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PLANNING PANELS VICTORIA
MELBOURNE PLANNING SCHEME AMENDMENT C258

Heritage Policies Review

SUBMISSION

My submission will cover the following points:

- Heritage Policy 22.05
- Heritage Places Inventory 2017

HERITAGE POLICY 22.05 – Heritage Places Outside the Capital City Zone

Provisions that I believe need amending to ensure better clarity and heritage protection are:

22.05-18 DEFINITIONS

Concealed/partly concealed

AmC258 Proposed:

Concealed/partly concealed	Concealed means cannot be seen from a street (other than a lane, unless the lane is classified as significant) or public park. not visible from any part of the street serving the front or principal part of the building, as defined under 'visible' Partly concealed means that limited amount some of the addition or higher rear part may be visible, provided it does not <u>visually dominate or reduce the prominence of the appearance of the existing building's façade(s) and the streetscape.</u>
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The existing definition for partly concealed states that “a **limited** amount of the addition or higher rear part” This is proposed to be changed to “**some** of the addition or higher rear part” There is a big difference between *some* and *limited*. ‘Some’ is much less specific than ‘limited’ if you look at their dictionary definitions. The definition for ‘some’ includes: ‘an unspecified amount’, ‘an appreciable or considerable amount’, whereas the definition for ‘limited’ includes: ‘restricted’ and ‘an implied boundary that cannot be passed’.

Use of ‘some’ unnecessarily introduces ambiguity and conflict into the definition, when read with the proviso words that follow:

'Partly concealed means that an unspecified, appreciable or considerable amount of the addition or higher rear part may be visible provided it does not visually dominate or reduce the prominence of the existing building's façade(s) and the streetscape.'

This clearly introduces ambiguity and inconsistency into the definition. So why not keep the whole of the definition of partly concealed clearly consistent? I therefore suggest that the new Definition for Partly Concealed reinstates the word 'limited'.

Partly concealed means that a limited amount of the addition or higher rear part may be visible provided it does not visually dominate or reduce the prominence of the existing building's façade(s) and the streetscape.

If agreed, this change should also be incorporated into Clause 22.05-8 Additions/Concealment of additions and Clause 22.05-7 New Buildings – as set out later in this submission.

Streetscape

Proposed:

Streetscape	A streetscape is a collection of buildings along a street frontage. When referred to in relation to a precinct, a streetscape typically contains a majority of buildings which are graded significant or contributory.
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Streetscapes often comprise historic elements in addition to buildings, e.g. historic infrastructure such as bluestone kerb and channel; historic street trees, 100-year old treed medians; and historic street geometry/layout can contribute to a heritage streetscape.

And similarly, a Significant Streetscape is not restricted to buildings:

Significant streetscape (as referred to in this policy)	Significant streetscapes are collections of buildings outstanding either because they are a particularly well preserved group from a similar period or style, or because they are a collection of highly significant buildings significant in their own right.
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The Melbourne Planning Scheme recognises a wider definition:

**MELBOURNE PLANNING SCHEME
MUNICIPAL STRATEGIC STATEMENT**

21.06 BUILT ENVIRONMENT AND HERITAGE
30/07/2015

Melbourne's character is defined by its distinctive urban structure, historic street pattern, boulevards and parks, heritage precincts, and individually significant heritage buildings. Heritage buildings, precincts and streetscapes are a large part of Melbourne's attraction and the conservation of identified heritage places from the impact of development is crucial.

with relevant clauses:

21.06 – 2 Heritage

Objective 1 To conserve and enhance places and precincts of identified cultural heritage significance.

Strategy 1.1 Conserve, protect and enhance the fabric of identified heritage places and precincts.

Strategy 1.2 Support the restoration of heritage buildings and places.

Strategy 1.4 In heritage precincts protect heritage buildings, subdivision patterns, boulevards and public open space.

Strategy 1.5 Protect the significant landscape and cultural heritage features of the City's parks, gardens, waterways and other open spaces.

Consistent with these provisions, Royal Park is assigned a **Significant Streetscape** grading in the AmC258 Heritage Places Inventory:

Parkville		CITY OF MELBOURNE HERITAGE GRADINGS	
Street	Number	Building Grading	Streetscape Grading
Flemington Road	Royal Park	Significant	Significant

It is pointed out, however, that Royal Park is predominantly open space parkland, not a building:

Similar examples of predominantly non-building Significant Streetscapes are:

Macarthur Street	Gordon Reserve	Significant	Significant
Wellington Parade	Fitzroy Gardens	Significant	Significant
Birdwood Avenue	Royal Botanic Gardens	Significant	Significant
William Street	Flagstaff Gardens	Significant	Significant

To overcome this anomaly in the definitions of Streetscape and Significant Streetscape, I suggest the following rewordings:

Streetscape: A streetscape is a collection of buildings, parkland, plantings or other elements along a street frontage. When referred to in relation to a precinct, a streetscape typically contains a majority of significant or contributory graded heritage places.

Significant streetscape: Significant streetscapes are collections of buildings, parkland, plantings or other elements outstanding either because they are particularly well preserved and of a similar period or style or because they are collectively significant in their own right.

PERFORMANCE STANDARDS FOR ASSESSING PERMIT APPLICATIONS

22.05-5 DEMOLITION

Before deciding on an application for full or partial demolition, the responsible authority will consider, as appropriate:

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- The character and appearance of the building or works and its contribution to the historic, social and architectural values, character and appearance of the heritage place.

I believe this does not take into account a prevalent style of heritage building in Melbourne, that is, an intact, or near intact, terrace housing row (a row of identical houses) or row of identical non-residential buildings. If one component of the row were allowed to be demolished, it would have a significant, detrimental impact on the heritage significance of the row as an entity and on the streetscape.

If Alterations (22.05-6) and Additions (22.05-8) can be assessed for their impact on the heritage precinct, then so too should be a major intervention such as demolition of component(s) of a terrace row.

The above two points could be addressed by adding 'streetscape and precinct' to the provision. This would be consistent with the existing provision in clause 22.05 for demolition (.... 'streetscape and area').

Before deciding on an application for full or partial demolition, the responsible authority will consider, as appropriate:

⋮

- The character and appearance of the building or works and its contribution to the historic, social and architectural values, character and appearance of the heritage place, streetscape and precinct.

This would also be consistent with the AmC258 Clause 22.05-2 Policy Objective:

- To retain fabric which contributes to the significance, character or appearance of heritage places **and precincts**.

22.05-8 ADDITIONS

Following on from my comments under Definitions for Concealed/partly concealed on pages 1-2 above, the criteria below should be reworded and, importantly, require that the concealed/partly concealed provisions are met by the use of 'must':

Concealment of additions:

Additions to a significant or contributory building must be concealed in significant streetscapes. ✓

In other streetscapes, additions to significant buildings must be concealed. ✓

In other streetscapes, additions to contributory buildings must be partly concealed – a limited amount of the addition or higher rear part may be visible, provided it does not visually dominate or reduce the prominence of the building's façade(s) and the streetscape:

Additions to corner properties may be visible, but should be respectful of the significant or contributory building in terms of scale and placement, and not dominate or diminish the prominence of the building or adjoining contributory or significant building and the streetscape.

22.05-7 NEW BUILDINGS

Similarly, for the last points in this clause:

In significant streetscapes, higher rear parts of a new building must be concealed.

In other streetscapes, higher rear parts of a new building must be partly concealed – a limited amount of the addition or higher rear part may be visible, provided it does not visually dominate or reduce the prominence of the building's façade(s) and the streetscape.

COLOURS AND MATERIALS

The reference document 'Conservation in the City of Melbourne' has been deleted from AmC258 Heritage Policy 22.05 as it was deemed out of date. One of its key, but still relevant, performance standards, however, has not been addressed in the new 22.05 policy guidelines. This is **colours**. Much is made of respecting every other aspect for a new building or addition, but not a key characteristic associated with heritage places - colour.

It is suggested that 'colour' is added to the following provisions:

22.05-7 New buildings

New buildings must:

- Be respectful of the heritage place and in keeping with:
 - Building height, massing and form; style and architectural expression; details; materials; colours; front and side setbacks; and orientation and fencing.

22.05-8 Additions

Additions to buildings in a heritage precinct must be respectful of and in keeping with:

- Precinct characteristics including building height, massing and form; style and architectural expression; details; materials; colours; front and side setbacks; and orientation.

[Added comment from presentation: If I might add – I think there is enough leeway in the use of the word 'respectful' to avoid mandating Indian Red and Brunswick Green paint colours!]

HERITAGE PLACES INVENTORY

Melbourne Planning Scheme

Incorporated Document

AmC258: Heritage Places Inventory 2017

Corrected for re-exhibition, November 2017

Outstanding items from my submission to Council (No. 67, May 12, 2017) that I would like addressed are:

1) Part 98-166 Macaulay Road

FLEMINGTON AND KENSINGTON			
Street	Number	Building Grading	Significant Streetscape
Macaulay Road	Part 98-166 (Gateway, wall and caretaker's house)	Significant	-

This listing is part of the former Melbourne Gas Company complex in Macaulay Road, North Melbourne (cf HO 1113; VHR H1731) and should be listed correctly in the North and West Melbourne section of the Inventory.

2) Walmsley House at 1 Gatehouse St / 161 Gatehouse St, Parkville?

The Walmsley House is sited in Royal Park. Although part of Royal Park and individually Heritage Victoria listed (VHR H1946), for consistency, it should (a) be reinstated in the Melbourne Planning Scheme AmC258 Heritage Places Inventory and (b) with a correct address.

(a) Other buildings in Royal Park are listed – Southbank Lodge, at 2A Manningham St and the Park Keeper's Lodge at the northern end of The Avenue:

PARKVILLE			
Street	Number	Building Grading	Significant Streetscape
Manningham Street	2A	Significant	-
The Avenue	Park Keeper's Lodge	Significant	-

The Walmsley house was listed in the first draft of the Heritage Places Inventory 2016: (cf Future Melbourne Committee 5 July 2016, agenda item 6.1)

Parkville		CITY OF MELBOURNE HERITAGE GRADINGS	
Street	Number	Building Grading	Streetscape Grading
Gatehouse Street	1	Significant	No

so it would be consistent to reinstate it in the AmC258 Heritage Places Inventory because it also is one of Royal Park's significant heritage buildings.

(b) The address shown in the Heritage Places Inventory (first draft 2016) for the Walmsley House was 1 Gatehouse St, and this is consistent with its VHR address:



WALMSLEY HOUSE



1 GATEHOUSE STREET PARKVILLE, MELBOURNE CITY

Prefabricated iron houses were amongst the thousands of prefabricated iron and timber buildings imported to Victoria following the first gold rushes of 1851. Prefabricated buildings overcame...

HERITAGE COUNCIL VICTORIA
Victorian Heritage Register
VHR H1946

However, the Council officially maps its address as 161 Gatehouse St.

In including the Walmsley House in the Melbourne Planning Scheme AmC258 Heritage Places Inventory, its listed address should be consistent with its actual map address.

[Added comment from presentation: I contacted Heritage Victoria today and they stated they have had other examples such this. Said that an option could be to annotate the VHR registration. KO suggested Council should liaise with Heritage Victoria following PPV AmC258 report].

3. 163 Gatehouse St

This building, a foreman’s lodge in Royal Park, should be checked for addition to the Heritage Places Inventory. If other buildings within Royal Park can be individually listed (2A Manningham St; Park Keeper’s Lodge, The Avenue; Walmsley House, 161 Gatehouse St), then for consistency, so should 163 Gatehouse St. It was considered to have “some significance”, in the Royal Park Cultural Heritage Study 1999.

4. Royal Park – Significant Streetscape

AmC258 Heritage Places Inventory lists Royal Park with a single address: Flemington Road in Parkville and with a **Significant Streetscape** grading:

Parkville		CITY OF MELBOURNE HERITAGE GRADINGS	
Street	Number	Building Grading	Streetscape Grading
Flemington Road	Royal Park	Significant	Significant

If Royal Park itself has a **Significant Streetscape** Grading, then why aren’t the buildings that are part of the Park and located at its perimeters also assigned Significant Streetscape gradings? These include the above listed:

- 2A Manningham St, Parkville
- Park Keeper’s Lodge, The Avenue, Parkville
- Walmsley House, 161 Gatehouse St, Parkville

The Panel is asked to address this inconsistency.

Summary of requested changes relating to Royal Park in the AmC258 Heritage Places Inventory - Parkville:

- 1) Add Walmsley House at 161 Gatehouse St - **Building Grading - Significant**
- 2) Add **Significant Streetscape Gradings** to:
 - 2A Manningham St
 - Park Keeper's Lodge, The Avenue
 - Walmsley House, 161 Gatehouse St
- 3) Check status of 163 Gatehouse St and add to Heritage Places Inventory.

I would like to conclude by saying many of the comments in my submission raise similar issues to those raised by Angela Williams, Ewan Oglivy on behalf of the Carlton Residents Association and Mary Kehoe for the Hotham History Project. I believe we all have many years' experience in strategic and statutory heritage in the City of Melbourne and I would like to ask that 'significant' weight be given to our submissions.