The City of Melbourne Heritage Review

Preliminary Comments

1) During the slide presentation conducted by the Council on the 13th April 2017, it was stated that the Heritage Policies Review was:
    i) Not a heritage review of the significance level of heritage places and precincts, and that it was
    ii) Not proposing to include or remove any properties from the Heritage Overlay. [In subsequent correspondence received on 22nd November 2017, it was stated that the "intention has always been that Heritage Overlay deletions/additions or changing to/from 'non-contributory' status is a job for the comprehensive heritage reviews."]
2) The CRA has great difficulty in reconciling these commitments with the way in which the review was actually undertaken. Indeed, the principal consultant acknowledged that thousands of "C" and "D" grade properties **required review** [Lovell Chen (October 2015) pp 5 and 6]. For example, "C" grade properties "required review in all precincts except Parkville." Although this review was not comprehensive [it was largely a desktop study], it resulted in hundreds of heritage places that once had the SAME grading, being allocated DIFFERENT grades under the revised grading system.
3) And again, from our detailed analysis of the existing and proposed Heritage Places Inventories, we have noted many Heritage Place deletions and additions. In some cases these deletions are clearly justified [following the demolition of buildings]; in other cases where deletions have been recommended, the **extent** of alterations provides the main justification. [The Consultant's Desktop Review of C, D & E Graded Carlton Properties provides ample evidence in support of this contention]. Unfortunately, we have also noted examples of demolished buildings that remain listed in the latest [2017] draft Heritage Places Inventory.
4) These departures from the Council's stated approach are not limited to Carlton. We are aware that the Heritage Places Inventory for East Melbourne includes several examples of non-contributory properties that are now graded. The CRA has also documented several examples of "A" grade properties in Parkville that have NOT translated directly to the new "Significant" Grade, contrary to the agreed translation principles. [Examples will be provided in this Submission].
5) It must also be recorded, that the CRA has found the draft Heritage Place Inventories very difficult to evaluate because all the early versions departed from the established practice of SEPARATING the odd and even numbered Heritage Places. While this was corrected in the November 2017 draft, at no stage were the changes [additions/deletions of Heritage Places] between the existing and proposed Inventories TRACKED.

Efficacy of the Heritage Review

6) In our view, the outcome of the Heritage Review would have been vastly superior if the different elements of the Melbourne Planning Scheme [MPS] had been exhibited concurrently. We are referring here to the draft new Heritage Place Inventories and the Heritage Overlay Maps and Schedules of the MPS. This decision has resulted in many errors and inconsistencies that cannot be corrected. The extent of this problem is exemplified in Exhibits 1, 2 and 3
7) A further difficulty arises when the currently adopted property street numbers do not align with the Heritage Place Street numbers. Examples of this problem are described in Exhibit 4: Problems when Heritage Street Numbers are not adopted, and Exhibit 4A – International House Case Study.
8) Finally, we do query whether any change to the grading of a heritage place should be recommended when the change has not been the subject of a comprehensive review. Obviously, if a Heritage Place has been demolished or altered beyond recognition, a comprehensive review would be irrelevant. However, where this is not the case, no grading change should be contemplated without addressing the

assessment criteria articulated in Planning Practice Note 1, *Applying the Heritage Overlay*, DELW&P [2018]. In Exhibit 5, we note the relevance of the criterion "Social Significance" to the assessment of two Lygon Street "institutions".

Problems with the Grading Translation Methodology

9) In the Association's first Submission to the Council [following the first Exhibition period in May 2017] the CRA expressed serious reservations over the recommended "Significant/Contributory/Non-Contributory" Scheme. The following extract encapsulated our principal concerns.

> **(a) The use of the heritage label/grading level of "Contributory" is not addressed in either *Australia ICOMOS Burra Charter*, 2013 [a key reference document when considering cultural significance] or the State Government's Practice Note 1 – *Applying the Heritage Overlay*.**
> **(b) While the use of the Grading Level "Contributory" is in common practice in Victorian Municipalities, from the information presented by the Consultant [Lovell Chen (September 2015) Appendix D], there is almost no consistency in the way this term has been used.**
> **(i) For example, in Brimbank Council, "Contributory heritage places are individually important places of State, regional or local heritage significance or are places that contribute to the significance of the heritage overlay area." This Council does not have a separate "Significant" Grading.**
> **(ii) And again, in the case of Bayside Council, "Contributory Buildings. Refers to those buildings that are deemed to make a contribution either individually, or as part of a collection, to the significance of the Heritage Precinct." This Council reserves the Grading "Significant" for a "building identified as having heritage significance that is not located in a precinct."**
> **(iii) Given this plethora of meanings, it is unhelpful to ascribe the descriptor "best practice" to the Significant, Contributory and Non-Contributory Grading System.**
> **(c) It must be emphasised that Heritage Places labelled/graded "Contributory" in both the existing and proposed policies, do not have a monopoly of this characteristic; "Significant" Heritage Places located in a precinct may also make a valuable contribution to a Precinct Overlay. Further, there are two important exceptions that render the label "Contributory" quite unhelpful.**
> **(i) Where for example, the precinct and/or overlay includes a modernist heritage place in a predominantly Victorian era precinct, clearly the label contributory makes no sense in relation to the modernist heritage place.**
> **(ii) And again, where an isolated heritage overlay includes just one C or D graded heritage place, the descriptor contributory is meaningless.**

10) While we still have serious reservations over this grading system, we accept that there is currently no momentum to adopt the two thresholds specified in Planning Practice Note 1: "State Significance" and "Local Significance". However, we remain concerned over the way the Grading System that was articulated in the Council's Review of Local Heritage Policies in the MPS [July 2014 p 12] has been applied [or rather modified] in the work undertaken by the principal consultant [Lovell Chen]. More particularly, the Association does not accept the default translation of "C" graded Heritage Places [within the Carlton Precinct] to the new grading category "Contributory". [See Exhibit 6].

11) In our view, the default translation of the C Graded Heritage Places to the Contributory Grade was both wrong and misleading. It has incorrectly conflated the group label "Contributory" in the current Planning Scheme with the new Contributory Grade. It is a fact that the group label Contributory never included the D Grade Heritage Places in Level 3 Streetscapes, whereas these Places WERE included in the new Contributory Grade. [See Exhibit 7] It is also a fact that ALL the C Grade Heritage Places located in "Individual" Heritage Overlays translated into the new SIGNIFICANT Grade, even although they were included in the current Contributory Group. [See Exhibit 8]

12) In the Association's view, the modified translation principles have not been applied consistently. We came to this conclusion from our analysis of the translation outcomes for two blocks [one in Carlton and one in Parkville]. For those suburbs [or parts of suburbs] that have been the subject of recent Heritage Reviews [eg West Melbourne and City North] the Council's 2014 translation principles have been applied. For the remainder of the Municipality, the default translation of the C Graded Heritage Places has been to the new Contributory Grade. [See Exhibit 9]
13) It is clear from Appendix 6 of the West Melbourne Heritage Review [Assessment Criteria used in this report] that Graeme Butler and Associates have adopted the Council's 2014 Translation Principles and NOT the default scheme adopted by Lovell Chen in 2015. [See Exhibit 10]
14) There is also support for the Council's 2014 Translation Principles in the 2018 amendment to the Heritage Policy [22.04] of the Stonnington Planning Scheme. [See Exhibit 11]
15) Given this context, we reiterate the Association's key conclusions, as articulated in the CRA's Supplementary Submission dated 19th January 2018.
    i) The bottom line is that two VERY DIFFERENT translation principles have been applied in the Council's Heritage Review of the C Graded Heritage Places.
    ii) In the Carlton area, the June 2016 Heritage Places Inventory includes 1,160 records of C Graded Heritage Places. The actual number of places would be higher, since many records include a pair or row of terraces. **All these records [Heritage Places] had the SAME GRADING STATUS in June 2016.** Following the Review, about 430 records [Heritage Places] translated to the new SIGNIFICANT GRADE and about 730 to the lower CONTRIBUTORY GRADE.
    iii) **In relative terms at least, the inescapable conclusion is that for the CARLTON area there has been a very uneven outcome in the GRADING status of our Heritage Places. Those C Grade Places in the City North Area have fared vastly better than those in that part of Carlton east of Swanston Street. [The outcome for the Parkville area is worse.]** In our view, the application of different translation principles in the SAME Heritage Review, does NOT result in a credible outcome.

Comments upon the New Local heritage Policy (Clause 22.05)

16) The Association's May 2017 Submission in relation to this matter included the following concerns.
17) **The Council must establish which Local Policy or Planning Scheme Provision is to be accorded priority in those cases where there is conflict between the provisions of the Planning Scheme.** One of the recurring challenges faced by heritage advocates concerns the competing objectives of the Planning Scheme. Where for example a Design and Development Overlay establishes a preferred maximum height for developments in a Heritage Overlay, developers [and their advocates] regularly assume that this objective should be privileged over any competing heritage guidance. This lack of clarity can result in laudable heritage policies having minimal influence in the assessment process.

The Association accepts that this matter will have to be addressed at another time; it will require an amendment to the Planning Scheme beyond the scope of the current Amendment.

18) **The Council must review the boundaries of Heritage Precincts and Heritage Overlays so that the. Revised Local Policies become permit triggers when new developments adjacent to [or behind] Heritage Places are proposed.** Clearly, if major developments are located adjacent to or proximate to Heritage Places, but not within a Heritage Overlay, those provisions of the Heritage Policy concerned with New Buildings [22.05-7] will have no impact at all. This problem is particularly acute where Heritage Places are located in isolated Overlays and not a Precinct

See Exhibit 12 for an example demonstrating this problem

19) **Those provisions of the proposed Local Policy which address the concealment of higher rear parts of new buildings [and additions to Heritage Places] require elaboration.** For example, this guidance must address the extent of any partial concealment that will be acceptable.
20) **The Council must also clarify the vantage point that is to be adopted when the matter of the concealment of higher rear parts is being considered.** Should this vantage point be located at the far side of the street and directly in front of the principal façade of the new building, or elsewhere in the immediate environment? Failure to specify this vantage point will result in unnecessary argument in any review proceeding.

See Exhibit 13 for examples of higher rear additions to Heritage Places that have been treated inconsistently

21) **The revised definitions of the words "Respectful and interpretive" must be more precise (22.05-18).** The use of the word "referenced" in the new definition is quite problematic. What does it mean? In the inner city, and Carlton in particular, heritage advocates are constantly being challenged with new development proposals that make a dramatic architectural statement. This "look at me" architectural language is anything but recessive. If new additions to a Heritage Place are not required to be "recessive" in both scale and architectural language, valued Heritage Places will become little more than a footnote in the emerging built environment.
22) **Incorporated Documents must be listed separately from the Reference Documents in the list of Reference Documents at 22.05-19.** Since the two kinds of documents have a different status in the Planning Scheme, they must be separately identified in any document list.

This matter has been addressed by omitting the Incorporated Documents from the Reference List

23) While the CRA does not have a settled position in relation to the demolition provisions of the new Local Policy, we are concerned that the language of key objectives remains ambiguous. The proposed new Policy at 22.05-5 states that neither partial demolition nor full demolition will "normally" be permitted in the case of significant buildings. If partial demolition of significant buildings is to be **discouraged**, shouldn't the full demolition of significant Heritage Places be **rarely** approved? The use of the word "normal" in both situations is quite unhelpful.

The Association accepts that the current wording of the Demolition Sub-Clause is an improvement over the first exhibited version

24) And again, while Council Officers argue that the proposed new Policy provides additional protection for the former D graded places in Level 3 Streetscapes [because Streetscape Gradings are no longer a consideration in demolition matters], this policy shift must be seen in context. In the inner city, the pressure to demolish all but a façade or two is not restricted to those Heritage Places with a D3 Grading. Increasingly, it is the present C graded Heritage Places that are being reduced to a façade or two. The new Policy will do little to halt this tendency. More fundamentally, the decision to abandon the different Streetscape Gradings must be questioned. In the large suburban-wide Heritage Precincts, the Streetscape Gradings have provided an important heritage context at the local level.

The Association notes that the extent of any concealment of additions to significant or contributory buildings [for example] is modified when the heritage place is located in a Significant Streetscape. In our view Streetscape quality should also be a relevant consideration in relation to demolition matters.

Comments in relation to the new Precinct Statements of Significance

25) The Association's May 2017 Submission in relation to this matter included the following concerns.
26) **The Statement for the Carlton Precinct [HO1] must address the three distinct sub-areas separately, that is the Princes Park, University Square and the large area east of Swanston Street.** By addressing each of these sub-areas separately, it would have become evident that the University Square area has received a very cursory treatment. For example, the Statement for this area should have included

reference to the role of William Guilfoyle in the current design of the square and the installation of the temperance drinking fountain. William Guilfoyle was curator of the Royal Botanic Gardens at the time; he was without doubt one of Melbourne's most important landscape gardeners and botanists.

The reference to William Guilfoyle above is inaccurate. The redesign of University Square in 1904-1906 with diagonal paths, new London Plane Trees and the commission and installation of the temperance drinking fountain should have been attributed to John Guilfoyle [William's brother.] John was curator of the reserves under the Melbourne Metropolitan Parks and Gardens Committee from 1891-1909

27) **The Council must review all those Heritage Overlays that include a group of buildings; there is currently no consistency in the way the Heritage Precinct Overlays are defined.** When for example does a collection of heritage places constitute a Precinct wide Overlay and when not? The Rathdowne, Pelham and Drummond Street site of the former Children's Hospital [from 1876] includes several significant heritage places within the one heritage Overlay, but it is not considered to be a Precinct Overlay, and it has no Precinct Statement of Significance.

See Exhibit 14 for further information in support of this contention

28) **The Council must ensure that the new Heritage Precincts that were approved for the City North Area are included in the new Inventory.** The Consultant recommended that "the statements for other precincts (not subject to this current project) should be included in the new Incorporated Document [Lovell Chen (September 2015) p 16]. This advice was not followed.

This recommendation is particularly important for the Carlton area. By not consolidating ALL the Precinct Statements of Significance in the one new Incorporated Document, permit applicants and other interested parties will be required to make reference to TWO separate Incorporated Documents for the City North Statements of Significance [Former Ramsay Surgical Precinct, Little Pelham Street Precinct and Lincoln Square South Precinct] and the Carlton Precinct. For the World Heritage Environs Area Precinct Statement, interested parties will need to make reference to the World Heritage Environs Area Strategy Plan: Royal Exhibition Building and Carlton Gardens [October 2009]. This complication should not be necessary.

The Revised Heritage Places Inventory

29) The inclusion of Heritage Places in the Heritage Places Inventory that are also included in the Victorian Heritage Register has not been addressed in a consistent manner. See Exhibit 15 for an elaboration of this problem.

Concluding Comments and Recommendations

30) In this Report the Carlton Residents' Association has focused upon key problems associated with the translation of the current letter grades [of Heritage Places] to the new Significant and Contributory Grading System.
31) From our analysis, many of the errors and inconsistencies have arisen because key elements of the heritage control "system" were not exhibited concurrently with the revised Heritage Place Inventories. We are referring here to the Heritage Overlay Maps and Schedules of the Melbourne Planning Scheme. Quite simply, if significant mapping and or schedule errors have been detected, these cannot be corrected, since the relevant documents were not exhibited.
32) This has resulted in many demolished Heritage Places remaining in the revised Inventory, and, worse still, Heritage Places that are recorded in the Inventory having NO protection because of mapping and/or schedule errors. [See Exhibit 16 for an elaboration of this problem].
33) The other major problem highlighted by the Association has arisen because there has been no consistency in the translation "principles" adopted by the different consultants. From evidence provided in this submission, it is clear that the default translation of the "C" Grade Heritage Places to the

"Contributory" Grade [adopted by the Principal Consultant for the Carlton Heritage Precinct] was NOT the approach taken in either the West Melbourne or the City North areas [for example].

34) Also, from our perspective, conflating the different meanings of the word "Contributory" in the current and revised Heritage Policies was quite unhelpful and problematic. There is simply no sound reason for translating most "C" Grade Heritage Places within the Carlton Precinct to the Contributory Grade, when ALL the "C" Grade Heritage Places within "Individual" Heritage Overlays have translated to the new "Significant" Grade.

35) Other problems with the translation component of this Heritage Review have arisen through inconsistencies in the Heritage Place numbering systems. The Association has noted inconsistencies between the Heritage Overlay Schedules and Inventories, and inconsistencies between current and former property numbering systems. In our view the tendency to apply the one heritage grade to a group of Heritage Places, which have previously been assessed [and graded] separately, has been quite problematic.

36) Finally, the Association submits that the City of Melbourne should follow the practice adopted by the City of Stonnington, and define each Heritage Place Grading level succinctly, and in a way which clarifies how the new grading system relates to the old letter grade system.

According to Lovell Chen [October 2015] Methodology Report, City of Melbourne Heritage Gradings Review:

Buildings graded A1, A2, B and C in this Policy are the equivalent of A, B, C and D/E graded buildings adopted by the City of Melbourne and a number of other councils.

Note: this Policy was approved on 25 January 2018

- *'Significant building fabric* means building fabric (including materials, roof, walls, windows, external joinery and chimneys) with heritage significance identified in the statement of significance or heritage assessment.

The heritage citation prepared for each place applies a building grade which corresponds with the following levels of significance:

- *'Significant places'* means places of either state or local significance including individually listed places graded A1, A2 or B. [See text box, 'B' equivalent to 'C' in MCC]
- *'Contributory places'* means buildings and other places in a heritage precinct graded C which are contributory to the built form attributes and significance of a heritage precinct.
- *'Ungraded places'* means buildings and other places which do not contribute to the significance of a heritage precinct.

The areas referred to in this policy have the following meanings:

- *'All areas'* means all commercial and residential areas.
- *'Residential areas'* means all areas included in residential zones.
- *'Commercial areas'* means all areas included in commercial and mixed use zones.

Postscript

Expert Witness Statements – Procedural Fairness

The Association believes that it is unreasonable that submitters should be confronted with a substantial shift in the Council's position at such a late stage in this important process. This has resulted in submitters having little time to consider the implications of the policy shift.

We are referring to the recommendation that Local Policy 22.04 [Heritage Places within the Capital City Zone] should be the Policy that applies to land within Schedule 5 to the Capital City Zone (City North). From the earliest circulation of draft policies in December 2015 to the most recent drafts circulated in February 2018, the Council's position has been that Local Policy 22.05 [Heritage Places **outside** the Capital City Zone] should apply to the City North Area.

We are also concerned that some submitters are wanting this Planning Panel to RETEST evidence that has already been the subject of an earlier Panel Hearing [C198 City North Heritage Review]. We find this

particularly problematic since the Heritage Consultant retained by the Council in relation to the City North Heritage Review will not be called to respond to any new information tendered in the current hearing.

Finally, given that the Council "intention has always been that Heritage Overlay deletions/additions or changing to/from 'non-contributory' status is a job for the comprehensive heritage reviews" we believe that, short of correcting obvious errors [eg deleting heritage places from an Inventory that have been demolished] other deletions and additions should only be instigated following a comprehensive review.

Key References

City of Melbourne [July, 2014] A Review of the Local Heritage Planning Policies in the Melbourne Planning Scheme

City of Melbourne, Future Melbourne (Planning) Committee [5 July 2016] Draft Amendment C258 Heritage Policies Review, Supporting Attachment

Goad, Philip & Tibbits, George [2003] Architecture on Campus - A Guide to the University of Melbourne and its Colleges, Melbourne University Press

Graeme Butler & Associates [2015] West Melbourne Heritage Review, Appendix 6: Assessment criteria used in this report [also Appendix 1, Summary Table of all surveyed places. This table includes both the letter grades and Significant/Contributory Gradings of all the surveyed places]

Harden, Michael [2008] Lygon Street stories and recipes from Melbourne's melting pot

Lovell Chen [2009] World Heritage Environs Area Strategy Plan: Royal Exhibition Building and Carlton Gardens [Approved by Minister for Planning 21 October 2009]

Lovell Chen [September 2015] City of Melbourne Heritage Review: Heritage Policies and Precinct Statements of Significance, Methodology Report [Prepared for City of Melbourne]

Lovell Chen [October 2015] Methodology Report, City of Melbourne Heritage Gradings Review [Prepared for City of Melbourne]

Lovell Chen [May 2017] Am_C258_Carlton_Desktop_Gradings_Review

Melbourne and Metropolitan Board of Works [MMBW], MCC, Ministry for Planning and Environment [1984] Lygon Street Action Plan, Final Report

Melbourne Planning Scheme, Incorporated Document, City North Heritage Review 2013 Statements of Significance [Revised June 2015]

Nigel Lewis and Associates [1984] Carlton, North Carlton and Princes Hill Conservation Study [Prepared for Melbourne City Council and Australian Heritage Commission]

RBA Architects + Conservation Consultants [2013] City North Heritage Review, Carlton (vol. 2) Appendix E Carlton Precinct (HO1), part

Stonnington Planning Scheme [25 January 2018, C132] Clause 22.04 Heritage Policy

The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance, 2013

Victoria, Department of Environment, Land, Water and Planning [2018] Applying the Heritage Overlay, Planning Practice Note 1

Yule, Peter, Editor [2005] Carlton - A History, Melbourne University Press

EO 2 August 2018

Exhibit 1 - MPS Mapping & Schedule Errors in South Carlton [East of Swanston Street]

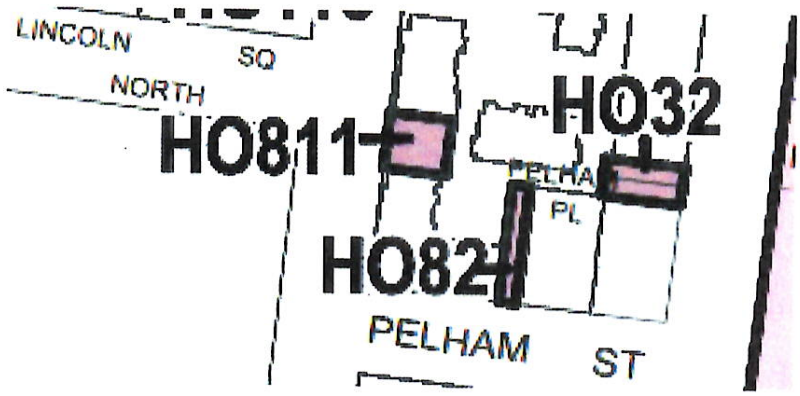
HO82 96-106 Pelham Street, Carlton [Most of this Heritage Place is omitted from HO Map]

Building Details:

A two storey brick on a bluestone base former factory with a basement. Designed by Mr Charles Webb, designer of the Windsor Hotel, in the Italianate style and built for the Banks & Co Clothing Company by Mr Henry Lockington of Carlton in 1884. A two storey caretaker's residence was erected to the rear of the factory. The cost of construction and the installation of machinery and fittings was upwards of 8,500 pounds. A hydraulic lift was installed running from the basement to the top storey. It employed up to 225 workers with a weekly wages bill of 250 pounds. In its day it was considered one of the most modern and innovative clothing factories in Victoria with the power for the machinery coming from a 6 1/2 hp Otto gas engine. To quote from the Argus Newspaper of 14 May 1885 "The machines employed for white work, for underclothing &c are run at the rate of between 1,400 and 1,500 stitches a minute, but for tweeds and heavy goods about 1,000 stitches is a good average speed". By the 1970's it had discontinued as a factory and was utilised as a warehouse. In 1991 it was refurbished and converted to offices and ground level retail.



South Elevation: Image capture November 2017 [Google Maps]



This Heritage Overlay describes the single storey section only. 96 Pelham has a suggested Grading of Significant in the draft 2017 Heritage Places Inventory.

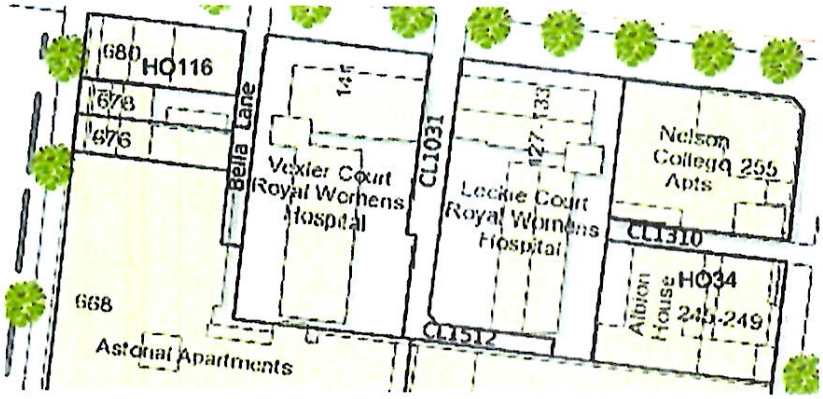
Note that HO811 is also shown incorrectly; this place has been **demolished**.

HO 34 [245-257 Cardigan Street]

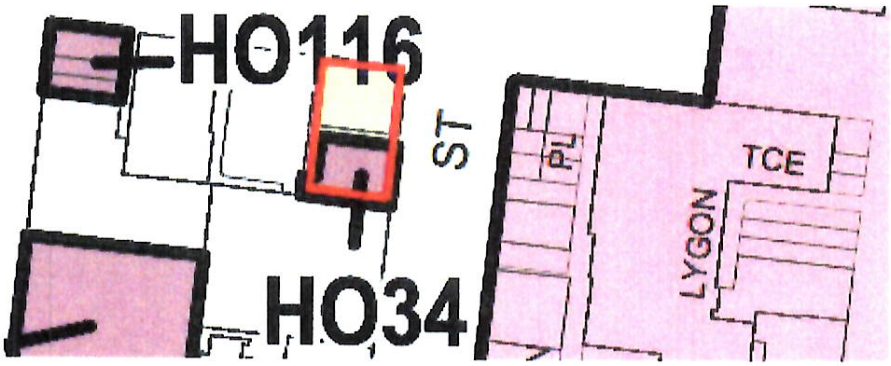
Extract from MPS Heritage Overlay Schedule

HO34	245-257 Cardigan St. Carlton

Extract from City of Melbourne Map



Extract from Heritage Overlay Map – note that the Map and Schedule Street numbers are inconsistent.

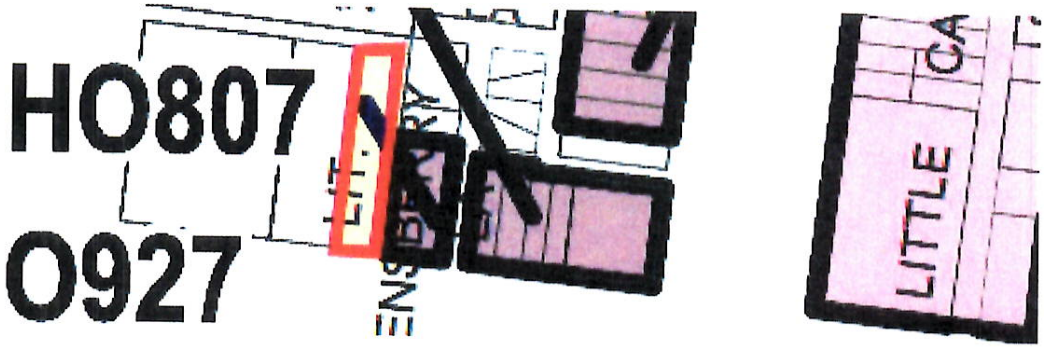


Note that the Nelson College Apartments [illustrated below] have NO protection. Formerly known as the Nelson Hotel and renamed the Carlton Club Hotel in the 1890's. A three storey rendered brick building built in 1860. This Heritage Place has a proposed grading of Significant in the 2017 Inventory.

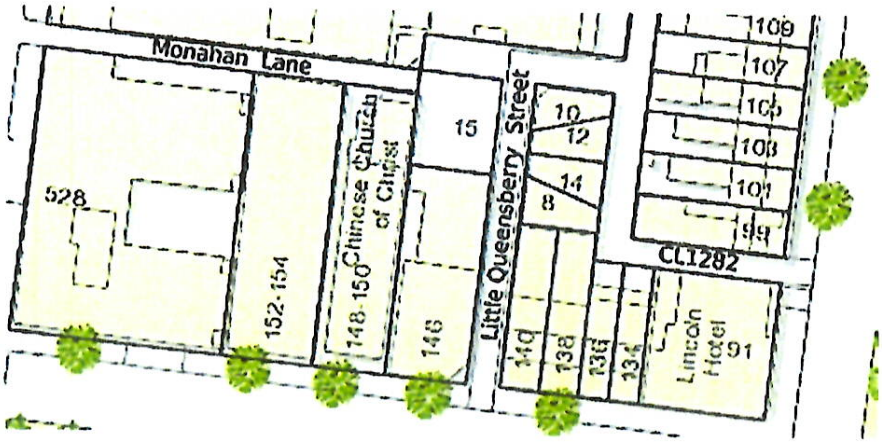


148 Queensberry Street – The Chinese Church of Christ

Extract from MPS Heritage Overlay Map



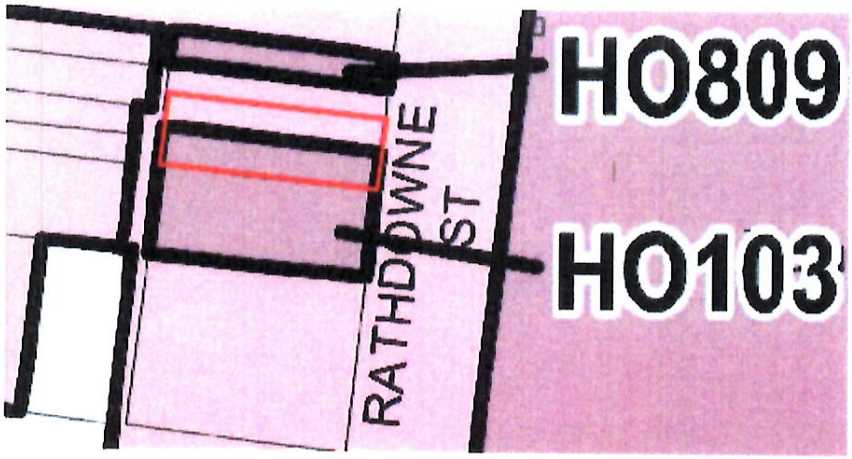
Extract from City of Melbourne Map

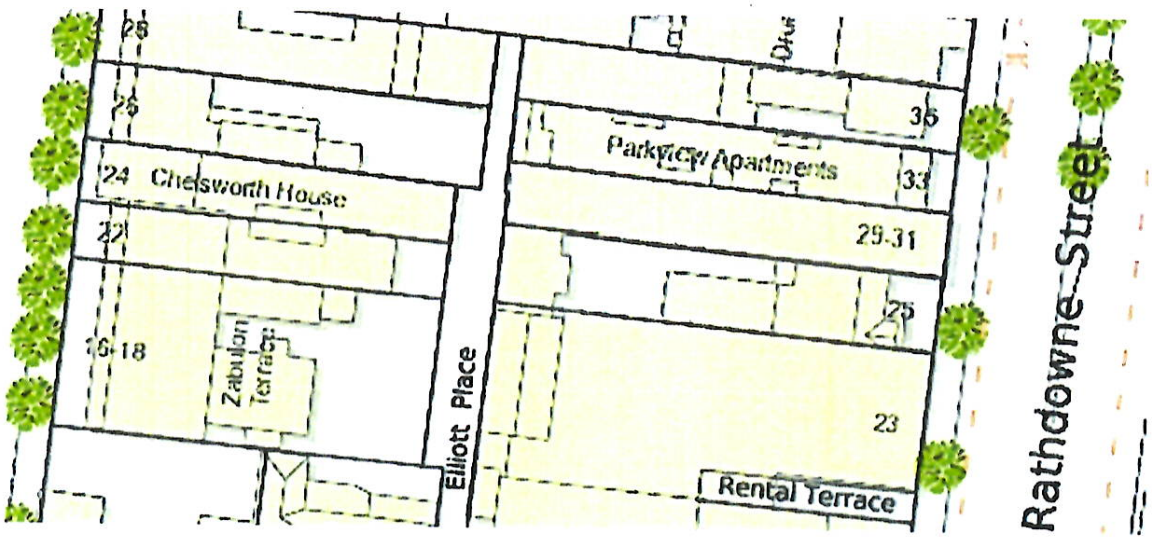


The Chinese Church of Christ [148 Queensberry Street] that is recorded in the 2016 Inventory and the i-Heritage Database has NO Heritage Overlay. It therefore has no heritage protection.



HO103 [25-27 Rathdowne Street] and HO809 [29-31 Rathdowne Street] should be shown as adjacent heritage places; they are BOTH mapped incorrectly]







Nos 25-27 and 29-31 illustrated in this image [clearly shown as adjacent properties]

Exhibit 2 – MPS Mapping and Schedule Errors
University of Melbourne Case Study

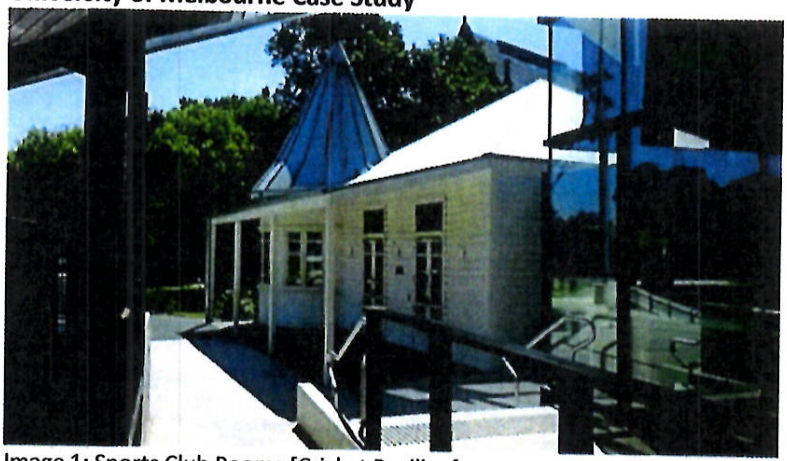


Image 1: Sports Club Rooms [Cricket Pavilion]



Image 2: Grandstand Melbourne University



Image 3: Colonial Bank Door [Entry to Underground Carpark]

Sports Club Rooms [Cricket Pavilion] HO333

This Heritage Place is mapped incorrectly; it is located where the Grandstand is sited. This error has been known for at least eight years.

The Grandstand

This Heritage Place was "C" Graded in both the original 1984 Carlton Conservation Study and the June 2016 Heritage Places Inventory. **It is not included in the draft 2017 Heritage Places Inventory.** The Heritage Overlay Map Number at this location HO333 refers to the Cricket Pavilion. [See above]

The Colonial Bank Door [HO331]

While this Heritage Place is included in the MPS Heritage Overlay Schedule, it is NOT mapped.



Image 4: 1888 Building Garden [Former Melbourne Teachers' College]



Image 5: Remnant Fence [NE Corner of Royal Parade & Grattan Streets]

1888 Building

HO324	*1888 Building, Part of Former Melbourne Teachers College, The University of Melbourne, 156-292 Grattan Street Parkville*

There is no reference to the Fence & Garden in this extract from the MPS Heritage Overlay Schedule; also, these elements are NOT mapped. In contrast, both the 1987 and June 2016 Inventories included the Fence & Garden. These elements now have NO protection.

Image 5 Remnant Fence

HO343	*Main Entrance Gates (Gate 6), Pillars & Fence, The University of Melbourne, 156-292 Grattan Street, Parkville*

The draft 2017 Heritage Places Inventory includes similar wording to this extract from the MPS Heritage Overlay Schedule [without including the street numbers].

In contrast, the June 2016 Heritage Places Inventory makes specific reference to that section at "NE cnr Royal Pde & Grattan St] illustrated at left. Since this section is NOT mapped, it has NO protection.

University of Melbourne (Main Campus) and Colleges – Extract from Heritage Overlay Map 5, MPS (29 Dec. 2017)

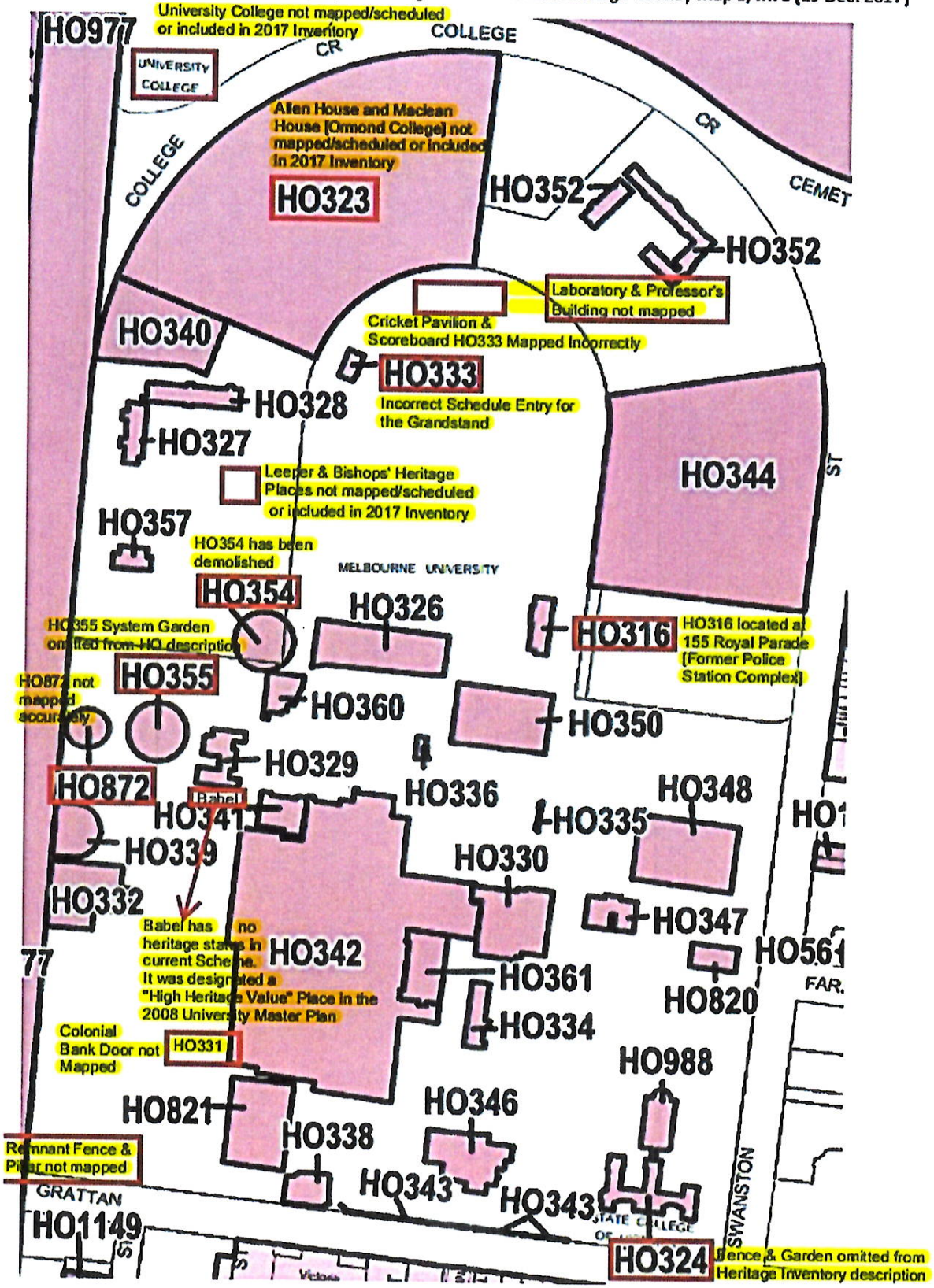


Exhibit 3 - MPS Mapping and Schedule Errors - Trinity College Case Study



The Leeper Wing from the East – This Heritage Place has no heritage protection

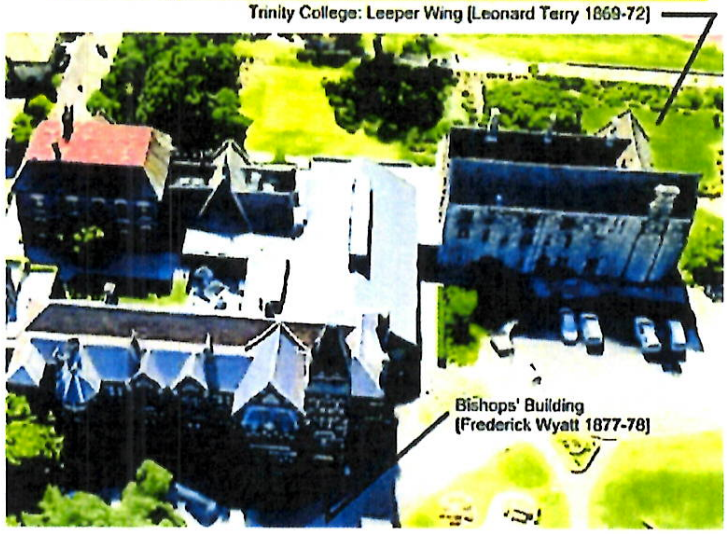
Summary

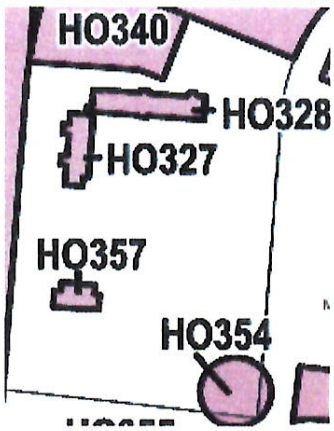
- The Council's 1987 Heritage Place Inventory included 5 "A" graded Heritage Places [Leeper, Bishops', Clark's, Former Laboratory & Chapel] & 3 "C" Graded Buildings [Behan, Squash Courts & Former Tennis Pavilion].
- The June 2016 Inventory only included two references: Trinity College [without specifying which buildings] and the Behan Building, Squash Court & Former Tennis Pavilion.
- The Draft December 2017 Inventory only included Behan, Clarke Building, Squash Courts and the Chapel & College.

Key Issue

Because the MPS Heritage Overlay Maps and Inventory were not exhibited concurrently with the Draft 2017 Inventory

- Necessary corrections to the MPS provisions [including the deletion of the Squash Courts] could not be addressed, and
- There was no ability to address serious omissions in the Planning Scheme Heritage Overlay and the current and proposed Heritage Place Inventories [including the Leeper Wing and the Bishops' Building]





Extracts from MPS Heritage Overlay Map & Schedule [current as at 21 May 2018]

HO327	*Behan Building, Trinity College, Royal Parade, Parkville*
HO328	*Clarke Building, Trinity College, The University of Melbourne, Royal Parade, Parkville*
HO354	*Squash Courts, Trinity College, Royal Parade, Parkville*
HO357	*Trinity Chapel & College, Trinity College, Royal Parade, Parkville*

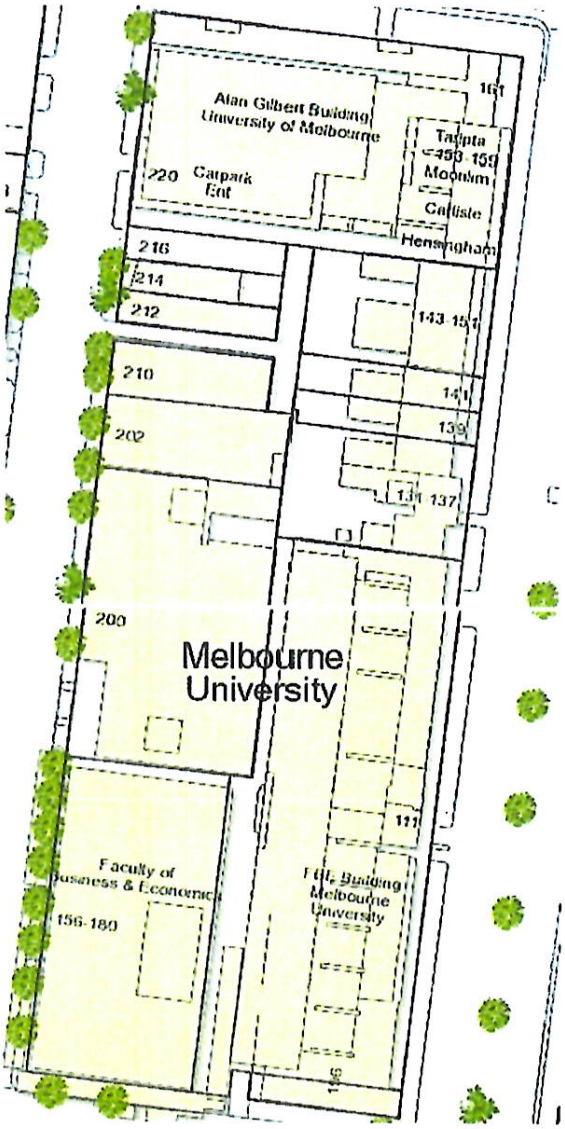
Notes

- The Squash Courts have been demolished.
- The reference to the "College" in HO357 is unhelpful, since, unless the college building is separately mapped and scheduled [and included in the Heritage Places Inventory] it will have NO protection under the Melbourne Planning Scheme

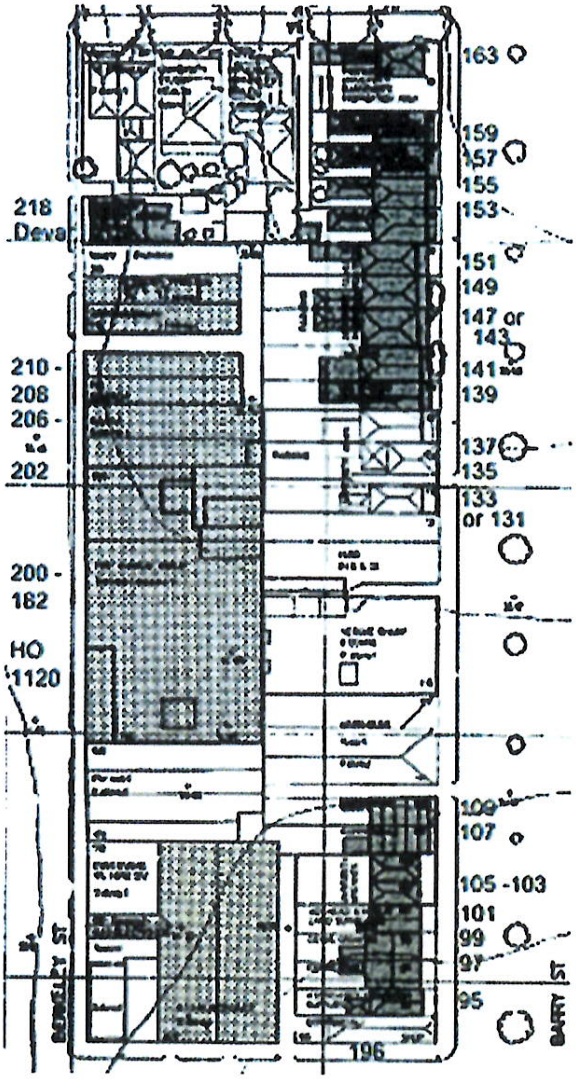
Image at left downloaded from Google Maps in March 2018

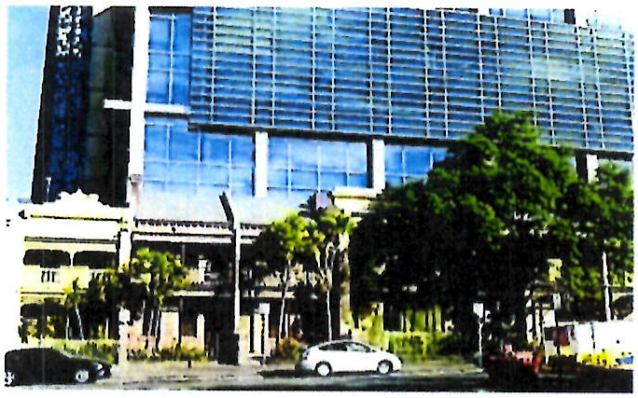
Exhibit 4 - Problems when Heritage Place Street Numbers are not adopted

The Barry Street Case Study



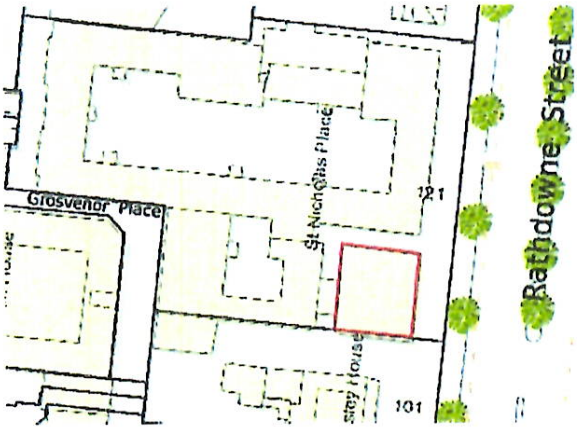
Note: From the current numbering, it is impossible to ascertain the location of the Heritage Places at the southern end of Barry Street; Places which are proposed to be graded "Significant" in the draft 2017 Heritage Places Inventory.

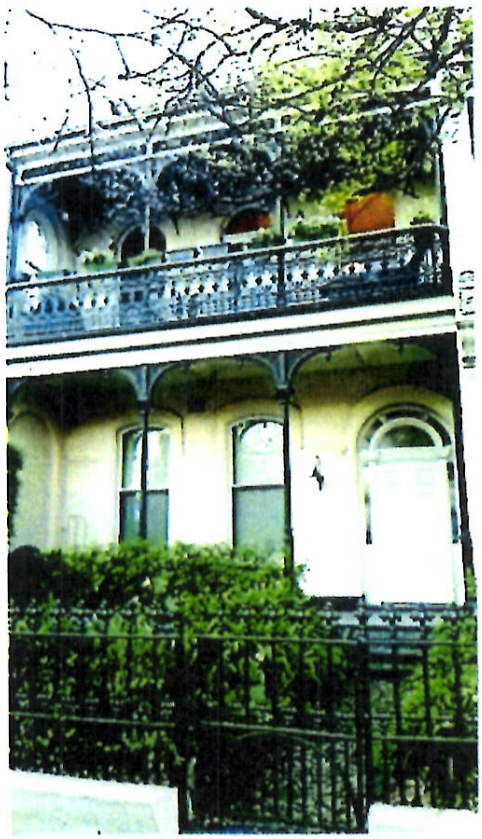




Heritage Places at the southern end of Barry Street, Carlton

The 121 [107-123] Rathdowne Street Case Study

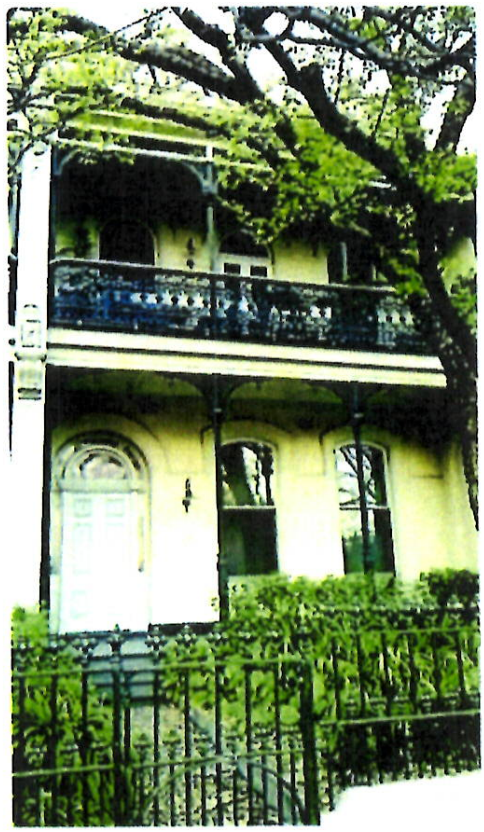






101 [99-105] Rathdowne Street

HO105 and HO992 Graded A1 in June 2016 with a proposed grading of Significant in 2017 [with NO Streetscape Grading]

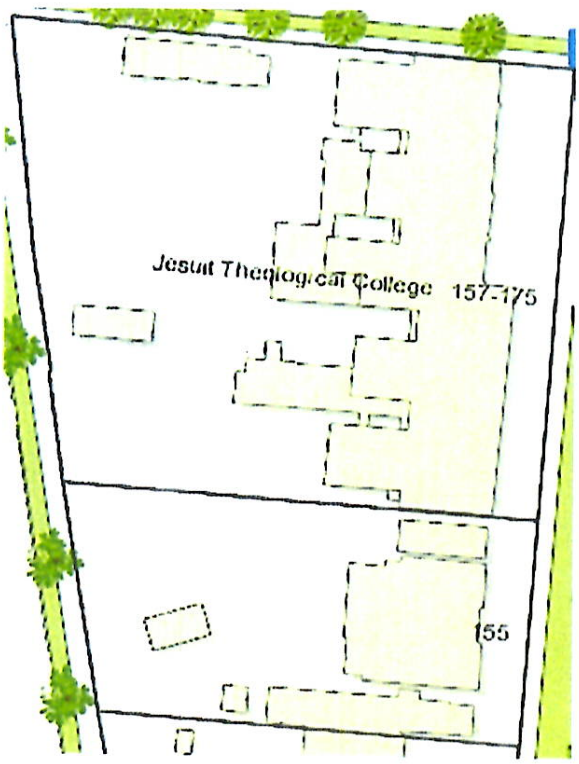




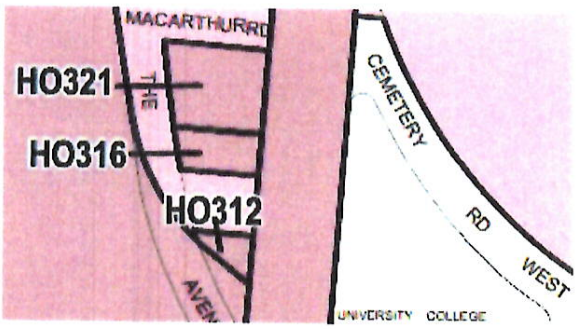
107-109 [pt] Rathdowne Street [Current Street numbers: 117-119]

HO992 [pt] **Graded C1 in June 2016, but with NO Heritage Place Gradings in draft 2017 Heritage Places Inventory [even although proposed to be located in a Significant Streetscape]**

157-175 Royal Parade Parkville HO321



Extract from City of Melbourne Maps



Extract from MPS Heritage Overlay Map

HO312	*Former College Church, 149 Royal Parade, Parkville*
HO316	*Former Police Station Complex, 155 Royal Parade, Parkville*
HO321	*Parkville Uniting Church, 171 Royal Parade, Parkville*

Extract from MPS Heritage Overlay Schedule. **Note that Description of HO321 is wrong. It is not the Parkville Uniting Church, but the Jesuit Theological College**



157-165 Royal Parade [Trinity Terrace]



167-175 Royal Parade [Park Terrace]

149 (College Church)	A	1
155 (Police Station)	A	1
157	A	1
159	A	1
161	A	1
163	A	1
165	A	1
167	A	1
169	A	1
171	A	1
173	A	1
175	A	1

Extract from June 2016 Heritage Places Inventory

149	Significant	Significant
151-153	-	Significant
155	Significant	Significant
171	Significant	Significant
197-259	Contributory	-

Extract from draft 2017 Heritage Places Inventory.

Note that the separately identified Heritage Places that were ALL graded A1 in June 2016 have been recorded as just one Significant Heritage Place in the draft 2017 Inventory [No 171 Royal Parade]. Given that HO321 includes two quite distinct terrace rows, this is quite misleading.

Exhibit 4A – Problems when Heritage Place Street Numbers not Adopted – International House Case Study



1-31 Leonard St [Former Ayr Cottage] Grade "A" June 2016 Inventory



217 Royal Parade [Greycourt] Grade "B" June 2016 Inventory



197-203 Royal Parade [Ian McLennan House] Grade "C" 2016 Inventory

International House 197-259 Royal Parade – Parkville

This College is located within the Parkville HO4 Precinct Overlay.

Although the 2016 Heritage Places Inventory includes two highly graded heritage places [one "A" Grade place in Leonard Street & one "B" Grade Place in Royal Parade] the draft 2017 Heritage Places Inventory includes just one entry for 197-259 Royal Parade – "Contributory". **This is NOT consistent with Consultant's translation "principles". It is not a credible grading result.**



Key Conclusion

When sites within a Precinct Overlay include Heritage Places of different levels of Heritage significance, they must be separately identified in any Heritage Places Inventory

Exhibit 5 - The Relevance of Social Significance in Reviewing the Revised Gradings of Heritage Places



The John Curtin Hotel

It would be difficult to imagine another Heritage Place in Carlton with a stronger "association with a particular community or cultural group for social, cultural or spiritual reasons." (Social Significance) Criterion G – Applying the Heritage Overlay, Planning Practice Note 1 [2018]

The following extract captures the "depth" of this significance.

> BRUNO Coruzzi, who owned and ran Carlton's classic John Curtin Hotel through the 1970s when it became a national meeting place for leaders of the trade union movement and the Australian Labor Party, has died of lung cancer at his home in Balwyn. He was 88.
>
> Key figures such as Bob Hawke, Gareth Evans, Mick Young, Simon Crean, Rob Jolly, Steve Crabb, Bill Landeryou, and David White, met regularly to socialise and plan their strategies at Coruzzi's Lygon Street establishment.
>
> Barry Donovan 3 August 2010



Jimmy Watson's: Established in 1935 by a flautist with a taste for red wine. Jimmy Watson's remains a Lygon Street institution, catering to an eclectic crowd of businessmen, academics and students. To the shock of some the wine saloon had a radical face-lift in the 1960s. The nineteenth-century structure was altered beyond recognition by the unrepentant modernity of Robin Boyd's Mediterranean-inspired facade. Ironically, this once shockingly modern design is now embraced as an important part of the street's heritage.

Mahar, Caitlin "A Bohemian Main Drag Lygon Street" in Yule, Peter Ed. [2005]

John Curtin Hotel

27-31 Lygon Street, Carlton

- Located in the HO64 Heritage Overlay [This Overlay also included three other Heritage Places]
- Graded "D2" in the June 2016 Heritage Places Inventory
- Graded "Contributory" in the draft 2017 Inventory.

[A comparison with the proposed 2017 "Significant" Grading of the Green Man's Arms, the former Astor Hotel, at 418 Lygon Street would be instructive]

Jimmy Watson's 331-335 Lygon Street, Carlton.

- This Heritage Place is located in the HO1 Heritage Overlay
- In the 1987 Heritage Places Inventory, Jimmy Watson's was graded "F" in recognition of the social significance of this Place.
- In the June 2016 Heritage Places Inventory this Place was graded "B"
- In contrast, this Place is UNGRADED in the proposed 2017 Heritage Places Inventory. There is no record of this Place in the consultant's worksheet

Exhibit 6 - City of Melbourne Heritage Review - the Translation "Principles"

The Council's Position in July 2014

Extract from: REVIEW OF LOCAL HERITAGE POLICIES IN THE MPS July 2014 [p 12]

The A-D gradings and 1-3 streetscape levels need to be translated into these new definitions of heritage significance. This will include reconciling the different definitions of gradings in some earlier studies. Generally the principles of the translation would be as follows:

City Of Melbourne Grades	Practice Note 01 levels of significance
A	State Significance
B	Individually Significant
C Possibly some D	Individually Significant
D Possibly some C	Contributory
Ungraded	Non-contributory

The Lovell Chen's Position in December 2015

Extract from: MPS Am C258 HERITAGE POLICIES REVIEW ATT3 Gradings Review Methodology Report Dec 2015 pp 5 & 6

Table 2 Recommended approach to gradings review

Precinct	A grade	B grade	C grade	D grade
East Melbourne and Jolimont	Significant	Significant	Review (240)	Contributory
South Yarra	Significant	Significant	Review (204)	Contributory
Parkville	Significant	Significant	Contributory	Contributory
Kensington	N/A	Significant	Review (46)	Review (598)
North and West Melbourne	Significant	Significant	Review (423)	Review (1226)
Carlton	Significant	Significant	Review (1200)	Contrib. to Review (193)

The table reflects the following:

- The direct transfer to significant was recommended for all A and B properties, in all precincts (there are no A grade properties in Kensington).
- In Parkville, the direct transfer was straightforward for all alphabetical gradings, i.e. A and B to significant, C and D to contributory.
- C grade properties required review in all precincts except Parkville.
- D grade properties required review in Kensington and North and West Melbourne, although as noted, Carlton was also added to this list.

Exhibit 7 - Examples of "D" Graded Heritage Places that were included in the new Contributory Grade, but were NOT included in the Contributory Group in the current Local Heritage Policy



Image 1: 106-110 Cardigan St Carlton

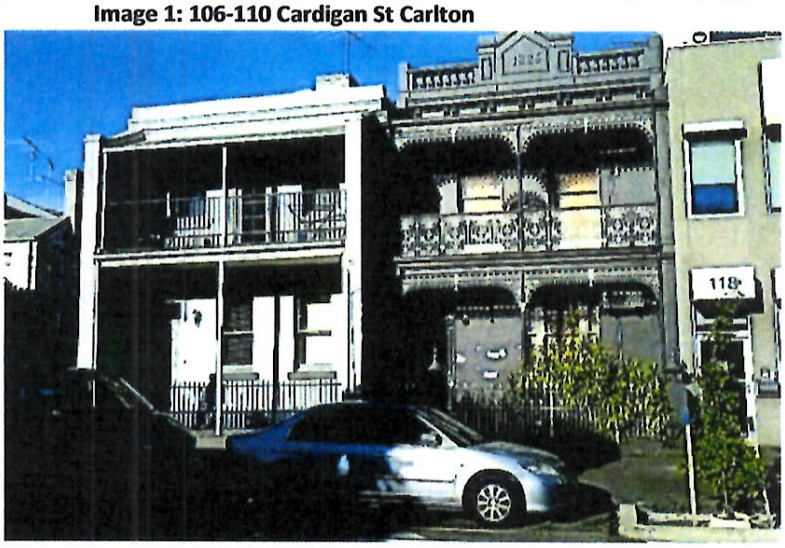


Image 2: 120-122 Cardigan St Carlton



Image 3: 187-191 Palmerston St Carlton

Images 1, 2 and 3

- "D" Grade Heritage Places in Level 3 Streetscape [June 2016 Heritage Places Inventory]
- Contributory Grade in draft 2017 Inventory

Key Conclusion

In the Association's view, the default translation of the "C" Graded Heritage Places to the Contributory Grade was both wrong and misleading. It has incorrectly conflated the group label "Contributory" in the current Planning Scheme with the new Contributory Grade.

It is a fact that the group label Contributory never included the D Grade Heritage Places in Level 3 Streetscapes, whereas these Places WERE included in the new Contributory Grade, as indicated in the examples illustrated on this page.

Exhibit 8 - Examples of "C" Graded Heritage Places that were included in the Contributory Group in the current Local Heritage Policy, but that would never be graded "Contributory" in the draft 2017 Inventory



Image 1: 233-235 Bouverie St [HO1130_Former Baptist Kindergarten]

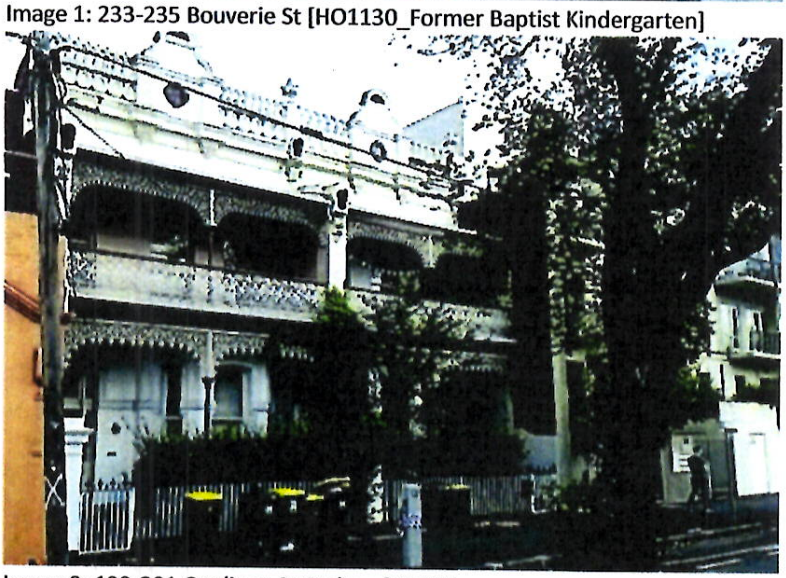


Image 2: 199-201 Cardigan St Carlton [HO32]

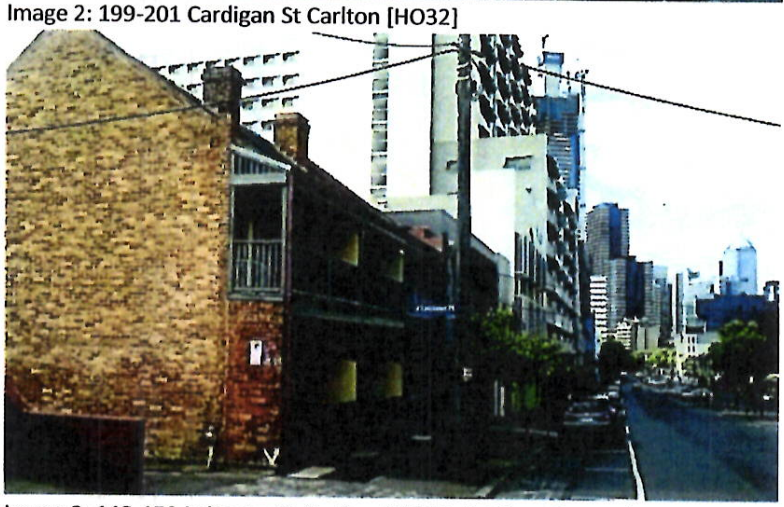


Image 3: 148-152 Leicester St Carlton [HO62_Pattison Terrace]

Images 1, 2 and 3

- "C" Grade Heritage Places in the June 2016 Heritage Places Inventory
- Graded "Significant" in the draft 2017 Heritage Places Inventory.

Key Conclusion

In the Association's view, the default translation of the C Graded Heritage Places to the Contributory Grade was both wrong and misleading. It has incorrectly conflated the group label "Contributory" in the current Planning Scheme with the new Contributory Grade.

It is a fact that ALL the C Grade Heritage Places located in "Individual" Heritage Overlays translated into the new SIGNIFICANT Grade, even although they were included in the current Contributory Group. The Heritage Places illustrated on this page support this contention.

Exhibit 9 - Translation Principles, Carlton [City North] v South Parkville

Grattan, Leicester, Pelham and Bouverie Street Block

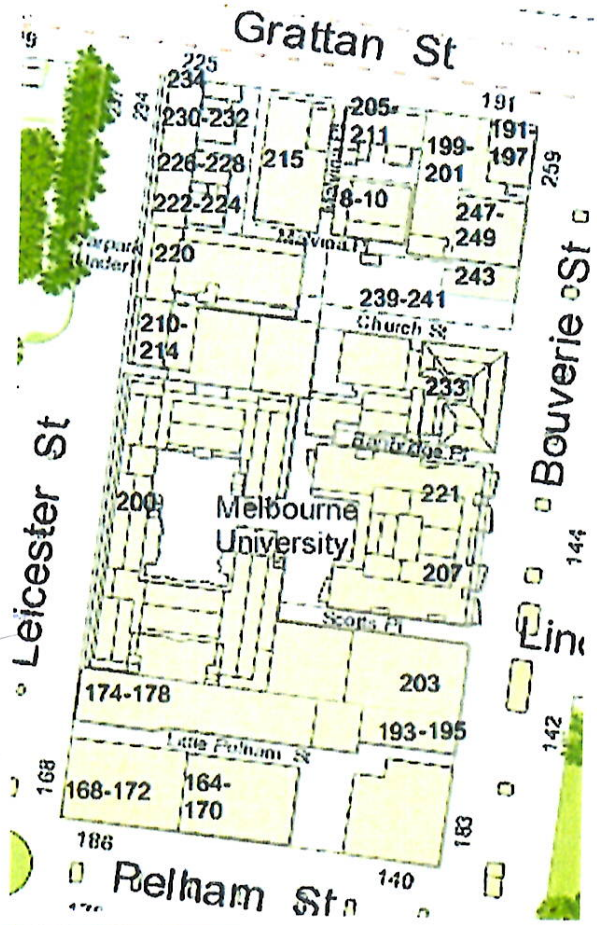
1984 Carlton Gradings as published Nov. 1987

City N HO1 Heritage Gradings as recommended by RBA Architects

Grattan St	HO No	1984	2014	City N	2016	Dec 2017
191-197	HO1	C2	C2	D2	D2	Contrib./-
205	HO1	C2	C2	C2	C2	Sig/-
207	HO1	C2	C2	C2	C2	Sig/-
209	HO1	C2	C2	C2	C2	Sig/-
211	HO1	C2	C2	C2	C2	Sig/-
213	HO1	D2	D2	D2	D2	Sig/-
215	HO1	-	-	C2	C2	Sig/-
Leicester St						
168-172	HO1121	-	-	D2	D2	Contrib./-
174-178	HO1121	-	-	C2	C2	Contrib./- Incorrect
210	HO1	C2	C2	C2	C2	Sig/-
212	HO1	C2	C2	C2	C2	Sig/-
214	HO1	C2	C2	C2	C2	Sig/-
216	HO1	E2	D2	?	D2	Demolished
222	HO1	C2	C2	C2	C2	Sig/-
224	HO1	C2	C2	C2	C2	Sig/-
226	HO1	C2	C2	C2	C2	Sig/-
228	HO1	C2	C2	C2	C2	Sig/-
230	HO1	C2	C2	C2	C2	Sig/-
232	HO1	C2	C2	C2	C2	Sig/-
234	HO1	C2	C2	C2	C2	Sig/-
Pelham St						
156-162	HO1121	-	-	D2	D2	Contrib./-
168-170	HO1121	-	-	-	D2	Contrib./-
Bouverie St						
183	HO1121	-	-	-	D2	Contrib./-
193-195	HO1121	-	-	C2	C2	Sig/-
233-235	HO1130	-	-	C3	C3	Sig/-

KEY CONCLUSION FROM TRACKED GRADINGS

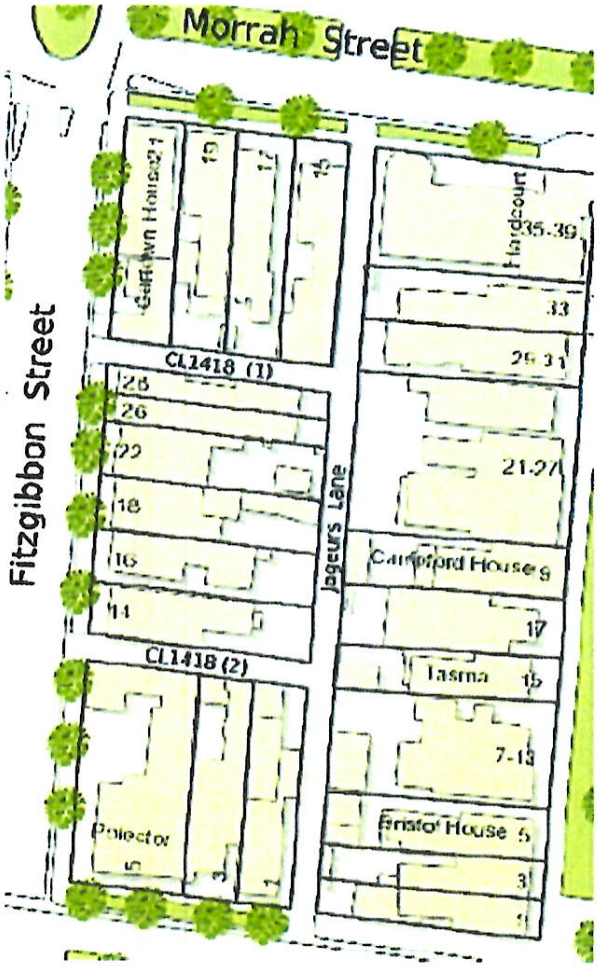
Most buildings graded "C" in 1984 received IDENTICAL Gradings thirty years later [City Nth Heritage Review]. Also, these buildings have ALL been graded SIGNIFICANT in the draft 2017 Heritage Places Inventory.





168-178 Leicester Street [Query grading of 174-178; it is NOT consistent with Heritage North translation principles]

Fitzgibbon and Morrah Streets, Royal Parade and Story Street Parkville [Comparison Block]





21 Royal Parade, Parkville

Street Name	HO No	1985	2016	2017
Fitzgibbon				
14	HO4	C1	C1	Contrib./Sig
16	HO4	D1	D1	Contrib./Sig
18	HO4	C1	C1	Contrib./Sig
22	HO4	C1	C1	Contrib./Sig
26	HO4	C1	C1	Contrib./Sig
28	HO4	C1	C1	Contrib./Sig
Morrah				
15	HO4	C1	C1	Contrib./Sig
17	HO4	C1	C1	Contrib./Sig
19	HO4	D1	D1	Contrib./Sig
21	HO4	C1	C1	Contrib./Sig
Royal Pde				
1	HO4	C1	C1	Contrib./Sig
3	HO4	C1	C1	Contrib./Sig
5	HO4	C1	C1	Contrib./Sig
7-13	HO4	C1	C1	Contrib./Sig
15	HO4	D1	C1	Contrib./Sig
17	HO4	C1	C1	Contrib./Sig
19	HO4	C1	C1	Contrib./Sig
21	HO4	A1	A1	Contrib./Sig
23	HO4	A1	A1	Contrib./Sig
25	HO4	C1	C1	Contrib./Sig
27	HO4	C1	C1	Contrib./Sig
29-31	HO4	C1	C1	Contrib./Sig
33	HO4	B1	A1	Sig/Sig
Story				
1	HO4	D1	D1	Contrib./Sig
5	HO4	A1	A1	Sig/Sig

Comments

For decades, South Parkville has been recognised as one of the most significant and intact Nineteenth Century Heritage Precincts in Melbourne; indeed ALL the Streetscapes of South Parkville are proposed to be graded "Significant". In contrast with City North Heritage translations, NOT ONE "C" Graded Heritage Place in HO4 has been given a SIGNIFICANT Grading. Even two "A" Graded Heritage Places [in this block] have been downgraded to Contributory. There are several other errors and inconsistencies with the Parkville "translation project". This is not a credible outcome.

Exhibit 10 - Assessment Criteria Used in the West Melbourne Heritage Review – Graeme Butler & Associates, 2015

West Melbourne Heritage Review

Appendix 6: Assessment criteria used in this report

Planning and Environment Act - heritage values and thresholds

Section 4(1)(d) of the *Planning and Environment Act 1987* lists the following heritage values for use in heritage assessment within a Planning Scheme:

- Scientific;
- Aesthetic;
- Architectural; or
- Historical interest; or
- other special value (includes social or spiritual interest).

The thresholds applied in any assessment of significance are:

- State Significance; and
- Local Significance.

Local Significance includes those places that are important to a particular community or locality.

City of Melbourne gradings

Buildings graded A, B, or C under the City of Melbourne definitions are proposed as locally significant with at least one of the above values being assessed as significant within the local context. Buildings graded A are significant at State level, with B graded places have potential, but not confirmed, State significance.

Assessment criteria used in this Review

This Review uses the above heritage values, as assessed under the *Victorian Planning Provisions* (VPP) Practice Note, *Applying the Heritage Overlay* (2012) which cites the following criteria as briefly described below:

A place may have:

A importance to the course or pattern of our cultural or natural history (historical significance);

B uncommon rare or endangered aspects of our cultural or natural history (rarity);

C potential to yield information that will contribute to an understanding of our cultural or natural history (research potential);

D importance in demonstrating the principal characteristics of a class of cultural or natural places or environments (representativeness);

E importance in exhibiting particular aesthetic characteristics (aesthetic significance);

F Importance in demonstrating a high degree of creative or technical achievement at a particular period (technical significance);

G. Strong or special association with a particular community or cultural group for social, cultural or spiritual reasons. This includes the significance of a place to Indigenous peoples as part of their continuing and developing cultural traditions (social significance); and/or

H Special association with the life or works of a person, or group of persons, of importance in our history (historical association).

Burra Charter

In addition to the Register of the National Estate criteria, the ICOMOS *Burra Charter* sets out broad heritage assessment considerations. The *Burra Charter* 1999 (1.2) defines *Cultural significance* as aesthetic, historic, scientific, social or spiritual value for past, present or future generations. Cultural significance is defined as embodied in the *place* itself, its *fabric, setting, use, associations, meanings, records, related places* and *related objects.*

Name	Address		Existing Grading (A-E)	Proposed Grading (A-D)	Existing Streetscape Level (1-3)	Proposed Streetscape Level (1-3)	Heritage Overlay	Proposed for new Heritage Overlay?	Contributory to precinct?	Significant	Recommendations
	Abbotsford Street	117	-	-	-	-	HO3	No	No	No	None.
Judy Lazarus Transition Centre	Adderley Street	50	-	-	-	-	No	No	No	No	None.
	Adderley Street	60 -80	-	-	-	-	No	No	No	No	None.
	Adderley Street	111 -133	-	-	-	-	No	No	No	No	None.
	Adderley Street	132 -134	-	-	-	-	No	No	No	No	None.
Corns or Jones house	Adderley Street	136	D	C	3	3	No	Yes	No	Yes	Revise Heritage Places Inventory July 2015. Proposed Heritage Overlay as: Corns or Jones house, 136 Adderley Street, West Melbourne.
	Adderley Street	137 -157	-	-	-	-	No	No	No	No	None.
	Adderley Street	138	D	-	3	-	No	No	No	No	Revise Heritage Places Inventory July 2015.
	Adderley Street	140	D	-	3	-	No	No	No	No	Revise Heritage Places Inventory July 2015.
	Adderley Street	142	D	D	3	3	No	No	No	No	None.
	Adderley Street	144	-	-	-	-	No	No	No	No	None.
	Adderley Street	148	-	-	-	-	No	No	No	No	None.
	Adderley Street	158	-	-	-	-	No	No	No	No	None.
	Adderley Street	160	-	-	-	-	No	No	No	No	None.
Michael Moran's row houses	Adderley Street	162 -164	C	C	3	3	HO459	No	No	Yes	None.
	Adderley Street	163	-	-	-	-	HO3	No	No	No	None.
	Adderley Street	168 -176	-	-	-	-	No	No	No	No	None.
Hampson's row houses, part 169-175 Adderley Street	Adderley Street	169 -171	C	C	3	2	HO3	No	Yes	Yes	Revise Heritage Places Inventory July 2015.
Hampson's row houses, part 169-175 Adderley Street	Adderley Street	173 -175	C	C	3	2	HO3	No	Yes	Yes	Revise Heritage Places Inventory July 2015.
Hampson's row houses, part 169-175 Adderley Street	Adderley Street	177	C	C	3	2	HO3	No	Yes	Yes	Revise Heritage Places Inventory July 2015.
Clarke's grocer shop and residence	Adderley Street	179 -183	C,D	C	3	2	HO3	No	Yes	Yes	Revise Heritage Places Inventory July 2015 grading and numbering, replaces 179, 181 Adderley Street.
	Adderley Street	187 -189	-	-	-	-	HO3	No	No	No	None.

Exhibit 11 - Translation Principles, the Stonnington Planning Scheme Precedent

22.04 HERITAGE POLICY

25/01/2018 C132

This policy applies to all land within a Heritage Overlay.

22.04-1 Policy basis

25/01/2018 C132

This policy applies Clause 15.03 (Heritage) of the State Planning Policy Framework to local circumstances and provides strategic direction to identify, conserve, and manage heritage places in the City. It implements provisions of the Municipal Strategic Statement which recognise the importance of protecting places of local cultural heritage significance within the City including Clause 21.03-2 (Strategic vision) and Clause 21.06-10 (Heritage).

22.04-2 Definitions

25/01/2018 C132

For the purposes of this policy the following meanings apply:

- *'Heritage place'* means a site, area, land, building, group of buildings in a precinct, a structure, archaeological site, tree, garden or other elements of the built environment with natural or cultural heritage significance.
- *'Primary building volume'* means the building fabric including the principal façade, roof form and chimneys. For residential buildings, this generally equates to the front two rooms in depth, of the original building.
- *'Principal facade'* means the front elevation facing the main road.
- *'Significant building fabric* means building fabric (including materials, roof, walls, windows, external joinery and chimneys) with heritage significance identified in the statement of significance or heritage assessment.

According to Lovell Chen [October 2015] Methodology Report, City of Melbourne Heritage Gradings Review:

Buildings graded A1, A2, B and C in this Policy are the equivalent of A, B, C and D/E graded buildings adopted by the City of Melbourne and a number of other councils.

Note: this Policy was approved on 25 January 2018

The heritage citation prepared for each place applies a building grade which corresponds with the following levels of significance:

- *'Significant places'* means places of either state or local significance including individually listed places graded A1, A2 or B. [See text box, 'B' equivalent to 'C' in MCC]
- *'Contributory places'* means buildings and other places in a heritage precinct graded C which are contributory to the built form attributes and significance of a heritage precinct.
- *'Ungraded places'* means buildings and other places which do not contribute to the significance of a heritage precinct.

The areas referred to in this policy have the following meanings:

- *'All areas'* means all commercial and residential areas.
- *'Residential areas'* means all areas included in residential zones.
- *'Commercial areas'* means all areas included in commercial and mixed use zones.

22.04-3 Objectives

25/01/2018 C132

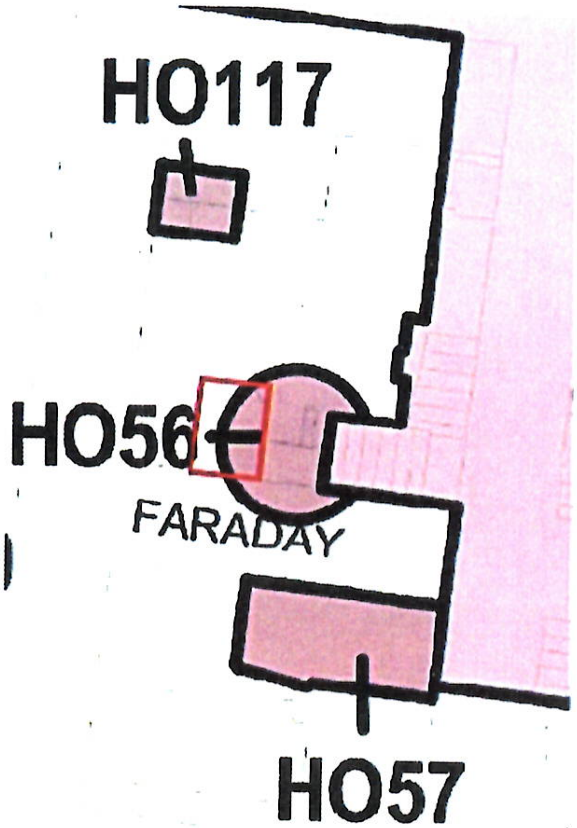
To retain all significant and contributory heritage places.

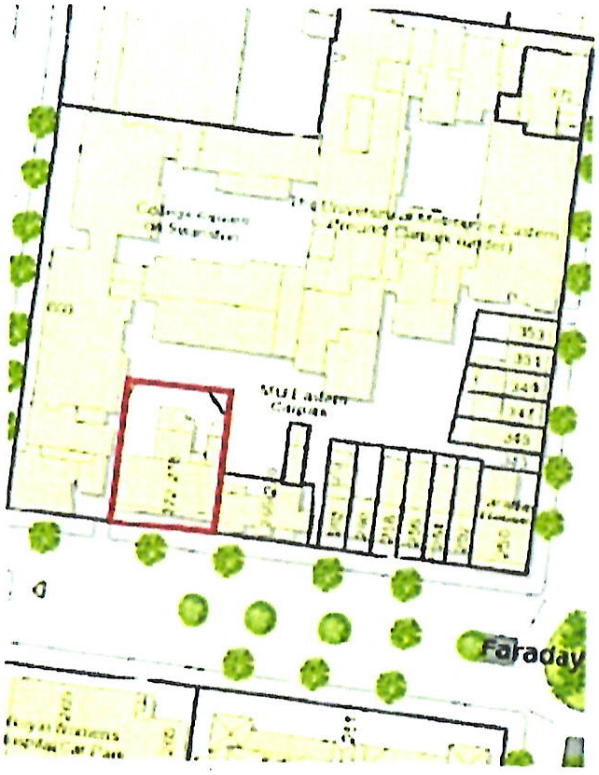
To conserve and re-use significant and contributory heritage places.

To ensure that new development respects the significance of heritage places.

To maintain views of and vistas to significant heritage places.

Exhibit 12 - Heritage Policies cannot influence design outcomes outside Heritage Overlays
A Carlton Example







College Square on Swanston Street – from Faraday Street

Exhibit 13 - Partial Concealment of Higher Rear Additions to Heritage Places

Examples of higher rear additions that have been treated differently in the draft new Heritage Places Inventory



38 Dorrit Street Carlton [adjacent to the single storey terrace]

This Heritage Place was graded "C" [in a level 1 Streetscape] in the June 2016 Heritage Places Inventory, but downgraded to Non-contributory in the draft 2017 Inventory. According to the Lovell Chen assessment, this Place has been "significantly altered."



245-249 Cardigan St [Albion House]

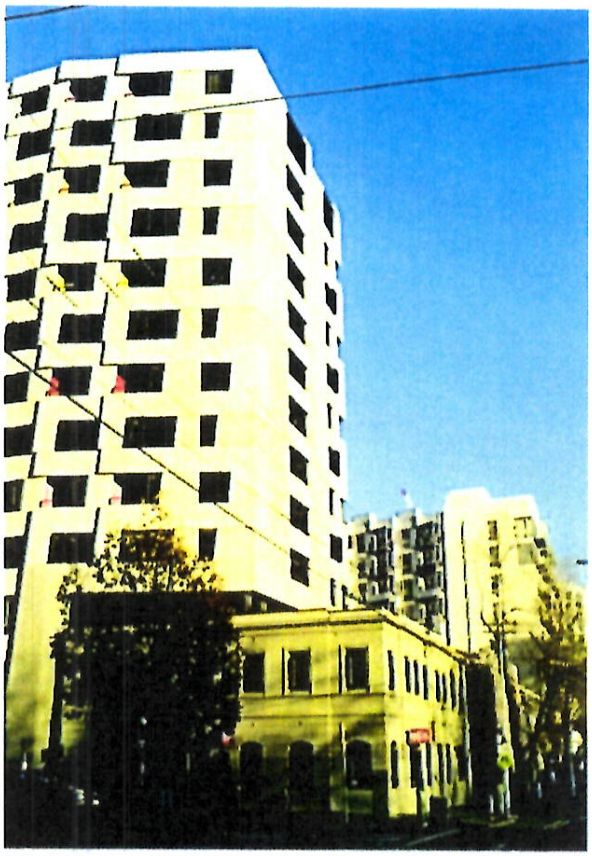
This row was graded "C" [in a level 3 streetscape] in the June 2016 Heritage Places Inventory, and graded "Significant" in the draft 2017 Inventory

The following extract from the Association's May 2017 Submission is relevant

i) **Those provisions of the proposed Local Policy which address the concealment of higher rear parts of new buildings [and additions to Heritage Places] require elaboration.** For example, this guidance must address the extent of any partial concealment that will be acceptable.

ii) **The Council must also clarify the vantage point that is to be adopted when the matter of the concealment of higher rear parts is being considered.** Should this vantage point be located at the far side of the street and directly in front of the principal façade of the new building, or elsewhere in the immediate environment? Failure to specify this vantage point will result in unnecessary argument in any review proceeding.

600 Swanston Street -The Former Canada Hotel on Corner of Swanston and Pelham Streets.



205-223 Pelham Street - The Former Reece Plumbing Building



Former Canada Hotel

Graded "C" in the June 2016 Heritage Places Inventory. This Heritage Place is not graded in the 2017 Inventory; and, since it is not located within a Heritage Overlay, it has no protection.

The CRA submits that more of the three dimensional form of the former Canada Hotel has been retained than has been achieved for the former Reece Plumbing Building illustrated below.

Yet, it is only the former Reece Plumbing Building that retains any heritage protection under the Melbourne Planning Scheme.

The Former Reece Plumbing Building

HO1133. This Heritage Place is mapped, but, there is NO Schedule entry for HO1133.

This Heritage Place was graded "C" in the June 2016 Heritage Places Inventory and "Significant" in the draft 2017 Inventory

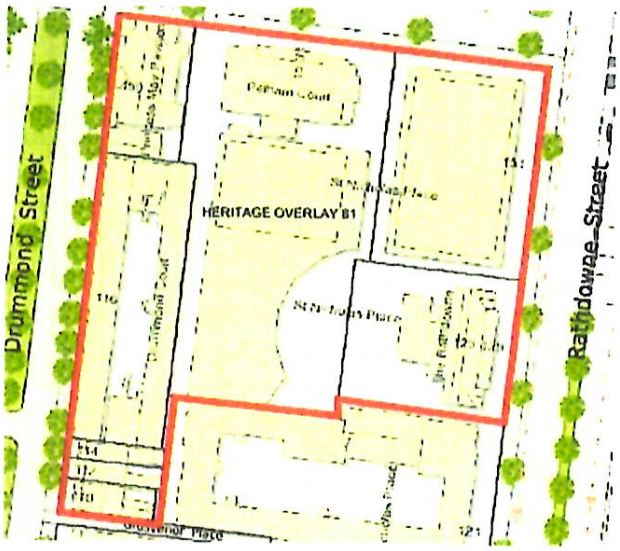
Exhibit 14 - Heritage Overlay Precincts and Places – When should a group of heritage buildings constitute a precinct?

Site of Former Children's Hospital – Princess May Building



Former Administration Block – 15-31 Pelham Street





Extract from City of Melbourne Map with HO81 marked

Extract from Association's Submission May 2017

The Council must review all those Heritage Overlays that include a group of buildings; there is currently no consistency in the way the Heritage Precinct Overlays are defined. When for example does a collection of heritage places constitute a Precinct wide Overlay and when not? The Rathdowne, Pelham and Drummond Street site of the former Children's Hospital [from 1876] includes several significant heritage places within the one heritage Overlay, but it is not considered to be a Precinct Overlay, and it has no Precinct Statement of Significance.

Extracts from 1984 Carlton Conservation Study

The Children's Hospital occupation of the Carlton site commenced in 1875 with the purchase of Sir Redmond Barry's house for use as a hospital. By 1899 a new outpatient department (now demolished) and a kitchen block had been built. A new medical block for in-patients, the Princess May Pavilion (1901-03) and a new Nurses' Home on the Rathdowne Street frontage opened in 1907. From 1911 to shortly before the outbreak of war a new administration block in Pelham Street, and the Edward Wilson Surgical [Facility].

Statement of Significance

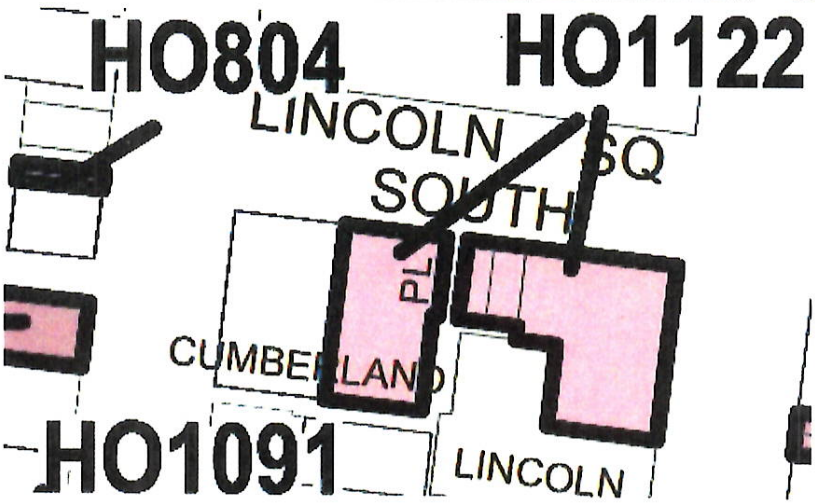
This is a significant complex of late nineteenth/early twentieth century hospital buildings, of considerable architectural merit and forming a crucial streetscape around three sides of an important Carlton block. Their proximity to the Sacred Heart church and former Residence at 101 Rathdowne Street adds to this streetscape significance.

The Lincoln Square South Precinct – Heritage Overlay 1122



From right to left: 23-31, 19, 15-17, 11-13 Lincoln Square South and 631-645 Swanston St





Extract from MPS Heritage Overlay Map showing HO1122

Extracts City North Heritage Review 2013 – Statements of Significance [Revised June 2015]

What is Significant?

The land and the six factory/warehouse buildings located at Lincoln Square South and the adjacent part of Swanston Street, four with an address to the former (nos 11-31), and the two with an address to the latter (nos 631-645). Elements of note are the original external treatments such as face red brick combined with areas of cement render and metal-framed, multi-paned windows.

Why is it Significant?

The Lincoln Square South precinct is of historic significance for being illustrative of the industrial development that occurred in this part of Melbourne during the Interwar period. At this time, there was extensive replacement of the pre-existing building stock, being mostly 19th century cottages and terrace houses with some industrial sites, to larger scale factories and warehouses. (AHC Criteria A4)

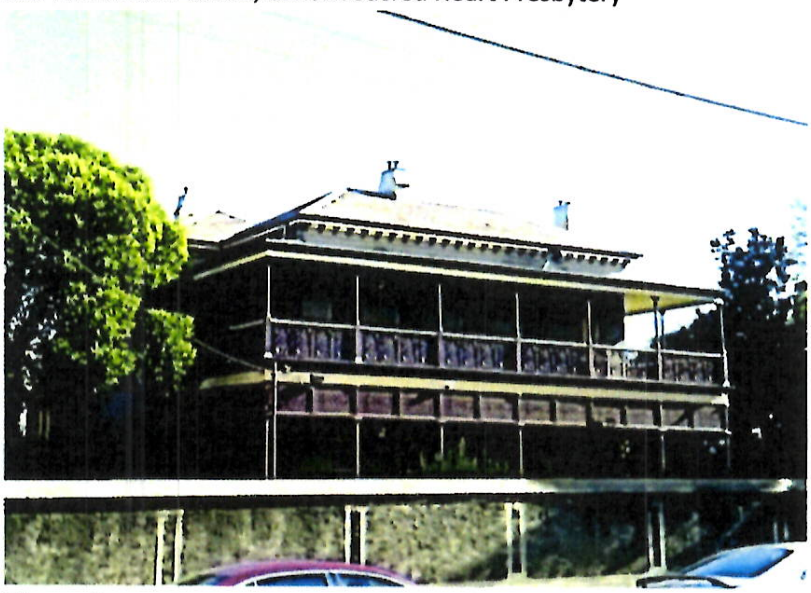
The Lincoln Square South precinct is of aesthetic significance as a largely intact group of Interwar and Post-war period buildings, four of which were designed by reputable architects. Although the buildings to Swanston Street have undergone some change, they form a cohesive group by the common approach to facade articulation (regular vertical divisions and red brick, generally contrasting with some areas of render, and nearly all with original format multi-paned windows) and are evocative of this key development phase in the area. In this precinct, the former Allan & Co. piano store (23-31 Lincoln Square South) is a landmark building in the Stripped Classical style. The other buildings are good examples of the Moderne/Functionalist style/s, (especially nos 11-13 and15-17 Lincoln Square South

Exhibit 15 - Heritage Places included on the VHR
Carlton v Parkville Case Studies

The Sacred Heart Church Precinct – Corner of Rathdowne and Pelham Streets Carlton HO107 and VHR Ref No H16



199 Rathdowne Street, Carlton Sacred Heart Presbytery



Observations

While the VHR Register includes a detailed map and textual description of the Extent of Registration for this Place, both the June 2016 and draft 2017 Heritage Places Inventory also record Gradings for some of the Heritage Places in this Precinct

Both Inventories include Significant/"A" Heritage Place Gradings for the 2-40 Pelham Street Address [2016 Inventory – St Georges Old School]

The 2016 Inventory also includes the Church ["A"] and Precinct ["C"] Gradings under the 199 Rathdowne Street Address, while,

The draft 2017 Inventory also includes a Significant Grading for 154-184 Drummond Street

The Sacred Heart Church Precinct

Extract from VHR Register

Why is it significant?

The Church of the Sacred Heart, although never completed, is of architectural significance as one of the first and finest full blown red brick Baroque church designs in Victoria, and the second classically styled Catholic church built in Victoria. The interior is of aesthetic significance for exhibiting a richness of decoration particularly the paintings by A F D Cavallaro, executed on canvas and then fixed to the elliptical barrel vaulted ceiling. The encaustic tiled floor by the Australian Tessellated Tile Company, stained glass by Hardman of Birmingham, and Brooks Robinson of Melbourne, Stations of the Cross by J Hennessey, and altar decorated by Ferguson, Urie and Lyon are also important elements. The Presbytery is a fine, relatively intact and representative example of a presbytery building of the late nineteenth century, designed by prominent and distinguished architects Reed and Barnes.

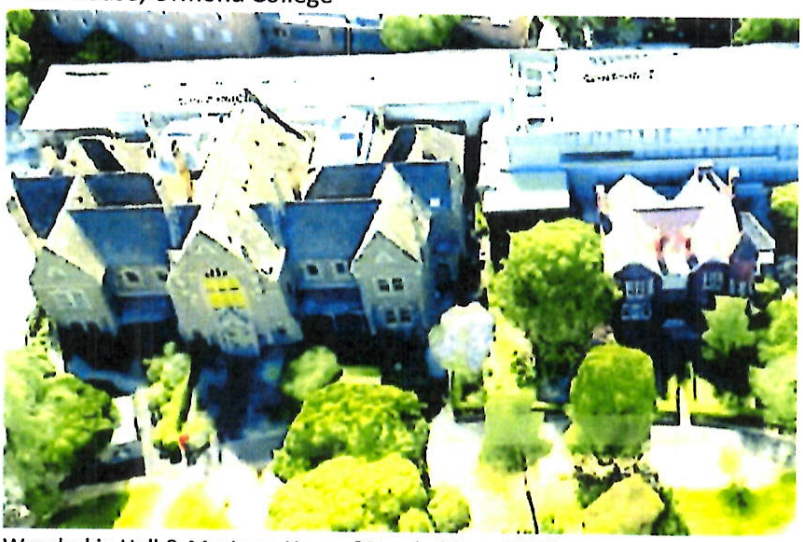
The former St Georges Church and School is of historical significance as an early example of a building intended to take advantage of government funding for denominational schools. It is also of historical importance as a reflection of the expansion of Melbourne at the time and of the efforts of the Catholic church in the early 1850s to provide for Catholics outside the city area.

Our Lady's Grotto is of social significance for its association with Melbourne's Italian community. Its construction was undertaken as an act of solidarity of Melbourne's Italian community at a very difficult time during the Second World War.

Ormond College – University of Melbourne, 49 College Crescent Parkville, HO323, VHR Ref H0728



Allen House, Ormond College



Wyselaskie Hall & MacLean House [Google Maps 2018]

Observations

While the June 2016 Heritage Places Inventory for Ormond College included specific reference to Maclean House and Allen House [which were both graded "A"], these Heritage Places have been omitted from the draft 2017 Heritage Places Inventory.

While the VHR Statement of Significant includes all the buildings constructed up until 1969 [as listed in text box], there is no consistency as to whether VHR Registered Places should ALSO be recorded in the Inventory.

Also, since some of the College buildings constructed since 1969 may now be regarded as locally or regionally significant, a separate identification of all Heritage Places in the Heritage Places Inventory would seem highly desirable.

Ormond College

1879-81 Reed & Barnes (north-west wing)

1885-87, 1888-89 Reed, Henderson & Smart (south-west wing, Wyselaskie Hall and residences, north-east wing)

1892-93 Reed, Smart & Tappin (dining hall, Allen House)

1922 H. H. Kemp (south-east wing, cloisters)

1929 Haddon & Henderson (MacLean House)

1958 Grounds Romberg & Boyd (Master's House)

1961-63 Romberg & Boyd (Picken Court)

1965 Romberg & Boyd (MacFarland Library)

1967-69 Romberg & Boyd (McCaughey Court)

[Extracted from Goad, Philip & Tibbits, George (2003)]

Why is it significant?

Ormond College is architecturally significant as a collection of collegiate buildings of exceptional quality designed by the most eminent Victorian architects of the nineteenth and twentieth centuries. Reed and Barnes, Reed Smart and Tappin, Frederick Romberg, Roy Grounds and Robin Boyd all contributed designs. The tower forms a notable landmark from both the University of Melbourne and the Melbourne Cemetery and dominates the row of colleges enclosing the university along Royal Parade, College Crescent and Swanston Street.

Ormond College is socially significant for its association with major figures in Victoria's social, cultural and educational history. It continues as an important educational and religious institution associated with the University of Melbourne and the Uniting Church.

[Extracted from VHR H0728]

Exhibit 16 - Heritage Overlay Schedule Errors [Extract]

Melbourne Planning Scheme s.43.01s Heritage Overlay Schedule and Map Errors [Carlton]

Summary

- There are 10 Heritage Overlays that should be included in the Melbourne [not Carlton] section.
- There are 5 Heritage Overlays that should be omitted; Heritage Places have been demolished.
- There are 3 Heritage Overlays with inaccurate or inadequate street number information.
- There is 1 Heritage Overlay that is recorded on the Heritage Overlay map, but not the Schedule.
- There is 1 Heritage Overlay that is recorded twice in the Schedule [on 2 separate pages].
- There is 1 former Heritage Overlay included that should be omitted.
- There are 9 Heritage Overlay Mapping errors, where the extent or location of the Heritage Place is described incorrectly.

	CARLTON
HO17	*Former Myer Despatch Buildings* *31-47 Barry Street and 258-274 Queensberry Street, Carlton*

HO800	*Pair of houses* *56-58 Barry Street, Carlton*
HO1126	*Repco Warehouse* *90-104 Berkeley Street, Carlton*
HO803	*Former Modern Printing Company Warehouse* *21 – 25 Bouverie Street, Carlton*
HO1127	*Former Modern Printing Company Factory* *129-135 Bouverie Street, Carlton*
HO804	*Former Ingram Bros Warehouse* *145 – 147 Bouverie Street, Carlton*
HO1130	*Former Baptist Kindergarten* *Part 197-235 Bouverie Street, Carlton* *(alternate address 233-235 Bouverie Street, Carlton)*
HO25	*Former Carlton & United Brewery, 2-76 Bouverie Street & Swanston Street, Carlton*
HO1128	*Former Pitman Books Building* *158-164 Bouverie Street, Carlton*

	HO1129	*House* *166-170 Bouverie Street, Carlton*
MPS Map Error	HO27	*51 – 66 Cardigan St, Carlton*
MPS Map Error	HO28	*71 Cardigan St, Carlton*
	HO29	*83-87 Cardigan St, Carlton*
	HO30	*101-111 Cardigan St, Carlton*
	HO32	*199-201 Cardigan St, Carlton*
MPS Map Error	HO34	*245-257 Cardigan St, Carlton*
MPS Map Error	HO35	*18-22 Cardigan St, Carlton*
	HO36	*50-56 Cardigan St, Carlton*
	HO799	*Melbourne General Cemetery, College Crescent, Carlton North*
	HO39	*Drummond Terrace, 93-105 Drummond St, Carlton*
	HO40	*Lothian Buildings, 175-179 Drummond St, Carlton*
	HO41	*Shops and residences, 313-315 Drummond St, Carlton*
	HO43	*Carlton Court House, 345-349 Drummond St, Carlton*

	HO37	*Rosaville, 46 Drummond St, Carlton*
	HO38	*Medley Hall, 48 Drummond St, Carlton*
	HO45	*Police Station, 334-344 Drummond St, Carlton*
NOT CARLTON	HO46	*518 Elizabeth St, Carlton Melbourne*
NOT CARLTON	HO49	*556 Elizabeth St, Carlton Melbourne*
NOT CARLTON	HO50	*576 Elizabeth St, Carlton Melbourne*
NOT CARLTON	HO51	*580 Elizabeth St, Carlton Melbourne*
NOT CARLTON	HO52	*614-618 Elizabeth St, Carlton Melb.*
NOT CARLTON	HO44	*656-668 Elizabeth St, Carlton Melb.*
NOT CARLTON	HO54	*708 Elizabeth St, Carlton Melb*
	HO924	*Underground Public Toilets, Faraday Street, Carlton*
	HO925	*La Mama Theatre Building, 205-207 Faraday St, Carlton*
MPS Map Error	HO56	*272-278 Faraday St, Carlton*
	HO57	*Kathleen Syme Education Centre (Former Primary School No. 112) 251 Faraday Street, Carlton*

Notes

The Heritage Overlay Schedule extracts [above] were downloaded from the Melbourne PS online http://planningschemes.dpcd.vic.gov.au/schemes/melbourne on the 18th May 2017. The map errors were detected on the Heritage Overlay maps that were downloaded on the 30th April 2017.

The errors noted in the Schedule and Maps include those detected while evaluating the City of Melbourne Heritage Review files [Exhibition Documents]. The CRA has undertaken a limited audit only; there may well be other errors in addition to those recorded above.

EO 18 July 2017