works including Gasholders and reticulation infrastructure. Community association with the Launceston Gasworks site is largely associated with the landmark status that the site has within the townscape, particularly the prominent Vertical Retort building with its distinctive 'Cook With Gas' logo in the brickwork of the clerestory level. The Launceston Gas Company, in its various forms, has been a pivotal industry for Launceston, occupying the same site***

LAUNCESTON CITY COUNCIL

MEMORANDUM

since 1859 with continuous manufacture of gas for approximately 100 years, and distribution for over 150 years. The long term association with the site and continuity of occupation mark the company as one of the few such industrial enterprises to remain in Launceston.

Background

A Heritage Impact Assessment (HIA) was not submitted with the original application documents for this development (DA0305/2019) and a report by Plico Design Studio was sought in response to the original Request for Further Information for this application. It is evident that the carpark and subdivision proposal was not developed alongside any documented heritage advice and only minor amendments were proposed by the consultant once engaged. These included a change in colour scheme highlights, from bright yellow to an ochre red, and relocation of a boom gate further back from the Cimitiere Street frontage.

Following the THC notice of refusal for DA0305/2019 the application was withdrawn and advice was provided by officers of Heritage Tasmania and the City of Launceston as to the issues which would need to be addressed as part of any future application. These issues included the overall scale of the structure, the setbacks from surrounding structures on the site, impacts on views into and across the site and the representation of these views as part of the application submission.

The current application was then developed and a HIA was provided as part of this application, however this was, as stated in the Introduction to this report, prepared within the context that the '*clients have made it clear that reducing the capacity of the carpark would be inadequate for the precinct and render these works financially unviable*' and '*As such no reduction to the overall height or setbacks would be possible*' (p.2). There appears to have been very little 'room to move' in regard to the design at this stage as the location, layout, height and structural form had already been finalised.

Planning Assessment

An assessment of the proposal against the relevant standards of the Local Historic Cultural Heritage Code is included as appendix to this report.

The standards which are considered to be most problematic for the proposal are the following:

- E13.6.5 Height and Bulk of Buildings
- E13.6.6 Site of buildings and structure

Additionally, there are issues in regard to the subdivision relating to the resultant building setbacks. Therefore the following standards from the Heritage Code must also be considered with care.

- E13.6.3 Lot size and dimensions and frontage
- E13.6.4 Site coverage

The provisions of the Parking and Sustainable Transport Code relating to pedestrian access are also relevant here.

There are also more general urban design and heritage issues inherent in providing a utilitarian vehicle parking structure in the historic context of the subject site. Therefore the following standards for new building work are also important:

LAUNCESTON CITY COUNCIL

MEMORANDUM

- E13.6.8 Roof form and materials
- E13.6.9 Wall materials

Although not assessed directly as part of the current heritage code, there doesn't appear to be any consideration of the archaeological potential of the site within the HIA, or as part of the larger application, nor the likely impacts of construction on the surrounding significant structures and how they may be mitigated. This is important as the car park is proposed in close proximity to a number of old and significant buildings and piling and other earthworks which would be required for the construction of a seven storey concrete building may have effects ranging from detrimental to devastating.

Discussion

As discussed throughout my assessment against the provisions of the Heritage code, the proposal is not considered to be 'compatible with the historic cultural heritage significance' of the local heritage place or its setting and additionally, is not considered to be provided with adequate justification as to how it may be considered to be consistent with the Purpose of the heritage code or meet the relevant performance criteria.

The HIA is considered to be inadequate in that it only identifies the retention of the remaining individual Gasworks buildings, and preserving some aspects of views into and across the site as being of importance, rather than acknowledging the significance of the whole site layout in the reading of the history of the site or any guidance in regard to what may be appropriate setbacks from existing buildings. In this context the responses provided in regard to the likely impacts of the development are simplistic and justification of the proposal in regard to the significance of the site is largely reliant on the location of the car park being away from street frontages.

The report states that the proposal is acceptable due to the location of the carpark behind the existing structures, the now receding colour scheme, some detailing including gable roof shapes, and the height being slightly lower than that of the tallest of these (the vertical retort and gasometer structures). The impact of the structure on the site itself is not considered and it is evident that the building will still be clearly visible from many vantage points around the site and across the larger city.

It is acknowledged that the revised photomontages demonstrating some likely views down William Street show the south-western boundary wall having a lesser impact than those available when considering the previous application due to the presence of tree foliage in Summer, however there are a number of view lines and fields, and times of year in which this wall will not be obscured or recede sufficiently to be considered as an acceptable new building form in its heritage context.

The design of this wall is not considered. The report dismisses the relevance of views from the west as neighbouring development may obscure these views in the future and therefore only appears to allow for views from Willis and Cimitiere Streets.

It is acknowledged that there is potential for future development to alter the views from the west and south-west, but until this development occurs, it would be possible (and highly desirable) to deal with these walls in a more sensitive and contextual way. This

LAUNCESTON CITY COUNCIL

MEMORANDUM

advice was provided to the applicant on a number of occasions and yet the design has remained largely the same as that originally proposed.

The analysis and assessment of the proposal is also considered to be lacking in that its support for the development does not identify or discuss the need for curtilage for the existing buildings or that any spaces may be of importance. Discussion of setbacks is limited to the following in response to clause E13.6.3 - Subdivision.

'The proposed boundaries have been positioned to allow the maximum separation between adjoining Carburetted Water Gas heritage Building and the proposed building. Whilst it would be preferable to see a greater amount of separation, the capacity of the carpark would be compromised with any further reductions to the building envelope' (p.22).

The exact setback is not noted in the HIA report, or dimensioned on the plans provided, but the separation between the wall of the car park and the building to the north-east appears to be approximately 1.5m. It is agreed that this is inadequate when the proposed wall is approximately 19m high and around 40m long and when the only justification provided relates to the intended capacity of the carpark, rather than analysis of the actual impacts or discussion of alternative design solutions which may have been considered.

It is unfortunate that the proposal has been developed without seeking adequate heritage guidance at an earlier stage as it is evident in the resulting design that the focus has not been on fitting in with the heritage character or significance of the site and this makes any approval of the proposal against the provisions or the Local Historic Cultural Heritage Code problematic.

It is also unfortunate that the applicant has been unwilling to consider further amendments to the size or form of the development once advice was provided in regard to the heritage impacts of a structure of this scale on the site. If this had not been the case, it is my opinion that conditions such as those recommended below may have been considered by the THC and the City of Launceston as the Planning Authority, thus enabling approval of the development in a slightly amended form.

Conclusion

In summary, the proposed development is generally considered to be too large for the area in which it is proposed, the overall design of the building is not considered to be compatible with the historic heritage significance of the site, and the application is not considered to provide adequate justification for the scale or the chosen design of building in this context such that it may be considered for approval in its current form.

The building elevations and the reports provided do not adequately address the scale, form or character of the subject site or its larger built context, which includes important public facilities such as the Albert Hall and City Park and other properties listed on the Tasmanian Heritage Register. It is clear that despite the recessive colour scheme, a number of these properties will be visually dominated by the scale and form of the proposed structure.

It is noted that the historic character of the surrounding area has been significantly altered in recent years, and is set to be further altered in the near future. If developed in line with UTAS' current masterplan for their Northern Transformation project, the buildings proposed for the Inveresk and Willis Street carpark sites will have a significant

LAUNCESTON CITY COUNCIL

MEMORANDUM

impact on the overall scale and form of the riverfront area, however the facts remain that the parking structure has been proposed without sufficient consideration of appropriate curtilage to existing buildings, and that the scale and form will not fit well with significant building forms on the site or the existing skyline character of the area when viewed from further afield.

Generally it is evident from plans, and it is clearly stated in the Planning Submission and HIA provided, that the proposed building has resulted from an 'inside out' design process, which has been based on the provision of a particular number of parking spaces, rather than consideration of the heritage values of the site, or other needs of the uses on the larger site. It has also been made clear that there is no flexibility in regard to the scale of the proposal at this stage, therefore no flexibility in regard to softening the impacts and no capacity to condition the proposal so that it may meet the requirements of the Heritage code.

It is in this context that I propose that the development is not considered to be compatible with the historic cultural heritage significance of the local heritage place and its setting and thus should not be considered to be consistent with the purpose of the Local Historic Cultural heritage Code or the performance criteria for the relevant clauses.

Recommendation

Acknowledging the refusal of the application by the Tasmanian Heritage Council, but allowing that this decision may be appealed I would recommend either of the following:

1. That the building form be altered such that:
 - a. the height is reduced so that the main visible bulk of the structure lies below the level of the main walls to the vertical retort building;
 - b. the face of the building to the north-east be set back at least 4m from the existing office building;
 - c. the face of the building to the south-east be set back at least 10m from the gasometer frame; and
 - d. the articulation of the two-tone concrete panels to the east and west facades be reconsidered to fit better with the scale and pattern of building forms in the area visible in the same view field.

This would mean a building at least 1 storey less in height, an additional 2.5m (approximately) in setback from the north-east and south-east boundaries, and the revised façade treatment would need to be signed off as part of an 'Amended Plan' condition.

In this scenario please also ensure that the following conditions are applied to any Permit which may be issued:

HERITAGE

The development must be undertaken in accordance with the conditions included on the Tasmanian Heritage Council 'Notice of Heritage Decision' for THC Application No. 5077, endorsed as part of this permit.

SIGNAGE CONTENT

Due to the listing of the site as a Local Heritage Place, any additional signage

LAUNCESTON CITY COUNCIL

MEMORANDUM

and any alteration to the content or graphic of approved signs may require separate approval of Council.

SIGN MAINTENANCE

The sign structure and the individual blades must be constructed and maintained in good condition to the satisfaction of the Council.

ARCHAEOLOGY

1. Prior to the commencement of works involving ground disturbance:

- i. An Archaeological Method Statement (AMS) must be prepared by a qualified professional historical archaeologist; and
- ii. The AMS must include a method for sorting, assessing, discarding, curating and interpreting any identified materials; and
- iii. The AMS must be submitted to and endorsed by the Manager City Development. Once endorsed, the archaeological processes that are recommended in the AMS will form part of this Planning Permit and must be implemented.

2. Prior to the commencement of bulk excavations for the purpose of building construction, a draft report detailing the findings of the archaeological investigations must be submitted and be to the satisfaction of the Manager City Development.

And also the following note regarding the retention of heritage listings on all resultant titles.

Local Heritage Place Listings

Please note that all lots affected by the subdivision will remain listed as Local Heritage Places within the current Planning Scheme as part of the original entry for 90-110 Cimitiere Street, Launceston (title no. 175929/2), and that works to the new lots may be subject to the current heritage code. The owner may request to have listings reviewed when the new property titles are sealed.

Or:

2. That the application be refused and the applicant be advised that there may be potential for a smaller scale development on the site, or another use and development more sympathetic to the heritage values of the Gasworks site.

Fiona Ranson
Heritage Planner

LAUNCESTON CITY COUNCIL

MEMORANDUM

Appendix 1

Assessment against clauses of the Local Historic Cultural Heritage Code

E13.6.3 Lot size and dimensions and frontage

Objective: To ensure that subdivision does not impact on the historic cultural heritage significance of local heritage places and their settings.

P1 Subdivision must not unreasonably impact on the historic cultural heritage significance of local heritage places or their settings, having regard to:

- (a) the cultural heritage values of the local heritage place and setting;
- (b) the historic development pattern of the area;
- (c) the separation of buildings or structures from their original setting;
- (d) the lot sizes, dimensions, frontage, access and orientation;
- (e) the suitability of the proposed lots for their intended uses; and
- (f) the removal of vegetation, significant trees or garden settings.

Does not comply

The HIA supports the subdivision on the basis that:

'The proposed site size and configuration is sensitive to the cultural heritage values due to its position behind the significant heritage buildings off the street frontage, which leaves the adjoining heritage buildings with some separation to the proposed building for maintenance access and some depth of perspective for the public to view the façade of the adjoining buildings.' (P.21)

And admits the following in regard to the setback of the lot boundary and the proposed building from the building directly to the north-east:

'Whilst it would be preferable to see a greater amount of separation, the capacity of the carpark would be compromised with any further reductions to the building envelope' (P.22).

These statements and the larger report also appear to miss the important point that subdivision is not required to provide parking, or otherwise support the development, and actually works against the secure/ongoing provision of parking for the uses on the larger gasworks site.

There also appears to be some confusion with references to the site as the larger title proposed for subdivision, and also the proposed new lot only, for instance when describing setbacks.

Without any justification provided to support the need for subdivision, the subdivision proposed is considered to be detrimental in as far as it will further fragment the site and provide less secure for parking for the uses established on the heritage site, as well as uses which are currently proposed and those which may be proposed in the future. Therefore the subdivision proposed is considered to unreasonably impact on the historic cultural heritage significance of the local heritage place and its setting.

LAUNCESTON CITY COUNCIL

MEMORANDUM

E13.6.4 Site coverage

Objective: To ensure that site coverage is compatible with the historic cultural heritage significance of local heritage places.

P1 The site coverage is compatible with the historic cultural heritage significance of local heritage places or their settings, having regard to:

- (a) the topography of the site;
- (b) the cultural heritage values of the local heritage place and setting;
- (c) the site coverage of buildings on sites in the surrounding area; and
- (d) the pattern of development in the surrounding area.

Does not comply

The pattern of development on the site will be altered by the proposal and thus, while the setback of the seven storey structure from the existing office building to the north-east is proposed to be around 1.5m, the increase in building coverage in this area of the Gasworks site is not considered to be compatible with the historic cultural heritage significance of the local heritage place. Refer also to assessment against clauses E13.6.6 for Siting of buildings.

E13.6.5 Height and bulk of buildings

Objective: To ensure that the height and bulk of buildings are compatible with the historic cultural heritage significance of local heritage places and their settings.

P1 The height and bulk of buildings are compatible with the historic cultural heritage significance of a place and its setting, having regard to:

- (a) the cultural heritage values of the local heritage place and setting;
- (b) the character and appearance of the existing building or place;
- (c) the height and bulk of other buildings in the surrounding area;
- (d) the historic cultural heritage significance of adjacent places; and
- (e) the streetscape.

Does not comply

The proposed building has a maximum height of 22.3m and a general wall height of approximately 19m. Height is not a stand-alone factor in the assessment of any proposal as the impacts of height will always be different, depending on the bulk and form of the building, the setbacks from other elements, any stepping of the form, the articulation of facades and roofs, and the character and importance of the site and surrounding context. While the height proposed for the subject car park is not taller than the Gasometer frame, or the Vertical Retort building, it is higher than all of the other structures in the area and the impact of its height will be much greater as it is a large cubic form with very little articulation to soften its visual impact on the site and the surrounding area. Any articulation of facades is also bold and often angular and appears to be in conflict with the pattern of architecture in this heritage context.

Throughout the documents submitted the height and size of the building is only ever justified by the need to provide a particular number of car spaces for

LAUNCESTON CITY COUNCIL

MEMORANDUM

the commercial viability of the project, and at no point is this further justified with any financial argument.

Throughout the HIA and the planning report the scale of the structure and its impact on the heritage significance of the site is described as being diminished due to its location behind the Gasometer frame and away from surrounding streets. Some consideration is also given to the detailing of the façades building, but this is described at one point as providing a *'neutral backdrop to heritage buildings'* (p.10) and at others as having a *'high level of articulation' and materials that are not commonly found on a building of this nature'* (p.11)

There is no other justification provided as to why or how a building of this scale is a positive solution for this site and the statements provided (as described above) are not considered to be adequate to make a convincing argument.

Possibly the most neglected façades in regard to design and discussion in the reports provided is that to the south-western boundary which will be highly visible above adjoining development on Tamar Street and the north-eastern wall which is to face the structure described as the *Carburetted Water Gas* building.

Views down William Street and also some views from Tamar Street will be affected by the appearance of the south-western side of the building. This elevation lies on the boundary line and is likely to have been left blank as it would be required to be fire rated in this location, however this requirement does not soften the impacts of this large wall on these views and this appears not to have been given consideration in the design of the building. The wall is proposed as sheer concrete panels with a vertical orientation which bear no relationship to surrounding building forms or other features, and no other articulation is proposed to soften impacts of such a structure which is clearly out of scale with the development to Tamar Street which adjoins the site.

It is acknowledged that the revised photomontages demonstrating the likely views down William Street show the south-western boundary wall having a lesser impact than those available when considering the previous application, due to the presence of tree foliage in Summer, however there are a number of view lines and fields in which this wall will not be obscured or recede sufficiently to be considered as an acceptable new building form in its heritage context.

The report dismisses the relevance of views from the west as neighbouring development may obscure these views in the future and therefore only appears to allow for views from Willis and Cimitiere Streets, which will of course also be affected. The following statement being made as part of the Introduction to the Planning Submission (page 3 of 29) the *'adjoining non heritage listed property on Tamar Street that is prime for development of a 6 storey building or building exceeding 12m in height will prevent any view from William Street in the very near future'*.

It is acknowledged that there is potential for future development to alter the views from the west and south-west, but this is not the case regarding views

LAUNCESTON CITY COUNCIL

MEMORANDUM

within the site to the panels which are intended to front the existing building to the north-east, and in the meantime it would be possible and highly desirable to deal with these walls in a more sensitive and contextual way. This advice was provided to the applicant on a number of occasions and yet the design has remained largely the same as the original proposal.

The overall scale and form of the proposed building, when placed in such close proximity to significantly lower buildings and significant structures with softer roof forms and finer detailing, are considered to have a detrimental impact on the heritage character and historic values of the former Gasworks site and the larger industrial waterfront area of the city, as well as views from City Park and more distant viewpoints.

Therefore the proposal is not considered to be compatible with the historic cultural heritage significance of the local heritage place or its setting. This assessment is also relevant to the consideration of the performance criteria for clause 15.4.1 of the Urban Mixed Use zone, dealing with Building height, setback and siting.

E13.6.6 Site of buildings and structure

Objective: To ensure that the siting of buildings are compatible with the historic cultural heritage significance of local heritage places and their settings.

P1 The front, side and rear setbacks must be compatible with the historic cultural heritage significance of a local heritage place and its setting, having regard to:

- (a) the cultural heritage values of the local heritage place and setting;
- (b) the topography of the site;
- (c) the size, shape, and orientation of the lot;
- (d) the setbacks of other buildings in the surrounding area;
- (e) the historic cultural heritage significance of adjacent places; and
- (f) the streetscape.

Does not comply

As discussed in regard to height and bulk, the proposed structure has a zero setback to the south-west and while the setback may be acceptable, the proposed height and the lack of consideration of the visual impacts of this from significant views outside of the site, in combination with this zero setback, are not considered to be acceptable.

As noted in regard to E13.6.3, the only discussion included in the HIA in regard to setbacks is the following:

'Whilst it would be preferable to see a greater amount of separation, the capacity of the carpark would be compromised with any further reductions to the building envelope' (P.22).

This refers to the separation between the wall of the car park and the building to the north-east which appears to be approximately 1.5m. It is agreed that this should be greater. 1.5m is not considered to be adequate when the

LAUNCESTON CITY COUNCIL

MEMORANDUM

proposed wall is approximately 19m high and around 40m long and is to be built alongside window openings. This distance will not allow the existing building to be seen or for the historic layout of the site to be read.

The setback from the Gasometer frame is larger, but is also not dimensioned. It appears to be around 7-8m and while this is somewhat less invasive than the above situation in regard to the heritage values and reading of the site, the new building is to lie to the north of the Gasometer and it is not considered to be entirely appropriate to develop a new 19-21.5m carpark structure such that it will overshadow the bulk of this development site for over half of the day.

Generally it is evident from plans, and it is clearly stated in the planning report provided, that the proposed building has resulted from an 'inside out' design process, which has been based on the provision of a particular number of parking spaces, rather than consideration of the heritage values of the site, or other needs of the uses on the larger site. It is in this context that I propose that the siting of the proposed building is not considered to be compatible with the historic cultural heritage significance of the local heritage place and its setting.

E13.6.8 Roof form and materials

Objective: To ensure that roof form and materials are compatible with the historic cultural heritage significance of local heritage places and their settings.

P1 Roof form and materials are compatible with the historic cultural heritage significance of a place and its setting, having regard to:

- (a) the cultural heritage values of the local heritage place and setting;
- (b) the design, period of construction and materials of the dominant building on the site;
- (c) the dominant roofing style and materials in the setting; and
- (d) the streetscape.

Does not comply

The HIA does not clearly address the specific elements of the performance criteria, but does state that *'In lieu of a roof form, the facade of the building will be read as a simple box form that will sit recessively behind the heritage structures'*. This will be true from some view points, but while a simple form may sometimes be able to be considered as recessive and appropriate on a site of heritage significance such as this, the form proposed is not at all common in this area and the scale of this form cannot be considered to recede from site or many streetscape views.

It is acknowledged that the features described as an *'abstract interpretation of the gable roof ends'* will have some softening effect on the form of the building, but these do not extend beyond the line of the roof.

The mesh screens now applied to parts of the upper floor may have a more significant softening effect, but will not lower the perceived height of the building or reduce the contrasting cubic nature of the form.

LAUNCESTON CITY COUNCIL

MEMORANDUM

It is stated that *'The roof form of the proposed carpark at level 6 comprises 43 parking spaces, this will not be seen due to the parapet walls which extend above the finished top floor level of the Carpark'*. However, as evidenced by the aerial views shown on the shadow diagrams provided, these spaces will be seen from many vantage points around the city and the actual view (at least from the hillside to the south) will not be of a roof form, but of a variety of motor vehicles in random patterns on the concrete rooftop parking level, and an area of mechanical plant.

At the scale proposed, this roof form is not considered to be compatible with the historic cultural heritage significance of the local heritage place and its setting.

E13.6.9 Wall materials

Objective: To ensure that wall materials are compatible with the historic cultural heritage significance of local heritage places and their settings.

P1 Wall material for buildings and structures must be compatible with the historic cultural heritage significance of a place and its setting, having regard to:

- (a) the cultural heritage values of the local heritage place and setting;
- (b) the design, period of construction and materials of the dominant building on the site;
- (c) the dominant wall materials in the setting; and
- (d) the streetscape.

Does not comply

The dominant wall material proposed is concrete which is to be configured in large panels which bear little to no relationship to the traditional forms, patterns or materials on the site or in the surrounding area.

The steel detailing which is now proposed to be in shades of red and grey which tie in with the colour of the red brick on the site, and which also relate to the current colour of the remaining steel gasometer frame should assist the building in fitting in with the surrounding buildings and forms, the superficial application of these fine elements alone are not considered to be enough to affect the overall impact of what is effectively a large cubic form.

While the building is of the scale currently proposed here, the grey concrete panels selected for use here, in the configuration proposed are not considered to be compatible with the historic cultural heritage significance of the local heritage place or its setting.

E13.6.11 Driveways and parking

Objective: To ensure that driveways and parking are compatible with the historic heritage significance of local heritage places and their settings.

In regard to the Heritage Code, the parking proposed under the main building floors and behind the front wall meets the Acceptable Solution for 'Driveways and parking', however as the proposal is for subdivision and car parking only,

LAUNCESTON CITY COUNCIL

MEMORANDUM

and the scale of the structure is an issue, I offer the following in regard to the provision of parking and its impacts.

It is stated in the Introduction to the Planning Submission (Page 3 of 29) that *'The 288 bays is the minimum number of bays that will support the precinct and remain viable for the project'*

While it is acknowledged that additional parking in this area of the city may be useful in the near future, the intent of the parking provisions in the planning scheme is for properties to provide parking to cater for the needs of their own staff and patrons, and not to rely on off-site public and commercial car parking facilities in the first instance. In this sense, the intent of the proposal to subdivide an area from a larger site which could provide parking for the subject site, and offer it for use by the public and other specific uses outside of the site, may be considered to work against the intent of the Scheme in regard to parking provision.

More importantly, in the case of this significant heritage site, catering for these uses outside the subject site to such an extent for commercial gain, also results in detrimental impacts on the heritage significance of the Local Heritage Place as discussed previously in regard to the scale of the development and should be well justified to enable approval.