

**PEER REVIEW REPORT:
HODDLE GRID HERITAGE REVIEW**



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Cover Image: *southern side of Flinders Lane looking west from opposite Malthouse Lane (February 2019)*

GLOSSARY OF ABBREVIATIONS

CoM	City of Melbourne
DELWP	Department of Environment, Land, Water and Planning
FMC	Future Melbourne Committee of Melbourne City Council
HGHR	Hoddle Grid Heritage Review
HO	Heritage Overlay
PPN1	Planning Practice Note 1: Applying the Heritage Overlay (August 2018)
VHR	Victorian Heritage Register

All photos taken by GJM Heritage unless otherwise stated.

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1.0 INTRODUCTION

Context P/L (Context) undertook the first stages of the Hoddle Grid Heritage Review (the HGHR) and submitted their initial report to the City of Melbourne (CoM) in June 2018. Council officers, under delegation, requested that the Minister for Planning apply interim Heritage Overlay controls to implement the findings of the initial stages of the HGHR through Melbourne Planning Scheme Amendment C327. Amendment C327 was approved and gazetted on 18 October 2018.

GJM Heritage was commissioned by the CoM in September 2018 to undertake a desk-top peer review of the initial HGHR report and citations prepared by Context to understand whether GJM Heritage could support Amendment C328 (now translated to C387melb), which sought permanent controls for those places subject to interim controls through Amendment C327 (referred hereafter as 'Peer Review - Stage 1'). The Peer Review – Stage 1 comprised:

- Limited site visits;
- Review of the HGHR methodology;
- Review of the Hoddle Grid Post-World War Two Thematic History; and
- Review of citations prepared by Context.

GJM Heritage was then engaged in March 2019 to undertake a review of citations for additional places prepared by Context over the intervening period and to review the list of individual places and precincts that had been assessed by Context but determined to not warrant inclusion on the Heritage Overlay. Further, in May 2019 GJM Heritage was engaged to undertake a full walk of the major and 'little' streets within the study area and to review the appropriateness of the Post Second World War places proposed for inclusion (referred hereafter as 'Peer Review - Stage 2'). The Peer Review – Stage 2 comprised:

- Site visits to review the list of postwar places recommended for inclusion in the Heritage Overlay;
- Assessments of postwar buildings dating from the period 1945-1975 identified during site visits;
- Review of additional citations prepared by Context;
- Review of places not recommended for inclusion in the Heritage Overlay by Context; and
- Revision of the Hoddle Grid Post-World War Two Thematic History.

This report provides a summary of GJM Heritage's comments and recommendations that were provided to CoM and Context as part of Peer Review – Stage 1 and Peer Review – Stage 2.

Following the Future Melbourne Committee (FMC) meeting held on 4 August 2020 council officers, under delegation, sought authorisation from the Minister for Planning under the *Planning and Environment Act 1987* to prepare and exhibit Planning Scheme Amendment C387. On 1 October 2020 the Minister for Planning authorised the preparation and exhibition of C387melb.

2.0 PEER REVIEW APPROACH

2.1 Study Area

Stages 1 and 2 of the Peer Review considered the same area as identified in the HGHR, and as described in Figure 1 below, with the exception of the land occupied by the Royal Melbourne Institute of Technology (RMIT) campus.

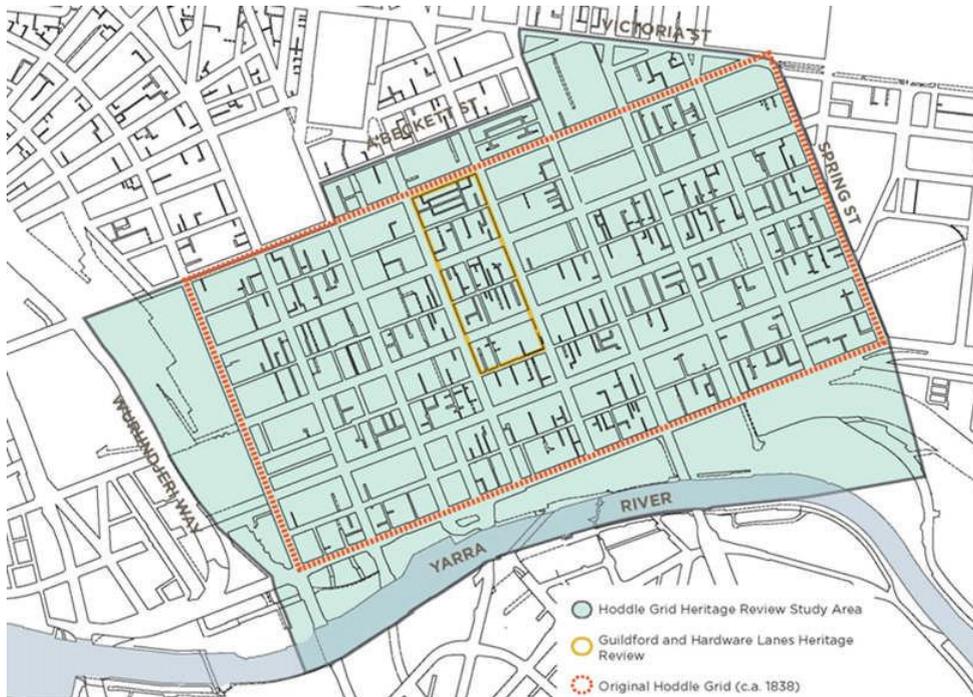


Figure 1. Map showing the extent of the HGHR

(Source: C387melb Explanatory Report)

2.2 Document Review

The following documents were provided by the CoM and were reviewed by GJM Heritage:

- City of Melbourne Future Melbourne Committee (FMC) Agenda 6.1, 21 August 2018
- Hoddle Grid Heritage Review - Volume 1: Built & Urban Heritage - Methodology and Appendices, June 2018 (including the Second World War Thematic History)
- Hoddle Grid Heritage Review - Volume 2: Built & Urban Heritage - Assessed Places and Precincts, June 2018
- C327 Amendment documents – interim controls
- C328 Amendment documents – permanent controls
- Draft citations for additional places/precincts assessed by Context (Peer Review – Stage 2)
- The list of places to be assessed
- The list of places not to be assessed
- Updated Volume 1 Methodology and Appendices

- City of Melbourne Future Melbourne Committee (FMC) Agenda 6.1, 4 August 2020.
- Panel Report into Melbourne Planning Scheme Amendment C186 – Melbourne Central City (Hoddle Grid), 11 July 2012.
- Department of Planning and Community Development briefing to the Minister for Planning regarding Melbourne Planning Scheme Amendment C186, 4 June 2013.
- Letter to the Lord Mayor of Melbourne from the Minister for Planning in regard to Melbourne Planning Scheme Approval of Amendment C186 Part 1, 4 June 2013.

GJM Heritage has not been provided with the technical reports in relation to Aboriginal cultural heritage and community consultation (Volumes 3, 4, 5 and 6 of the HGHR) and we have not provided comment on these.

In undertaking this review GJM Heritage was cognisant of Melbourne Planning Scheme Amendment C186 – Melbourne Central City (Hoddle Grid), which is pertinent to this amendment. Jim Gard'ner was involved in briefing Hon. Matthew Guy, then Minister for Planning, on the approval of Amendment C186, including the nine Post Second World War (postwar) properties proposed for inclusion in a Heritage Overlay.

This Peer Review has been prepared in the context of the recently amended heritage provisions of the Melbourne Planning Scheme (including as introduced through Amendment C258) and Planning Practice Note 1: Applying the Heritage Overlay (August 2018).

3.0 PEER REVIEW - STAGE 1

The Peer Review – Stage 1 was a desk-top review with limited site visits made of particular sites within the HGHR study area. The following is a summary of the findings, methodology review and recommendations made in response to the Peer Review – Stage 1 and the actions undertaken to address these matters.

3.1 GJM Heritage Findings

The following is a summary of the key findings made by GJM Heritage.

1. The methodology utilised for undertaking the HGHR appears consistent with PPN1 and current heritage practice.
2. The HGHR appears to provide a justifiable basis for implementing the Heritage Overlay to a number of places (individual buildings and precincts) on a permanent basis and contributes to the objectives and strategies of Clause 15.03-1S – ‘Heritage conservation’ and the objectives of section 4(1)(d) of the *Planning and Environment Act 1987*. A small number of recommendations and findings in the HGHR are not supported.
3. The extent of application of ‘external paint controls’ and ‘tree controls’, ‘outbuildings and fences not exempt under Clause 43.01-4’ is considered appropriate. It is noted that a study of significant interiors will inform the future application of ‘internal alteration controls’ within the study area.
4. The HGHR has considered relevant previous heritage studies.
5. The Hoddle Grid Post-World War Two Thematic History requires expansion and redrafting to provide a robust thematic context for the postwar places considered within the HGHR.
6. The comparative analysis of the postwar places is too limited and does not adequately address the concerns of the Panel considering Melbourne Planning Scheme Amendment C186.

3.2 Review of Methodology

The Peer Review – Stage 1 found that the methodology utilised for the HGHR appeared to be robust and consistent with PPN1 and current heritage practice. A small number of recommendations were made around ensuring clarity and consistency within the HGHR. More detailed recommendations were made in respect of the Post-World War Two Thematic History and the comparative analysis for postwar places, and these are discussed separately below.

3.3 Review of Hoddle Grid Post-World War Two Thematic History

The HGHR included a thematic history specific to the postwar period in the Hoddle Grid. The purpose of the document is to augment the existing City of Melbourne

Thematic Environmental History (TEH)¹. The Peer Review – Stage 1 found that the breadth of the HGHR Post-World War Two Thematic History was too limited and the examples of places drawn on to illustrate key themes lacked the depth necessary to provide a robust thematic context for the postwar places considered. It was also considered necessary to use the existing historic themes included within the TEH, which were informed by *Victoria's Framework of Historical Themes* (Heritage Council of Victoria, February 2010), rather than those prepared by Dr Susan Marsden to assist the then Australian Heritage Commission in identifying and assessing postwar places².

3.4 Comparative Analysis of Postwar Places

In peer reviewing the proposed postwar places, particularly the curtained walled office typology, it was noted that the comparative analysis for these places was limited and that the study would benefit from a more detailed assessment of similar properties across the study area. The lack of comparative analysis of places dating from the postwar period was identified as a failure within Amendment C186, which included a number of properties that are again being considered in the HGHR. The Panel considering C186 provided the following discussion in relation to those buildings identified under the 'Urban Spurt' theme (which describes the period from 1956 to 1975):

The group of nine buildings tabulated under the Urban Spurt theme, which represents a major phase in the development of modern Melbourne, were particularly the focus of this discussion. The Panel has found it difficult to understand why these nine were chosen rather than some other apparently equally deserving buildings not subject to heritage controls. It was unclear to us how they compared with one another or other buildings in the greater Melbourne area and whether there may be others which also warrant consideration for the application of the Heritage Overlay. There is no doubt that Melbourne has many buildings constructed during the period 1956 – 75 and the Panel was concerned that the selection proposed here may not adequately represent the spectrum of buildings from this important phase of Melbourne's architectural development.

While the C186 Panel recommended that the Heritage Overlay could be applied to these nine properties, the Minister for Planning did not approve that aspect of the amendment at the time, instead determining that the "...post World War 2 buildings will be the subject of further assessment by the department ... in consultation with council officers."³

¹ *Thematic History – A History of the City of Melbourne's Urban Environment 2012* (Context P/L, 2011).

² *Urban Heritage: the rise and postwar development of Australia's capital city centres* (Susan Marsden, Australian Council of National Trusts and Australian Heritage Commission, Canberra, 2000).

³ Letter to the Lord Mayor of Melbourne from the Minister for Planning dated 4 June 2013.

3.5 Review of Context citations

The Peer Review – Stage 1 involved the review of all the citations prepared by Context at that time. The intent of the review of individual citations prepared by Context was not to alter the author’s voice but to ensure the rigour and consistency of the assessments. The Peer Review – Stage 1 identified that Heritage Criteria C, E, G and H had been overused in the preparation of the citations and that their application should occur only where the threshold for local significance was clearly demonstrated.

4.0 PEER REVIEW - STAGE 2

Following the initial – predominantly desktop – Peer Review – Stage 1, GJM Heritage was engaged in March 2019 to undertake street-by-street fieldwork to inspect all properties recommended for inclusion on the Heritage Overlay and identify postwar places of potential significance. Further, GJM Heritage was engaged to review the list of individual places and precincts that had been assessed by Context but determined to not warrant inclusion on the Heritage Overlay.

The following is a summary of the actions undertaken as part of the Peer Review – Stage 2.

4.1 Site visits

Jim Gard'ner and Ros Coleman of GJM Heritage walked every 'major' and 'little' street within the study area to review the list of postwar places recommended for inclusion (refer Figure 1 for study area). Only those laneways and service alleys that abutted a building or precinct recommended for inclusion on the Heritage Overlay were inspected.

4.2 Postwar assessments

To address the additional postwar places identified through site visits, GJM Heritage and Context P/L were commissioned to prepare additional assessments of buildings dating from the period 1945-1975⁴. Those places that were constructed outside of that period were omitted from this assessment phase. A full description of the methodology applied to this piece of work is contained in the final HGHR report. It is considered that this additional work has addressed the issues raised in Peer Review – Stage 1.

4.3 Review of additional Context citations

The Peer Review – Stage 2 included review of the additional citations prepared by Context since the completion of the Peer Review – Stage 1. Review of individual citations was undertaken and workshops held with representatives of Context, GJM Heritage and CoM officers. Like the earlier review of citations, this stage focused on the rigour and consistency of the assessments.

4.4 Review of places not recommended for inclusion in the Heritage Overlay

The Peer Review – Stage 2 included a review of the list of individual places and precincts assessed by Context but not recommended for inclusion in the Schedule to the Heritage Overlay. It was recommended that a table be prepared providing a rationale for those places determined to not warrant inclusion.

⁴ The end date of 1975 accords with the end of the third quarter of the century and is commonly used for studies including the Central City (Hoddle Grid) Heritage Review (Graeme Butler and Associates, 2011), surveys of this period such as *Australia Modern: Architecture, landscape & design* (Lewi, H. & Goad, P., 2019) and generally pre-dates the rise of the Post-modern movement in architecture.

4.5 Revision of Hoddle Grid Post-World War Two Thematic History

To provide a more robust strategic basis and historical context for the enlarged group of buildings from the period 1945-1975, GJM Heritage was engaged to revise and broaden the scope of the HGHR Post-World War Two Thematic History. The final Context/GJM Heritage (co-authored) *City of Melbourne Hoddle Grid Heritage Review - Postwar Thematic Environmental History 1945-1975* forms part of the final HGHR.

5.0 RECOMMENDED CHANGES

5.1 Summary of Changes

The following table provides a summary of the recommended changes made following the completion of Stages 1 and 2 of the Peer Review.

Recommended Changes	Rationale
<p>Deletion of the Little Collins Street Precinct and replacement with the following individual places:</p> <ul style="list-style-type: none"> • 114-122 Exhibition Street • 57-67 Little Collins Street 	<p>The Little Collins Street Precinct is a small precinct that is less historically or visually cohesive than comparative examples. Two places within the precinct are already within individual Heritage Overlays and two further places are recommended for inclusion within individual Heritage Overlays. Only one remaining place (62-66 Little Collins Street) will not be protected by abandoning the precinct.</p>
<p>Deletion of two individual places:</p> <ul style="list-style-type: none"> • 8-12 Market Street (Former Southern Cross Assurance Building) • 53-57 Queen Street (SDA House) 	<p>8-12 Market Street is considered to be too altered when compared with the 1965 photograph provided in the citation and other comparable examples of buildings of this period. These changes include removal of glass screens, alterations to spandrel panels, reglazing and refacing of columns, which has reduced the integrity of this building to such a point that it does not warrant inclusion on the Heritage Overlay.</p> <p>53-57 Queen Street is identified in part for its technological significance (Criterion F) however this building has lost the distinctive external expression of the post-tension fixing on the Queen Street façade which has dramatically altered its appearance and the legibility of this technical design response. More intact examples of this building type have been identified in the HGHR.</p>
<p>Deletion of 25 Bennetts Lane from the Little Lonsdale Street Precinct</p>	<p>The building has been demolished.</p>
<p>Removal of two non-contributory places from proposed precincts:</p> <ul style="list-style-type: none"> • 272-282 Lonsdale Street (Drewery Lane Precinct) • 11-13 Exhibition Street (Flinders Lane East Precinct) 	<p>It is considered that boundaries of heritage precincts should generally not finish with a non-contributory property unless its inclusion is necessary to protect the heritage values of the precinct, such as in an otherwise highly intact High Street context where these small non-contributory buildings are consistent with the fine grain streetscape pattern of the rest of the precinct.</p>
<p>Removal of the thin sliver of Heritage Overlay applying to the western side of Oliver Lane within the Flinders Lane East Precinct and make the following changes:</p> <ul style="list-style-type: none"> • Include all of 24-30 Russell Street in the precinct boundary as a contributory place (instead of the Oliver Lane frontage only). • Identify all of 14-22 Russell Street as non-contributory. • Include all of 142-148 Flinders Street in the precinct boundary with that part of the site included in the VHR identified as such and 	<p>PPN1 advises that “...uncomplicated and easily recognised boundaries” should be used. Inclusion of the whole of 24-30 Russell Street will avoid confusion and the extent of the contributory fabric can be identified in the Incorporated Document Heritage Places Inventory (February 2020 Part A). In contrast, none of the fabric of 14-22 Russell Street is considered to contribute to the Flinders Lane East Precinct and this property should be identified as non-contributory. 142-148 Flinders Lane has been identified as contributory to the precinct noting that part of that site is included within the VHR (H1175 - Duke of Wellington Hotel).</p> <p>These changes will result in a clearer western extent for the proposed precinct and will more accurately identify those</p>

the remainder of the site as a contributory place.	buildings and elements that contribute to the western edge of Oliver Lane.
<p>Correcting the categories for two places within the Swanston Street North Precinct:</p> <ul style="list-style-type: none"> • 261-263 Swanston Street (change from non-contributory to contributory) • 265-267 Swanston Street (change from contributory to non-contributory) 	This corrects an error where the categories of these buildings were transposed.
<p>Changing the categories for two places within the Swanston Street North Precinct:</p> <ul style="list-style-type: none"> • 271 Swanston Street (change from contributory to non-contributory) • 273 Swanston Street (change from contributory to non-contributory) 	These buildings were re-categorised from contributory to non-contributory as they are substantially altered and more closely correspond with the definition of 'non-contributory' compared with 'contributory' in Clause 22.04 of the Melbourne Planning Scheme.
<p>Changing the categories for two places within the Swanston Street South Precinct:</p> <ul style="list-style-type: none"> • 145 Swanston Street (change from contributory to non-contributory) • 147 Swanston Street (change from contributory to non-contributory) 	These buildings were re-categorised from contributory to non-contributory as they are substantially altered and more closely correspond with the definition of 'non-contributory' compared with 'contributory' in Clause 22.04 of the Melbourne Planning Scheme.
Changing the category of 268-270 Lonsdale Street (Pacific House) within the Drewery Lane Precinct from significant to contributory	This building was redeveloped while the HGHR was finalised. It was re-categorised from significant to contributory given the recent alteration. The building more closely corresponds with the definition of 'contributory' compared with 'significant' in Clause 22.04 of the Melbourne Planning Scheme
Removal of the application of Criterion C (research potential) from every place	Criterion C is applied to places that have the potential to yield information through hidden fabric or below ground archaeology. It is considered that the application of Criterion C in the HGHR is an unnecessary duplication of controls triggered by the Victorian Heritage Inventory given that Criterion C is recommended only for places already subject to inclusion on the Victorian Heritage Inventory.
Removal of the application of Criterion G (social significance) from selected places.	Criterion G should not be applied to places where there is a lack of evidence provided to substantiate social significance.
Removal of the application of Criterion E (aesthetic significance) from selected places.	Criterion E should not be applied where places are typical examples of building types and do not display any particular aesthetic characteristics beyond what is usual for the class of place.
Removal of the application of Criterion H (associative significance) from selected places.	Criterion H should not be applied to places where this association is related to the architect who designed the building and it is not a notable example of their work, or the individual or practice is not of importance to the history of the City of Melbourne.
Defining the postwar period as 1945-1975.	The establishment of a clear date range aids comparative analysis and limits the number of buildings that need to have their inclusion or exclusion justified. The period 1945 to 1975 spans the third quarter of the twentieth century from the end of the Second World War until the emergence Post-modernist in Victoria.

Expand the following existing Heritage Overlays to incorporate additional elements identified in the HGHR:

- HO737 – Former Melbourne City Power Station
- HO1005 – Former Gothic Chambers and Warehouse
- HO1041 – Former Markillie’s Prince of Wales Hotel
- HO1052 – Former Thomas Warbuton Pty Ltd Complex

These Heritage Overlays were expanded to include elements identified through the HGHR that form an integral part of those existing heritage places.

5.2 Other matters

Stages 1 and 2 of the Peer Review identified a number of other matters within particular citations including the articulation of significance, extent, references, clarity of the source of the places assessed, the benchmarking indicators identified, consistency of terminology, descriptions of architectural styles and historical periods, and other drafting issues. All these have been addressed in the HGHR provided to FMC on 4 August 2020.

6.0 CONCLUSION

The Peer Review occurred in two stages between 2018 and 2020 and has resulted in amendments to the methodology, the assessments of individual places and precincts and the recommendations for inclusion in the Heritage Overlay. In particular, the Peer Review has resulted in a more thorough analysis of Post Second World War places in the Hoddle Grid. Heritage citations prepared by Context have been reviewed and, while retaining their author's voice, have been amended to improve clarity and, in some cases, vary the heritage criteria under which their inclusion on the Heritage Overlay has been proposed. In a small number of cases, places recommended for inclusion on the Heritage Overlay and subject to interim controls have been recommended for removal from the final HGHR.

It is considered that the final adopted methodology, thematic environmental history and recommendations of the HGHR July 2020 represent a sound framework for the inclusion of 137 individual heritage places and five precincts in the Schedule to the Heritage Overlay of the Melbourne Planning Scheme.