



34-40 Howick Street South Launceston - Attachment 2 - Amended Plans

Northern Tasmania Steiner Association Inc.
41 French Street
Launceston, 7250

8th February 2016

Launceston City Council
Town Hall, Saint John Street
Launceston

To Planning at Launceston City Council,

This planning application relates to part of the area on the title for 34-40 Howick Street, Launceston which is on the piece of crown land known as the East Wing of the LGH. The building is known as the Old Nurses Recreation Hall and has an unofficial street address of 41 French Street.

This application is for a proposal to extend the current playgroup's activities as the children grow, and cater for a small class of kindergarten aged children from 2016. Since 2007, the building has been occupied by our group who have been running Rainbow Garden Playgroup, craft sessions, parent information talks and workshops. We currently have 8 children enrolled for 2016 and while it is our hope that this will grow, we anticipate numbers will remain small for the foreseeable future. We are therefore proposing that up to 12 children may attend. If we are successful and interest grows beyond this, we plan to move the kindergarten to a larger and more permanent site for 2018. We note that in the unlikely event that we were to increase numbers beyond 12 students on the site in the future, this would be require a new planning application.

As you would be aware, the building is currently zoned Urban Mixed Use¹ and is a class 9 building which means a building of a public nature. As such, we understand that the building and its surrounding area including street parking have been designed and are able to be used to support activities of a public nature in higher density areas such as this one in inner Launceston. We believe that the proposed activity is a modest and valuable use of the space which will have minimal impact on the surrounding neighbourhood.

The playgroup has benefitted many families over the years providing a safe, nurturing place for families with young children. This helps to reduce social isolation for new parents and to support positive parenting practices to raise healthy, happy children. Playgroup therefore contributes to the City's goals of social inclusion and diversity. Steiner education is a very popular form of education and is available in every other major city/town in Australia, and many regional areas (there is currently only one other Steiner school in Tasmania – in Hobart) and we feel that it would be wonderful for Launceston to offer a greater diversity of educational options. We have been operating peacefully without any complaints, either to us or Council, about our impact on the surrounding neighbourhood. Our closest neighbours, have been to our knowledge, all owner-occupiers over the last 8 years. We expect any continued use of the building to be very similar to the past use, with a small number of children attending during the day (9am-3pm).

We want to also note that the building and facilities have been assessed by the Schools Registration Board as suitable for this purpose (i.e. we have current registration) and the building has current

¹ Urban Mixed Use Zone: Seeks to provide for integration of residential, retail, community services and commercial activities in urban locations. It also seeks to provide for a diverse range of urban uses that support the role of activity centres and to facilitate increased intensity of development including increased residential densities in locations close to major activity centres. (Launceston Central Area Development Strategy 2013)

assessment against the building code also in line with this use. Tas Fire Services have done inspections biannually during our tenure. We understand that to enable this use, the zoning needs to include Education, which is one of the discretionary uses allowed under the zoning Urban Mixed Use.

In preparing this application, we door-knocked each house in French St and on the northern end of Lord St, we have spoken with 25 of 40 households. From this (and our parking observations), it is clear that the situation with parking and traffic in French Street has changed dramatically in recent years, and according to 7 residents has become unworkable with visitors/friends/family unable to park and residents losing access to carparking after short outings. These and other residents are finding this so difficult that many resort to reserving a park with a bollard or traffic cone. Five of the residents we spoke to are also very concerned about the narrowness of the section of street going around the corner at the top of French St into Lord St and the potential for an accident. The parking and traffic situation is genuinely stressful for residents with it being a daily or several times daily concern. The allocation of additional 2P carparking down the lower end of French Street (with permits for residents) has somewhat alleviated the pressure on parking at the western end of the street where we are located by disallowing all day parking by LGH and Hotel Charles staff which is the biggest pressure on the street. Residents without off-street parking can now use these 2P carparks given that the majority of parking users stay all day. However, this solution appears to have increased pressure on the eastern end of the street. These parking and traffic issues exist regardless of our use of the area. These issues will need to be addressed with residents by Council regardless of whether our permit is approved or not. Permit parking seems to be the obvious solution and we understand that some steps have been taken towards this.

Opposition to our application has therefore been based on concerns that our use will increase these parking and traffic issues. We are very sympathetic to this concern and we wish to work towards solutions that minimise our impact, while also recognising that the 41 French Street Hall exists and will no doubt be used for a purpose whether it is for us or another group. We believe that our current proposal will actually decrease the parking and traffic impact that residents have been experiencing (albeit by a small amount given that our use is so relatively small). As mentioned, we have been running playgroup for up to 3 days a week over the last 8 years with additional activities at other times. The current proposal reduces playgroup to one day per week with limited additional activities due to the usage of the building for the kindergarten on other days. We have negotiated for kindergarten drop-off and pick-up to occur via Howick Street rather than French Street which means that on four days a week, the only traffic will be the teacher and helper coming and going (4 movements). On these four days, there will be no carparking usage on either the 2P or untimed parking. We consider this to be an extremely low impact for a building of the nature of the 41 French Street building. On the playgroup day, as has been the case for 8 years, playgroup families will drive in (max 10 movements), stay for 2 hours in the 2P carparks, and drive out 2 hours later (max. 10 movements). We expect that our usage will follow the same pattern as in the past, and that we will have no usage of the untimed parking which is the main area of concern for residents. The arrangements are described in more detail in the attached. We understand that according to the carparking code, we are only required to provide 2 carparks. Our provision of a drop-off and pick-up location not accessed through French Street therefore exceeds the carparking code: a measure that we have worked hard to secure in acknowledgement of the situation in French St. We have not spoken with any residents who have voiced any other objections to our use, and overwhelmingly, residents were very supportive of having child-related activities in our location as long as the parking and traffic issues are addressed. In general, the majority of residents (18 out of 25) were either unconcerned about our use or supportive. In addition, if the carparking issues in French Street were

to be resolved (through permit parking or other methods), we anticipate that there would be very little or no concern about our use.

In relation to the only concern raised by Council about our previous application, the safety of the carpark at the western end of French Street in which carparking has been allocated for our use, we provide details in the attachment. We have made arrangements so that the carpark will only be used by staff and helpers (before or after any ingress/egress by parents/children). Our site has access from defined footpaths on both the eastern and western sides of the 'street frontage', and our parents/children will access the site via these entrances rather than through the carpark.

We include with our application, a completed application form, and a site analysis and plan. We note that there is no certificate of land title for the site which is on Crown Land and this application has been approved by DHHS as per the attached documents.

Regards



Caroline Sinclair
Northern Tasmania Steiner Association Inc.

Northern Tasmania Steiner Association Inc.
41 French Street,
Launceston, TAS, 7250

8th February 2016
Launceston City Council Town Hall,
St John Street Launceston

To Planning at Launceston City Council,

We provide the following information to supplement our planning application. The following information was previously provided in response to a letter dated 28th July 2015 in relation to our original application and has been updated to include additional carparking arrangements and a change to maximum numbers.

Please note that, given that the area of 34-40 Howick Street is Crown Land and effectively untitled, the 'site' we are allocated within that area is notional. Our lease documents indicate that our site area includes both the building and surrounding grounds as well as the 2 carparks (in the carparking area at the western end of French Street) and adjacent to our building that have been allocated exclusively for our use. We therefore believe that these 2 carparks can be considered within the boundaries of our 'site' and that therefore, we have met the requirements for carparking arrangements, to provide 2 spaces for our anticipated 1.5FTE staff. In this case, we understand it would be unnecessary for us to provide this further information for us to be assessed against a performance criteria. However, given the pressure on carparking in French Street and residents' concerns, we nonetheless provide the additional information that could be required.

We also include an additional section addressing the safety of the French Street carpark and how our proposed solution addresses this issue.

Urban Mixed Use Zone

Please be advised that the site has domestic security lighting and there are no existing or proposed external air conditioning, air extraction or heating systems.

Please see our site analysis for a detailed internal floor plan to the scale of 1:100 that shows the location of essential features including the 'classroom' area. The site analysis also includes a plan showing external existing and proposed play areas.

Playgroup is very unlikely to host more than 10 families in the one session due to the space restrictions but there are no formal limitations. Please note, that we currently have 9 confirmed kindergarten/prep enrolments. Given interest to date, the number of 18 students stated in the previous planning application (related to the maximum allowable according to School Registration Board space requirements) is highly unlikely in the short term, the actual maximum number of students we expect to have is 12.

Car Parking and Sustainable Transport Code

Please note that we have copied text from your letter and provided our answers below

Because the car parking spaces are unable to be provided within the property boundaries, further information is required to demonstrate how the proposal complies with performance criteria E6.5.1 (P1.1) of the Scheme in which the following factors need to be considered:

- a) the availability of off-road public car parking spaces within reasonable walking distance;*

We are allocated exclusive use of two off-road parking spaces in the carpark adjacent to the site that is managed by CARE Park on behalf of DHHS. These spaces are line-marked and already have signage that designates these carparks for the exclusive use of Rainbow Garden Playgroup Monday to Friday 9am to 5pm. Additional carparking for drop-off and pick-up in excess of the requirements for our use will be provided within the boundaries of DHHS owned area. This will now be located in the 'Spur Wing' carpark (to the south-west of the building) which is accessed via Howick Street rather than French Street to enable short-term parking for drop-off and pick-up of children. This carpark provides for visiting doctors, patients and carers and the spaces are not allocated. We will have access to all available car parks for short term parking (up to fifteen minutes). When required, we will also have the use of an accessible car park in the 'Spur Wing' carpark. Our observations of the Spur Wing carpark so far are that when we have had drop-off and pick-up, there has only been 2-3 other cars parked out of a possible 20 spaces. In the past, we have observed higher usage of this carpark but it has never been full, with at least 3-5 spaces available at all times.

- b) the ability of multiple users to share spaces because of:*

i. variations in car parking demand over time; or

Overall, the majority of the demand on parking will be for short periods of time, between 5 and 15 minutes per car during school drop-off and pick up prior to 9am. Each space may be used twice or more before the nominated starting time of 9am. Our allocated off-road parking spaces in the carpark adjacent to our building in French Street will be used by staff and parent helpers. Part-time employees and parent-helpers will only require the off-road parking for a portion of the day, so either the second space will be used multiple times in the day or it will be available for more than half the operating hours.

On playgroup days, the allocated parking can be used by the playgroup leader and one family with the remaining families either using 2P parking in French Street/Saint John Street, being dropped off or walking.

ii. efficiencies gained by consolidation of car parking spaces;

Efficiencies will be gained by consolidation using off-road spaces available in the DHHS parking (in the Spur Wing carpark) for short-duration drop-off and pick-up carparking. Our use of this carpark for this purpose will not restrict carparking available for the current use by hospital interns and patients because of the short duration and the variability in use by the hospital users, the availability of spaces rotates over a 24 hour period and there are always sufficient carparks available for our use at any given time. In the unlikely event that the carpark became fully utilised due to our use, it would be a matter of minutes before the carparking would again be available because of the short-term nature of our use. As noted in the notes to the previous Council Agenda relating to our application, the planning proposal for the DHHS development for construction of the hospital intern and patient

accommodation provided sufficient carparking and there should be no reason for staff, students and residents to park outside the property grounds.

With the maximum number of 12 students, which will include at least one family with 2 children attending and one family walking, there will be a maximum of 10 drop-off/pick-ups, with this number more likely to be less. We anticipate an initial number of 5 cars using this parking. We will communicate the drop-off and pick-up arrangements to each family individually and also publicise the arrangements in any regular communication to parents such as newsletters. In this way, we anticipate that users will observe preferred carparking arrangements and avoid parking in French Street, and in fact, this is already the case.

- c) *the availability and frequency of public transport within reasonable walking distance of the site;*

There are several bus routes which stop at Charles Street near Frankland Street, at the LGH, and on Howick Street opposite Mulgrave Street. These all involve a walk uphill. Currently, several playgroup families already walk from their homes (as far as West Launceston) to playgroup. We anticipate that probably 1-2 out of 10 families would walk/catch public transport.

- d) *any site constraints such as existing buildings, slope, drainage, vegetation and landscaping;*

Please note that we consider the current 2 off-road carparks to be within our site boundaries as they are noted on our lease as part of the area that we have been allocated within the boundary of the untitled Crown land that comprises 34-40 Howick Street. Due to the position of the building on the site (towards the front of the block) and the slope, we are unable to create further off-road parking spaces within the site boundaries and we understand that these are also not a requirement given that our 2 allocated spaces meet the requirements in the carparking code under the Planning Scheme.

- e) *the availability, accessibility and safety of on-road parking, having regard to the nature of the roads, traffic management and other uses in the vicinity;*

The site is located at the end of French Street, the street is a wide street with good visibility. There is pedestrian access via a footpath on the South side (where we are located) and children will be accompanied by adults. There are 8 2P spaces on French Street within 100m of the site, and further untimed parking right up French Street. There is also a further section of 2P spaces, possibly up to 8, available in Saint John Street (the nearest side street), although these are rarely used due to the steep slope. Based on current usage of French Street parking (from parking observations), most of the 2P spaces will be available and will not be occupied by residents (only 3 residents with adjacent houses have been observed using on-street parking), and because of the shorter time limit, are unlikely to be occupied by other users who park and walk down to the Hospital or the Charles for longer work hours. We anticipate that our off-road parking will service the majority of our parking needs, with, as outlined below very light use of the 2P parking close by in French Street and Saint John Street (one day per week), while still allowing for use by residents with permits. We anticipate that we will not require any use on the remaining untimed parking in French Street and Saint John Street and our impact will be negligible.

- f) *an assessment of the actual car parking demand determined in light of the nature of the use and development; and*

Our current usage:

On our playgroup days (2-3 per week), we are using our 2 allocated off-road spaces plus up to another six spaces (most likely using available 2P spaces) from 9.30am - 11.30am (i.e. for the two hour duration of playgroup). Our meetings and other gatherings have a similar impact, but at different times of the day and sometimes in the evening.

Our planned usage:

With the planned use of the space from 2016 and modified carparking arrangements, we would have significantly less impact on parking than we have for the last 8 years, during which there have been no complaints about parking. The teacher and parent-helper would use our off-road parking each day with, as mentioned drop-off and pick-up via Howick Street using off-road parking. On a playgroup day, we could have up to 10 families (parent and child) attend. However, playgroup would only be held when the school children are off-site. As suggested, we are anticipating that at least 1 out of every 10 families would either walk, catch public transport, or carpool. There will also be consolidation from families with more than one child attending.

Table 1: Summary of planned usage

Activity	Kindergarten	Playgroup
Max. no of students	12	10
Staff	1	1
Hours of operation	9am to 3pm	9.30am to 11.30am
Peak traffic and parking demand	<p>Traffic: 2 x 2 movements (8.30am x 2, 12pm x 1 and 3.30pm x 1)</p> <p>Parking: No on-road parking impact</p>	<p>Traffic: 2 x 10 movements (9.30am and 11.30am)</p> <p>Parking: 10 x 2P (9.30-11.30am)</p>
No. of days per week	4*	1*
No. of parents to remain onsite	1 (9am to 12pm)	All parents remain onsite

*Note that playgroup and kindergarten will occur on alternate days

A note on additional activities: The planned usage of the site will generally preclude the use of the site for other activities (craft etc.). The only current planned additional activities are board meetings once a month which will occur from 7.30pm-9pm with up to 8 adults attending (no children). We will obviously also have other occasional access for activities such as garden maintenance. Parents may also meet individually with the teacher after hours as needed.

g) the effect on streetscape and to the amenity of the locality.

As noted in our cover letter, while French Street may at first glance seem like a quiet backstreet, it actually already experiences a period of busy activity from at least 8am (from our parking observations, but residents have said it starts at 7am), through to 9am when people park and walk down to Charles Street or the LGH for work. On one day, 24 vehicles were recorded as parking between 8 and 9am, with most parking prior to 8.45am. This, coupled with residents' movements leaving for work

and completing their school drop-offs creates a relatively busy period of activity. The large majority of vehicles (belonging to workers) are then parked for long periods of time (generally all day) precluding other parking uses. The proposed use will have minimal additional impact with up to 2 cars daily arriving and parking in off-road parking, and school children will be seen walking up from the Spur Wing carpark. The one playgroup session a week represents a higher level of use with up to 10 cars coming and going and again, parents and children walking down the street which despite its impact represents a relatively low level of use when compared with the all-day parkers. There may be occasional use of 2P parking in French Street from other visitors.

As noted in the cover letter to our application, the 41 French Street building is a class 9, i.e. of a public nature, and is in an Urban Mixed Use zone. We understand this to mean that the city's plan would already include an allocation for use of on-street parking for purposes of a public nature. We therefore consider that our proposal will have a very minimal effect on the street in relation to the range of allowable uses for a building like ours in this zoning.

As noted, our group has already been a resident of the street and has been running playgroup and our other activities in the space since 2007 with no complaints about traffic, parking or other disturbances. We have spoken with the neighbours most likely to be affected in the process of preparing this application and none have raised concerns other than existing concerns about parking/traffic with us as described in the cover letter.

Reason for Refusal: The existing car parking spaces proposed to be utilised are not constructed or designed appropriately to provide for the safe ingress and egress for users of the playgroup and kindergarten.

The proposed arrangements significantly alter our use of the carpark at the western end of French Street adjacent to our site. Please note that in this application, we will only be allocated exclusive use (or any use) of two of the carparks, those closest to our site that are already included on our lease and signed for our use. The remaining carparks will continue to be available to DHHS users (mainly nurses using adjacent accommodation). There is currently only one DHHS user, and this has been the case for some months. There can be up to four other DHHS users park on the northern side of the carpark.

We are proposing that these allocated carparks will only be used by staff and helpers (parent/community volunteers). Staff/volunteers will arrive before and leave after children arrive/leave, so the cars will be parked and stationary when parents/children arrive. We cannot guarantee that the other DHHS users' cars in this carpark will not move during arrival/leaving times so we have made provisions so that our users will avoid any ingress/egress through the carpark.

The following provisions have been made to direct users to the entrances accessed via defined footpaths (and avoid access via the French Street carpark)

- Kindergarten pick-up and drop-off will occur in the Spur Wing carpark, therefore these users will walk up the ramp, which has handrails on both sides to the most western entrance which is accessed from the ramp. Any other users accessing the site from this direction will also be directed to use this entrance.
- Playgroup families who park in French Street and walk down will be directed to use the most eastern entrance (via both personal communication as well as signage). This entrance is also accessible from the defined footpath. Users will walk down the existing lane (which is currently our alternate evacuation route) and enter via a side gate.
- The middle entrance accessible from the carpark will be signed for users to use alternate entrances.

If deemed necessary, we may line-mark the carparks on the northern side of the carpark to more clearly mark where cars should park to further ensure the safety of users entering and leaving the carparks. We note, however, that we consider manoeuvring in and out of the carpark from the 2 spaces allocated to our group to be relatively safe and easy to use, particularly given that our pedestrians will not be walking through when vehicles are moving.

Many thanks

Caroline Sinclair

Northern Tasmania Steiner Association Inc.

Site Analysis – 41 French St

Location

This site sits within a large title 34-40 Howick St. See figure 1 below illustrating the location of the area in which this application is concerned.

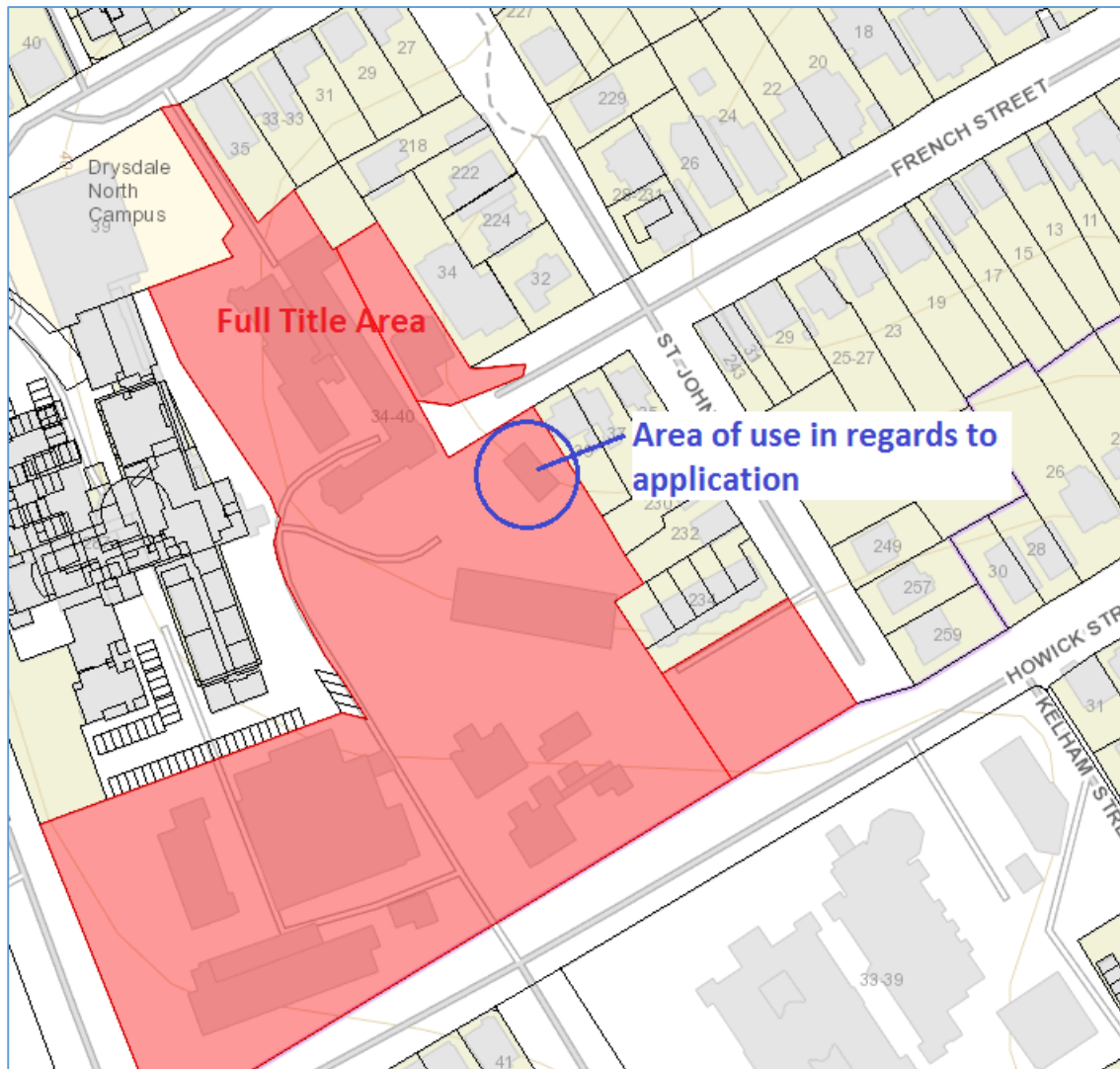


Figure 1 – Title map showing the larger title area of 34-40 Howick St in red and the area of interest to this application circled in blue.



Figure 2 – Detailed plan of the site showing the dimensions of the area; existing building; existing vegetation; contour lines; title boundaries and street access.



Figure 3 –Detailed plan of the site overlaid on an aerial photograph of the area illustrating existing facilities and structures in the surrounding area.

Current Use

The site has been used for playgroup, craft groups and parent information meetings during the last 8 years; since 2007.

Proposed Use

In 2016 the plan is to use the site to run a small kindergarten/prep class in addition to the current uses.

Topography and Natural Features

Topographic lines are present on Figure 2. The site sits between 50- 60 m (AHD). No natural drainage channels, water courses or wetlands exist near the site.

Vegetation

No natural vegetation remains on the site. Some large well established trees exist along the western and southern extents of the site. No removal of vegetation is planned with this change in use.

Pedestrian and Vehicle Access

The pedestrian and vehicle access has been established from the end of French St (see figure 2). There is also pedestrian and vehicle access available from Howick Street, using the Spur Wing carpark and walking up the ramp to the building.

Carparking

Two carparks have been permanently allocated at the front of the site as well as access to a further carparks in the Spur Wing carpark (adjacent to the south west border of the site) for pick-up/drop-off periods. An accessible carpark is also available in the 'Spur Wing' Carpark.

Site Facilities

The site contains an existing Hall (see figure 2 for location); and a fenced playground area and the 2 carparks. No additional changes or additions to the facilities are planned with the proposed change in use.

Adjoining Properties

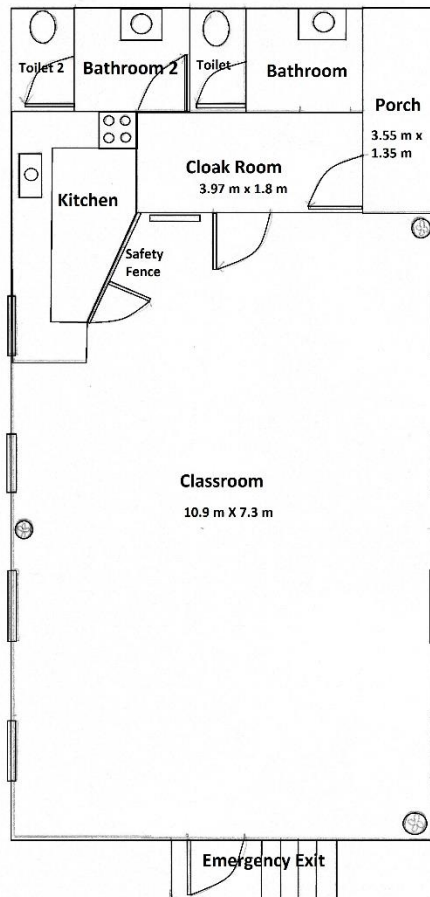
The location of the adjoining properties can be seen on figure 1. The Eastern and northern surrounds of the site consist of private residences; north-west of the site is nurse's accommodation; south of the site are carparks and an additional government health building.

Site Services

No change to roads, driveways, car parking and footpaths is proposed. Currently an entry footpath and two car parks are within the site. The site does not contain any open or communal spaces and this will not change. All main utilities have been previously connected and will not change. No subdivisions or lot boundaries are proposed.

Internal Floor Plan

Floor Plan



Scale 1:100

Existing and proposed external play areas

