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Expert Witness Statement - Heritage
for
Melbourne Amendment C387 – Hoddle Grid Heritage Review

5 August 2021

Prepared for and under the instruction of the City of Melbourne by
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ANNEXURE I – Instructions from Toby Hayes, Practice Leader, City Strategy & Legal Counsel, City of Melbourne dated 11 June 2021

ANNEXURE II – Documents relied upon in the preparation of evidence

1. Introduction

1.1 Name and address of expert

- [1] James (Jim) Maitland Gard'ner, Director, GJM Heritage, Level 3, 124 Exhibition Street, Melbourne, VIC 3000.

1.2 Expert's qualifications and experience

- [2] I hold a Bachelor of Building Science and an honours degree in Architecture from Victoria University of Wellington (New Zealand), a post graduate diploma in building conservation from the Architectural Association of London and a graduate certificate in visual arts from Harvard University. I am registered with the Architects' Registration Board of Victoria (16044) and am a member of the Australian Institute of Architects, the Victorian Planning & Environmental Law Association and Australia ICOMOS (International Council on Monuments and Sites).
- [3] I have practiced as an architect on heritage buildings and new design projects in New Zealand and the United Kingdom, and have specialised in heritage conservation since 1997. I have worked as Project Architect on commercial projects in the World Heritage Listed City of Bath, and, as a Historic Buildings Architect at English Heritage, I provided technical and regulatory advice on a diverse range of heritage places including Stonehenge, Bolsover Castle, Derbyshire and the Wellington Arch in London. At the National Trust of Australia (Victoria) I led the classification of heritage places on the National Trust Register and the development of responses to heritage and planning permit applications.
- [4] In my role as the Director, Strategy and Policy and then as the Executive Director at Heritage Victoria I developed and implemented heritage policy and guidance to assist in the interpretation of the provisions of the *Heritage Act 1995* including in relation to: the assessment of 'reasonable or economic use' under s73(1)(b) of the Heritage Act; *Victoria's Framework of Historical Themes*; *The Victorian Heritage Register Criteria and Threshold Guidelines*; and the *Victorian Government Cultural Heritage Asset Management Principles*. I previously Chaired the Royal Exhibition Building and Carlton Gardens World Heritage Steering Committee and have been a member of the Heritage Chairs and Officials of Australia and New Zealand. From 2012-15 I held the position of Executive Director, Statutory Planning and Heritage in the Victorian State Government where I administered the *Environment Effects Act 1978* (Vic) and advised the Minister for Planning on planning scheme amendments and permit decision making under the *Planning and Environment Act 1987* (Vic).
- [5] As an independent heritage consultant, I advise on the heritage assessment of, and management and works to, heritage places including private dwellings, places of worship, institutional and commercial buildings, and industrial properties. I advise local and State Governments on statutory planning approvals and strategic planning matters related to heritage, and have undertaken place-specific assessments as well as heritage studies for broader

areas and precincts. I have experience and expertise in formulating and implementing policy and controls for heritage places.

1.3 Statement identifying the expert's areas of expertise to make this report

- [6] I am expert in the assessment of cultural heritage significance of historic heritage places, the administration of legislation to regulate and manage historic heritage places and objects, and in providing advice and preparing documentation to support conservation and redevelopment of heritage places.
- [7] As Executive Director, Heritage Victoria under the Heritage Act I have been the independent statutory decision-maker for heritage permits for works to heritage places and objects, and consents for the disturbance or destruction of historical archaeological sites.
- [8] As a consultant I have prepared numerous Heritage Impact Statements detailing the impact of proposed works upon places included on both the Victorian Heritage Register and the Heritage Overlay, and have provided independent peer review of development proposals on behalf of local planning authorities.
- [9] I have provided expert evidence to VCAT, Planning Panels Victoria and the Heritage Council of Victoria under the instruction of private property owners, developers and local government.

1.4 Statement identifying other significant contributors to the report

- [10] This report was prepared with the assistance of Ms Renae Jarman, Director and Ms Felicity Coleman, Senior Heritage Consultant, of GJM Heritage. The views expressed in this report are my own.

1.5 The identity and qualifications of the person who carried out any tests or experiments upon which the expert relied in making the report

- [11] No tests or experiments were relied upon in making this report.

1.6 Relationship between the expert witness and the client

- [12] Outside of providing heritage advice on various matters and being a resident of the municipality, there is no private or business relationship between myself and the City of Melbourne beyond my role as expert advisor and expert witness in this matter.

1.7 Instructions

- [13] I have been instructed by the City of Melbourne to prepare expert evidence in relation to Amendment C387 to the Melbourne Planning Scheme (C387melb) (hereafter referred to as 'the Amendment' or 'Amendment C397'), which proposes to implement the Hoddle Grid Heritage Review ('HGHR'). My instructions are provided in full at Annexure I.

[14] I have specifically been instructed to:

- Consider and express an opinion about the heritage aspects of the Amendment, including the strategic basis for the Amendment having regard to the Planning Practice Note 1: Applying the Heritage Overlay (August 2019) ('PPN1'); and
- Consider and respond to heritage issues raised in all submissions noting that some submissions may not disclose any substantive matters to respond to.

[15] Twenty-two (22) submissions were received that expressed support for the Amendment, including from the National Trust of Australia (Victoria), the Royal Historical Society of Victoria (RHSV) and Melbourne Heritage Action (MHA). Forty-four (44) submissions were received objecting to the inclusion of forty-nine (49) places within Heritage Overlays as part of the Amendment. The properties subject to objections are:

Sub No.	Subject property address(es)
1	354-360 Little Bourke Street
2	106 Little Lonsdale Street
9	470-472 Little Lonsdale Street
10	303-317 Collins Street
11	341-345 Elizabeth Street
12	256-260 King Street
13	53-57 Lonsdale Street
14	457-471 Bourke Street
16	25 Elizabeth Street
18	516-520 Collins Street
19	577-583 Little Collins Street
20	111-129 Queen Street
21	178-188 William Street
22	269-275 William Street
23	335-349 Little Collins Street
25	57-67 Little Collins Street
26	26-32 King Street
28	410-412 Lonsdale Street & 414-416 Lonsdale Street
30	75-77 Flinders Lane
31	221-231 Collins Street
32	594-610 Lonsdale Street
38	107-109 Flinders Lane
40	393-405 Bourke Street
41	166-172 Queen Street
44	376-378 Bourke Street
45	56-64 Collins Street
46	308-336 Collins Street
47	588-600 Little Collins Street
48	93-101 Spring Street
50	188 Bourke Street
52	204-208 King Street

54	134-144 Little Lonsdale Street & 17-23 Bennetts Lane
55	114-122 Exhibition Street
56	430-442 Collins Street, 457-469 Little Collins Street & 527-555 Bourke Street
57	2-6 Rankins Lane
58	447-453 Lonsdale Street & 43-51 Queen Street
59	Elizabeth Street motorcycle precinct
60	91-93 Flinders Lane
61	130 Little Collins Street
62	3 Kirks Lane
63	124-130 Russell Street
64	341-345 Elizabeth Street
65	490 Flinders Street
66	103-105 Queen Street

1.8 Site inspections

- [16] I inspected all the properties subject to the HGHR throughout the assessment process and I revisited all objecting submissions most recently in July 2021. The properties were viewed from the public realm only.

1.9 Reports and documents relied upon

- [17] All documents relied upon are listed at Annexure II. Note: Volumes 3 through 6 of the HGHR have not been considered as part of this evidence.

1.10 Statement identifying the role the Expert had in preparing or overseeing the exhibited report(s)

- [18] GJM Heritage was initially engaged by the City of Melbourne in September 2018 to undertake a desktop peer review of the HGHR built and urban heritage methodology report (Volume 1) and citations (Volume 2A) prepared by Context Pty Ltd ('Context') as of that date, to determine whether my office could support Amendment C328 (now translated to Amendment C387). Amendment C328 sought permanent controls for those places subject to interim controls through Amendment C327.

- [19] GJM Heritage's initial input comprised a peer review of:

- The HGHR methodology;
- The Hoddle Grid Post-World War Two Thematic History; and
- Citations prepared by Context.

- [20] GJM Heritage was subsequently engaged in March 2019, May 2019, January 2020 and February 2020 to provide further input into the HGHR. GJM's role in preparing the exhibited documents at these stages comprised:

- Review of additional citations prepared by Context;
- Assessment and preparation of citations for postwar places identified during site visits by GJM Heritage;

- Revision of – and minor updates to – postwar place citations prepared by Context; and
- Revision and consolidation of the Postwar Thematic Environmental History 1945-75.

1.11 Facts, matters and assumptions upon which statement proceeds

- [21] It is assumed that all documents referred to in paragraph 17 above and Annexure II, including the exhibited amendment documents, are current and correct in the information they contain at the time of completion of this report.
- [22] In November 2017, GJM Heritage, under my direction, provided a memorandum of advice to APP Corporation that provided a preliminary heritage assessment to determine the likelihood of the 124-130 Russell Street subject site meeting the ‘locally significant’ threshold for inclusion on the Heritage Overlay. This preliminary assessment concluded that former Russell House was likely to meet the local-level threshold for inclusion on the Heritage Overlay on a site-specific basis.
- [23] In May 2018, GJM Heritage, under my direction, provided a memorandum of advice to Dexu, owner of 60 Collins Street, in relation to the identified and potential heritage significance of the Former Reserve Bank of Australia and the (now relocated) mural ‘Eureka Stockade’ by Sir Sidney Nolan. Advice was also provided at this time in relation to the potential refurbishment opportunities and additions to the building.
- [24] In summary, GJM Heritage concluded that 60 Collins Street:
- while being included within the mapped extent of HO504 (Collins Street East Precinct), falls outside the identified period of significance of this precinct and does not contribute to the identified heritage values of the precinct;
 - is unlikely to meet the threshold for State-level significance and warrant inclusion in the Victorian Heritage Register (VHR);
 - is likely to meet the local-level threshold for inclusion on the Heritage Overlay on a site-specific basis; and
 - the 1990s additions and alterations particularly to the ground floor are of no heritage significance and detract from the presentation of the building.
- [25] Further, it was acknowledged that the Sidney Nolan mural was classified by the National Trust of Australia (Victoria) at a State-level and would be more likely to warrant inclusion on the VHR than the Reserve Bank building itself. GJM Heritage was not engaged by Dexu beyond the provision of this advice, and our engagement concluded prior to our retention by the City of Melbourne in respect of the HGHR. The advice provided to both Dexu and the City of Melbourne in respect of the local heritage significance of this building is consistent and it is considered that no conflict of interest exists in relation to this building.

[26] I also note that in June 2013, in my previous capacity as Executive Director, Statutory Planning and Heritage at the Department of Planning and Community Development (DPCD), I approved a briefing to the Hon. Matthew Guy MLC, Minister for Planning in relation to Melbourne Amendment C186 – Heritage Properties in the Hoddle Grid, which considered the merits of that amendment, including the appropriateness of including of a number of postwar properties in the Heritage Overlay of the Melbourne Planning Scheme. After considering the advice of DPCD the Minister for Planning determined to split Melbourne Planning Scheme Amendment C186 into two parts, approving Part 1 (the prewar buildings) and referring the postwar buildings as Part 2 for further assessment including additional comparative analysis.

1.12 Any questions falling outside the expert's expertise

[27] It is noted that the full scope of the HGHR extends beyond the assessment of historic heritage places (and which forms the basis of this Amendment). Volumes 3, 4 and 5 of the HGHR relate to Aboriginal heritage, history and archaeology respectively. Volume 6 documents the communications and engagement plan for the HGHR. These volumes have not been considered as part of this evidence and the disciplines covered fall outside of my area of expertise.

[28] No questions in relation to the historic heritage assessment matters that have been raised fall outside my expertise. I have not had specific regard to the economic and social impacts of this Amendment, as the assessment of these impacts falls outside my area of expertise.

1.13 Summary opinion

[29] It is my view that:

- The HGHR provides a sound and justifiable basis for including the recommended places (individual buildings and precincts) within the Heritage Overlay of the Melbourne Planning Scheme on a permanent basis. The implementation of the HGHR through Amendment C387 contributes to the objectives and strategies of Clause 15.03-1S – 'Heritage conservation' of the Melbourne Planning Scheme and the objectives of section 4(1)(d) of the *Planning and Environment Act 1987*;
- The methodology underpinning the HGHR is sufficiently robust to support the Amendment and the heritage assessment of the places recommended for inclusion in the Heritage Overlay – including the 46 places listed in paragraph 15 above – have been completed in accordance with the requirements of PPN1;
- The heritage criteria within PPN1 have been appropriately applied to recognise the heritage significance of the buildings and precincts proposed for inclusion in the Heritage Overlay through Amendment C387;
- With the exception of 106 Little Lonsdale Street, the properties identified in paragraph 15 of this report are of local heritage significance to the City of Melbourne (each meeting one or more of the Heritage Criteria) and

warrant inclusion in the Heritage Overlay of the Melbourne Planning Scheme;

- The Amendment should be revised to reflect advice that I have provided to the City of Melbourne following consideration of the submissions received in respect of three (3) places:
 - Revise the grading of 106 Little Lonsdale Street from 'contributory' to 'non-contributory' given the significance of the Little Lonsdale Street Precinct does not include buildings constructed in the postwar period;
 - Reduce the extent of individual Heritage Overlay HO1307 to more closely align with the retained Former John Danks & Son building at 393-405 Bourke Street, Melbourne; and
 - Revise the Former Universal House Statement of Significance (25 Elizabeth Street, Melbourne) to delete Criterion E (aesthetic significance) given the loss of decorative features and revise the assessment of Criterion A (historical significance) to reduce the emphasis on the Hordern Family.
- Matters relating to financial impacts, Ecologically Sustainable Development/Environmentally Sustainable Design (ESD), future use and development, and live planning permits affecting individual properties are not relevant in determining the heritage significance of a place. The principal consideration in determining whether a place warrants inclusion in the Heritage Overlay is whether the place reaches the threshold for local heritage significance.

1.14 Declaration

- [30] I have made all the inquiries that I believe are desirable and appropriate. No matters of significance which I regard as relevant have to my knowledge been withheld from the Panel.



Jim Gard'ner, Director - GJM Heritage

2. Background to Amendment C387

2.1 Introduction

- [31] Amendment C387 seeks to implement the recommendations of the HGHR on a permanent basis. It proposes to include one-hundred and thirty-seven (137) individual places and five (5) precincts in the Schedule to the Heritage Overlay of the Melbourne Planning Scheme for their local heritage significance. This includes fifty-five (55) postwar places constructed between 1945 and 1975.
- [32] Following a 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.
- [33] On 1 October 2020 the Minister for Planning authorised the preparation and exhibition of the Amendment.
- [34] Sixty-six (66) submissions were received following public exhibition of the Amendment. Twenty-two (22) submissions expressed support for the Amendment, including from the National Trust of Australia (Victoria) and the Royal Historical Society of Victoria (RHSV). Forty-four (44) objecting submissions were received objecting to the inclusion of forty-nine (49) places in Heritage Overlay of the Melbourne Planning Scheme.

2.2 Background to the Hoddle Grid Heritage Review

- [35] The HGHR is the first comprehensive review of heritage buildings in the central city since the 1990s and the largest study of postwar heritage in Melbourne's Central Business District to date.
- [36] Council commissioned Context to undertake the HGHR in 2017. A key purpose of the project was to review and assess all urban and built places within the study area that were previously identified in heritage studies but had not been afforded protection under the Planning Scheme, as well as to consider additional places identified through a process of extensive community consultation and engagement. An outcome of the project was to determine whether any places (individual buildings and/or precincts) satisfied the threshold for local heritage significance and inclusion in the Heritage Overlay of the Melbourne Planning Scheme.
- [37] As it relates to built heritage, the HGHR comprises two volumes:
 - Volume 1: Built and Urban Heritage – Methodology; and
 - Volume 2, comprising Volume 2a: Assessments of precincts, pre-1945 places and revisions to existing Heritage Overlays; and Volume 2b: Postwar Thematic Environmental History and assessments of postwar places.
- [38] Volumes 3, 4 and 5 of the HGHR relate to Aboriginal heritage, history and archaeology respectively. Volume 6 documents the communications and engagement plan for the HGHR. These volumes have not been considered as part of this evidence and fall outside of my area of expertise.

- [39] The HGHR was completed in a number of stages over a four-year period (2017-2020), and developed into what could be categorised as two discrete components:
- a “Gap Study” review of precincts and pre-1945 places in the central city (Volume 2a): and,
 - a “Thematic Study” of postwar places (Volume 2b).
- [40] These two components of the HGHR are addressed separately within my evidence at Sections 5 and 6.

2.2.1 Commencement and initial reporting (2017-2018)

- [41] Context undertook the first stages of the HGHR from April 2017 and submitted their initial report to the City of Melbourne 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 Amendment C327melb. Amendment C327melb was approved and gazetted on 18 October 2018. It introduced the Heritage Overlay on an interim basis to 50 individual places and six (6) precincts.

2.2.2 Peer review – Stages 1 and 2 (2018-2020)

- [42] GJM Heritage was commissioned by the City of Melbourne 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 the inclusion of the recommended heritage places in the Schedule to the Heritage Overlay. The work undertaken by GJM Heritage in this first stage comprised:
- Review of the HGHR methodology;
 - Review of the Hoddle Grid Postwar Thematic Environmental History; and
 - Review of citations prepared by Context.
- Limited site visits were also undertaken to better inform the peer review.
- [43] GJM Heritage was subsequently 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 in the Heritage Overlay.
- [44] The outcome of the two-stage peer review can be summarised as follows:
- GJM Heritage queried specific findings, details and recommendations of Context’s work, which were discussed, clarified and resolved with Context.
 - GJM Heritage formed the view that the methodology developed for the project was sufficiently robust and consistent with PPN1 and current heritage practice, subject to additional work required to address postwar places (see paragraphs 48 and 49 below);
 - The HGHR provides a justifiable basis for including a number of places (individual buildings and precincts) in the Heritage Overlay on a permanent

basis. The implementation of the HGHR is consistent with the objectives and strategies of Clause 15.03-1S – ‘Heritage conservation’ of the Melbourne Planning Scheme and the objectives of section 4(1)(d) of the *Planning and Environment Act 1987*.

- [45] GJM Heritage was satisfied that the assessments undertaken by Context were consistent with the guidance provided within PPN1. Each citation includes:
- a photograph (or photographs);
 - a map showing the extent of the proposed heritage place;
 - summary information about the heritage place;
 - historical context;
 - site history;
 - site description;
 - discussion on integrity;
 - comparative analysis;
 - assessment against the criteria set down in PPN1; and
 - recommended controls.
- [46] The Statements of Significance are drawn from the assessments within each citation and are prepared in a format consistent with the example provided in Appendix A of PPN1.
- [47] It is noted that through the peer review GJM Heritage did not seek to alter the author’s ‘voice’ or the type of language used by Context but instead focussed on the rigour and consistency of the assessments. There are, consequently, stylistic differences between the citations prepared by Context and those subsequently prepared by GJM Heritage.

2.2.3 Postwar Review (2019-2020)

- [48] A key finding of the peer review was that, in the absence of a comprehensive review of postwar buildings within the Hoddle Grid, the postwar buildings initially recommended for inclusion in the Heritage Overlay could not be supported. This position was consistent with the Minister for Planning’s previous position in respect of Amendment C186. GJM Heritage recommended that Council undertake a full gap study of postwar places within the Hoddle Grid. This recommendation was supported by Council and the work was undertaken by Context and GJM Heritage.
- [49] As a result, in May 2019 GJM Heritage was engaged to undertake a full walk of the major and ‘little’ streets within the study area to review the appropriateness of the Post-World War II places recommended for inclusion in the Heritage Overlay, and identify additional postwar places of potential significance. GJM Heritage was then further engaged to:
- Undertake a number of heritage assessments of postwar buildings dating from the period 1945-1975 identified during site inspections;

- Complete a peer review of postwar place citations prepared by Context;
- Review the list of postwar places not recommended for inclusion in the Heritage Overlay prepared by Context; and
- Revise and consolidate the Hoddle Grid Postwar Thematic Environmental History 1945-75.

2.2.4 Hoddle Grid Heritage Review Final Report (July 2020)

[50] Following the 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 the Amendment.

3. Earlier Planning Scheme Amendments relevant to Amendment C387

- [51] A number of planning scheme amendments previously prepared and exhibited by Council are of relevance to Amendment C387. The outcome of these and their relationship to Amendment C387 are summarised below.

3.1 Amendment C186 – Central City (Hoddle Grid) Heritage Review 2011

- [52] Amendment C186 sought to implement the findings of the 'Central City (Hoddle Grid) Heritage Review', 2011 by Graeme Butler and Associates, which included nine (9) postwar places. An independent panel hearing was held to review Amendment C186 and consider submissions in late 2011.
- [53] The panel recommended that Amendment C186 be adopted generally as exhibited. However, the Minister for Planning did not approve heritage protection for the nine postwar places considered as part of the review due to the lack of comparative analysis of places dating from this period. The Minister instead requested that a further review of postwar places in the Hoddle Grid be undertaken to ensure that appropriate buildings were included in the Heritage Overlay on a permanent basis.

3.2 Amendment C271 – Guildford and Hardware Laneways Study 2017

- [54] Amendment C271 implemented the findings of the 'Guildford and Hardware Laneways Heritage Study 2017' by applying permanent heritage controls to sites identified in the study.
- [55] The 'Guildford and Hardware Laneways Study 2017' was undertaken by Lovell Chen to assess the heritage value of buildings and places in the study area, building on a previous City of Melbourne heritage study, the 'Heritage Precincts Project' by Meredith Gould, which identified all of Guildford and Hardware Lanes as warranting heritage protection but never progressed.
- [56] The amendment identified two (2) new precincts – the Guildford and Hardware Laneways Precinct (HO1205) and the Elizabeth Street West Precinct (HO1204) – and seven (7) individual Heritage Overlays.
- [57] In regard to Amendment C387, a number of the places not subject to detailed assessment as part of 'Guildford and Hardware Laneways Heritage Study 2017' were added to the list for consideration as part of the HGHR. In addition to this, some submitters to Amendment C271 objected to findings of the 'Guildford and Hardware Laneways Heritage Study 2017' that specific places did not warrant inclusion in the Heritage Overlay. These places were also reconsidered as part of the HGHR.

3.3. Amendment C327 – Hoddle Grid Heritage Review 2018

- [58] Amendment C327 implemented the recommendations of the HGHR as at 2018 by introducing the Heritage Overlay on an interim basis to fifty (50) individual places and six (6) precincts to ensure that their heritage values were recognised and protected while Amendment C328 (translated to the current Amendment

C387) to introduce permanent protection, progressed through the planning scheme amendment process.

4. Amendment C387 – common matters raised in objecting submissions

[59] In reviewing the forty-four (44) objecting submissions received in respect of Amendment C387, a number of common, recurring matters were raised. In summary, these are:

- The place has not been identified in a previous heritage study;
- The place was previously graded C or D in a heritage study;
- The age of a heritage place (postwar places are not sufficiently 'old' for heritage controls);
- The level of alteration undermines the stated significance;
- The impact of live planning permits; and
- The application of the Heritage Overlay adversely impacts the future use and development opportunities of a place, involves complex maintenance issues, limits opportunities for the delivery of ESD initiatives and has other financial impacts.

[60] Outlined below is my response to each of these common matters.

4.1 Places not identified in previous studies

[61] A number of submissions cited the 'previous lack of heritage importance attributed to the site' through earlier heritage studies and reviews as a primary objection for a place's inclusion in the Heritage Overlay.

[62] The HGHR is the most comprehensive heritage review of the Hoddle Grid since the 1990s, with the majority of current Heritage Overlays within the Hoddle Grid arising from heritage studies undertaken in the 1980s and 1990s. Given the timeframe that has elapsed since then – now more than 20 years – it is reasonable to expect that public and professional recognition of heritage has changed over this time, particularly when coupled with losses of heritage fabric over this period. As such, previous assessments of heritage values may warrant reconsideration.

[63] This is particularly relevant to the assessment of postwar places (dating to the period 1945 to 1975). In comparison with nineteenth and early twentieth century buildings, very few postwar buildings have been identified through previous heritage studies undertaken within the City of Melbourne. Given that it is the passing of time that allows the enduring cultural heritage values of a place to be rigorously and objectively assessed, it is unsurprising that heritage studies undertaken in the 1980s and 1990s did not rigorously consider of the buildings dating from the 1950s to the 1970s, as sufficient time had not elapsed to be able to undertake a meaningful assessment of such places. The postwar places included in the HGHR have now been assessed as part of a comprehensive review undertaken to address this gap in the recognition of Melbourne's heritage.

- [64] As part of the HGHR, a number of places first considered as part of the 'Guildford and Hardware Laneways Study 2017' were reviewed. The re-assessment of these places was undertaken in the context of a substantially larger study area which included the whole of the Hoddle Grid. This stands in contrast to the study area for the Guildford and Hardware Laneways Heritage Study, which concentrated on a discrete area and assessed the contribution of buildings within this area to the specific precinct-based history, and its setting and character.

4.2 Places graded C or D in previous heritage studies

- [65] Common to a number of submissions was that a place had previously been attributed with a "lower" heritage grading in earlier studies, particularly those places that had been graded 'C' or 'D'.
- [66] Lovell Chen – in the 'City of Melbourne Heritage Gradings Review (2016)' – clearly articulated the appropriateness of reviewing and revisiting earlier heritage gradings when they stated:

The majority of current gradings were attributed during heritage studies undertaken in the 1980s and 1990s. Given the timeframe which has elapsed, it is reasonable to assume that some gradings are out of date.

...

Instances where this could occur include where the intactness and appearance of a place or property has changed. It could also occur where the assessment of heritage value warrants reconsideration. For example, heritage places of the interwar and post-war period are now generally more highly valued in heritage terms than they typically were in the 1980s. Early properties, such as those from the 1850s-1870s are also increasingly more highly valued due to recognition of their rarity. Intact terrace rows, even rows of very modest workers cottages, are another heritage place type more highly valued due to maintaining their original external form with little visible change.

Other examples of places deserving of a higher-level grading include those with important histories, or places with recognised social values. (p.6)

- [67] I share the position that it is appropriate to consider afresh places graded C, D or E in earlier heritage studies. Further, I note that many of these gradings were applied through assessment processes where the heritage criteria applied at the time differ from that now included within PPN1.

4.3 The age of a place

- [68] The age of a place was a common issue raised in submissions objecting to the inclusion of postwar places in the Heritage Overlay. Many submissions considered that such places were 'too recent' to be listed.

- [69] PPN1 provides no guidance on the minimum age for places to be assessed or listed on a local Heritage Overlay. Notwithstanding this, it is a generally accepted heritage practice that a generation (approximately 25-30 years) should pass before determining whether a place is of heritage value. This allows for a sufficient passage of time to elapse to ensure the enduring cultural heritage values of a place can be rigorously and objectively assessed. This principle is captured in the Heritage Council of Victoria's 'Victorian Heritage Register Criteria and Thresholds Guidelines (2020)'. The HGHR approach is consistent with this principle.

4.4 Levels of alteration

- [70] Common to a number of submissions was that the level of alteration and modification to a place suggested that the place did not warrant inclusion in the Heritage Overlay. In the early stages of the HGHR, a benchmarking tool was used to consider the impact of changes to individual properties within the review. This benchmarking tool recognised that a degree of change is common to buildings within the Hoddle Grid, particularly to the ground floor. The benchmarking exercise assisted in establishing whether or not the alterations had so changed a place that its integrity was reduced to the point that it did not warrant inclusion on the Heritage Overlay.
- [71] The large-scale modification at the lower level (or levels) of a building - including the wholesale replacement of ground floor shopfronts - is a widespread occurrence throughout the central city. The degree of change to ground floors within the Hoddle Grid is notably higher than nineteenth and twentieth century commercial high streets found in the inner and middle suburbs of Melbourne. Very few places retain intact shopfronts or entries, which reflects the central city context and development pressures placed on buildings within the Central Business District. The replacement of window glazing or façade cladding at the upper levels is also relatively common across the central city.
- [72] It is noted that places already subject to the Heritage Overlay are also commonly subject to these types of alterations particularly at street level, and that renewal of shopfronts continues to occur to these places to meet commercial imperatives of the owners and/or tenants. From a heritage perspective, this is generally considered acceptable where change is limited to areas of previous alteration, and where the fabric that clearly contributes to the significance of the place (generally being above street-level) remains largely intact.
- [73] Specific to postwar places is the level of alterations to ground floor plazas. The provision of an open, public or semi-public plaza formed part of a planning strategy adopted in the 1960s to gain approval for additional building height. Most examples of buildings within the municipality that retain their original plaza setting are located outside the Hoddle Grid.
- [74] Similarly, very few postwar buildings retain their ground floor recessed entries, reflecting the central city context and commercial value placed on ground floor street frontages in the intervening years. These recessed entrances and

associated loggia-like spaces have generally been infilled to provide retail and food and beverage tenancies.

- [75] I therefore consider that within the Hoddle Grid context, more substantial alteration at lower levels should generally not preclude the inclusion of a place in the Heritage Overlay, subject to its assessed heritage values remaining legible at the upper-levels of the building.

4.5 Live planning permits

- [76] Planning permits have been issued for a number of places recommended for inclusion in the Heritage Overlay of the Melbourne Planning Scheme. This matter was raised in a number of objecting submissions.
- [77] Heritage protection is being pursued through Amendment C387 in the event that the approved permit is not acted upon. If a permit is not acted on it is appropriate for any future development proposal to be assessed having regard to the identified values of the heritage place.
- [78] However, if a live permit is acted upon, the Heritage Overlay can, if appropriate, be amended or removed prior to the finalisation of this amendment or via a future amendment. It is my view that where a building included within the HGHR has been completely demolished then that site should be removed from the Heritage Overlay.

4.6 Future use and development, ESD and financial impacts

- [79] A number of submissions raised the matter of the impact of heritage protection on future use and development opportunities for a place and potential financial constraints.
- [80] The principal consideration when applying the Heritage Overlay is whether the place reaches the threshold for local heritage significance. The impact on individual owners in relation to the future use and development of a property or personal financial impacts (including property value) is not relevant in determining the heritage significance of a place. These issues have been the subject of numerous Planning Panel deliberations. The findings of those Panels include:

The key issue at the amendment stage was the heritage significance of the property, and other matters such as competing policy settings, hardship for owners etc. should be considered when a planning application was considered (Greater Geelong C71)

Matters such as personal economic impacts for the property owner of applying a Heritage Overlay, the structural integrity or condition of the buildings, and restrictions on the property owner's ability to redevelop the property are not relevant when considering an amendment to apply a Heritage Overlay (Moonee Valley C195)

The Panel supported the view that an owner opposing the Heritage Overlay, on the grounds of impediments to

development, costs or impact on property prices did not constitute a reason to exclude the place, provided its heritage significance had been shown to meet the appropriate threshold (Yarra C157 and C163)

The Panel took the view that the principal consideration in applying the Heritage Overlay is whether the place reaches the threshold for local heritage significance and questions of the potential of the land for other uses and the social and economic effects should be considered at a later stage of the planning process (Greater Geelong C49).

- [81] These Panel reports all support the position that the principal consideration in applying the Heritage Overlay is whether the place reaches the threshold for local heritage significance by satisfying one or more of the heritage criteria articulated in PPN1.

5 Amendment C387 – precincts, pre-1945 places, revisions to existing individual Heritage Overlays

5.1 Introduction

- [82] This component of the HGHR is effectively a ‘Gap Study’ to review pre-World War Two places within the Hoddle Grid not currently subject to heritage controls. This component of the HGHR was completed by Context in two main phases: 2017-2018 and 2018-2020, with peer review by GJM Heritage.
- [83] The approach and methodology of this component of the HGHR is set out in Volume 1: Built and Urban Heritage – Methodology and is summarised below.
- [84] The findings and recommendations in respect of precincts, pre-1945 places, and revisions to existing individual Heritage Overlays are documented as *Volume 2a: HGHR – Precincts, pre-1945 places, and revisions to existing individual Heritage Overlays*.

5.2 Summary of methodology

- [85] The original list of places for review of the HGHR was derived from four primary sources:
- Lists of places prepared by the City of Melbourne from previous heritage studies, including ‘Central Activities District Conservation Study’ (1985), ‘Central City Heritage Review’ (1993), ‘Review of Heritage Overlay listings in the CBD’ (2002), ‘Central City Heritage Review’ (2011) and the ‘Guildford and Hardware Laneways Heritage Study’ (2017);
 - Consultation workshops, including with the HGHR External Reference Group (ERG);
 - Desktop and field surveys undertaken by Context; and
 - Internal review undertaken by the City of Melbourne.
- [86] Through this process, a long list of potential heritage places was developed. In order to develop a manageable work program, this long list of potential heritage places was further refined by Context and the City of Melbourne to arrive at a manageable short list.

5.2.1 Defining a threshold for integrity

- [87] In order to undertake the comparative analysis required for the HGHR, it was necessary to develop a benchmark for integrity. This assisted in determining whether the level of change made to a place was commensurate and consistent with other, similar places.
- [88] As noted in 4.4 above, the degree of change to the ground floors of buildings within the Hoddle Grid is notably higher than nineteenth and twentieth century commercial high streets found in the inner suburbs of Melbourne. Given the degree of change that has occurred throughout the study area, buildings assessed as part of the HGHR are often of a lower level of intactness –

particularly at street-level – when compared to similar buildings located outside the Hoddle Grid.

- [89] This benchmarking exercise was used to help identify which places remained sufficiently intact to their period of construction to remain clearly legible.

5.2.2 Fieldwork

- [90] The fieldwork component comprised site inspections and photographic documentation of all places included in the short list, as seen from the street. The site visits identified the integrity and current presentation of each place. Any visible alterations and extensions that potentially altered the intactness of a place when compared to the original design was also noted.

5.2.3 Physical analysis

- [91] Informed by the site visits conducted, a physical description was compiled for each place noting the form of the place, its architectural detail and the current condition and integrity.

5.2.4 Historical research

- [92] A range of primary and secondary sources were consulted as part of the historical research. The aim of the historical research was to determine (where possible):
- The build date of each place;
 - The owner of the place when built;
 - A builder or architect where documented;
 - Whether the place had any significant associations with events, groups or people;
 - The development of the place;
 - The current level of intactness compared to the original design; and
 - The historical theme (or themes) the place demonstrates.

5.2.5 Comparative analysis

- [93] A comparative analysis was undertaken for each place to establish its context within the municipality and its significance threshold. Places were compared against similar examples of places already included in the Heritage Overlay – either as individual places or within a precinct and categorised (graded) as ‘Significant’ – in terms of their level of integrity, architectural detail, the quality of expression of their architectural style or period, their history or their function. Where relevant, places were also compared in terms of their identified architect.

5.2.6 Citations and Statutory Recommendations

- [94] To determine whether a place satisfied the threshold for local heritage significance and inclusion in the Heritage Overlay of the Melbourne Planning Scheme, places were assessed in accordance with the guidance provided in PPN1.
- [95] Drawing upon the historical research, physical investigation and comparative analysis, an assessment against the heritage criteria was undertaken and a Statement of Significance prepared for each individually significant place.
- [96] The Statements of Significance follow the format of 'What is significant?', 'How is it significant?' and 'Why is it significant?'. The Statement of Significance clearly defines the heritage values of the place and identifies significant and contributory fabric to guide future management.
- [97] Volume 1, Appendix A6 of the HGHR includes an illustrated list of the extant buildings that were considered as part of the review and not progressed for assessment; this included 85 buildings that pre-date 1945.

5.3 Submissions received

- [98] During the public exhibition of Amendment C387 a total of twenty-eight (28) submissions were received which related specifically to pre-1945 places and precincts. Two (2) of these submissions were in support of the Amendment and twenty-six (26) were objections.
- [99] The table below lists each objecting submission, including the submission number (which accords with the submitter table prepared by Council) and the identified place. The section in this Statement of Evidence that addresses the relevant objecting submission is noted.

Objecting submissions received for pre-1945 places and precincts

Sub No.	Subject property address	Section in this Statement
1	354-360 Little Bourke Street	5.3.1
2	106 Little Lonsdale Street	5.3.2
9	470-472 Little Lonsdale Street	5.3.3
11	341-345 Elizabeth Street	5.3.4
12	256-260 King Street	5.3.5
13	53-57 Lonsdale Street	5.3.6
16	25 Elizabeth Street	5.3.7
19	577-583 Little Collins Street	5.3.8
25	57-67 Little Collins Street	5.3.9
26	26-32 King Street	5.3.10
28	410-412 Lonsdale Street	5.3.11
30	75-77 Flinders Lane	5.3.12
32	594-610 Lonsdale Street	5.3.13
38	107-109 Flinders Lane	5.3.14
40	393-405 Bourke Street	5.3.15
50	188 Bourke Street	5.3.16
52	204-208 King Street	5.3.17
54	134-144 Little Lonsdale Street & 17-23 Bennetts Lane	5.3.18

55	114-122 Exhibition Street	5.3.19
57	2-6 Rankins Lane	5.3.20
59	Elizabeth Street motorcycle precinct	5.3.21
60	91-93 Flinders Lane	5.3.22
62	3 Kirks Lane	5.3.23
63	124-130 Russell Street	5.3.24
64	341-345 Elizabeth Street	5.3.4
65	490 Flinders Street	5.3.25

[100] Following is a response to the matters raised in each of the objecting submissions. The column entitled 'Summary of heritage issues raised' in the tables below is extracted directly from the table of submissions prepared by Council for FMC on 18 May 2021. The column entitled 'Expert response' in the tables below represents my opinion in relation to these matters. In preparing this advice I read each submission.

5.3.1 Melbourne House, 354-360 Little Bourke Street



Summary of significance (as exhibited)

[101] 354-360 Little Bourke Street is assessed as being locally significant for the following reasons:

- as a relatively intact example of the first wave of tall buildings constructed between World War One and World War Two that replaced the generally low-scale buildings dating from the nineteenth and early twentieth century (Criterion A).
- as a purpose-built building for the business A G Healing & Co (Criterion A).
- as a relatively intact, competent and representative example of the interwar Chicagoesque style, which demonstrates the exploration of building styles that adapted classical traditions to the new taller forms (Criterion D).

Response to submission received

- [102] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>The individual heritage overlay HO1345 should be removed or the site downgraded to contributory.</p> <p>The previous lack of heritage importance attributed to the site through the Guildford and Hardware Laneways Heritage Study 2017 implemented through C271.</p> <p>Additionally, the Melbourne Central Activities District Conservation Study 1985 graded the building as D and The Central City Heritage Study Review 1993 graded the building as C, confirming it as a contributory building within a precinct.</p>	<p>The property warrants the application of an individual Heritage Overlay, for the reasons stated in the exhibited heritage citation and Statement of Significance.</p> <p>In relation to the earlier assessment of the place through the Guildford and Hardware Laneways Heritage Study, it is noted that this property was subject to submissions challenging the assessment at that time - refer to my response at 3.2 above.</p> <p>The changes made to this building, including the replacement of the ground floor shop front and upper-level window frames and glazing, is a common intervention within the City of Melbourne; however, the restrained architectural expression of the building remains legible to the original design. The broader comparative analysis undertaken as part of the HGHR (in comparison with that of the Guildford and Hardware Laneways Heritage Study) has confirmed that Melbourne House displays a similar level of intactness and integrity to other buildings of this period that are included within the Heritage Overlay and/or have been assessed as being 'Individually Significant' in the HGHR. Further, within the Guildford and Hardware Laneways Heritage Study area, Hardware House at 386-392 Little Collins Street which was graded 'Significant' in that study is similar in form, detailing and architectural expression to Melbourne House.</p> <p>The re-assessment of the subject property is appropriate as some assessments from earlier studies of the 1980s and 1990s will be outdated - refer to my response at 4.2 above.</p>

5.3.2 106 Little Lonsdale Street ('contributory' within Little Lonsdale Precinct)



Summary of significance (as exhibited)

[103] The Little Lonsdale Precinct is assessed as being locally significant for the following reasons:

- for its demonstration of less salubrious 'fringe' areas in the central city, and as a working-class residential precinct for mostly Irish immigrants who had settled by the late 1840s and early 1850s in an area referred to as 'Little Lon' (Criterion A).
- for its association with phases of migration, firstly by the Irish, and later by the Chinese, Germans, Jews, Lebanese and Italians who were part of a later wave of migration after the 1890s depression (Criterion A).
- as a remnant of the vibrant and complex community that evolved in the area from the 1840s (Criterion A).
- for its evidence of at least three phases of development from the 1870s to the 1940s (Criterion D).
- for the combination of low-scale two to three-storey buildings on both Little Lonsdale Street and within its laneway network (Criterion E).
- for the association of part of the precinct with King O'Malley (1858-1953), a North American politician who rose through the Australian Labor Party ranks to become minister for home affairs, a prominent advocate against conscription and supporter of women's rights (Criterion H).

Response to submission received

- [104] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>Revise the citation to acknowledge the correct date of construction for 106 Little Lonsdale Street and the building be cited as non-contributory.</p> <p>The proposed precinct citation for the 'Little Lonsdale Street Precinct' includes 106 Little Lonsdale Street and identifies it as an 'interwar' building, which is 'contributory' to the precinct.</p> <p>Evidence has been provided to show the building would have been constructed in 1954 or later and cannot be classified as an 'interwar' building.</p>	<p>The information provided in the submission demonstrates that the building was constructed in 1954. The Statement of Significance for the Little Lonsdale Street Precinct articulates the period of significance as being from c.1840s to c.1936.</p> <p>The category of 106 Little Lonsdale Street should be revised from 'contributory' to 'non-contributory' within the Little Lonsdale Street Precinct on this basis.</p>

Updates to Amendment C387 following exhibition

- [105] I recommend that the category of 106 Little Lonsdale Street within the Little Lonsdale Street Precinct Statement of Significance, July 2020 be revised from 'contributory' to 'non-contributory'. Further, the category of 106 Little Lonsdale Street within the Heritage Places Inventory February 2020 (Amended July 2020) Part A should be revised from 'contributory' to 'non-contributory'.

5.3.3 Shops, 470-472 Little Lonsdale Street



Summary of significance (as exhibited)

- [106] 470-472 Little Lonsdale Street is assessed as being locally significant for the following reasons:
- historically significant as a once common building typology demonstrating integrated uses of both retailing and housing. The building demonstrates

a once common type of housing for city dwellers within the Hoddle Grid in the 1870s (Criterion A).

- a fine example of a mid-Victorian residential and commercial building. Once used as daily retail points, a number of these surviving shops are found in both the main streets and smaller streets of the Hoddle Grid (Criterion D).

Response to submission received

[107] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>The property is currently not subject to an existing heritage overlay. The property was graded 'C' in both the 1993 Central City Heritage Study review and 1985 Central Activities District Conservation Study. Further, the property was ungraded in both the 2011 Central City Heritage Review and 2002 Review of Heritage overlay listings in the CBD.</p> <p>The physical and aesthetic changes have diminished the heritage integrity of the building to the point that it does not contribute to the heritage significance or historic character of the precinct and therefore should be graded as 'non-contributory'.</p> <p>The property has been extensively altered from the original construction. Significant alterations have occurred on the ground floor with no evidence at all of the original shopfronts. The entire ground floor façade has been replaced in recent years with a modern steel framed glass façade with a curved top. The entire lower level rendered brick cladding has been replaced with cement sheet cladding. The property has been repainted/re-rendered a number of times.</p> <p>The upper-level façade has also been altered with the original sash windows replaced with more modern frames and glazing as well as wrought iron window baskets installed.</p> <p>The original 'symmetrical' plan is no longer visible with both original outside toilets and sheds having been removed and replaced in stages with a variety of ad-hoc additions including an extension to the original property, covered courtyard area and disabled toilet room.</p>	<p>The re-assessment of the subject property is appropriate as some assessments from earlier studies of the 1980s and 1990s will be outdated - refer to my response at 4.2 above.</p> <p>Large-scale modification to ground level shop fronts is a widespread occurrence within the Hoddle Grid and the degree of alteration at 470-472 Little Lonsdale Street is commensurate with other Individual Heritage Places included in the Heritage Overlay of the Melbourne Planning Scheme - refer to my response at 4.4 above.</p> <p>Alterations to the upper level are generally limited to the installation of wrought iron window baskets. These easily reversible elements have not diminished the ability to understand and appreciate the place as an example of a Victorian shop and residence within the City of Melbourne.</p> <p>Changes to the interior have no impact on the appearance and character of the building as viewed from the public realm and do not diminish the overall significance of the place as outlined in the exhibited Statement of Significance. Internal alteration controls are not being proposed. Overall the place retains notable features associated with the place type and period, and it warrants inclusion in the Heritage Overlay under Criterion A (historical significance) and Criterion D (representativeness).</p> <p>The principal consideration in applying the Heritage Overlay is whether the place reaches the threshold for local heritage significance. The impact on individual owners in relation to the future use and development of a property is not relevant in determining the heritage significance of a place - refer to my response at 4.6 above.</p>

<p>The wall separating the two shops has been removed in large sections both downstairs and upstairs with only one set of stairs remaining and as such the property has lost its 'symmetry'. Additionally, a small extension was completed to the first floor as well as a series of skylights having been installed.</p> <p>Due to extensive alterations to the face over the past few decades it does not meet the definition of being externally intact. The building lacks any real notable architectural features associated with the Victorian era architecture and as such cannot be considered a representative example of the period or style.</p> <p>The buildings referenced in the comparative analysis (35-37 Bourke Street, and 203-205 Queen Street) are far higher quality and more architecturally detailed than this building. Additionally, the building at 215-217 Elizabeth Street is far higher quality and size than this building. The building does not meet the historical or representativeness criteria given the changes to the building.</p> <p>When the property was purchased in 2012 it was not within or proposed to be within a Heritage Overlay. The application of a Heritage Overlay will limit the potential use and development of the site and impact on its value.</p>	
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5.3.4 Former Cassells Tailors Pty Ltd, 341-345 Elizabeth Street



Summary of significance (as exhibited)

[108] 341-345 Elizabeth Street is assessed as being locally significant for the following reasons:

- for the evidence it provides of the 1920s boom period in manufacturing. At this time, industrial workshops and small factories increasingly took over the northwest area of the city as manufacturing led Melbourne's recovery from the economic depression of the late 1920s-early 1930s (Criterion A).
- as a modestly scaled, but highly intact early example of the interwar Chicagoesque style that characterised the early phase of this new wave of development (Criterion D).

Response to submission received

[109] Two objecting submissions were received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p><u>Submission 11</u></p> <p>There is no strategic or heritage basis to support "uplift" of the grading of the Subject Site from "C" or contributory to significant. The current heritage policy (contained within Clause 22.04 of the Melbourne Planning Scheme) applies equally to significant and contributory buildings (see page 6 of the policy).</p> <p>The Subject Site was previously graded (prior to introduction of Amendment C271) a "C" graded building and we see no rigorous or independently tested evidence which justifies this "uplift" in heritage significance through either Amendment C271 or the present amendments.</p> <p>The immediately adjacent building at 347 Elizabeth Street (which has similar architectural form and age) has been classified as "contributory".</p>	<p>The assessment of 341-345 Elizabeth Street was undertaken in accordance with PPN1. The place has been assessed against the Heritage Criteria set out in the Practice Note and it is considered that the significance of the building is adequately demonstrated in the exhibited heritage citation and Statement of Significance.</p> <p>The re-assessment of the subject property is appropriate as some assessments from earlier studies of the 1980s and 1990s will be outdated - refer to my response at 4.2 above.</p> <p>The building exhibits fine detailing and architectural features which elevates its aesthetic significance above the adjacent property which displays typical rather than exceptional characteristics of the period in which it was constructed. Further, the building displays a similar level of intactness and integrity to other buildings of this period that are included in the Heritage Overlay and/or have been assessed as being 'Significant'.</p>
<p><u>Submission 64</u></p> <p>A planning permit has been issued.</p> <p>The change of heritage controls over the building is entirely unnecessary and this site should be removed from Amendment C387.</p>	<p>Amendment C387 does not affect permit TP-2020-463 which allows for the re-development of 337-347 Elizabeth Street - refer to my response at 4.5 above.</p>

5.3.5 Former Paramount House, 256-260 King Street



Summary of significance (as exhibited)

[110] 256-260 King Street is assessed as being locally significant for the following reasons:

- for its ability to demonstrate one aspect of Melbourne’s social and cultural history related to the provision of entertainment and the transmission of American popular culture through film from the interwar period (Criterion A).
- as a rare surviving example of a purpose-built interwar commercial building associated with the film industry. Its exclusive long-term use (from 1930 to 1989) as the core distribution centre is significant, as no other building of its type within Hoddle Grid is known to have such long-term association (Criterion B).

Response to submission received

[111] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>The citation for the Subject Site describes its integrity as moderate/high, it is only moderately intact.</p> <p>The cultural heritage significance of the Subject Site has been overstated as the building does not demonstrate to any appreciable extent its former use as a commercial building associated with the film industry. The building is a standard example of an interwar commercial building that has been altered and is of moderate integrity to its original appearance.</p> <p>No architectural significance is ascribed to the building.</p>	<p>The place is intact to its principal upper-level façade, retaining its decorative panels, cornice, fenestrations, patterns of openings and steel-framed multi-pane windows. The large-scale modification to ground level facades is a widespread occurrence within the Hoddle Grid and the degree of alteration at 256-260 King Street is commensurate with other Individual Heritage Places included in the Heritage Overlay of the Melbourne Planning Scheme.</p> <p>The place has a clear association with Melbourne’s film industry as a commercial building constructed in Melbourne in 1929 as a headquarters for prominent international film distribution companies. It is also significant as a rare surviving example of a purpose-built interwar commercial building associated with</p>

<p>The Subject Site was graded 'D' in the 1985 Central Activities District Conservation Study (Butler) and then graded 'C' in the 1993 Central City Heritage Study Review (Raworth et al), a grading that did not identify significance that would warrant a site-specific heritage control.</p>	<p>the film industry, a use that differs from the cinemas themselves. GJM contends that this association is evident in the tripartite articulation of the first-floor façade with flanking pavilions.</p> <p>The place is significant at a local level for its historical associations and rarity. It is not considered to be of aesthetic (or architectural) significance.</p> <p>The re-assessment of the subject property is appropriate as some assessments from earlier studies of the 1980s and 1990s will be outdated - refer to my response at 4.2 above.</p>
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5.3.6 Shops and residences, 53-57 Lonsdale Street



Summary of significance (as exhibited)

[112] 53-57 Lonsdale Street is assessed as being locally significant for the following reasons:

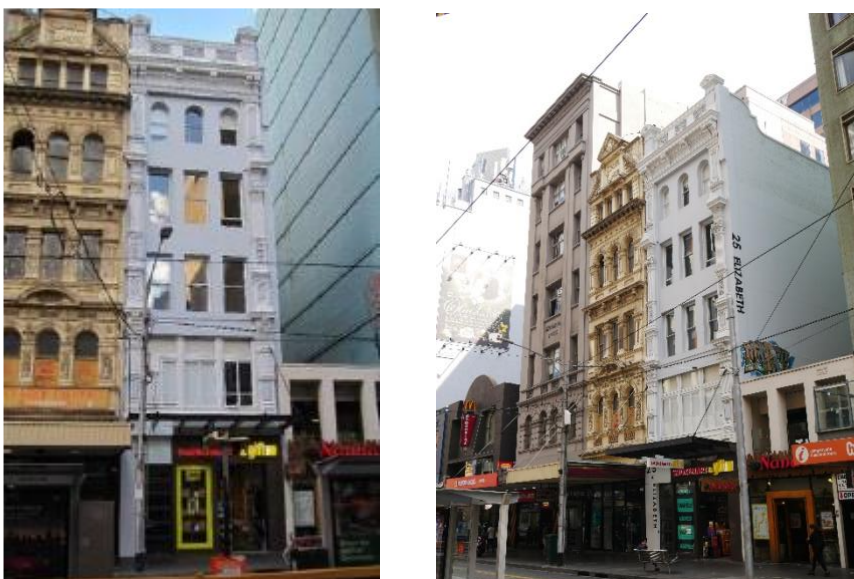
- for its links with Melbourne Italian restaurateur families who conducted eating houses in the building from 1901 to 2001 and for its demonstration of the flourishing Italian café society that developed in the first decades of the twentieth century prior to Italian migrants establishing restaurants and pizza cafes in the inner-city area in the 1950s and 1960s (Criterion A).
- as a fine example of a small-scale shop and residence from the mid-late Victorian period, built at a time when Melbourne was developing rapidly as a retail and commercial centre (Criterion D).
- for its long association with Italian restaurants, restaurateurs and their clientele for nearly a century (1901-2001) as part of Melbourne dining traditions, and for its direct and long-standing associations with several important Italian restaurateurs/families who have significantly influenced Melbourne's culinary culture, and who introduced new cuisines and dining styles to Melbourne (Criterion H).

Response to submission received

- [113] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>The significance of the building has not been adequately demonstrated.</p> <p>The periodic use of the building as a restaurant is not sufficient to demonstrate a “flourishing Italian café society”. The importance of the Italian influence in Melbourne is more appropriately demonstrated by other buildings and locations (for example, in Lygon Street, Carlton).</p> <p>The architects of the building - Crouch and Wilson - are noted by Council to be “civic and institutional” architects. This example of their work is a rudimentary shop with dwellings above, and it is not an example of the work for which they were known or recognised.</p> <p>The design of the shops and dwellings above is considered by Council to be “modest” and on this basis the identification of the property for heritage protection fails to implement the methodology in the Review which is to identify particularly early, rare or fine examples, or having exceptionally strong historic or other heritage values.</p>	<p>The assessment of 53-57 Lonsdale Street was undertaken in accordance with PPN1. The place has been assessed against the Heritage Criteria set out in the Practice Note and it is considered that the significance of the building is adequately demonstrated in the exhibited heritage citation and Statement of Significance.</p> <p>The subject site has a clear association with Italian ‘culinary traditions’ and Italian restaurateur families through the long-term use and occupation of the site as Italian restaurants periodically from 1922 until 2001, as outlined in the exhibited Statement of Significance for the place. It predates the postwar boom of Italian restaurant culture in other locations within the City of Melbourne, such as Lygon Street.</p> <p>The place is recognised as an example of the work of architects Crouch and Wilson under Criterion D, however the property is not asserted to be significant for this association (Criterion H), but rather as a ‘fine example of a small-scaled shop and residence’ (Criterion D).</p> <p>53-57 Lonsdale Street is locally significant as ‘a fine example of a small-scale shop and residence... built at a time when Melbourne was developing rapidly as a retail and commercial centre’, as expressed in the Statement of Significance for the place.</p>

5.3.7 Former Universal House, 25 Elizabeth Street



Summary of significance (as exhibited)

[114] 25 Elizabeth Street is assessed as being locally significant for the following reasons:

- for its association with Melbourne's retail development during the boom years of the 1880s and for its association with the Hordern Australian retailing dynasty, who operated stores and other ventures in Australia from 1844 until 1970 (Criterion A).
- for demonstrating its Victorian origins despite its altered form and somewhat stripped back façade. The scale, height and form continue to demonstrate a typical commercial building from the late nineteenth century (Criterion D)
- for its aesthetic significance for its remaining 1880s decorative stucco detail and the pattern of upper floor windows, including the joinery of the first-floor windows (Criterion E).

Response to submission received

[115] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>The significance of the building has not been adequately demonstrated.</p> <p>The citation attributes the building to have historical significance (Criterion A) due to the association with Melbourne's retail development. This connection has not been sufficiently demonstrated.</p>	<p>The assessment of 25 Elizabeth Street was undertaken in accordance with Planning Practice Note 1: Applying the Heritage Overlay. The place has been assessed against the Heritage Criteria set out in the Practice Note and it is considered that the significance of the building is adequately demonstrated.</p> <p>The place's historical connection with Melbourne's retail development is clearly demonstrated through</p>

<p>The citation indicates that the building demonstrates its Victorian origins and is a typical commercial building. In relation to Criterion D the building is a poor representation of a late 19th century commercial building, owing to its various alterations over time.</p> <p>On this basis the identification of the property for heritage protection fails to implement the methodology in the Review, which is to identify particularly early, rare or fine examples, or having exceptionally strong historic or other heritage values.</p> <p>The architectural significance of the building has been overstated. The citation indicates that the building is aesthetically significant for its remaining stucco detailing and the pattern and joinery of upper floor windows. These elements in isolation are not sufficient to achieve the requirements of Criterion E, which requires demonstrated importance in aesthetic characteristics.</p> <p>The building does not contribute towards a meaningful streetscape of heritage significance when considered in concert with 17 -19 or 21 - 23 Elizabeth Street. There is minor factual interest in the same architect designing three buildings adjacent to each other, but that fact has not created significance in its own right to warrant protection for No. 25.</p> <p>Council notes that the significance of the building is as part of a group of three buildings designed by the same architect, being 17 Elizabeth Street (also proposed for protection in Amendment C387) and 21 Elizabeth Street (included in HO1015). The Council is proposing an individual heritage overlay and the significance of the site as part of a group of three buildings has not been adequately analysed or demonstrated.</p>	<p>its association with the retailing boom of the 1880s. The building has a clear historical association with this important phase of Melbourne's development. The Hordern family was one of a number of prominent retailers from this time. Having said that, it is accepted that the assessment under Criterion A places undue emphasis on the Hordern family rather than role of the building in reflecting the wider historical association with retail growth in this part of the Hoddle Grid. It is therefore recommended that the Statement of Significance be amended to clarify the expression of the building's historical significance.</p> <p>While substantial aspects of the architectural ornamentation of the façade remain, including to the first-floor level, the parapet with deep moulded cornice, the dentil band and decorative scroll brackets, and the elaborate flanking pilasters, the windows to the second, third and fourth floors had their decorative mouldings removed in the 1960s. On further review of historical photographs and when compared to the neighbouring building at 21-23 Elizabeth Street (HO1015) (also designed by William Salway), the loss of the decorative features reduces the intactness of the original design intent of the façade to the point that it does not meet the threshold for Criterion E (aesthetic significance).</p> <p>Having said that, it remains my opinion that this building, like 17-19 and 21-23 Elizabeth Street, demonstrates the historic retail development of Melbourne from the 1880s (Criterion A) and is representative of this class of commercial building through its scale, height, form and architectural detail (Criterion D).</p> <p>The Statement of Significance for 17-19 Elizabeth Street (also proposed for an Individual Heritage Overlay as part of C387) also identifies the aesthetic value of the group as a whole. The three buildings, all designed by architect William Salway in the 1880s, are a legible grouping which clearly demonstrate the historical development and evolution of retail properties in the city from the boom period of the 1880s to the interwar period; however, the buildings are considered to satisfy the threshold for individual significance.</p>
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Updates to Amendment C387 following exhibition

- [116] I recommend that Criterion E (aesthetic significance) be removed from the Former Universal House Statement of Significance (25 Elizabeth Street, Melbourne), July 2020.
- [117] Further, I recommend that Criterion A (historical significance) under ‘Why is it significant?’ in the Former Universal House Statement of Significance (25 Elizabeth Street, Melbourne), July 2020 be altered to remove undue emphasis on the Hordern family and focus on the building’s role in reflecting the wider historical association with retail growth in this part of the Hoddle Grid as follows:

25 Elizabeth Street is of historical significance for its association with Melbourne's retail development during the boom years of the 1880s. 25 Elizabeth Street was one of three adjacent buildings designed by architect William Salway: the subject building (built 1889); 21-23 Elizabeth Street (built 1890); and 17-19 Elizabeth Street (built 1885; remodelled 1925). Built in 1889 for Celia Hordern of the Hordern family retailing dynasty as a warehouse with hospitality and retail uses 25 Elizabeth Street clearly demonstrates this important phase of development in the city.
(Criterion A)

5.3.8 Warehouses, 577-583 Little Collins Street



Summary of significance (as exhibited)

- [118] 577-583 Little Collins Street is assessed as being locally significant for the following reasons:
- for its association with manufacturing and warehousing in the City of Melbourne (Criterion A).
 - as a flour mill complex known as City Flour Mills constructed for Russell and Gillespie in 1875 (Criterion A).
 - as a representative example of brick and render warehouse buildings constructed in the Victorian period in the City of Melbourne (Criterion D).

Response to submission received

[119] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>The Subject Site does not meet the threshold for individual significance to the City of Melbourne. An individual heritage overlay place requires a higher level of significance and intactness to warrant this form of protection.</p> <p>The buildings do not have aesthetic or architectural significance. The interiors and facades of the buildings do not have heritage or cultural significance.</p>	<p>The properties meet the threshold for individual significance as demonstrated in the exhibited heritage citation and Statement of Significance. The citation and Statement of Significance have been undertaken in accordance with PPN1 and it is considered that there is sufficient justification to warrant the application of a Heritage Overlay.</p> <p>The Statement of Significance for the property does not ascribe aesthetic significance to the buildings. They are considered to be of historic and representative significance. There is also no significance ascribed to the interiors and internal alteration controls are not proposed.</p>

5.3.9 Former Craig, Williamson Pty Ltd complex, 57-67 Little Collins Street



Summary of significance (as exhibited)

[120] 57-67 Little Collins Street is assessed as being locally significant for the following reasons:

- for its clear association with the growth in manufacturing that was part of the buoyant new economy in early twentieth century Melbourne following the economic depression of the 1890s and new federal tariffs introduced in the early 1900s (Criterion A).
- for its association with the Commonwealth Postmaster-General's Department from 1932-88 (Criterion A).
- as the site of the Mayser or 'atomic clock' that supplied accurate timekeeping to all master clocks in Australia (Criterion A).

- as a representative example of an interwar industrial building which maintains its rhythm, scale and form from the 1925 period (Criterion D).

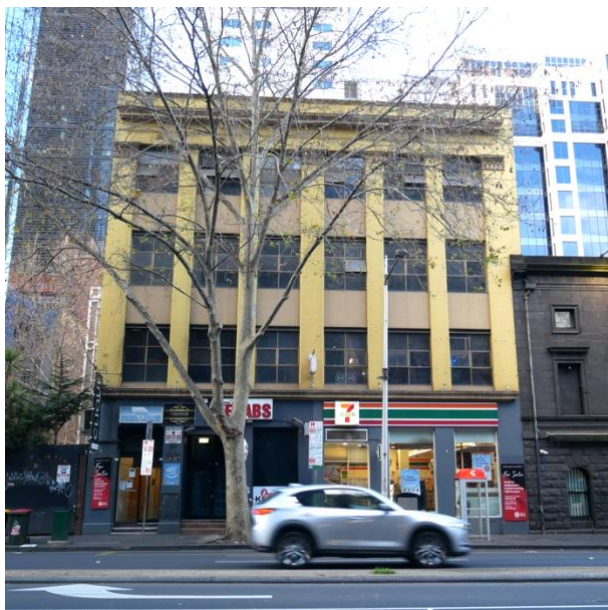
Response to submission received

[121] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>There is no justification for placing a Heritage Overlay over the Site.</p> <p>Criterion A (historical) has not been met as there is no physical evidence of Craig Williamson Pty Ltd's activities on the site nor is there any physical evidence of the activities of any Commonwealth government department (including pre-Canberra phase), or the Mayser clock...Craig Williamson used the buildings for a period of approximately 17 years only and it was secondary to their showroom in Elizabeth Street. The Commonwealth government occupied the building for a period of only 61 years between 1927-1988. The building was not designed or constructed for the Commonwealth, rather extensions with footing having a greater load-bearing capacity were designed, possibly never constructed like the other intended works which did not proceed.</p> <p>Criterion D (representativeness) has not been met. There is minimal and undistinguished decoration on the façade. The existing windows may not be original and other than for the masonry piers and lintels all the ground floor façade has been remodelled recently. Internally the upper floors have been renovated to provide an open plan with various areas having modern partitions. There is a timber roof deck above the eastern portion. The level of integrity of the building has been compromised by numerous alterations.</p> <p>While the place/object may be one of a class (interwar industrial buildings), there is no clear association, beyond historical fact, with any event, phase, period, process, function, movement, important persons, custom or way of life in Melbourne's history.</p> <p>The relevance of the comparative examples is questionable. While 258-274 Queensbury Street, Carlton and 401-405 Little Bourke</p>	<p>The assessment of 57-67 Little Collins Street was undertaken in accordance with PPN1. The place has been assessed against the Heritage Criteria set out in the Practice Note and thorough comparative analysis undertaken to substantiate the significance of the place. The exhibited heritage citation and Statement of Significance for the place provides sufficient justification for the implementation of a Heritage Overlay.</p> <p>The assessment against Criterion A (historical significance) does not rely solely on the association with Craig Williamson Pty Ltd but on the evolution of manufacturing in this part of Melbourne in the early twentieth century. This building also housed the Mayser or 'atomic clock' which performed an important public service across Australia. The 60-year use of the site by the Commonwealth is considered to strongly contribute to the historical significance of the place.</p> <p>The architectural expression of the building, while not highly elaborate, is clearly representative of commercial buildings of this type dating from the early part of the twentieth century.</p> <p>The level of alteration to the building is appropriately acknowledged in the citation. Having said that, the level of integrity of the building is such that its historic form, rhythm and architectural detailing remains clearly legible and the place is considered to satisfy Criterion D (representative significance). While the comparative examples provided in the citation are generally larger-scale structures, the building at 57-67 Little Collins Street remains a largely intact representative example of this factory / warehouse building of the early twentieth century.</p>

Street, Melbourne have some relevance in terms of materiality, the comparison stops there. These are both much more substantial buildings. As for the other examples, which having similar façade articulation and minimal detailing, their relevance is questionable.	
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5.3.10 Warehouse, 26-32 King Street



Summary of significance (as exhibited)

[122] 26-32 King Street is assessed as being locally significant for the following reasons:

- as surviving evidence of warehousing in this part of the city of Melbourne, which was integral to the economic activity of the original port that continued into the 1950s (Criterion A).
- as a substantially intact example of the wave of warehouse development in the western port area of Melbourne during the late Edwardian and early interwar period that replaced the low scale masonry warehouses of the nineteenth century. The King Street façade is an intact and representative example of this Chicagoesque stylistic tendency (Criterion D).

Response to submission received

[123] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
The citation does not provide a convincing basis for inclusion based on Criterion A (historical) or Criterion D (representativeness).	The assessment of 26-32 King Street was undertaken in accordance with PPN1. The place has been assessed against the Heritage Criteria set out in the Practice Note and thorough comparative analysis

<p>The building was constructed in 1911 and does not exhibit its original fabric as modifications were made in 1923 and also between 1952 and 1954. The works carried out in this period do not reflect the association with the development of Melbourne as a trading port or reflect anything significant about the evolution of Melbourne. Its social connection with the port and the growth of the CBD is not so remarkable as to warrant heritage protection.</p> <p>There is nothing remarkable about the structure that makes it stand out and there are likely to be other comparable buildings in Melbourne that are not in the Capital City Zone, where high rise buildings can be permitted.</p> <p>The justification for inclusion of a heritage place in the Melbourne CBD must be strong, compared with other locations. The Melbourne Planning Scheme allows tower style developments in this location. As such, the argument for heritage protection should be strong enough to justify the need for a built form response that retains fabric, rather than just a commemorative plaque.</p> <p>We have an interest in acquiring the adjoining undeveloped title to the north on the corner of Flinders Lane. If a Heritage Overlay is applied this may undermine future efforts to consolidate the two titles to achieve a more flexible development footprint.</p>	<p>undertaken to substantiate the significance of the place.</p> <p>The property is of historical significance to the City of Melbourne as a surviving example of a substantial warehouse associated with the shipping and merchant trades that were constructed in this part of the city in the late nineteenth and early twentieth centuries. The place is illustrative of the historical development of this part of the city in the late nineteenth century, when a substantial number of warehouses were built to service Melbourne's trading port. As a surviving remnant of the extensive Zanders Bonded Stores that occupied most of the northern half of the block between Highlander Lane and King Street in the late-nineteenth century, it has a clear association with early warehousing in the area and the shipping and merchandising industries that populated this part of the city to the 1950s.</p> <p>The building is an intact example of a substantial warehouse that compares favourably with other examples within the City of Melbourne that are included in the Schedule to the Heritage Overlay of the Melbourne Planning Scheme. As outlined in the Statement of Significance, both the 1911 built form and scale and the c1923 decorative features contribute to the significance of the place.</p> <p>The building has not been identified as aesthetically significant (Criterion E), but rather is of representative significance (Criterion D) for clearly demonstrating the principal characteristics of the Chicagoesque style. The internal modifications to the building that were carried out in the 1950s have had no impact on the character, presentation or appearance of the building and internal alteration controls are not proposed.</p> <p>The effect of the proposed Heritage Overlay on future development outcomes on this site or adjoining sites is not relevant to establishing whether the building meets the threshold for local significance. Likewise, the effect of the proposed Heritage Overlay on future applications to consolidate land titles is not relevant to establishing whether the building meets the threshold for local significance - refer to my response at 4.6 above.</p>
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5.3.11 Warehouse, 410-412 Lonsdale Street



Summary of significance (as exhibited)

[124] 410-412 Lonsdale Street is assessed as being locally significant for the following reasons:

- for its association with development that proliferated in this part of the city, between Bourke and Lonsdale streets, from the 1880s to 1920s (Criterion A).
- as a highly intact example of the wave of development in central Melbourne during the early interwar period that replaced the low scale masonry buildings dating from the late nineteenth and early twentieth century (Criterion D).

Response to submission received

[125] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>The basis on which the permanent controls are advanced requires further examination and justification particularly where a significant grading is proposed within the Inventory.</p> <p>The introduction of individual Heritage Overlays are required to be more detailed and updated with a methodology befitting the significance and nature of the Amendment particularly within the context of the central city.</p>	<p>The assessment of 410-412 Lonsdale Street was undertaken in accordance with PPN1. Both places have been assessed against the Heritage Criteria set out in the Practice Note and thorough comparative analysis and it is considered that the significance of the buildings is adequately demonstrated in the exhibited heritage citations and Statements of Significance.</p> <p>The HGHR has been undertaken in a manner that has allowed for a rigorous and comprehensive assessment of places located within the study area. A detailed explanation and summary of the</p>

<p>Previous studies identified the building at 410-412 Lonsdale Street as follows:</p> <p>Central Activities District Conservation Study (1985) – graded ‘E’ in the context of a six tier grading system ‘A-F’.</p> <p>Central City Heritage Study 1993 – Graded ‘C’ which is in the context of a three tier grading system ‘A-C’.</p> <p>The methodology used to convert previous gradings to the current tiered grading system particularly in the context of the transformation from the respective C gradings in the 1993 Study to the current respective significant gradings.</p> <p>Our clients separately own and hold interest in 410-412 Lonsdale Street, Melbourne and 414-416 Lonsdale Street, Melbourne. To date, preliminary planning has identified potential opportunities for our clients to redevelop their sites jointly or separately and both are concerned that the application of the proposed controls will unreasonably preclude redevelopment opportunities.</p>	<p>methodology, which has been undertaken in accordance with PPN1, is included in Volume 1 of the Review. I consider the assessment methodology and level of information provided in relation to individual heritage places to be satisfactory to warrant their inclusion on the Heritage Overlay.</p> <p>The re-assessment of the subject property is appropriate as some assessments from earlier studies of the 1980s and 1990s will be outdated - refer to my response at 4.2 above.</p> <p>The effect of the proposed Heritage Overlay on future development outcomes on this site or adjoining sites is not relevant to establishing whether the building meets the threshold for local significance - refer to my response at 4.6 above.</p>
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5.3.12 Alley Building, 75-77 Flinders Lane (‘significant’ within Flinders Lane East Precinct)



Summary of significance (as exhibited)

- [126] The Flinders Lane East Precinct is assessed as being locally significant for the following reasons:
- for its association with manufacturing and warehousing principally for the clothing and textile businesses, colloquially referred to as the ‘rag trade’, between the 1850s and the 1930s (Criterion A).

- for its low-rise built form and street pattern that represents the pre-modern city (Criterion D).
- for its views down Oliver, Malthouse and Higsons Lanes. It is also aesthetically significant for its nearly complete streetscape of small lot buildings up to six storeys in height and built to the property boundaries (Criterion E).

Response to Submission received

[127] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
The building should be categorised as not significant and not be categorised as significant or contributory to the Precinct.	<p>The Flinders Lane East Precinct represents the commercial and manufacturing history of the textile, clothing and related industries that operated in the locality from the 1880s through to the 1960s.</p> <p>75-77 Flinders Lane is currently subject to a site-specific Heritage Overlay (HO1026). The existing Statement of Significance for 75-77 Flinders Lane notes that the building is an interwar warehouse that has had a long and enduring association with the clothing trade in this part of the city. It is evident the place makes an important historical and architectural contribution to the precinct and there is substantial justification for its inclusion in the Flinders Lane East Precinct.</p> <p>The direct transfer of the property from an individual Heritage Overlay to 'significant' within the precinct is appropriate and reflects the building's important contribution to the precinct while also being a 'heritage place in its own right'.</p>

5.3.13 Former Andrew Jack, Dyson & Co Factory, 594-610 Lonsdale Street



Summary of significance (as exhibited)

[128] 594-610 Lonsdale Street is assessed as being locally significant for the following reasons:

- for the evidence it provides of the rise in manufacturing in the city from the 1920s, of the long-term industry and warehouse concentration in this part of the city, and of the many printing and linotype companies established from the interwar period in this northwest part of the city (Criterion A).
- as a relatively intact example of the wave of development in central Melbourne during the early interwar period that replaced the low-rise masonry buildings dating from the late nineteenth and early twentieth century (Criterion D).

Response to submission received

[129] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
The heritage citation does not sufficiently detail the effects of the alteration of the building on its heritage significance.	As set out in the exhibited heritage citation and Statement of Significance, the building retains a high degree of integrity in fabric, form and detail. While the building has undergone some alterations, these do not diminish the ability to understand and appreciate the place as a fine example of an interwar factory built in the City of Melbourne.

5.3.14 Factory and warehouse, 107-109 Flinders Lane ('contributory' within Flinders Lane East Precinct)



Summary of significance (as exhibited)

[130] The Flinders Lane East Precinct is assessed as being locally significant for the following reasons:

- for its association with manufacturing and warehousing principally for the clothing and textile businesses, colloquially referred to as the ‘rag trade’, between the 1850s and the 1930s (Criterion A).
- for its low-rise built form and street pattern that represents the pre-modern city (Criterion D).
- for its views down Oliver, Malthouse and Higsons Lanes. It is also aesthetically significant for its nearly complete streetscape of small lot buildings up to six storeys in height and built to the property boundaries (Criterion E).

Response to submission received

[131] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>The Heritage Overlay should not apply to the building as there is no architectural or aesthetic significance.</p> <p>The building does not represent a historical association with the manufacturing and warehousing of the historical clothing and textile businesses.</p> <p>The building does not enhance the intimate scale of ACDC Lane.</p>	<p>The proposed contributory grading for the building at 107-109 Flinders Lane is appropriate. The building has a direct association with the manufacturing and textile industries that characterise the Flinders Lane East Precinct, having accommodated a number of manufacturers including makers of leather goods, underclothing and children’s clothing manufacturers and later the ladies clothing manufacturer Lisscraft Creations. It reflects the ‘continued demand in the 1920s for factory and warehouse space in the city centre for the growing manufacturing sector’, which is an important element of the precinct’s significance.</p> <p>The place is not aesthetically significant in its own right but it is noted that its architectural form and detailing clearly contributes to the overall values of the proposed heritage precinct.</p> <p>The scale of the building abutting ACDC Lane provides a sense of enclosure and contributes to the heritage character of the laneway.</p>

5.3.15 Former John Danks & Son, 393-403 Bourke Street



Summary of significance (as exhibited)

[132] 393-403 Bourke Street is assessed as being locally significant for the following reasons:

- for its long association with and use for, in part and whole, hardware retail, operating virtually uninterrupted for 148 years from c1859 to 2007 (Criterion A).
- as a largely intact example of the first wave of early twentieth-century mid-rise warehouse building development in central Melbourne (Criterion D).
- for its well-executed use of eclectic Art Nouveau and earlier Victorian details, including cornices, semicircular arches, brackets, rusticated end bays, decorative floral garlands, pattern of window openings and oriel windows (Criterion E).

Response to submission received

[133] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
Do not support the introduction of a site-specific Heritage Overlay over the site. The level of significance afforded to the site by an individual Heritage Overlay is obstructive, given the existing development on site, which already includes retention of the 'significant' heritage elements of the Foundry Building.	I agree that the heritage values of this site are now limited to the ornate six storey façade and its return elevations given the construction of a 30-storey tower since the initial survey undertaken by Context. The cadastral block for this site is highly irregular and substantially larger than the extent of the heritage built form. It is therefore appropriate to reduce the mapped extent of the proposed Heritage Overlay to more closely align with the principal heritage form of the heritage building.
Should the Amendment proceed with inclusion of an individual Heritage Overlay on this site, it is requested that the extent of the citation is	

reduced to only apply to the 399 Bourke Street façade, where the Foundry Building has, in most part, already been retained. The heritage overlay should not apply to the building as there is no architectural or aesthetic significance.	
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Updates to Amendment C387 following exhibition

[134] In response to the submission, I recommended that:

- The extent of individual Heritage Overlay HO1307 on Planning Scheme Map 8HO1 is reduced to more closely align with the retained heritage building John Danks & Son building at 393-403 Bourke Street, Melbourne. [insert the revised HO extent prepared by CoM]
- The Former John Danks & Son Statement of Significance (393-403 Bourke Street, Melbourne), July 2020 is revised to reflect the extent of individual Heritage Overlay HO1307.
- HO1307 within the Schedule to Clause 43.01 is revised to refer to Part 393-403 Bourke Street, Melbourne and the revised Statement of Significance.
- The Former John Danks & Son Statement of Significance (393-403 Bourke Street, Melbourne), July 2020 within the Schedule to Clause 72.04 is revised to refer to the revised Statement of Significance.
- The address within the Heritage Places Inventory February 2020 (Amended July 2020) Part A is revised to refer to Part 393-403 Bourke Street, Melbourne.

5.3.16 Former Rockman’s Showrooms Pty Ltd, 188 Bourke Street



Summary of significance (as exhibited)

[135] 188 Bourke Street is assessed as being locally significant for the following reasons:

- for the evidence it provides of an important phase in Melbourne's retail history; the rise in popularity of the chain store retailers from the 1920s in the central city (Criterion A).
- as a finely detailed, modestly-scaled example of a Jazz Moderne commercial building in central Melbourne (Criterion D).

Response to submission received

[136] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>The building whilst retaining some original features has had considerable alterations occur since its construction in 1937 including the shop front and replacement of the first-floor windows.</p> <p>The site is relatively small with a narrow frontage. Given the scale of buildings to both the east and west the subject building is largely screened from the public realm with its significantly altered shop frontage being the most prominent feature</p>	<p>The alterations to the building at the ground level and to the first-floor windows do not diminish the ability to understand and appreciate the place as an example of an interwar retail building within the City of Melbourne. Wholesale modifications to ground level shop fronts is a widespread occurrence within the Hoddle Grid and the level of alteration is commensurate with buildings of similar age and architectural style included in the Heritage Overlay of the Melbourne Planning Scheme.</p>

5.3.17 Great Western Hotel, 204-208 King Street



Summary of significance (as exhibited)

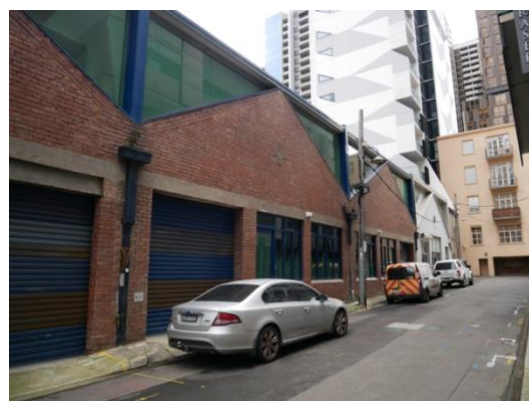
- [137] 204-208 King Street is assessed as being locally significant for the following reasons:
- as a substantial early-Victorian purpose-built hotel in Melbourne (Criterion A).
 - as a largely intact example of a substantial early Victorian hotel building on a prominent corner site (Criterion D).
 - for its long connections with the city, serving as a social meeting place for a diverse clientele for more than 150 years (Criterion G).

Response to submission received

- [138] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
The previous lack of heritage significance attributed to the site through various heritage studies by the City of Melbourne and the site does not currently have a Heritage Overlay.	<p>The re-assessment of the subject property is appropriate as some assessments from earlier studies of the 1980s and 1990s will be outdated - refer to my response at 4.2 above.</p> <p>Early properties, such as those from the 1850s-1870s are increasingly more highly valued due to recognition of their rarity. The Great Western Hotel is one of only a small number of early-Victorian purpose-built hotels that remain in central Melbourne and it warrants the application of an Individual Heritage Overlay for the reasons outlined in the exhibited heritage citation and Statement of Significance.</p>

5.3.18 134-144 Little Lonsdale Street and 17-23 Bennetts Lane ('contributory' within Little Lonsdale Street Precinct)



Summary of significance (as exhibited)

- [139] The Little Lonsdale Precinct is assessed as being locally significant for the following reasons:
- for its demonstration of less salubrious 'fringe' areas in the central city, and as a working-class residential precinct for mostly Irish immigrants who had settled by the late 1840s and early 1850s in an area referred to as 'Little Lon' (Criterion A).
 - for its association with phases of migration, firstly by the Irish, and later by the Chinese, Germans, Jews, Lebanese and Italians who were part of a later wave of migration after the 1890s depression (Criterion A).
 - as a remnant of the vibrant and complex community that evolved in the area from the 1840s (Criterion A).
 - for its evidence of at least three phases of development from the 1870s to the 1940s (Criterion D).

- for the combination of low-scale two to three storey buildings on both Little Lonsdale Street and within its laneway network (Criterion E).
- Part of the precinct is associated with King O'Malley (1858-1953), a North American politician who rose through the Australian Labor Party ranks to become minister for home affairs, a prominent advocate against conscription and supporter of women's rights (Criterion H).

Response to submission received

[140] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
Given the extent of the intervention already evident to these properties and the permitted works approved by TP-2018-1112 it is not appropriate to introduce any further heritage controls on the land.	<p>The properties at 134-144 Little Lonsdale Street and 17-23 Bennetts Lane have been subject to previous alteration, including the addition of new built form. Notwithstanding this, the remaining fabric as presented to the street/laneway is considered to contribute to the identified historic and industrial architectural values of the precinct, as contained in the exhibition heritage citation.</p> <p>Amendment C387 does not affect permit TP-2018-1112 which allows for the re-development of 134-144 Little Lonsdale Street and 17-23 Bennetts Lane - refer to my response at 4.5 above.</p>

5.3.19 Former Morris House, 114-122 Exhibition Street



Summary of significance (as exhibited)

- [141] 114-122 Exhibition Street is assessed as being locally significant for the following reasons:
- for its association with the Charity Organisation Society (Victoria), an influential organisation established in Melbourne in 1887 as an offshoot of its British antecedent (Criterion A).
 - for its ownership and use by the Australian-American Association from 1957 to 1973, specifically as clubrooms for female members (Criterion A).

- as an example of the interwar classical revival style that was popular for government buildings, banks and other commercial premises built during the decades after World War One (Criterion D).

Response to submission received

[142] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>The criteria and elements of significance identified in the Statement of Significance are insufficient and inadequate to justify the imposition of permanent heritage controls on the subject site.</p> <p>The site is not significant as evidenced by the limited application against nine possible criterion. It is recognised that Council referred to the recognised heritage criteria in the HGHR established by the Practice Note. Only two criterion out of a possible nine criterion are referenced so the site has not been sufficiently justified against the recognised heritage criteria.</p> <p>The subject site does not meet the criteria established by Criterion A (historical significance) in an obvious or substantive manner. Although the original charity-based uses and subsequent use as a club are interesting, these former uses are not well known to the community and are no longer associated with the subject site. It is noted that the Subject Site was considered to have unlikely social value as set out in the social value analysis contained in the HGHR. The previous uses of the site lack a clear historical association and these uses are largely unknown to the public.</p> <p>The previous uses of the site were short in tenure and other comparable charitable institutions and clubs (eg. Mission to Seafarers at 717 Flinders Street and the Alexander Club at 81 Collins Street are more widely known and readily manifested in the respective building's fabric, which is not the case for the subject site.</p> <p>The site does not meet the criteria established by Criterion D (representativeness). The site is not a notable example of the interwar classical revival style as there is no evidence to suggest that it is particularly influential or pivotal. It is</p>	<p>The assessment of 114-122 Exhibition Street was undertaken in accordance with PPN1. It is only necessary for a place to satisfy one of the heritage criteria set out in PPN1 to warrant inclusion in the Heritage Overlay. Places rarely – even at the State, National and World Heritage level – satisfy more than two or three criteria.</p> <p>The site is of local historical significance (Criterion A) for its association with the Charity Organisation Society, the Victorian Society for the Prevention of Cruelty to Children and the Australian-American Association for the reasons outlined in the Statement of Significance.</p> <p>The place satisfies Criterion D (representative significance) as a largely intact example of an Interwar Classical Revival building. The exhibited heritage citation notes that the place has been subject to some alteration; however, these changes do not undermine the legibility of the building's architectural form and detailing and are largely reversible in nature. It is considered that the assessment of the building (as contained in the exhibited heritage citation) provides sufficient justification for the application of an Individual Heritage Overlay.</p> <p>The re-assessment of the subject property is appropriate as some assessments from earlier studies of the 1980s and 1990s will be outdated - refer to my response at 4.2 above.</p>

not a particularly good nor intact example of the “interwar classical revival style that was popular for government building, banks and other commercial premises building during the decades after World War One” (excerpt from the HGHR).

There are visible alterations to the site building further negate its supposed representative significance. The Statement of the Significance deems the ‘more recent alterations and addition’ as not be significant. However, the site has undergone overt alterations through the introduction of an extensive first floor balcony to its west, the creation of a recessed corner entry that changes the way in which the building addresses the corner, and additions to the roof that create a semi-enclosed terrace with glass balustrade. It follows that these are in fact significant alterations, which further disprove the site is intact for the purposes of imposing heritage restriction to protect its purported integrity

The site was not previously recognised as a significantly historical building pursuant to the following heritage reviews:

In the Central Activities District Conservation Study (1985) the site was identified as D graded in the context of a 5-tier grading system of A-E.

In the Central City Heritage Study Review the site was regraded C in the context of a 3-tier grading system from A-C.

In the Review of Heritage Overlay Listings in the CBD (2002), the site was not included in the Review and consequently was not graded.

In the Central City Heritage Review (2011) the site was not included in the Review and consequently was not graded.

With regard to the above the site was graded in categories of low significance in prior reviews or not graded at all. Despite being included in earlier reviews, the site was noticeably excluded in more recent heritage reviews. It follows that the site has been

considered by multiple heritage experts to be of low significance or not significant at all.	
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5.3.20 2-6 Rankins Lane (forming part of the Former Thomas Warburton Pty Ltd complex at 384-386 Bourke Street, 365-367 Little Bourke Street, 2-6 and 8-14 Rankins Lane)



Summary of significance (as exhibited)

[143] The Former Thomas Warburton Pty Ltd complex is assessed as being locally significant for the following reasons:

- for providing important tangible evidence of the evolution of a prominent business in this area of central Melbourne that was known for horse bazaars, ironmongery and hardware merchants from the 1840s (Criterion A).
- as a representative example of a building complex associated with manufacturing and wholesaling, which was once common in central Melbourne but is now unusual (Criterion D).
- as a collection of substantially intact buildings that provide tangible evidence of an important pattern of development in central Melbourne (Criterion D).

Response to submission received

[144] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
Object to 2-4 Rankins Lane being included in the Amendment. Maintaining these pieces of valuable history is very onerous and expensive, while being a major drawcard for CBD	The principal consideration in applying the Heritage Overlay is whether the place reaches the threshold for local heritage significance. The impact on individual owners is not relevant in determining the

Melbourne and subsequent economy contribution in the city.	heritage significance of a place - refer to my response at 4.6 above.
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5.3.21 Elizabeth Street motorcycle precinct (affecting Former Cassells Tailors Pty Ltd, 341-345 Elizabeth Street)



Summary of significance (as exhibited)

[145] 341-345 Elizabeth Street is assessed as being locally significant for the following reasons:

- for the evidence it provides of the 1920s boom period in manufacturing. At this time, industrial workshops and small factories increasingly took over the northwest area of the city as manufacturing led Melbourne's recovery from the economic depression of the late 1920s-early 1930s (Criterion A).
- as a modestly scaled, but highly intact early example of the interwar Chicagoesque style that characterised the early phase of this new wave of development (Criterion D).

Response to submission received

[146] One objecting submission was received which sought inclusion of 341-345 Elizabeth Street as part of a motorcycle precinct, and recognition of the motorcycle-related historical and social values of such a precinct. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>The Motorcycle Riders Association strongly supports Mr John Nelson's call for heritage recognition for the world famous Elizabeth Street Motorcycle Precinct in Melbourne.</p> <p>For more than 110 years the Elizabeth Street strip was the meeting place for Melbourne's motorcycle community and for visitors from interstate and overseas. This precinct was unique in Australian cities.</p>	<p>Submission #59 asserts a number of social and historical values to the motorcycling community of Melbourne that are associated with a 'motorcycle precinct' comprising buildings between numbers 299 and 421 Elizabeth Street. Any social values could be considered as part of any future review of the existing Statements of Significance for HO1125 (Elizabeth Street (CBD) Precinct) and HO1204 (Elizabeth Street West Precinct).</p>

5.3.22 91-93 Flinders Lane ('contributory' within Flinders Lane East Precinct)



Summary of significance (as exhibited)

[147] The Flinders Lane East Precinct is assessed as being locally significant for the following reasons:

- for its association with manufacturing and warehousing principally for the clothing and textile businesses, colloquially referred to as the 'rag trade', between the 1850s and the 1930s (Criterion A).
- for its low-rise built form and street pattern that represents the pre-modern city (Criterion D).
- for its views down Oliver, Malthouse and Higsons Lanes. It is also aesthetically significant for its nearly complete streetscape of small lot buildings up to six storeys in height and built to the property boundaries (Criterion E).

Response to submission received

[148] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
The building should be categorised as non-contributory to the Precinct.	The proposed contributory grading for the building at 91-93 Flinders Lane is appropriate. The building has a direct association with the manufacturing and textile industries that characterise the Flinders Lane East Precinct, having been constructed in 1925 by clothing manufacturer Denniston and Co. While I acknowledge that the place has been subject to quite substantial alteration, it is my opinion that it still retains sufficient form and detail to understand its original historical purpose and contributes to the overall values of the proposed heritage precinct.

5.3.23 3 Kirks Lane (forming part of the Gothic Chambers at 418-420 Bourke Street and 3 Kirks Lane)



Summary of significance (as exhibited)

[149] Together with 418-420 Bourke Street, 3 Kirks Lane is assessed as being locally significant for the following reasons:

- for its association with a key phase in Melbourne's development when, during the economic boom of the 1880s and the early 1890s, an increasing number of investors constructed architect-designed multi-storey factory and warehouse premises in the city to house the growing manufacturing and retail industry (Criterion A).
- as a highly intact example of a pair of warehouses built in the late Victorian period (Criterion D).
- for its use of Venetian Gothic Revival style elements, which was unusual for a small-scale warehouse (Criterion E).

Response to submission received

[150] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>No detail has been provided in any correspondence forwarded to me or made publicly available that provide any detail whatsoever about the following:</p> <p>Who 'nominated' the building?</p> <p>What are the full details of the person(s) / entity responsible for the nomination?</p>	<p>The approach taken for the identification and assessment of places in the HGHR is set out in the 'Methodology' (see Volume 1 of the HGHR). It is noted that, unlike the process established under the <i>Heritage Act 2017</i> for state-significant places, there is no formal 'nomination' process for places considered for inclusion in the local Heritage Overlay. All properties considered in the HGHR were identified through a comprehensive program of street surveys, public consultation and reviews of existing heritage documentation.</p>

<p>In what form was the building 'nominated'?</p> <p>What were the credentials of the person(s) or entities who 'nominated'?</p> <p>The lack of detail and vagueness surrounding this particular item and the contradictory approach to the said property based on previous heritage reviews for the subject property is of significant concern.</p>	<p>I consider the assessment methodology and level of information provided to be satisfactory to warrant inclusion of 3 Kirks Lane on the Heritage Overlay - refer to my response at paragraph 45.</p>
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5.3.24 Melbourne Theosophical Society (former Russell House), 124-130 Russell Street



Summary of significance (as exhibited)

[151] 124-130 Russell Street is assessed as being locally significant for the following reasons:

- for its demonstration of car sales in the early years of motoring in Victoria. With car ownership concentrated in Melbourne in the 1920s, motor garages represent an important use for a small number of buildings in the central city (Criterion A).
- for its association with the Melbourne Theosophical Society, which was formed to encourage the study of comparative religion, philosophy and science (Criterion A).
- As a commercial building designed in the interwar classical style (Criterion D).
- for its relatively intact façade (Criterion E).
- for its long-standing associations with the Melbourne Theosophical Society as its headquarters and the location of its library, bookshop and meeting spaces (Criterion G).

Response to submission received

- [152] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>Planning permit TP-2020-9 was issued on 18 September 2020 and allowed the complete demolition of all buildings on the site providing for the construction of a residential hotel on the land. Plans were endorsed on 15 March 2021.</p> <p>We have engaged a head contractor and it is anticipated that the demolition of the building (being the first stage of the redevelopment) will commence in June 2021 with an estimated completion date for the project of 2023. - Having regard to the above we would respectfully submit that the introduction of permanent heritage controls over the building is entirely unnecessary and that this site should be removed from Amendment C387.</p>	<p>Amendment C387 does not affect permit TP-2020-9 which allows for the redevelopment of 124-130 Russell Street- refer to my response at 4.5 above.</p>

5.3.25 Willis' Building, 490 Flinders Street



Summary of significance (as exhibited)

- [153] 490 Flinders Street is assessed as being locally significant for the following reasons:
- for the evidence the building provides of the need for and provision of daily retail points with associated residences in a part of the city that, during the mid-Victorian period, thrived with port-related activities (Criterion A).

- as largely intact two-storey shops and residences constructed in the pre-boom period in 1869-70 in the Victorian Italianate style (Criterion D).

Response to submission received

[154] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
The existing building is modest, unremarkable and there is no compelling evidence to support its retention on architectural or cultural heritage grounds.	<p>The assessment of 490 Flinders Street was undertaken in accordance with PPN1. The place has been assessed against the Heritage Criteria set out in the Practice Note and it is considered that the significance of the building is adequately demonstrated in the exhibited heritage citation and Statement of Significance.</p> <p>A building does not need to be 'remarkable' to warrant inclusion in the Heritage Overlay. The Statement of Significance identifies the building as being of historic significance (Criterion A) for its association with retailing in Melbourne since the 1860s, and representative significance (Criterion D) as a largely intact example of Victorian Italianate shop/residence</p>

6. Amendment C387 – postwar places (1945-1975)

6.1 Introduction

- [155] A key finding from GJM Heritage’s peer review of the 2018 HGHR was that in the absence of a comprehensive review of postwar buildings within the Hoddle Grid, the postwar buildings initially recommended for inclusion in the Heritage Overlay could not be supported. This position was consistent with the Minister for Planning’s previous position in respect of Amendment C186 (refer to 3.1 above). The peer review recommended that the City of Melbourne undertake a full thematic study of postwar places within the Hoddle Grid. This recommendation was supported by Council and the work was undertaken by Context and GJM Heritage.
- [156] The postwar period was one of radical transformation for Melbourne; from the low-rise city that still reflected its colonial origins to a bustling international centre of commerce and culture. The surviving buildings from this period are evidence of the evolving economic and social conditions in Melbourne at the time and demonstrate the city’s transition from its nineteenth century manufacturing origins to its current banking, office and service industry focus. These buildings reflect the increasing commercial and cultural role of Melbourne in the international context of globalisation and postwar optimism as well as a radically altered economic environment which saw an influx of foreign capital and ideas. Collectively, these buildings represent a transformative period in the life of the city; a period that is characterised by significant change, growth and evolution across all aspects of life – social, political, economic and cultural.
- [157] The postwar period was a period of great optimism and energy – the lifting of constraints on building materials in 1952 and the gradual recovery of Melbourne’s economy brought a new-found confidence to the city. No fewer than 30 new multi-storey office buildings were built in and around the city centre in four years alone between 1955 and 1958 and in 1973 it was reported that buildings of 20 or more storeys were appearing in central Melbourne at a rate of approximately one per year.
- [158] The building boom of the late 1960s and early 1970s was of additional importance as it began to turn the tide on wholesale demolition and development and focused attention on what was being lost in Melbourne’s city centre. This growing concern by the National Trust of Australia (Victoria) and others to preserve elements of Melbourne’s past ultimately led to reforms to planning schemes and the establishment of registers to protect historic buildings that continue to exist today.
- [159] The approach to this component of the HGHR is set out in Volume 1: Built and Urban Heritage – Methodology and is summarised below.
- [160] The findings and recommendations in respect of postwar places in the Hoddle Grid are documented in *Volume 2b: Postwar Thematic Environmental History and postwar places*.

6.2 Summary of methodology

6.2.1 Defining the postwar period: 1945-1975

- [161] There is no universally agreed definition of what time period constitutes the “postwar period”. While 1945 (the year of the end of World War II) is clear, the end date is less clear. The period from 1945 to 1975 was applied to the HGHR for a number of reasons.
- [162] The end date of 1975 accords with the end of the third quarter of the century and generally pre-dates the rise of the Post-modern movement in architecture in Australia. Historically, the mid 1970s coincided with seismic shifts in the Australia’s social and economic fabric including the 1973 Oil Crisis, Australia’s withdrawal from the Vietnam War the same year and the dismissal of the progressive Whitlam Government in 1975.
- [163] The period is also consistent with the timeframe applied in other prominent heritage studies, including the ‘Central City (Hoddle Grid) Heritage Review’ (Graeme Butler and Associates, 2011), the ‘Survey of Post-War Built Heritage in Victoria: Stage One and Two’ (Built Heritage, 2008) and ‘Melbourne’s Marvellous Modernism’ (National Trust of Australia (Victoria), 2014), as well as surveys of this period such as ‘Australia Modern: Architecture, landscape & design’ (Lewi, H. & Goad, P., 2019) and Philip Goad’s doctoral thesis ‘The Modern House in Melbourne, 1945-1975’. The recent publication on modernist architecture in Melbourne entitled ‘Melmo’ (Grow, R. with Reeves, S., 2021) also covers the period from 1945 until the mid-1970s.

6.2.2 Hoddle Grid Postwar Thematic Environmental History

- [164] The ‘City of Melbourne Hoddle Grid Heritage Review - Postwar Thematic Environmental History, 1945-1975’ (the Postwar TEH) has been prepared to document and illustrate how various themes have shaped the environment and culture of central Melbourne following World War II. In this way, the Postwar TEH provides a context for postwar heritage places that have been identified as part of the HGHR.
- [165] The peer review undertaken by GJM Heritage found that the breadth of the 2018 version of the Postwar TEH 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 ‘Thematic History – A History of the City of Melbourne’s Urban Environment’ (Context 2012), which were informed by ‘Victoria’s Framework of Historical Themes’ (Heritage Council of Victoria, February 2010).
- [166] To provide a more robust strategic basis and historical context for the assessed group of buildings from the period 1945-1975, GJM Heritage was engaged to revise and broaden the scope of the Postwar TEH. The final Context/GJM Heritage (co-authored) Postwar TEH forms part of the final HGHR as part of Volume 2b.

- [167] The revised Postwar TEH assisted in identifying historical associations with particular themes, and provided a broader historical context for the assessment of postwar places included in the HGHR.

6.2.3 Postwar places within existing precincts

- [168] Unlike the assessment of pre-1945 places, postwar buildings within existing precincts were considered for individual assessment. The majority of postwar places currently included in precinct Heritage Overlays do not demonstrate any of the key attributes of the precinct (as identified within the existing Statements of Significance) and generally fall outside the relevant period of significance. It was therefore considered necessary to assess these places on an individual basis. Where the threshold for significance was met, individual Heritage Overlays have been proposed to recognise the site-specific heritage values of these places.

6.2.4 Fieldwork

- [169] Ros Coleman (architectural historian and Associate at GJM Heritage) and I walked every 'major' and 'little' street within the study area to identify postwar places that exhibited a *prima facie* case for local heritage significance and which warranted full assessment for potential inclusion in the Heritage Overlay. Only those laneways and service alleys that abutted a place identified for further assessment were inspected.
- [170] The fieldwork for the heritage assessment phase comprised site inspections and photographic documentation of all places recommended for full assessment, as seen from the street. The site visits identified the integrity and current presentation of each place. Any visible alterations and extensions that potentially altered the intactness of the place when compared to the original design were also noted.

6.2.5 Physical analysis

- [171] Informed by the site inspections conducted, a physical description was compiled for each place noting the form of the place, architectural detail and the current condition and integrity.

6.2.6 Historical research

- [172] A range of primary and secondary sources were consulted as part of the historical research. The aim of the historical research has been to determine (where possible):
- The build date of each place;
 - The owner of the place when built;
 - A builder or architect where documented;
 - Whether the place had any significant associations with events or people;
 - The development of the place;
 - The current level of intactness compared to the original design; and

- The historical theme(s) the place demonstrates.

6.2.7 Comparative analysis

- [173] A detailed comparative analysis was undertaken for each place to establish its context within the municipality and its significance threshold.
- [174] As only a limited evaluation of postwar buildings within the Hoddle Grid in the City of Melbourne has previously occurred, few buildings from the postwar period had been included in the Heritage Overlay of the Melbourne Planning Scheme and therefore the majority of comparative examples remain 'untested'.
- [175] Where possible, places were compared against similar examples of places that are already included in the Heritage Overlay – either as individual places or within a precinct and categorised (graded) as 'Significant' – in terms of their level of integrity, architectural detail and the quality of expression of their architectural style. Due to the relative lack of buildings of the period being included in the Heritage Overlay, postwar buildings included in the Victorian Heritage Register were used as comparators where relevant. Places were also compared with other similar examples that were also being considered in the HGHR.

6.2.8 Citations and Statutory Recommendations

- [176] To determine whether they satisfied the threshold for local heritage significance and inclusion in the Heritage Overlay of the Melbourne Planning Scheme, places were assessed in accordance with the guidance provided in PPN1.
- [177] Drawing upon the historical research, physical investigation and comparative analysis, an 'Assessment Against Criteria' was undertaken and a Statement of Significance prepared for each individually significant place. The Statements of Significance follow the format of 'What is significant?', 'How is it significant?' and 'Why is it significant?'. The Statement of Significance clearly defines the heritage values of the place and identifies significant and contributory fabric to guide future management.
- [178] Volume 1 Appendix A6 of the HGHR includes an illustrated list of the extant buildings that were considered as part of the review and not progressed for assessment; this included 49 buildings that constructed after 1945.

6.3 Submissions received

- [179] During the public exhibition of Amendment C387 a total of twenty-nine (29) submissions were received which related specifically to postwar places, comprising:
- Eleven (11) submissions in support of the Amendment, including ten (10) in support of the inclusion of Former Russell Street Automatic Telephone Exchange and Postal Building (114-120 Russell Street) on the Heritage Overlay and one (1) in support of the inclusion of the Coates Building (18-20 Collins Street); and

- Seventeen (17) objecting submissions to the Amendment. An additional late submission objecting to the inclusion of the Former Ajax House at 103-105 Queen Street in the Heritage Overlay was received in May 2021.

[180] The table below lists each objecting submission, including the submission number (which accords with the submitter table prepared by Council) and the identified place. The section in this Statement of Evidence that addresses the relevant objecting submission is noted.

Objecting submissions received for postwar places

Sub No.	Subject property address	Section in this Statement
10	303-317 Collins Street	6.3.1
14	457-471 Bourke Street	6.3.2
18	516-520 Collins Street	6.3.3
20	111-129 Queen Street	6.3.4
21	178-188 William Street	6.3.5
22	269-275 William Street	6.3.6
23	335-349 Little Collins Street	6.3.7
28	414-416 Lonsdale Street	6.3.8
31	221-231 Collins Street	6.3.9
41	158-164 & 166-172 Queen Street	6.3.10
44	376-378 Bourke Street	6.3.11
45	56-64 Collins Street	6.3.12
46	308-336 Collins Street	6.3.13
47	588-600 Little Collins Street	6.3.14
48	93-101 (99) Spring Street	6.3.15
56	430-442 Collins Street 457-469 Little Collins Street 527-555 Bourke Street	6.3.16
61	130-134 Little Collins Street	6.3.17
66	103-105 Queen Street	6.3.18

[181] Following is a response to the matters raised in each of the objecting submissions. The column entitled 'Summary of heritage issues raised' in the tables below is extracted directly from the table of submissions prepared by Council for FMC on 18 May 2021. The column entitled 'Expert response' in the tables below represents my opinion in relation to these matters. In preparing this advice I read each submission.

6.3.1 Former MLC Building [also known as Royal Bank Plaza and IOOF Centre (current name)], 303-317 Collins Street



Summary of significance (as exhibited)

[182] 303-317 Collins Street is assessed as being locally significant for the following reasons:

- the place has a clear association with the postwar building boom which transformed central Melbourne into a modern high-rise city. The design of these commercial buildings from the late 1950s to the mid-1970s – many of which were architect designed – was driven by the commercial demands and the prestige afforded by a dominant city presence (Criterion A).
- the place is a fine and highly intact representative example of a Post-War Modernist commercial building (Criterion D).

Response to submission received

[183] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
Substantial modifications have been made to the MLC building since its construction and, on that basis, our client submits that the Statement of Significance's description of 'highly intact' is misguided.	Podiums of the majority of 1960s and 1970s multi-storey commercial buildings in the City of Melbourne have been modified at street level. Alterations to the forecourt of the MLC Building – acknowledged in the heritage assessment – do not diminish its architectural integrity or the ability to understand and appreciate the place as a fine example of a postwar commercial building to such an extent that it does not warrant inclusion on the Heritage Overlay - refer to my response at 4.4 above.
The original forecourt rotunda has been demolished and replaced with a three-storey podium which extends to the site boundaries. The citation contained in the Hoddle Grid Heritage Review, downplays this modification and suggests that the alterations do not diminish the ability to understand and	The Pictorial Guide to Identifying Australian Architecture (Richard Apperley et al) was published

<p>appreciate the place as a fine example of a Post-war Modernist, multi-storey commercial building. However, in circumstances where the curved features of the building are supposedly paramount to its significance, our client's view is that the removal of a prominent curved element compromises the architectural importance of the building.</p> <p>There is nothing remarkable about the materials or detailing of the building. The materials used are considered typical for this type of commercial building and the curved form is not particularly innovative, given the earlier construction of buildings like the former BP House on the corner of Albert and St Kilda Roads.</p> <p>It is queried whether the MLC building can be properly characterised as having 'a clear association with the postwar building boom' as the Statement of Significance suggests. Arguably, the building was constructed too late to fall within this category of development. It is acknowledged that the 'postwar building boom' does not have specific beginning or end dates. However, the Pictorial Guide to Identifying Australian Architecture defines the postwar era as c1940-1960. Accordingly, a building which was designed in 1969 and completed in 1973 is too recent to be properly considered postwar.</p> <p>There have been a number of heritage studies undertaken in the Melbourne CBD and the subject site has never before been considered worthy of heritage protection.</p> <p>The existing building is not of sufficient intactness or architectural or historical significance to warrant heritage protection</p>	<p>in 1989 and focuses on the classification of architectural styles rather than the definition of historic periods. It also considers the postwar period within a different historical context, being published over 30 years ago. The end date of 1975 chosen for the study is consistent with the timeframe for other studies and monographs on this period. A building designed in 1969 and completed in 1973 is therefore appropriately included within this defined period - refer to my response at 6.2.1 above.</p> <p>The majority of current Heritage Overlays within the Hoddle Grid therefore arise from heritage studies undertaken in the 1980s and 1990s. Given the timeframe that has elapsed since then – now more than 20 years – it is reasonable to expect that public and professional recognition of heritage has changed over this time and the assessment of heritage values may warrant reconsideration - refer to my response at 4.1 above.</p>
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6.3.2 Former Dalgety House, 457-471 Bourke Street



Summary of significance (as exhibited)

[184] 457-471 Bourke Street is assessed as being locally significant for the following reasons:

- the place has a clear association with the postwar building boom which transformed central Melbourne into a modern high-rise city (Criterion A).
- the place is a fine and highly intact representative example of a Post-War Modernist commercial building (Criterion D).

Response to submission received

[185] One objecting submission was received for the place noting that “a detailed submission is to be lodged”. No further submission was received.

6.3.3 Office Building, 516-520 Collins Street



Summary of significance (as exhibited)

[186] 516-520 Collins Street is assessed as being locally significant for the following reasons:

- the place has a clear association with the postwar building boom which transformed central Melbourne into a modern high-rise city (Criterion A).
- the place is a fine and highly intact representative example of a Post-War Modernist commercial building (Criterion D).

Response to submission received

[187] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>The Heritage Review has failed to provide a detailed analysis of the significance of the buildings within the Post-War Modernist office group that would lead to protection being granted.</p> <p>The subject building is a general example of the Post-War Modernist expression and does not meet the criteria. The citation does not detail how the building meets the required criteria.</p> <p>The building is not an early example of Post-War modernist expression, nor is it a rare example of specific design. It is not the work of a notable architect and it is without specific features of merit.</p>	<p>The Postwar Thematic History undertaken as part of the HGHR (and provided in the place citation under historical context) clearly establishes the historical importance of postwar development in the Hoddle Grid and provides a robust basis for the assessment of the heritage significance of this place type.</p> <p>The assessment of 516-520 Collins Street was undertaken in accordance with PPN1. Comprehensive comparative analysis, which draws on other similar places within the study area, was undertaken to substantiate the significance of the place and it is considered that the significance of the building is adequately demonstrated in the exhibited heritage citation and Statement of Significance. The place is significant for its 'clear association with the postwar building boom' and as a 'fine and highly</p>

<p>The citation does not reference Planning Permit TP-2019-1057 which allows part demolition, alterations and additions.</p>	<p>intact representative example of a Post-War Modernist commercial building', as demonstrated in the place citation and Statement of Significance.</p> <p>Amendment C387 does not affect permit TP-2019-1057 which allows for part demolition, alterations and additions of 516-520 Collins Street - refer to my response at 4.5 above.</p>
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6.3.4 Former Royal Automobile Club of Victoria, 111-129 Queen Street



Summary of significance (as exhibited)

[188] 111-129 Queen Street is assessed as being locally significant for the following reasons:

- as the headquarters of the large and influential RACV who were advocates for the rights of motorists, including the spending of significant public money on infrastructure for motorised transport (Criterion A).
- as a fine example of a recreational club in the city centre (Criterion D).
- for its composition, of which the three-storey transparent cantilevered podium is a notable feature (Criterion E).
- for its strong and long-standing association with the RACV Club members, staff and board (Criterion G).
- as the headquarters of the State's premier road lobbyist, as a major tourism promoter, and as a private club serving Melbourne's business, professional and social elite that has hosted many significant political and public events for more than four decades (Criterion H).

Response to submission received

[189] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>The buildings do not have aesthetic, architectural or historical significance.</p> <p>There is not proper assessment, rationale or justification provided as part of the Amendment that is sufficient to justify the proposed significant grading.</p> <p>The building's historical use is not evident when reviewed from the public realm, it does not contribute to the precinct and have been altered so as to impact on any significance.</p> <p>The citation prepared for the Site is vague and too simplistic to warrant the Amendment. It does not clarify what heritage fabric must be retained and conserved.</p> <p>A review of historical drawings highlights that a great deal of change to the fabric of the building has occurred over time.</p> <p>There are a number of items that either need correction, further discussion and/or clarification in the relevant citation.</p> <p>The comparative analysis in the citation is lacking in detail and fails to properly describe the context of high-rise development in Melbourne in the 1950s and 1960s of other buildings within the Hoddle Grid, in particular it fails to describe other buildings occupied by clubs in Melbourne and their historical associations are greater than the Royal Automotive Club of Victoria.</p> <p>Some of the narrative in the citation is overstated, unsupported by facts and fails to identify appropriate sources.</p>	<p>The assessment of 111-129 Queen Street was undertaken in accordance with PPN1. The place has been assessed against the Heritage Criteria set out in the Practice Note and it is considered that the significance of the building is adequately demonstrated in the exhibited heritage citation and Statement of Significance. The assessment provides sufficient justification to demonstrate that the place is of historic, aesthetic, representative and social significance to the City of Melbourne. The citation follows the format outlined in PPN1, detailing what features contribute to the significance of the place (and therefore should be conserved and retained), and what features do not contribute (allowing for a greater degree of change and alteration). Specific decisions around fabric management are appropriately dealt with at a planning permit stage.</p> <p>The 'great deal of change to the fabric of the building', the 'items that either need correction, further discussion and/or clarification' and the 'narrative' that is 'overstated' are not detailed in the Submission and no comments in regard to these issues can therefore be offered. The main alterations to the exterior of the building have occurred at the ground floor level and these changes have had only a minor impact on the character, appearance and presentation of the place.</p> <p>The Contextual History for the place provides a detailed analysis of high-rise development within the Hoddle Grid in the 1950s and 1960s, which provides a strong basis for the comparative analysis. As only a limited evaluation of postwar buildings within the Hoddle Grid in the City of Melbourne has previously occurred, few buildings from the early postwar period are currently included in the Heritage Overlay of the Melbourne Planning Scheme. The subject building is one of a number of postwar places that have been assessed as part of this comprehensive review to address this gap. The comparative examples provided are considered to be appropriate and demonstrate that the subject property is of local significance and the application of an Individual Heritage Overlay is justified.</p> <p>The majority of buildings occupied or associated with clubs within the City of Melbourne generally predate the Former RACV Building and are not considered to be relevant comparators. A notable exception to this is the Lyceum Club at 2-18 Ridgway Place, which has also been assessed as part of the HGHR and is subject to Amendment C387.</p>

6.3.5 Office Building [also known as Prudential Building and Douglas Menzies Chambers (current name)], 178-188 William Street



Summary of significance (as exhibited)

[190] 178-188 William Street is assessed as being locally significant for the following reasons:

- the place has a clear association with the postwar building boom which transformed central Melbourne into a modern high-rise city (Criterion A).
- the place is a fine and highly intact representative example of a Post-War Modernist commercial building (Criterion D).

Response to Submission received

[191] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>The building does not meet the threshold for individual significance to the City of Melbourne.</p> <p>The building's architectural expression is unremarkable as it is a standard example of a 1970s modernist office tower and therefore the significance of the Site has been overstated.</p> <p>The building is not representative of architect Peter McIntyre's important body of postwar work – i.e. experimental residential designs and the structurally adventurous Olympic swimming pool. This building is not discussed as a key work in the Encyclopaedia of Australian</p>	<p>The assessment of 178-188 William Street was undertaken in accordance with PPN1. The place has been assessed against the Heritage Criteria set out in the Practice Note and it is considered that the place meets the threshold for the application of an Individual Heritage Overlay as demonstrated in the exhibited heritage citation and Statement of Significance.</p> <p>I dispute the assertion that the building is a 'standard example of a 1970s modernist office tower' with an 'unremarkable' architectural expression. As outlined in the exhibited heritage citation and Statement of Significance, it is a fine and highly intact representative example of a Post-War Modernist commercial building that demonstrates important aspects of this architectural style.</p>

<p>Architecture, further supporting our position that the architectural significance the building has been overstated.</p> <p>A building that was constructed in 1972-73 is arguably too recent to belong to Melbourne's 'postwar' period which generally refers to the architecture that resulted from the economic prosperity and technological advancements of the 1950s and 1960s.</p> <p>The building was graded 'D' in the 1985 Central Activities District Conservation Study and then reclassified as ungraded in the 1993 Central City Heritage Study Review. It is not listed in the Australian Institute of Architects (Victorian Chapter) 20th Century Building Register nor the National Trust's 2014 report Melbourne's Marvellous Modernism: A Comparative Analysis of Postwar Modern Architecture in Melbourne's CBD 1955-1975. This is indicative of its relatively low heritage value, especially in comparison to other buildings of this era and style which have been deemed better examples.</p>	<p>The building has not been identified as aesthetically significant (Criterion E) and its asserted significance is not predicated solely on its association or connection with architect, Peter McIntyre (Criterion H). As demonstrated in the Statement of Significance for the place, it is considered to be of historic significance (Criterion A) for its association with the postwar building boom and of representative significance (Criterion D) for clearly demonstrating 'the principal characteristics of a Post-War Modernist commercial high-rise building'. The building is one of a number of CBD buildings that were completed by McIntyre, McIntyre and Partners in the postwar period and forms part of the firm's extensive body of work.</p> <p>The end date of 1975 chosen for the study is consistent with the timeframe for other studies and monographs on this period. A building constructed in 1972-73 is therefore appropriately included within this defined period - refer to my response at 6.2.1 above.</p> <p>The re-assessment of the subject property is appropriate as some assessments from earlier studies of the 1980s and 1990s will be outdated - refer to my response at 4.2 above.</p>
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6.3.6 Nubrick House, 269-275 William Street



Summary of significance (as exhibited)

- [192] 269-275 William Street is assessed as being locally significant for the following reasons:

- for the evidence it provides of Melbourne's postwar development and rapid growth of corporate architecture of the 1950s-70s (Criterion A).
- as a highly intact example of a Post-War Modernist commercial building constructed during the postwar period that utilised a reinforced concrete frame (Criterion D).
- for its distinctive design that adopted robust brick piers as one of the main design elements (Criterion E).

Response to submission received

[193] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>We disagree that the Subject Land and the building contained on it (Nubrik House) portray sufficient qualities to warrant heritage protection when assessed against the three criteria identified (historical, architectural and representative). While the external integrity of the building is relatively intact above ground floor, we are of the view that the historical, architectural, and representative significance of Nubrik House has been overstated in the citation to the point that heritage protection is not warranted or made out with respect to the recognised criteria.</p> <p>Historically, the extent to which 271 William Street encapsulates Melbourne's 'postwar' style of architecture is questioned. The citation for 271 William Street claims that the building is 'historically significant for the evidence it provides of Melbourne's postwar development and rapid growth of corporate architecture of the 1950s-70s'. The term 'Melbourne's postwar corporate architecture' is, however, more typically associated with the multistorey development that resulted from the economic prosperity and technological advancements of the 1950s and 1960s. It is far less associated with development of the 1970s.</p> <p>The relatively modest scale and unremarkable architectural expression of Nubrik House does not render it a strong example of the type of architecture produced by the postwar economic and construction boom. This, coupled with the fact that Nubrik House was constructed in 1972, weakens its historical significance.</p>	<p>The assessment of 269-275 William Street (Nubrik House) was undertaken in accordance with PPN1. The place has been assessed against the Heritage Criteria set out in the Practice Note and it is considered that the place meets the threshold for the application of an Individual Heritage Overlay as demonstrated in the exhibited heritage citation and Statement of Significance.</p> <p>The Postwar Thematic History undertaken as part of the HGHR (and provided in the place citation under historical context) clearly establishes the historical importance of postwar development in the Hoddle Grid and provides a robust basis for the assessment of the heritage significance of this place type.</p> <p>The building has not been identified as being significant on the basis of its association or connection with architects, Buchan, Laird & Buchan (Criterion H). As demonstrated in the Statement of Significance for the place, it is considered to be of historic significance (Criterion A) for its association with the postwar building boom, of representative significance (Criterion D) as an intact representative example of a Post-War Modernist commercial building and of aesthetic significance (Criterion E) as a building that "...is distinguished by its design solution that consciously utilised bricks, the main products of the company, to promote this material...". The building is one of a number of CBD buildings that were completed by Buchan, Laird & Buchan in the postwar period and forms part of the firm's extensive body of work.</p> <p>The assertion that the building is a 'standard commercial development of the period' is disputed. As outlined in the exhibited heritage citation and Statement of Significance, the building is a highly</p>

<p>As a representative work, Nubrik House is not generally considered to be one of Buchan, Laird and Buchan's more accomplished postwar works. There are many other more aesthetically refined examples of the firm's work. Notably, while Buchan, Laird and Buchan's work throughout the modernist and post-war periods is explored in detail in the Encyclopedia of Australian Architecture, Nubrik House is not one of the numerous buildings discussed in that entry.</p> <p>The building is noted with a data sheet in Melbourne's Marvellous Modernism, however, it is not identified in any way as an important building, but simply as an example of the 'expressed structure' mode of the period. Further the entry for Nubrik House was presented under the misconception that the building was of 'loadbearing brick construction' which has subsequently been discovered to be false further diluting any representative qualities.</p> <p>Aesthetically, Nubrik House is fairly typical of commercial architecture of the late 1960s and early 1970s in its 'robust' character. As a 'standard' commercial development of that period, it is altogether unremarkable in its overall architectural expression, particularly in comparison with the numerous other examples of Buchan, Laird and Buchan works.</p> <p>Nubrik House is also neither remarkable nor unusual in the broader context of postwar commercial architecture in Melbourne. Relevantly, the Subject Land was not graded as a heritage building in either the 1985 Central Activities District Conservation Study or the 1993 Central City Heritage Study Review. This lack of recognition in previous studies or relevant reference books is indicative of the subject building's low heritage value, especially in comparison to other buildings of this era and style.</p>	<p>intact representative example of a Post-War Modernist commercial building (Criterion D) with a distinctive architectural expression that utilised the company's brick products in the design of its façade (Criterion E).</p> <p>Given the timeframe that has elapsed since the 1985 and 1993 studies – now more than 20 years – it is reasonable to expect that public and professional recognition of heritage has changed over this time and the assessment of heritage values may warrant reconsideration - refer to my response at 4.3 above.</p>
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6.3.7 Equitable House, 335-349 Little Collins Street



Summary of significance (as exhibited)

[194] 335-349 Little Collins Street is assessed as being locally significant for the following reasons:

- for the evidence it provides of two waves of retail and office development in Melbourne in the 1920s and post-World War Two. The building reflects the growth and progress in the city in the 1920s and 1960s that resulted in architecturally designed, company-named buildings being erected (Criterion A).
- [The building fronting Little Collins Street is significant] as a relatively intact example of interwar commercial development in central Melbourne, in the interwar Commercial Palazzo style (Criterion D).
- [The building fronting Elizabeth Street is significant] as a largely intact example of postwar commercial development in central Melbourne, which utilised the Post-War Modernist style that characterised this new wave of development (Criterion D).

Response to submission received

[195] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
The significance of the building to warrant an individual Heritage Overlay has not been adequately demonstrated. The scope of the Review has resulted in the extent of heritage protection being disproportionate to the value of the buildings that are included.	The assessment of 335-349 Little Collins Street was undertaken in accordance with PPN1. The place has been assessed against the Heritage Criteria set out in the Practice Note and it is considered that the significance of the building is adequately demonstrated in the exhibited heritage citation and Statement of Significance.

<p>The Amendment doesn't provide criteria by which the "early, rare or fine" can be assessed amongst the group of buildings identified for protection.</p> <p>A more detailed submission is to follow.</p>	
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6.3.8 Laurens House, 414-416 Lonsdale Street



Summary of significance (as exhibited)

[196] 414-416 Lonsdale Street is assessed as being locally significant for the following reasons:

- for its demonstration of the surge in office development at the time, which reflected not only the adoption of modern architecture, but also widespread economic and political change (Criterion A).
- as a representative example of an early curtain-walled office building of the early postwar era (1950s-60s). The building is one of a group of commercial buildings built for insurance and finance companies in the city centre during this period (Criterion D).
- as a distinctively modernist building with visual interest derived from the arrangement of building elements across the asymmetrical façade and retains a high level of integrity, comparing favourably with the other examples that have often been refaced or altered significantly at ground level (Criterion E).

Response to submission received

[197] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
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<p>The basis on which the permanent controls are advanced requires further examination and justification particularly where a significant grading is proposed within the Inventory.</p> <p>The introduction of individual Heritage Overlays are required to be more detailed and updated with a methodology befitting the significance and nature of the Amendment particularly within the context of the central city.</p> <p>Previous studies identified the building at 414-416 Lonsdale Street as follows:</p> <p style="padding-left: 40px;">Central Activities District Conservation Study 1985 – Graded ‘D’ in the context of a six tier grading system ‘A-F’.</p> <p style="padding-left: 40px;">Central City Heritage Study 1993 – Graded ‘C’ which is in the context of a three tier grading system ‘A-C’.</p> <p>The methodology used to convert previous gradings to the current tiered grading system particularly in the context of the transformation from the respective C gradings in the 1993 Study to the current respective significant gradings.</p> <p>Some of the comparative examples listed in the citations are ‘un-tested’ and should be given limited weight. Other comparative examples provided clearly demonstrate elements of greater significance than either of these sites and should not be benchmarked as comparable.</p> <p>Our clients own and hold interest in 410-412 and 414-416 Lonsdale Street, Melbourne. To date, preliminary planning has identified potential opportunities for our clients to redevelop their sites jointly or separately and both are concerned that the application of the proposed controls will unreasonably preclude redevelopment opportunities.</p>	<p>The assessment of 410-412 and 414-416 Lonsdale Street was undertaken in accordance with PPN1. Both places have been assessed against the Heritage Criteria set out in the Practice Note and thorough comparative analysis and it is considered that the significance of the buildings is adequately demonstrated in the exhibited heritage citations and Statements of Significance.</p> <p>The HGHR has been undertaken in a manner that has allowed for a rigorous and comprehensive assessment of places located within the study area. A detailed explanation and summary of the methodology, which has been undertaken in accordance with PPN1, is included in Volume 1 of the Review.</p> <p>The re-assessment of the subject property is appropriate as some assessments from earlier studies of the 1980s and 1990s will be outdated - refer to my response at 4.2 above.</p> <p>As only a limited evaluation of postwar buildings within the Hoddle Grid in the City of Melbourne has previously occurred, few buildings from the early postwar period are currently included in the Heritage Overlay of the Melbourne Planning Scheme and therefore the majority of comparative examples remain ‘untested’. The subject building is one of a number of postwar places that have been assessed as part of a comprehensive review undertaken to address this gap. The examples provided are appropriate and demonstrate that the subject property is of local significance and the application of an Individual Heritage Overlay is justified.</p> <p>The principal consideration in applying the Heritage Overlay is whether the place reaches the threshold for local heritage significance. The impact on individual owners is not relevant in determining the heritage significance of a place - refer to my response at 4.6 above.</p>
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6.3.9 Wales Corner, 221-231 Collins Street



Summary of significance (as exhibited)

[198] 221-231 Collins Street has been assessed as being locally significant for the following reasons:

- the place has a clear association with the postwar building boom which transformed central Melbourne into a modern high-rise city (Criterion A).
- the place is a fine and highly intact representative example of a Post-War Modernist commercial building (Criterion D).

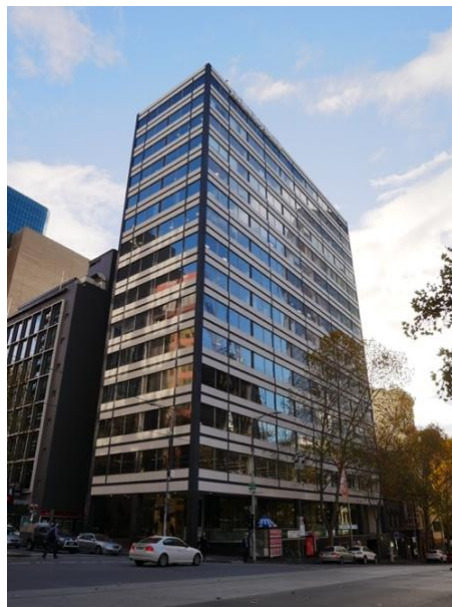
Response to submission received

[199] One objecting submission was received for this property. The issues raised and responses to the issues are provided below

Summary of heritage issues raised	Expert response
<p>The significance of the building to warrant an individual Heritage Overlay has not been adequately demonstrated.</p> <p>The scope of the Review has resulted in the extent of heritage protection being disproportionate to the value of the buildings that are included.</p> <p>The Amendment doesn't provide criteria by which the early, rare or fine can be assessed amongst the group of buildings identified for protection.</p> <p>The Amendment is contradictory to the VPP Practice Note which does not support the</p>	<p>The assessment of 221-231 Collins Street was undertaken in accordance with PPN1. The place has been assessed against the Heritage Criteria set out in the Practice Note and it is considered that the significance of the building is adequately demonstrated in the exhibited heritage citation and Statement of Significance.</p> <p>Places are assessed against the recognised heritage criteria set out in PPN1 to determine their heritage value. The HERCON heritage criteria have been broadly adopted by heritage jurisdictions across Australia and have been used accordingly in the HGHR to identify and assess places of significance within the Hoddle Grid. The place has been assessed as being of historic significance (Criterion A) for its clear association with the postwar building boom</p>

<p>application of the HO to an individual building or structure that is also within a precinct.</p>	<p>that transformed central Melbourne, and representative significance (Criterion D) as a 'fine and highly intact representative example of a Post-War Modernist commercial building'.</p> <p>While 221-231 Collins Street is located within the mapped extent of HO502 (The Block Precinct) it does not demonstrate any of the key attributes of the precinct identified within the Statement of Significance and falls outside the period of significance (c.1880s-1940). It is therefore appropriate to apply an individual Heritage Overlay to recognise the individual heritage values of this building.</p>
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6.3.10 Former Sleigh Buildings (H C Sleigh Building & former Sleigh Corner), 158-164 & 166-172 Queen Street



Summary of significance (as exhibited)

- [200] Together, 154-164 & 166-172 Queen Street are assessed as being locally significant for the following reasons:
- as a part of the postwar development and rapid growth of corporate architecture of the 1950s and 1960s (Criterion A).
 - as illustrations of the rapid development of the Post-War Modernist style over a decade, from the mid-1950s to the mid-1960s, and the enthusiasm with which large corporations embraced the style to reflect their rapid growth and status (Criterion A).
- [201] Further, the Former Sleigh Building at 158-164 Queen Street:
- demonstrates later developments in the Post-War Modernist style (Criterion D).

- is aesthetically significant as a refined and substantial example of later development in curtain wall design. The aesthetic significance is further enhanced by retention of the original Tom Bass sculpture 'Transportation', attached to the rear wall of the plaza (lift shaft) (Criterion E).

[202] The HC Sleigh Building at 166-172 Queen Street is:

- notable as the first postwar city office block to be constructed in Melbourne for a private company. It is further significant as a very early example of a curtain-walled office building, the design of which predates the earliest fully glazed example (Gilbert House, constructed in 1955), and as an early and well-executed design in the the Post-War Modernist style by noted architectural firm of Bates, Smart & McCutcheon (Criterion A).
- of the earlier development of the Post-War Modernist style that prevailed prior to the 1960s abolition of the 40 metre (132 foot) height control that had been in place since 1916 (Criterion D).

Response to submission received

[203] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>The Building does not meet the threshold required to be considered significant because any historic context of the Building is incidental and is not reflected in its form. The Building lacks distinctiveness, and cannot be said to be a notable example of a class, or reflective of a period of historic importance.</p> <p>Under Criterion E, the citation refers only to the Sleigh Corner building (158- 164 Queen Street) and has been incorrectly applied to the Building.</p> <p>The Building does not satisfy the requisite threshold to be considered "of importance" to the course or pattern of Melbourne's cultural history, nor is the stated association evident in the fabric of the building. The Building was built as an office building, however, this was at a time when postwar construction common and there was an increase in office work.</p> <p>The Building is comparable to numerous buildings constructed at the time and still remaining intact. The tenuous association as an office building does not elevate it to the necessary level of significance.</p> <p>The citation specifies that the HC Sleigh Building was notable because of its scale, form</p>	<p>The assessment of 158-172 Queen Street (comprising two Sleigh buildings) was undertaken in accordance with PPN1. 158-172 Queen Street is of local historical, representative and aesthetic significance for the reasons outlined in the Statement of Significance, and it is considered that the assessment of the place (as contained in the exhibited heritage citation) provides sufficient justification for the application of the Heritage Overlay.</p> <p>The HC Sleigh Building at 166-172 Queen Street and Sleigh Corner at 158-164 Queen Street have been assessed as a pair and together warrant inclusion within the Melbourne Planning Scheme as an individual Heritage Overlay. Built for the same owners and by the same architects, as a direct result of the rapid expansion of the HC Sleigh company in the postwar period, the two buildings clearly demonstrate the 'postwar development and rapid growth of corporate architecture of the 1950s and 1960s.</p> <p>The Former Sleigh Buildings are also visually linked through the rear wall of the plaza to Sleigh Corner and the original Tom Bass 'Transportation' sculpture, which assists in an understanding and appreciation of the relationship between the two buildings.</p>

<p>and façade. The architectural and design features, such as the tiles have been changed and removed over time.</p>	<p>The HC Sleigh Building at 166-172 Queen Street remains sufficiently intact to its original form, scale and configuration. While some modification has occurred, including the removal of the tiled cladding, window glazing and spandrel configuration, GJM is of the opinion that this has not diminished the ability to understand and appreciate the place as an example of a Post-War Modernist style office building within the City of Melbourne. In combination, the Former Sleigh Buildings clearly illustrate the advancement of construction techniques from the 1950s through to the mid-1960s and are part of a group of fine and highly intact representative examples of postwar office buildings within the Hoddle Grid that demonstrate the broad range of design approaches of the period.</p> <p>The HC Sleigh Building at 166-172 Queen Street is considered to be of local historical and representative significance; aesthetic significance is ascribed only to 158- 164 Queen Street.</p>
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6.3.11 Former Coles and Garrard Building, 376-378 Bourke Street



Summary of significance (as exhibited)

[204] 376-378 Bourke Street is assessed as being locally significant for the following reasons:

- as a highly intact example of the Post-War Modernist style offices utilised for commercial development in central Melbourne during the late 1950s and early 1960s (Criterion A).

- for the way it reflects the growth and progress in 1950s and 1960s Melbourne of locally established companies, resulting in many architecturally designed buildings being erected in the city (Criterion D).
- for its long-term association with Victorian optometrists and spectacle makers, Coles & Garrard (Criterion H).

Response to submission received

[205] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>The building's structure, presentation and operation is very poor and dated requiring significant capital to meet current building standards and Environmentally Sustainable Design (ESD) criteria.</p> <p>Placing the building under a Heritage Overlay will limit repositioning opportunities and cap future capital investment required to reposition the building to attract commercial tenants therefore negatively impacting the property's value.</p>	<p>The principal consideration in applying the Heritage Overlay is whether the place reaches the threshold for local heritage significance - refer to my response at 4.6 above.</p> <p>The exhibited heritage citation and Statement of Significance appropriately articulate the reasons the property warrants inclusion in the Heritage Overlay.</p>

6.3.12 Former Reserve Bank of Australia, 56-64 Collins Street



Summary of significance (as exhibited)

[206] 56-64 Collins Street is assessed as being locally significant for the following reasons:

- the place has a clear association with the postwar building boom which transformed central Melbourne into a modern high-rise city (Criterion A).

- the place is a fine and highly intact representative example of a Post-War Modernist office building (Criterion D).

Response to submission received

[207] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>The previous lack of heritage significance attributed to the site through various heritage studies commissioned by the City of Melbourne.</p> <p>Extensive works to the exterior during the 1990s have resulted in the loss of critical aspects of the original character, materiality and detailing of the building.</p> <p>The whole of the site at is included within the Collins East Precinct (HO504). The proposed introduction of an additional Heritage Overlay to the Subject Site, and an individually significant grading is completely divergent from past heritage review.</p>	<p>Given the timeframe that has elapsed since the 1985 and 1993 heritage studies – now more than 20 years – it is reasonable to expect that public and professional recognition of heritage has changed over this time and the assessment of heritage values may warrant reconsideration - refer to my response at 4.2 above.</p> <p>The exterior modifications mentioned in the submission including that ‘the marble facings to the vertical structural elements were over-clad in segmented stainless steel, and the uppermost band of granite spandrel panels were removed’; but it is my opinion that despite these modifications, the overall character, appearance and presentation of the building remains sufficiently intact to warrant inclusion in the Heritage Overlay. Despite the works in the 1990s that altered the original design of the ground floor, the original design intent remains evident and the ability to understand and appreciate the place as a fine example of a Post-War Modernist multi-storey office building remains.</p> <p>While the subject building is located within the mapped extent of HO504 (Collins East Precinct) it does not demonstrate any of the key attributes of the precinct identified within the Statement of Significance and falls outside the period of significance (mid1800s-1940). It is therefore appropriate to apply an individual Heritage Overlay to recognise the individual heritage values of this building.</p>

6.3.13 Former Colonial Mutual Life Assurance Building and plaza with 'Children's Tree' Sculpture, 308-336 Collins Street



Summary of significance (as exhibited)

[208] 308-336 Collins Street is assessed as being locally significant for the following reasons:

- as part of the post-World War Two development and the rapid growth of the corporate architecture of the 1950s-1970s and a reflection of the growth of insurance and assurance companies in Victoria during the 1950s-60s resulting in many company-named buildings being commissioned and constructed (Criterion A).
- as an example of a postwar office site that provided a publicly accessible plaza, demonstrating one of the key aspects of the postwar corporate buildings in Melbourne (Criterion A).
- as a representative example of post war development in central Melbourne that retains its original form, scale and characteristic stylistic details which reflect the era and original design in which it was constructed (Criterion D).
- The bronze sculpture 'Children's Tree', created in 1963 by celebrated Australian sculptor Tom Bass, and set within its original plaza setting is aesthetically significant. The sculpture and plaza were integral parts of the original design of the building at 308-336 Collins Street, by architects Stephenson & Turner (Criterion E).

Response to submission received

[209] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
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<p>The Building is not of sufficient historical, representative or aesthetic significance to warrant a Heritage Overlay.</p> <p>The Building's heritage significance has been compromised by its diminished integrity and intactness, following a significant refurbishment in 2003. The changes alter and diminish the aspects of the Building that are referred to in the citation. The alterations largely replaced the postwar modernist style with a contemporary commercial architectural character.</p> <p>There are many other examples of such buildings in the Melbourne CBD. The Building does not display characteristics of a higher quality than is usual for postwar modernist office buildings.</p> <p>The Building was designed by a known architectural firm, however it is not striking or remarkable example of their work.</p> <p>There is no visual or thematic relationship between the Building and the sculpture. It does not form an integral part of the Building, nor contributes to an understanding of the history or social significance of the site. A planning permit, currently allows for the relocation of the sculpture.</p>	<p>The assessment of 308-336 Collins Street was undertaken in accordance with PPN1. The site is of local historical, representative and aesthetic significance for the reasons outlined in the Statement of Significance, and the assessment of the building (as contained in the exhibited heritage citation) provides sufficient justification for the application of the Heritage Overlay.</p> <p>The building remains largely intact to its original form and scale. While some change has occurred, including the over-cladding of the elements of the façade in aluminium panels, I am of the opinion that this has not diminished the ability to understand and appreciate the place as a fine example of a postwar building within the City of Melbourne.</p> <p>308-336 Collins Street is one of a number of fine and highly intact representative examples of postwar office buildings within the Hoddle Grid that together clearly illustrate the advancement of construction techniques from the 1960s through to the mid-1970s and demonstrate the broad range of design approaches of the period. In particular, the combined building and public plaza is an important, and increasingly rare, typology within the Hoddle Grid. The concept of the open plaza formed part of a strategy adopted in the 1960s to gain council approval for additional building height. As outlined in the heritage citation for the place, most examples within the City of Melbourne of buildings that retain their original plaza setting are located outside the Hoddle Grid, making this an important surviving example of this once more widely adopted practice. The relationship of the building to the plaza is integral to its significance. The partial infilling of the return of the plaza at the northern end of the Elizabeth Street elevation and construction of a cantilever canopy has not substantially reduced the legibility of the historic relationship between the tower and plaza and the 'Children's Tree' sculpture.</p> <p>The building's significance is not solely based on its association or connection with architects, Stephenson & Turner. The building is one of a number of buildings that were completed by the firm in the postwar period and forms part of the firm's extensive body of work.</p> <p>There is a clear link between the 'Children's Tree' sculpture and the plaza as it was commissioned specifically to sit within this space. As clearly articulated in the Statement of Significance, it</p>
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	formed part of the original design concept for the building and plaza and remains in its original location.
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6.3.14 Stella Maris Seafarer's Centre, 588-600 Little Collins Street



Summary of significance (as exhibited)

[210] 588-600 Little Collins Street is assessed as being locally significant for the following reasons:

- for the tangible evidence it provides of part of the history of Melbourne as a trading port, and of the prevailing concerns for the religious, moral and social welfare of people in the shipping trade (Criterion A).
- for its long association with the adjoining St Augustine's Church through its role from the late 1960s in continuing the Catholic Church's official missionary work to provide pastoral care, services and support for seafaring people, begun by the Church in the mid-nineteenth century (Criterion A).
- for its strong association with a Catholic community of lay staff and volunteers, and religious staff, that offer a dedicated mission to seafarers through their work at the Centre and at Melbourne port (Criterion G).

Response to submission received

[211] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
The Heritage overlay is contrary to Planning Practice Note 1 – Applying the Heritage Overlay.	The site was purchased by the Stella Maris entity in Melbourne in the late 1960s and the existing building on the site was purpose-built as the new Stella Maris Seafarer's Centre in 1972. While the site has had a number of owners over time, the current building has been solely owned and occupied by the Stella Maris and it therefore has a clear and direct association with the Stella Maris community.
The Subject Site does not meet the requisite threshold for the application of a site-specific Heritage Overlay.	

<p>The proposed listing is contrary to the objectives and purpose of the Planning and Environment Act 1987 (Vic).</p> <p>The Statement of Significance focuses upon the use and occupation of the land, which is not a tangible asset. In the absence of there being any built form significance, the Heritage Overlay is not the appropriate tool to apply to recognise or protect any historic use of the land. - Stella Maris has occupied part of the land for an extended period of time, however it is not the only occupant or user of the land and the occupation in is relatively recent in heritage terms.</p> <p>The building has been substantially altered and its era and age does not meet the threshold for the application of the Heritage Overlay.</p> <p>The Subject Site has not been previously identified in previous heritage studies.</p>	<p>This association is clearly represented in the building fabric, as the building was purpose-built as the Stella Maris Seafarer's Centre and continues to provide welfare services for that community. The continuous usage of the place demonstrates a contemporary and ongoing association that is directly linked to the fabric of the building. PPN1 advises 'an appropriate test for a potential heritage place to pass in order to apply the Heritage Overlay is that it has 'something' to be managed'. The association between the Stella Maris Seafarer's Centre and the community is particularly strong due to the ongoing and close relationship between the physical place, the Stella Maris community and the provision of religious, moral and welfare services to Roman Catholic seafarers.</p> <p>There is no provision in PPN1 that requires a place to be of a minimum age before it can be assessed or included in a local Heritage Overlay and there is sufficient justification for the application of an Individual Heritage Overlay - refer to my response at 4.3 above.</p> <p>Given the timeframe that has elapsed since the 1985 and 1993 heritage studies – now more than 20 years – it is reasonable to expect that public and professional recognition of heritage has changed over this time and the assessment of heritage values may warrant reconsideration - refer to my response at 4.1 above.</p>
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6.3.15 Treasury Gate, 93-101 Spring Street (referred to as 99 Spring Street in submission)



Summary of significance (as exhibited)

[212] 93-101 Spring Street is assessed as being locally significant for the following reasons:

- as one of the first wave of high-rise residential apartments constructed in the Melbourne CBD from the late 1960s, and before the introduction of a Victorian government policy in 1971 that directed where growth in Melbourne's housing supply could take place (Criterion A).
- as a notable example of a new building typology that emerged in the late 1960s and early 1970s – the modern high-rise residential apartment building (Criterion D).
- for its demonstration of modernism in mixed use apartment design (Criterion E).

Response to submission received

[213] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
Currently undertaking works to the building and seek to understand how the heritage controls will impact on further proposed works. Specifically, the completion of the application of gold banding to the Spring Street (east) elevation of the tower element (already applied to the north, west and south elevations), works to the driveway entrance and improving the sheet metal awning to the residences.	Gold coloured spandrel panels have been recently applied to limited sections of the north, west and south elevations of the building, which are the secondary facades of the building. Notwithstanding this alteration, the place is considered to remain sufficiently intact to its original form and detailing to warrant the application of the Heritage Overlay as recommended on the HGHR. Matters relating to the impact of a Heritage Overlay on future development aspirations have been the

	subject of numerous Planning Panels, who have consistently found that future development is a matter for the planning permit process should a place be found to be of sufficient significance to warrant inclusion in the Heritage Overlay- refer to my response at 4.6 above.
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6.3.16 The Royal Insurance Group Building, 430-442 Collins Street; Cowan House, 457-469 Little Collins Street & AMP Tower and St James Building complex, 527-555 Bourke Street



Summary of significance (as exhibited)

[214] The Royal Insurance Group Building at 430-432 Collins Street is assessed as being locally significant for the following reasons:

- for its association with the rapid growth of high-rise office buildings in the 1960s-mid 1970s postwar period, and with the expansion of large companies undertaking construction and naming rights of new city office buildings as a form of promotion and fund investment (Criterion A).
- as a fine, intact and representative example of a modern office tower, many of which were designed by the prominent architectural practice of Yuncken Freeman during the 1960s (Criterion D).
- for its attributes that include the black granite pre-glazed concrete panels that are expressed in the façade, its podium level of tall glazing carried on columns and its mezzanine level (Criterion E).

[215] Cowan House at 457-469 Little Collins Street is assessed as being locally significant for the following reasons:

- for the evidence it provides of postwar development and rapid growth in Melbourne of corporate architecture of the 1950s-70s (Criterion A).
- as a highly intact example of postwar commercial development in central Melbourne in the Post-War Modernist style that characterised this new wave of development (Criterion D).
- as a highly intact example of the later postwar development in curtain wall design during the 1960s (Criterion E).

[216] The AMP Tower and St James Building complex at 527-555 Bourke Street is assessed as being locally significant for the following reasons:

- the place has a clear association with the postwar building boom which transformed central Melbourne into a modern high-rise city (Criterion A).
- the place is a fine and intact representative example of a Post-War Modernist commercial building (Criterion D).
- the place is a well-considered and carefully detailed example of a designed urban space in the Melbourne CBD. Widely discussed and illustrated in contemporary architectural journals during and after construction, the site presents as a well-designed and now rare urban space in the CBD. (Criterion B & E).

Response to submission received

[217] One objecting submission was received for the three properties at 430-432 Collins Street, 457-469 Little Collins Street and 527-555 Bourke Street. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>All properties are proposed to be individually listed which will severely and unnecessarily constrain the continuing evolution of the buildings to accommodate commercial and supporting activities. The inability to substantially modify and change the buildings will significantly affect the long-term utility of the assets.</p> <p>They are all modern office buildings that require ongoing significant work to remain commercially viable into the future</p> <p>430-442 Collins Street was largely refurbished in 1994-1996 while the ground floor has undergone multiple, significant renovations since that time. The latest refurbishment works at the ground floor are currently being finalised on site. The Review notes the building is proposed to be labelled as 'Significant' partly due to its pre-cast concrete cladding. It is noted this cladding may well need to be replaced in the coming years as part of general maintenance. A Heritage Overlay will make these necessary maintenance works unnecessarily burdensome or may go so far as to prevent the works from occurring. Architects have been engaged to provide a series of options to upgrade the building to modern standards and provide additional accommodation and remain relative in the future tenant market. A permanent Heritage</p>	<p>The principal consideration in applying the Heritage Overlay is whether the place reaches the threshold for local heritage significance. The impact on individual owners or future development opportunities is not relevant in determining the heritage significance of a place - refer to my response at 4.6 above.</p> <p>Given the timeframe that has elapsed since the 1985 and 1993 heritage studies – now more than 20 years – it is reasonable to expect that public and professional recognition of heritage has changed over this time and the assessment of heritage values may warrant reconsideration - refer to my responses at 4.1 and 4.2 above.</p> <p>The assessments of 430-442 Collins Street, 457-469 Little Collins Street and 527-555 Bourke Street were undertaken in accordance with PPN1. I am of the opinion that the assessments contained in the exhibited heritage citations provide sufficient justification for the application of Individual Heritage Overlays to each place.</p>

<p>Overlay would put this necessary evolution of the building in jeopardy.</p> <p>In the four Heritage studies prepared to date for the Hoddle Grid (1985, 1993, 2002 and 2011) 457-459 Little Collins Street has never been nominated for heritage grading. Other postwar buildings have been identified previously, including many being introduced as part of Amendment C387. It is unclear why this building now demands heritage controls when it has never previously been identified in at least four studies to date and is of no architectural merit.</p> <p>The heritage significance of 527-555 Bourke Street was found to be of limited importance or value when it was assessed in detail at the time the previous owner AMP sought to redevelop the site in the mid-1990s. Since Julliard purchased the complex the buildings have been revitalised and modified with the addition of further floors atop of the St James building and the creation of a new courtyard. These modifications have significantly improved the amenity and utility of the buildings and overall public spaces. It is worthwhile to reflect on whether it would be possible to make these changes if a heritage overlay was in place at the time the changes were proposed.</p>	
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6.3.17 Former Methodist Church Centre [also known as Uniting Church Centre], 130-134 Little Collins Street (referred to as 130 Collins Street in submission)



Summary of significance (as exhibited)

[218] 130-134 Little Collins is assessed as being locally significant for the following reasons:

- the place has a clear association with the postwar building boom which transformed central Melbourne into a modern high-rise city (Criterion A).
- the place is a fine and highly intact representative example of a Post-War Modernist office building (Criterion D).

Response to submission received

[219] One objecting submission was received for this property. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>Planning permit TP-2017-826 has been issued with endorsed plans and amendments along with a Section 29A consent for demolition.</p> <p>Given these circumstances the introduction of permanent heritage controls over the building is entirely unnecessary and this site should be removed from the Amendment.</p>	<p>Amendment C387 does not affect permit TP-2017-826 which allows for the re-development of 130-134 Little Collins Street - refer to my response at 4.5 above.</p>

6.3.18 Former Ajax House, 103-105 Queen Street



Summary of significance (as exhibited)

[220] 103-105 Queen Street is assessed as being locally significant for the following reasons:

- as a part of the postwar development and rapid growth of corporate architecture in central Melbourne of the 1950s-70s that reflected the expansion of large national and international companies opting for

construction and naming rights of new city office buildings as a form of promotion and fund investment (Criterion A).

- as a reflection of the growth of insurance and assurance companies in Victoria during the 1950s-70s, cementing Melbourne's pre-eminent role in the state for financial institutions (Criterion A).
- as an example of early postwar commercial development in central Melbourne (Criterion D).

Response to submission received

- [221] One objecting submission was received for the place noting that “a detailed submission is to be lodged”. No further submission was received during the exhibition period.

7. Amendment C387 - other submissions

[222] Following is a response to the matters raised in each of the other submissions. The column entitled 'Summary of heritage issues raised' in the tables below is extracted directly from the table of submissions prepared by Council for FMC on 18 May 2021. The column entitled 'Expert response' in the tables below represents my opinion in relation to these matters. In preparing this advice I read each submission.

7.1 National Trust of Australia Victoria (Submission 29)

[223] NTAV submitted a detailed submission in response to Amendment C387. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>Strongly support Amendment C387 which implements the recommendations of the Hoddle Grid Heritage Review on a permanent basis.</p> <p>Advocate for the period 1975-2000 to be the subject of future work to ensure that significant heritage places from this period are afforded appropriate protection.</p> <p>Note that a framework for a study into interiors was drafted as part of the 2018-20 component of the Review but has not progressed at this stage. We advocate for the completion of this work be prioritised, noting that significant interiors in the City of Melbourne are highly valued by the community, but are particularly vulnerable to inappropriate redevelopment.</p>	<p>The period between 1975 and 2000 falls outside the scope of the HGHR as do building interiors.</p> <p>A future heritage study that covers the period 1975-2000 would be an appropriate mechanism in which to consider these and other buildings from the later part of the twentieth century.</p> <p>Likewise, it would be appropriate to undertake a study covering building interiors.</p>

7.2 Melbourne Heritage Action (Submission 51)

[224] MHA submitted a detailed submission in response to Amendment C387. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>The Review should have included: anything built after 1975, significant interiors, historic signs, lane-scapes, and objects, such as street furniture and public art, which all often come under threat.</p> <p>The scope of the Review should have included existing heritage precincts given the Statements of Significance for these precincts have inadequate detail and the boundaries require revision. We also note that in a number of cases the boundaries of pre-existing precincts should be examined and potentially</p>	<p>Typological and/or thematic studies are the most appropriate way to address the particular typologies noted in Submission 51 as warranting further assessment. This might include future typological/thematic studies of significant interiors, historic signs, public car parks and objects such as street furniture and public art across the whole municipality. Typology/thematic studies benefit from a focused identification and assessment of places or objects that share commonalities, and are integral in bridging gaps in heritage knowledge and protection.</p>

<p>extended, for instance individual places listed in Ridgeway Place could logically have been folded in the Bourke Hill or Collins East precinct.</p> <p>We would have also liked to see more clarity on postwar places deemed in the review as not meeting the threshold for individual heritage value in context of other postwar places, but which may have some contributory status in the precincts. For instance the Hub Arcade in Little Collins Street, which is now threatened with demolition, but may have some value as part of the streetscape as a postwar arcade, now a rare item in the CBD after the demolition of Port Phillip Arcade.</p> <p>A list of places which have not been provided heritage protection and potentially should:</p> <ul style="list-style-type: none"> • Victoria Hotel complex, Little Collins Street • 10-16 McKillop Street • 300 Russell Street • 296-298 Russell Street • Saracen's Head Hotel, 387-391 Bourke Street. • Croft Institute, 21-25 Croft Alley • Burtons Livery 46-50 Latrobe Street • Melbourne Cyclorama Company, 166-186 Little Collins Street • Askew House, 364- 372 Lonsdale Street • Orbit House, 183 Elizabeth Street • Golden Square Parking, 217-231 Lonsdale Street • Lane-scape of 239-243 Elizabeth Street • Manton Lane • Lane-scape of 232 King St (Tramway Union House) 	<p>A review of post-1975 buildings lay outside the scope of the HGHR. A future heritage study that covers the period 1975-2000 would be an appropriate mechanism in which to consider these and other buildings from the later part of the twentieth century. Likewise, a review of the existing precincts within the City of Melbourne was outside the scope of the HGHR.</p> <p>All places identified for potential inclusion in the Heritage Overlay by Submission #51 were considered in the HGHR. These places were considered to not meet the threshold for local significance and consequently did not warrant inclusion in the Schedule to the Heritage Overlay as Individual Heritage Places, or as 'contributory' or 'significant' places within existing precincts.</p> <p><u>Victoria Hotel complex, Little Collins Street</u> The earlier sections of this complex (west of Athenaeum Place) are already included in HO504 (Collins East Precinct). It is considered that the remainder of the site may have some local historic and social significance and is recommended for assessment in a future precinct review of HO504.</p> <p><u>10-16 McKillop Street</u> These building were not recommended for protection within the Guildford & Hardware Laneways Study. Following further consideration through the HGHR, they were considered to be too altered in comparison with other examples to warrant inclusion as an individual heritage place.</p> <p><u>300 Russell Street</u> This place was identified as contributory within a potential Russell Street Precinct which was not progressed as it lacked cohesion. It is considered that this building is not of sufficient significance to warrant inclusion as an individual heritage place.</p> <p><u>296-298 Russell Street</u> This place was identified as contributory within a potential Russell Street Precinct which was not progressed as it lacked cohesion. It is considered that this building is not of sufficient significance to warrant inclusion as an individual heritage place.</p> <p><u>Saracen's Head Hotel, 387-391 Bourke Street</u> It is considered that this place is too heavily altered, is of low integrity and is no longer legible as a former hotel and does not warrant inclusion as an individual heritage place.</p>
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	<p><u>Croft Institute, 21-25 Croft Alley</u> It is considered that this place is more readily comparable with contributory graded buildings within existing heritage precincts and does not warrant inclusion as an individual heritage place.</p> <p><u>Burttons Livery 46-50 Latrobe Street</u> This place is considered to be highly modified with only the façade retained and a tower development constructed above. It is considered to be too compromised to warrant inclusion as an individual heritage place.</p> <p><u>Melbourne Cyclorama Company, 166-186 Little Collins Street</u> This place has been subject to a large number of changes over a long period of time. It is considered to be too altered to warrant inclusion as an individual heritage place.</p> <p><u>Askew House, 364-372 Lonsdale Street</u> This place is considered to be of insufficient architectural quality to warrant inclusion as an individual Heritage Place.</p> <p><u>Orbit House, 183 Elizabeth Street</u> This place is considered to be of insufficient architectural quality to warrant inclusion as an individual heritage place. The building's intactness and low-rise scale is acknowledged but it is not considered to meet the threshold for inclusion on the Heritage Overlay. I note that the previously intact ground floor shop front was recently removed.</p> <p><u>Golden Square Parking, 217-231 Lonsdale Street</u> The Little Bourke Street and Tattersalls Lane elevations of this car park are currently included in the Little Bourke Street Precinct (HO507). As discussed above, it is considered that a typology/thematic study of car parks within the City of Melbourne is needed to consider this building and others such as the Parkade Carpark at 34 Little Collins Street.</p> <p><u>'Lane-scapes'</u> Laneways are included within the extent of precincts where they form part of the identified heritage values these places. 'Lane-scapes' were not in</p>
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	<p>themselves considered as a typology and a review of laneways fell outside the scope of the HGHR.</p> <p>In relation to the rear of 239-243 Elizabeth Street, the laneway is not considered to be a cohesive urban streetscape warranting inclusion on the Heritage Overlay.</p> <p>In relation to Manton Lane, GJM note that for the majority of its length the older built form occupies only one side of the lane with contemporary development occupying western side of the lane at 270-280 King Street.</p> <p>The heritage values of the rear of 232 King Street and Brown Alley, which is largely recognised by being flanked two VHR-listed properties could, like the other 'lane-scapes' noted in Submission 51, be considered as part of a broader laneway study.</p> <p>The Heritage Policy at Clause 22.04 recently introduced through C258melb does not give as much weight to laneway elevations as it does to principal street frontages. The addressing of this policy position is outside the scope of the HGHR.</p>
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7.3 Australian Institute of Architects (Submission 58)

[225] The AIA provided a detailed submission in response to C387melb. The issues raised and responses to the issues are provided below.

Summary of heritage issues raised	Expert response
<p>Generally support the Hoddle Grid Heritage Review however also recommend potential areas of focus and future direction.</p> <p>It is natural, and critical, to wish to protect and heritage list the very best examples of this period, like the already listed ICI House (glass facade), the proposed listing of 440 Collins (precast facade), and the listed 140 William Street (steel facade), which, by many accounts, are considered the exemplars of this period of the 50's, 60's and 70's respectively. There are also clear and significant commercial examples from more recent times, such as the 80s, including both Collins Place by IM Pei and 1 Spring Street by Harry Seidler, and the 90s with local Gold Medallist architects DCM with 101 Collins Street to name a few.</p> <p>The bar for heritage protection in the CBD needs to be kept to a high level of significance</p>	<p>The HGHR has been undertaken in a manner that has allowed for a rigorous and comprehensive assessment of places located within the study area. The methodology used conforms to the requirements of PPN1, in that it uses HERCON heritage criteria, involves comprehensive comparative analysis and has produced heritage citations and Statements of Significance that clearly explain the basis for which places have been assessed as having heritage significance.</p> <p>The threshold for State Significance is much higher than the test of locally significant which is the relevant test for inclusion on the Heritage Overlay of the Melbourne Planning Scheme. Submission 58 references VHR-listed postwar office buildings including former ICI House, 1 Nicholson Street (H0786) and former BHP House, 140 William Street (H1699). It is not necessary for the Lonsdale Exchange building at 447-453 Lonsdale Street or 43-51 Queens Street, both of which are proposed to be</p>

<p>and avoid over-reach. CBD buildings need to be listed for their high-quality contribution, as otherwise their upkeep, impact on the environment and lost opportunity/cultural cost will lead to undesirable impacts on the future prosperity of the city.</p> <p>Examples of potential over-reach in the current Review is the:</p> <ul style="list-style-type: none"> • Lonsdale Exchange building, at 447-453 Lonsdale Street which was not designed by a prominent architect, is not a significant example of brutalism and is out of scale with its context in the absence of true architectural merit to support this height. It presents a unique opportunity, if demolished, to be replaced with a competition-based design for a new carbon-neutral building of similar or greater height, combined with the opportunity to have glass to each facade to take advantage of its unique context. Alternatively, the height could be limited to allow for the expansion of the courts into a building that reinforces the scale and significance of the precinct. • 43-51 Queen Street which is an infill building, not a corner of freestanding tower site, finished in 1957 but of limited merit when compared to ICI house completed in 1958 which is an holistic approach to glass curtain. The murals and artwork to the base of this building have been removed. Whilst the curtain wall is of note, this site perhaps would be better used for future opportunities. <p>Need to be able to provide sites to allow for new commercial towers, new modes of working that have not yet been conceived, and new materials and energy systems which are truly innovative and sustainable.</p> <p>We propose the consideration of strategies to provide rent relief, building maintenance support, and other incentives to assist these</p>	<p>included on the Heritage Overlay as part of Amendment C387, to meet the same threshold as places included on the VHR.</p> <p>The assessments contained in the exhibited heritage citations provide sufficient justification for the application of individual Heritage Overlays to the Lonsdale Exchange building at 447-453 Lonsdale Street (for its historical significance in demonstrating the growth and change in telecommunication services in Melbourne and its aesthetic/architectural value as a highly intact Post-War Modernist building), and 43-51 Queen Street (for its historical significance in demonstrating the growth of insurance and assurance companies in the postwar period in Melbourne and its architectural value as a highly intact Bates Smart & McCutcheon designed curtain wall building).</p> <p>The principal consideration in applying the Heritage Overlay is whether the place reaches the threshold for local heritage significance. The impact on individual owners is not relevant in determining the heritage significance of a place. Further, it is noted that the individual postwar places discussed in Submission 58 only make up a very small proportion of the land area within the Hoddle Grid - refer to my response at 4.6 above.</p> <p>The I.M. Pei designed Collins Place and Denton Corker Marshall's 101 Collins Street discussed in Submission 58 fall outside the period of 1945-1975 and therefore were outside the scope of the HGHR. The Former Shell House at 1 Spring Street, designed by Harry Seidler, dating from the mid-late 1980s is included on the VHR (H2365). A future heritage study that covers the period 1975-2000 would be an appropriate mechanism in which to consider these and other buildings from the later part of the twentieth century</p> <p>Issues of direct financial support for heritage conservation or incentivization through plot ratio bonuses fall outside the scope of the HGHR.</p>
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<p>sites and to encourage their meaningful contribution back to the city. Amendment C270 could be revised to provide an opportunity to increase the plot ratio for developments that provide money into a heritage restoration fund for the immediate city precinct they belong to.</p>	
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8. Conclusion

- [226] It is my evidence that the HGHR provides a justifiable basis for including one-hundred and thirty-seven (137) individual places and five (5) precincts in the Heritage Overlay of the Melbourne Planning Scheme on a permanent basis. The implementation of the HGHR through Amendment C387 contributes to the objectives and strategies of Clause 15.03-1S – ‘Heritage conservation’ of the Melbourne Planning Scheme, and the objectives of section 4(1)(d) of the *Planning and Environment Act 1987*.
- [227] The methodology underpinning the HGHR is sufficiently robust to support the Amendment and the heritage assessment of the places recommended for inclusion in the Heritage Overlay have been conducted in accordance with the requirements of PPN1. The heritage criteria within PPN1 have been appropriately applied to recognise the heritage significance of the buildings and precincts proposed for inclusion in the Heritage Overlay through Amendment C387.
- [228] Subject to the changes recommended in relation to 106 Little Lonsdale Street, 393-405 Bourke Street and 25 Elizabeth Street, it is my view that Amendment C387 should be adopted as exhibited.

ANNEXURE I – Instructions from Toby Hayes, Practice Leader, City Strategy & Legal Counsel, City of Melbourne dated 11 June 2021



CITY OF MELBOURNE

GPO Box 1603
Melbourne VIC 3001
Telephone (03) 9658 9658
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DX210487

ABN 55 370 219 287

11 June 2021

Jim Gard'ner
Level 3, 124 Exhibition Street
MELBOURNE VIC 3000

Sent via email to jim@gjmheritage.com

Dear Mr Gard'ner

Melbourne Planning Scheme Amendment C387 Hoddle Grid Heritage Panel Hearing

Thank you for agreeing to prepare and present expert evidence at the hearing of this matter before Planning Panels Victoria. A two member Panel has been appointed and the Panel will comprise Tim Hellsten and Lucinda Peterson. The hearing is listed for the week commencing 23 August 2021.

As you are aware, the Amendment seeks to implement the recommendations of the Hoddle Grid Heritage Review. The Amendment was on public exhibition between 5 November and 17 December 2020 and includes the protection of 55 postwar buildings located in the Hoddle Grid.

Melbourne City Council currently expects to call one other expert at the hearing. With the tight timeframes for preparation and submission of evidence, the process requires considerable coordination. I will be instructing at the hearing with assistance from Suellen Hunter noting that Carly Robertson of counsel has been briefed to appear and will be led by Susan Brennan S.C.

In terms of your task, please review the following documents which will be made available to you through a Microsoft SharePoint link in a separate email to follow shortly:

- PPN01 Planning Practice Note (Folder 10)
- Report and minutes from the 4 August 2020 Future Melbourne Committee Meeting of Melbourne City Council (Folder 01)
- Report and minutes from 18 May 2021 Future Melbourne Committee Meeting of Melbourne City Council (Folder 03)
- Interactive map (Folder 08)
- Exhibited Amendment Documents: (Folder 02)
 - Gazette notice
 - Explanatory report
 - Instruction sheet
 - Clause 22.04 Heritage Places within the Capital City Zone Policy
 - Schedule to Clause 43.01 Heritage Overlay
 - Schedule to Clause 72.04 Incorporated Documents
 - Planning Scheme maps:
 - Melbourne C387melb 003d-ho1 Map 08 Exhibition (deletion map)
 - Melbourne C387melb 014ho1 Map08 Exhibition
 - Melbourne C387melb 004ho1 Map08 Exhibition

- Melbourne C387melb 015ho1 Map08 Exhibition
- Melbourne C387melb 008ho2 Map08 Exhibition
- Melbourne C387melb 009ho2 Map08 Exhibition
- Melbourne C387melb 010ho2 Map08 Exhibition
- Melbourne C387melb 011ho2 Map08 Exhibition
- Melbourne C387melb 012ho2 Map08 Exhibition
- Melbourne C387melb 013ho Map08 Exhibition
- Incorporated Documents:
 - Guildford and Hardware Laneways Heritage Study 2017 Heritage Inventory November 2018 (Amended July 2020)
 - Guildford and Hardware Laneways Heritage Study 2017 Statements of Significance November 2018 (Amended July 2020)
 - Heritage Places Inventory February 2020 (Amended July 2020) Part A Incorporated Document Exhibition
 - Heritage Precincts Statements of Significance February 2020 (Amended July 2020) Incorporated Document
 - Statements of Significance:
 - 53-57 Lonsdale Street, Melbourne Statement of Significance, July 2020
 - 166 Russell Street, Melbourne Statement of Significance, July 2020
 - AMP Tower and St James Building Complex Statement of Significance (527-555 Bourke Street, Melbourne), July 2020
 - Apartment building Statement of Significance (13-15 Collins Street, Melbourne), July 2020
 - Atlas Assurance Building Statement of Significance (404-406 Collins Street, Melbourne), July 2020
 - Australia-Netherlands House Statement of Significance (468-478 Collins Street, Melbourne), July 2020
 - Coates Building Statement of Significance (18-22 Collins Street, Melbourne), July 2020
 - Collins Gate Statement of Significance (377-379 Little Collins Street, Melbourne), July 2020
 - Commercial building Statement of Significance (480 Bourke Street, Melbourne), July 2020
 - Commercial Building Statement of Significance (582-584 Little Collins Street, Melbourne), July 2020
 - Cowan House Statement of Significance (457-469 Little Collins Street, Melbourne), July 2020
 - Downs House Statement of Significance (441-443 Little Bourke Street, Melbourne), July 2020
 - Dreman Building Statement of Significance (96-98 Flinders Street, Melbourne), July 2020
 - Brewery Lane Precinct Statement of Significance, July 2020
 - Epstein House Statement of Significance (134-136 Flinders Street, Melbourne), July 2020
 - Equitable House Statement of Significance (335-349 Little Collins Street, Melbourne), July 2020
 - Flinders Lane East Precinct Statement of Significance, July 2020
 - Flinders Street Railway Viaduct Statement of Significance (Flinders Street, Melbourne), July 2020
 - Former Ajax House Statement of Significance (103-105 Queen Street, Melbourne), July 2020
 - Former Allans Building Statement of Significance (276-278 Collins Street, Melbourne), July 2020

- Former AMP Building Statement of Significance (344-350 Collins Street, Melbourne), July 2020
- Former AMP Building Statement of Significance (402-408 Lonsdale Street, Melbourne), July 2020
- Former Andrew Jack Dyson & Co (594-610 Lonsdale Street, Melbourne), July 2020
- Former Australia Pacific House Statement of Significance (136-144 Exhibition Street, Melbourne), July 2020
- Former Bank of Adelaide Building Statement of Significance (265-269 Collins Street, Melbourne), July
- Former Bank of Australasia Statement of Significance (152-156 Swanston Street, Melbourne), July 2020
- Former Bank of New South Wales Statement of Significance (137-139 Flinders Lane, Melbourne), July 2020
- Former Batman Automatic Telephone Exchange Statement of Significance (376-382 Flinders Lane,
- Former Bryson Centre Statement of Significance (174-192 Exhibition Street, Melbourne), July 2020
- Former Cassells Tailors Pty Ltd Statement of Significance (341-345 Elizabeth Street, Melbourne), July 2020
- Former Coles and Garrard Building Statement of Significance (376-378 Bourke Street, Melbourne), July 2020
- Former Colonial Mutual Life Insurance Building and Plaza with 'Children's Tree' Sculpture Statement of Significance (308-336 Collins Street, Melbourne), July 2020
- Former Commercial Banking Company of Sydney Building Statement of Significance (251-257 Collins Street, Melbourne), July 2020
- Former Commonwealth Banking Corporation Building Statement of Significance (359-373 Collins Street, Melbourne), July 2020
- Former Craig Williamson Pty Ltd complex Statement of Significance (57-67 Little Collins Street, Melbourne), July 2020
- Former Dalgety House Statement of Significance (457-471 Bourke Street, Melbourne), July 2020
- Former Dilingham Estates House Statement of Significance (114-128 William Street, Melbourne), July 2020
- Former Excelsior Chambers Statement of Significance (17-19 Elizabeth Street, Melbourne), July 2020
- Former Exhibition Towers Statement of Significance (287-293 Exhibition Street, Melbourne), July 2020
- Former Factory Statement of Significance (203-207 King Street, Melbourne), July 2020
- Former Gilbert Court Statement of Significance (100-104 Collins Street, Melbourne), July 2020
- Former Godfrey's Building Statement of Significance (188-194 Little Collins Street, Melbourne), July 2020
- Former Gordon Buildings Statement of Significance (384-386 Flinders Lane, Melbourne), July 2020
- Former Gothic Chambers and warehouse Statement of Significance (418-420 Bourke Street and 3 Kirks Lane, Melbourne), July 2020
- Former Guardian Building Statement of Significance (454-456 Collins Street, Melbourne), July 2020
- Former Hosie's Hotel Statement of Significance (1-5 Elizabeth Street, Melbourne), July 2020

- Former John Danks & Son Statement of Significance (393-403 Bourke Street, Melbourne), July 2020
- Former Kantay House Statement of Significance (12-18 Meyers Place, Melbourne), July 2020
- Former Law Department's Building Statement of Significance (221-231 Queen Street, Melbourne), July 2020
- Former Law Institute House Statement of Significance (382 Little Collins Street, Melbourne), July 2020
- Former Legal and General House Statement of Significance (375-383 Collins Street, Melbourne), July 2020
- Former London Assurance House Statement of Significance (Part 468-470 Bourke Street, Melbourne), July 2020
- Former Malcolm Reid & Co Department Store Statement of Significance (151-163 Bourke Street, Melbourne), July 2020
- Former Manchester Unity Oddfellows Building Statement of Significance (335-347 Swanston Street, Melbourne), July 2020
- Former Markillie's Prince of Wales Hotel Statement of Significance (562-564 Flinders Street and rear in Downie Street, Melbourne), July 2020
- Former Melbourne and Metropolitan Tramways Board Building Statement of Significance (616-622 Little Collins Street, Melbourne), July 2020
- Former Melbourne City Council Power Station Statement of Significance (617-639 (part) and 651-669 Lonsdale Street, 602-606 and 620-648 Little Bourke Street, Melbourne), July 2020
- Former Melbourne City Council Substation Statement of Significance (10-14 Park Street, Melbourne), July 2020
- Former Melbourne City Council substation Statement of Significance (11-27 Tavistock Place, Melbourne), July 2020
- Former Melbourne City Council Substation Statement of Significance (23-25 George Parade, Melbourne), July 2020
- Former Melbourne Shipping Exchange Statement of Significance (25 King Street, Melbourne), July 2020
- Former Methodist Church Centre Statement of Significance (130-134 Little Collins Street, Melbourne), July 2020
- Former MLC Building Statement of Significance (303-317 Collins Street, Melbourne), July 2020
- Former Morris House Statement of Significance (114-122 Exhibition Street, Melbourne), July 2020
- Former National Bank of Australasia Stock Exchange Branch Statement of Significance (85-91 Queen Street, Melbourne), July 2020
- Former Palmer's Emporium Statement of Significance (220 Bourke Street, Melbourne), July 2020
- Former Paramount House Statement of Significance (256-260 King Street, Melbourne), July 2020
- Former Patersons Pty Ltd Statement of Significance (Part 152-158 Bourke Street, Melbourne), July 2020
- Former Princes Bridge Lecture Room Statement of Significance (Princes Walk, Birrarung Marr, Melbourne), July 2020
- Former Printcraft House Statement of Significance (428-432 Little Bourke Street, Melbourne), July 2020
- Former Reserve Bank of Australia Statement of Significance (56-64 Collins Street, Melbourne), July 2020

- Former Ridgway Terrace Statement of Significance (20 Ridgway Place, Melbourne), July 2020
- Former Rockman's Showrooms Statement of Significance (188 Bourke Street, Melbourne), July 2020
- Former Royal Automobile Club of Victoria Statement of Significance (111-129 Queen Street, Melbourne), July 2020
- Former Russell Street Automatic Telephone Exchange and Postal Building Statement of Significance (114-120 Russell Street, Melbourne), July 2020
- Former Sharpe Bros Pty Ltd Statement of Significance (202-204 Bourke Street, Melbourne), July 2020
- Former Sleigh Buildings Statement of Significance (158-172 Queen Street, Melbourne), July 2020
- Former South British Insurance Company Ltd Building Statement of Significance (155-161 Queen Street, Melbourne), July 2020
- Former State Savings Bank of Victoria Statement of Significance (45-63 Swanston Street, Melbourne), July 2020
- Former State Savings Bank of Victoria Statement of Significance (233-243 Queen Street, Melbourne), July 2020
- Former State Savings Bank Statement of Significance (258-264 Little Bourke Street, Melbourne), July 2020
- Former Sunday School Union of Victoria Statement of Significance (100-102 Flinders Street, Melbourne), July 2020
- Former Thomas Warburton Pty Ltd complex Statement of Significance (365-367 Little Bourke Street, 384-386 Bourke Street, 2-6 and 8-14 Rankins Lane, Melbourne), July 2020
- Former Union House Statement of Significance (43-51 Queen Street, Melbourne), July 2020
- Former Universal House Statement of Significance (25 Elizabeth Street, Melbourne), July 2020
- Former Victorian Amateur Turf Club Statement of Significance (482-484 Bourke Street, Melbourne), July 2020
- Former Wenley Motor Garage Statement of Significance (39-41 Little Collins Street, Melbourne), July 2020
- Former Zander's No 2 Store Statement of Significance (11 Highlander Lane, Melbourne), July 2020
- Grange Lynne Pty Ltd Statement of Significance (183-189 A'Beckett Street, Melbourne), July 2020
- Great Western Hotel Statement of Significance (204-208 King Street Melbourne), July 2020
- Henty House Statement of Significance (499-503 Little Collins Street, Melbourne), July 2020
- Hoyts Mid City Cinemas Statement of Significance (194-200 Bourke Street, Melbourne), July 2020
- Laurens House Statement of Significance (414-416 Lonsdale Street, Melbourne), July 2020
- Little Lonsdale Street Precinct Statement of Significance, July 2020
- Lonsdale Exchange Building Statement of Significance (447-453 Lonsdale Street, Melbourne), July 2020
- Lyceum Club Statement of Significance (2-18 Ridgway Place, Melbourne), July 2020
- Melbourne House Statement of Significance (354-360 Little Bourke Street, Melbourne), July 2020

- Melbourne Theosophical Society Statement of Significance (124-130 Russell Street, Melbourne), July
- Metropolitan Hotel Statement of Significance (263-267 William Street, Melbourne), July 2020
- Nubrik House Statement of Significance (269-275 William Street, Melbourne), July 2020
- Office building Statement of Significance (178-188 William Street, Melbourne), July 2020
- Office building Statement of Significance (516-520 Collins Street, Melbourne), July 2020
- Office building Statement of Significance (589-603 Bourke Street, Melbourne), July 2020
- Offices Statement of Significance (422-424 Bourke Street, Melbourne), July 2020
- Park Tower Statement of Significance (199-207 Spring Street, Melbourne), July 2020
- Residence Statement of Significance (474 Little Lonsdale Street, Melbourne), July 2020
- Residences Statement of Significance (120-122 Little Lonsdale Street, Melbourne), July 2020
- Royal Insurance Building Statement of Significance (430-442 Collins Street, Melbourne), July 2020
- Royal Mail House Statement of Significance (253-267 Bourke Street, Melbourne), July 2020
- Sanders and Levy Building Statement of Significance (149-153 Swanston Street, Melbourne), July 2020
- Shop and residence Statement of Significance (215-217 Swanston Street, Melbourne), July 2020
- Shop Statement of Significance (37 Little Collins Street, Melbourne), July 2020
- Shop Statement of Significance (171 Bourke Street, Melbourne), July 2020
- Shop Statement of Significance (215 Queen Street, Melbourne), July 2020
- Shop, café and office Statement of Significance (7-9 Elizabeth Street, Melbourne), July 2020
- Shops and dwellings Statement of Significance (201-207 Bourke Street, Melbourne), July 2020
- Shops and dwellings Statement of Significance (209-215 Bourke Street, Melbourne), July 2020
- Shops and offices Statement of Significance (359-363 Lonsdale Street, Melbourne), July 2020
- Shops Statement of Significance (173-175 Bourke Street, Melbourne), July 2020
- Shops Statement of Significance (470-472 Little Lonsdale Street, Melbourne), July 2020
- Shops, residence and former bank Statement of Significance (146-150 Bourke Street, Melbourne), July 2020
- Stella Maris Seafarer's Centre Statement of Significance (588-600 Little Collins Street, Melbourne), July 2020
- Swanston Street North Precinct Statement of Significance, July 2020
- Swanston Street South Precinct Statement of Significance, July 2020

- Swiss Club of Victoria Statement of Significance (87-89 Flinders Lane, Melbourne), July 2020
- The Former Houston Building Statement of Significance (184-192 Queen Street, Melbourne), July 2020
- The Waiters Restaurant Statement of Significance (20 Meyers Place, Melbourne), July 2020
- Treasury Gate Statement of Significance (93-101 Spring Street, Melbourne), July 2020
- Turnverein Hall Statement of Significance (30-34 La Trobe Street, Melbourne), July 2020
- Victoria Club building Statement of Significance (131-141 Queen Street, Melbourne), July 2020
- Wales Corner Statement of Significance (221-231 Collins Street, Melbourne), July 2020
- Warehouse Statement of Significance (1-5 Coverlid Place, Melbourne), July 2020
- Warehouse Statement of Significance (11-15 Duckboard Place, Melbourne), July 2020
- Warehouse Statement of Significance (11A Highlander Lane, Melbourne), July 2020
- Warehouse Statement of Significance (26-32 King Street, Melbourne), July 2020
- Warehouse Statement of Significance (27-29 Little Lonsdale Street, Melbourne), July 2020
- Warehouse Statement of Significance (34-36 Little La Trobe Street, Melbourne), July 2020
- Warehouse Statement of Significance (171-173 King Street, Melbourne), July 2020
- Warehouse Statement of Significance (353 Exhibition Street, Melbourne), July 2020
- Warehouse Statement of Significance (410-412 Lonsdale Street, Melbourne), July 2020
- Warehouses Statement of Significance (577-583 Little Collins Street, Melbourne), July 2020
- Willis' Buildings Statement of Significance (490 Flinders Street, Melbourne), July 2020
- Reference Documents:
 - Hoddle Grid Heritage Review July 2020 Volume 1
 - Hoddle Grid Heritage Review July 2020 Volume 2a
 - Hoddle Grid Heritage Review July 2020 Volume 2b
 - Guildford and Hardware Laneways Heritage Study 2017, Lovell Chen (Updated October 2018)
- Peer Review Report October 2020 GJM Heritage (Folder 02)
- Submissions 1-65 inclusive to Amendment C387 (Folder 15)
- Written submissions made to 18 May 2021 Future Melbourne Committee Meeting of Melbourne City Council (Folder 15)
- Late Submission 66 to Amendment C387 accepted (Folder 15)

Once you have reviewed the documents, you are instructed to prepare and provide a draft report that:

- considers and expresses opinions about the heritage aspects of the Amendment including the strategic basis for the Amendment having regard to the PPN01 Planning Practice Note; and
- considers and responds to heritage issues raised in all submissions noting that some submissions may not disclose any substantive matters to respond to.

Please note that you are also being asked to present your finalised report at the hearing and that such presentation might benefit from some PowerPoint slides or any aides which you consider would assist the Panel. As you no doubt know, you are briefed on the basis of your field of expertise and qualifications and in doing so would be cognisant of the matters within your field of expertise or otherwise. You will likely be asked questions.

Kindly record the factual matters and any assumptions upon which you rely in your report. You can reference any existing publicly available material, reports, studies or policy as support or justification for your opinions or your own work provided it is appended to your report. For any information or documents you have accessed online and rely upon, please provide external web links so that we can provide the Panel with a complete list and copy of all reference materials.

Please read and comply with the Planning Panels Victoria *G7 Guide To Expert Evidence* (note: this was updated February 2020) which is set out at Attachment 1 and contains detailed advice and is prescriptive in terms of the content and form of your expert report. In addition to the declaration that you must make pursuant to that *Guide*, please also have regard to the *Appendix to the Guide* which is set out at Attachment 2: *Expert Witness Declaration for Video Conferencing*. We anticipate that the hearing will be held via video conference, likely Microsoft Teams or Zoom, which means you would need to make a further declaration as set out in the *Appendix to the Guide*.

We understand that the cost to Melbourne City Council of your engagement as an expert will be charged in accordance with the rates you advised via email on 9 June 2021.

Kindly email your draft report to me by **5pm on 19 July 2021** noting that some time for discussion may be required after for you to finalise your report.

Please indicate acceptance of your engagement as an expert in this matter on the terms and conditions set out in this letter by signing and returning a copy of this letter to me via email.

Yours sincerely



Toby Hayes
Practice Leader, City Strategy and Legal Counsel

E-mail toby.hayes@melbourne.vic.gov.au

Website www.melbourne.vic.gov.au

.....
Signed by Jim Gard'ner
as acceptance of the Terms and Conditions of
Engagement

ATTACHMENT 1

G7: Guide to expert evidence

Version: February 2020

Circulation of expert reports

Expert witness reports must be submitted five working days prior to the commencement of the Hearing, or another date directed by the Panel. An earlier date will be specified for more complex reports.

Parties must identify at the Directions Hearing, the evidence (if any) they will be calling at the Public Hearing.

Copies of witnesses' reports or statements must be circulated in accordance with Directions made at the Directions Hearing. If no specific directions are made, six copies of their reports or statements must be given to the Panel Coordinator at least five working days before the Hearing. Copies will be given to the Panel and to other parties as directed. Other people may obtain electronic copies by contacting the Panel Co-ordinator at Planning Panels Victoria (PPV) on 8392 5115.

A soft copy of reports should be provided as follows:

- as an unlocked 'pdf' or Microsoft Word format to PPV; and
- as a 'pdf' to the Planning Authority suitable for uploading in its website.

Before the Hearing, copies of witnesses' reports or statements will normally be available for perusal by submitters at the offices of the Planning Authority and PPV.

Expert's duty to the Panel

An expert witness has a paramount duty to the Panel and not to the party retaining the expert.

An expert witness has an overriding duty to assist the Panel on matters relevant to the expert's expertise.

An expert witness is not an advocate for a party to a proceeding.

Content and form of expert's report

The report of an expert must include:

- the name and address of the expert
- the expert's qualifications and experience
- a statement identifying the expert's area of expertise to make the report
- a statement identifying any other significant contributors to the report and where necessary outlining their expertise
- all instructions that define the scope of the report (original and supplementary and whether in writing or oral)

- an unambiguous reference to the report, or reports that the expert relies upon
- a statement identifying the role that the expert had in preparing or overseeing the exhibited report(s)
- a statement to the effect that the expert adopts the exhibited report and identifying:
 - any departure of the expert from the finding or opinions expressed in the exhibited report
 - any questions falling outside the expert's expertise
 - any key assumptions made in preparing the report
 - whether the exhibited report is incomplete or inaccurate in any respect.

Where a report has not been used to prepare an amendment or proposal, the report should include:

- the facts, matters and all assumptions upon which the report proceeds
- reference to those documents and other materials the expert has been instructed to consider or take into account in preparing his or her report, and the literature or other material used in making the report
- a summary of the opinion or opinions of the expert
- a statement identifying any provisional opinions that are not fully researched for any reason (identifying the reason why such opinions have not been or cannot be fully researched)
- a statement setting out:
 - any questions falling outside the expert's expertise
 - whether the report is incomplete or inaccurate in any respect.

The expert must declare at the end of the report:

'I have made all the inquiries that I believe are desirable and appropriate and no matters of significance which I regard as relevant have to my knowledge been withheld from the Panel.'

Privacy

Expert witnesses need to be aware of their obligations under the *Information Privacy Act 2000*. Particularly when using personal information contained in submissions they have received as a third party.

Copies of witnesses' reports are usually posted on the Planning Authorities website. Where possible, the report of an expert should not refer to any individual submitter by name and if necessary, submitters should be referred to by submission number.

For more information on Privacy refer to the separate PPV **Guide to Privacy at Planning Panels Victoria**.

Where the expert changes his or her opinion on a material matter

An expert witness who changes an opinion on a material matter on the basis of another expert's report or for any other reason must communicate that change of opinion in writing to the party retaining the expert and that party must file with the Panel, notice of such change of opinion as soon as practicable.

Such a document must specify reasons why his or her opinion has changed.

Where the Panel directs expert witnesses to meet

Expert witnesses retained by parties are encouraged to meet to narrow any points of difference between them and to identify any remaining points of difference. The Panel may also direct that they meet.

If expert witnesses meet they must each set out in writing by a document filed with the Panel any agreed points and all remaining points of difference.

If any expert witness directed by the Panel to meet with any other expert is instructed not to reach agreement in respect of points of difference, the fact of such instructions must be reported in writing to the Panel by the expert witness.

Generally

Parties to a proceeding must ensure that any expert retained by them to provide a report for use in the proceeding is aware of the contents of this direction, at the time of such retainer.

Form of report

Written material presented at the Hearing should be two-hole punched and stapled (not bound).

Photographs or other visual material should be presented in binders in A4 or A3 format, not on large boards. This makes the material easier to transport and file.

Further information

Further information about Planning Panels Victoria can be found on the [department's website](#).

ATTACHMENT 2



Appendix to Guide to Expert Evidence

Planning Panels Victoria

Direction for witnesses providing expert evidence through remote conferencing

Declarations are required as standard practice in accordance with the PPV Guide to Expert Evidence (<https://www.planning.vic.gov.au/panels-and-committees/planning-panel-guides>) All witnesses include a response to this in filing their evidence.

As some PPV matters are being held remotely, any person providing expert evidence must table (either verbally or in writing), this Declaration when called to give their evidence in chief:

In giving my evidence, I confirm I:

- *will be alone in the room from which I am giving evidence and will not make or receive any communication with another person while giving my evidence except with the express leave of the Panel;*
- *I will inform the Panel immediately should another person enter the room from which I am giving evidence;*
- *during breaks in evidence, when under cross-examination, I will not discuss my evidence with any other person, except with the leave of the Panel; and*
- *I will not have before me any document, other than my expert witness statement and documents referred to therein, or any other document which the Panel expressly permits me to view.*

Signed by: _____ Date: _____

ANNEXURE II – Documents relied upon in the preparation of evidence

The documents I have relied upon in the preparation of my evidence are:

- Planning Practice Note 1: Applying the Heritage Overlay (updated August 2018) (PPN1)
- Report and minutes from the 4 August 2020 Future Melbourne Committee Meeting of Melbourne City Council
- Report and minutes from 18 May 2021 Future Melbourne Committee Meeting of Melbourne City Council
- Exhibited Amendment C387 Documents:
 - Hoddle Grid Heritage Review July 2020 Volume 1
 - Hoddle Grid Heritage Review July 2020 Volume 2a
 - Hoddle Grid Heritage Review July 2020 Volume 2b
 - Gazette notice
 - Explanatory report
 - Instruction sheet
 - Clause 22.04 Heritage Places within the Capital City Zone Policy
 - Schedule to Clause 43.01 Heritage Overlay
 - Schedule to Clause 72.04 Incorporated Documents
 - Planning Scheme maps:
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 - Melbourne C387melb 010ho2 Map08 Exhibition
 - Melbourne C387melb 011ho2 Map08 Exhibition
 - Melbourne C387melb 012ho2 Map08 Exhibition
 - Melbourne C387melb 013ho Map08 Exhibition
 - Incorporated Documents:
 - Guildford and Hardware Laneways Heritage Study 2017 Heritage Inventory November 2018 (Amended July 2020)
 - Guildford and Hardware Laneways Heritage Study 2017 Statements of Significance November 2018 (Amended July 2020)

- Heritage Places Inventory February 2020 (Amended July 2020) Part A Incorporated Document Exhibition
- Heritage Precincts Statements of Significance February 2020 (Amended July 2020) Incorporated Document
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 - Equitable House Statement of Significance (335-349 Little Collins Street, Melbourne), July 2020

- Flinders Lane East Precinct Statement of Significance, July 2020
- Flinders Street Railway Viaduct Statement of Significance (Flinders Street, Melbourne), July 2020
- Former Ajax House Statement of Significance (103-105 Queen Street, Melbourne), July 2020
- Former Allans Building Statement of Significance (276-278 Collins Street, Melbourne), July 2020
- Former AMP Building Statement of Significance (344-350 Collins Street, Melbourne), July 2020
- Former AMP Building Statement of Significance (402-408 Lonsdale Street, Melbourne), July 2020
- Former Andrew Jack Dyson & Co (594-610 Lonsdale Street, Melbourne), July 2020
- Former Australia Pacific House Statement of Significance (136-144 Exhibition Street, Melbourne), July 2020
- Former Bank of Adelaide Building Statement of Significance (265-269 Collins Street, Melbourne), July
- Former Bank of Australasia Statement of Significance (152-156 Swanston Street, Melbourne), July 2020
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- Former Bryson Centre Statement of Significance (174-192 Exhibition Street, Melbourne), July 2020
- Former Cassells Tailors Pty Ltd Statement of Significance (341-345 Elizabeth Street, Melbourne), July 2020
- Former Coles and Garrard Building Statement of Significance (376-378 Bourke Street, Melbourne), July 2020
- Former Colonial Mutual Life Insurance Building and Plaza with

- 'Children's Tree' Sculpture Statement of Significance (308-336 Collins Street, Melbourne), July 2020
- Former Commercial Banking Company of Sydney Building Statement of Significance (251-257 Collins Street, Melbourne), July 2020
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- Former John Danks & Son Statement of Significance (393-403 Bourke Street, Melbourne), July 2020

- Former Kantay House Statement of Significance (12-18 Meyers Place, Melbourne), July 2020
- Former Law Department's Building Statement of Significance (221-231 Queen Street, Melbourne), July 2020
- Former Law Institute House Statement of Significance (382 Little Collins Street, Melbourne), July 2020
- Former Legal and General House Statement of Significance (375-383 Collins Street, Melbourne), July 2020
- Former London Assurance House Statement of Significance (Part 468-470 Bourke Street, Melbourne), July 2020
- Former Malcolm Reid & Co Department Store Statement of Significance (151-163 Bourke Street, Melbourne), July 2020
- Former Manchester Unity Oddfellows Building Statement of Significance (335-347 Swanston Street, Melbourne), July 2020
- Former Markillie's Prince of Wales Hotel Statement of Significance (562-564 Flinders Street and rear in Downie Street, Melbourne), July 2020
- Former Melbourne and Metropolitan Tramways Board Building Statement of Significance (616-622 Little Collins Street, Melbourne), July 2020
- Former Melbourne City Council Power Station Statement of Significance (617-639 (part) and 651-669 Lonsdale Street, 602-606 and 620-648 Little Bourke Street, Melbourne), July 2020
- Former Melbourne City Council Substation Statement of Significance (10-14 Park Street, Melbourne), July 2020
- Former Melbourne City Council substation Statement of Significance (11-27 Tavistock Place, Melbourne), July 2020
- Former Melbourne City Council Substation Statement of Significance (23-25 George Parade, Melbourne), July 2020
- Former Melbourne Shipping Exchange Statement of Significance (25 King Street, Melbourne), July 2020

- Former Methodist Church Centre Statement of Significance (130-134 Little Collins Street, Melbourne), July 2020
- Former MLC Building Statement of Significance (303-317 Collins Street, Melbourne), July 2020
- Former Morris House Statement of Significance (114-122 Exhibition Street, Melbourne), July 2020
- Former National Bank of Australasia Stock Exchange Branch Statement of Significance (85-91 Queen Street, Melbourne), July 2020
- Former Palmer's Emporium Statement of Significance (220 Bourke Street, Melbourne), July 2020
- Former Paramount House Statement of Significance (256-260 King Street, Melbourne), July 2020
- Former Patersons Pty Ltd Statement of Significance (Part 152-158 Bourke Street, Melbourne), July 2020
- Former Princes Bridge Lecture Room Statement of Significance (Princes Walk, Birrarung Marr, Melbourne), July 2020
- Former Printcraft House Statement of Significance (428-432 Little Bourke Street, Melbourne), July 2020
- Former Reserve Bank of Australia Statement of Significance (56-64 Collins Street, Melbourne), July 2020
- Former Ridgway Terrace Statement of Significance (20 Ridgway Place, Melbourne), July 2020
- Former Rockman's Showrooms Statement of Significance (188 Bourke Street, Melbourne), July 2020
- Former Royal Automobile Club of Victoria Statement of Significance (111-129 Queen Street, Melbourne), July 2020
- Former Russell Street Automatic Telephone Exchange and Postal Building Statement of Significance (114-120 Russell Street, Melbourne), July 2020

- Former Sharpe Bros Pty Ltd Statement of Significance (202-204 Bourke Street, Melbourne), July 2020
- Former Sleigh Buildings Statement of Significance (158-172 Queen Street, Melbourne), July 2020
- Former South British Insurance Company Ltd Building Statement of Significance (155-161 Queen Street, Melbourne), July 2020
- Former State Savings Bank of Victoria Statement of Significance (45-63 Swanston Street, Melbourne), July 2020
- Former State Savings Bank of Victoria Statement of Significance (233-243 Queen Street, Melbourne), July 2020
- Former State Savings Bank Statement of Significance (258-264 Little Bourke Street, Melbourne), July 2020
- Former Sunday School Union of Victoria Statement of Significance (100-102 Flinders Street, Melbourne), July 2020
- Former Thomas Warburton Pty Ltd complex Statement of Significance (365-367 Little Bourke Street, 384-386 Bourke Street, 2-6 and 8-14 Rankins Lane, Melbourne), July 2020
- Former Union House Statement of Significance (43-51 Queen Street, Melbourne), July 2020
- Former Universal House Statement of Significance (25 Elizabeth Street, Melbourne), July 2020
- Former Victorian Amateur Turf Club Statement of Significance (482-484 Bourke Street, Melbourne), July 2020
- Former Wenley Motor Garage Statement of Significance (39-41 Little Collins Street, Melbourne), July 2020
- Former Zander's No 2 Store Statement of Significance (11 Highlander Lane, Melbourne), July 2020
- Grange Lynne Pty Ltd Statement of Significance (183-189 A'Beckett Street, Melbourne), July 2020
- Great Western Hotel Statement of Significance (204-208 King Street Melbourne), July 2020

- Henty House Statement of Significance (499-503 Little Collins Street, Melbourne), July 2020
- Hoyts Mid City Cinemas Statement of Significance (194-200 Bourke Street, Melbourne), July 2020
- Laurens House Statement of Significance (414-416 Lonsdale Street, Melbourne), July 2020
- Little Lonsdale Street Precinct Statement of Significance, July 2020
- Lonsdale Exchange Building Statement of Significance (447-453 Lonsdale Street, Melbourne), July 2020
- Lyceum Club Statement of Significance (2-18 Ridgway Place, Melbourne), July 2020
- Melbourne House Statement of Significance (354-360 Little Bourke Street, Melbourne), July 2020
- Melbourne Theosophical Society Statement of Significance (124-130 Russell Street, Melbourne), July
- Metropolitan Hotel Statement of Significance (263-267 William Street, Melbourne), July 2020
- Nubrik House Statement of Significance (269-275 William Street, Melbourne), July 2020
- Office building Statement of Significance (178-188 William Street, Melbourne), July 2020
- Office building Statement of Significance (516-520 Collins Street, Melbourne), July 2020
- Office building Statement of Significance (589-603 Bourke Street, Melbourne), July 2020
- Offices Statement of Significance (422-424 Bourke Street, Melbourne), July 2020
- Park Tower Statement of Significance (199-207 Spring Street, Melbourne), July 2020
- Residence Statement of Significance (474 Little Lonsdale Street, Melbourne), July 2020
- Residences Statement of Significance (120-122 Little Lonsdale Street, Melbourne), July 2020
- Royal Insurance Building Statement of Significance (430-442 Collins Street, Melbourne), July 2020
- Royal Mail House Statement of Significance (253-267 Bourke Street, Melbourne), July 2020

- Sanders and Levy Building Statement of Significance (149-153 Swanston Street, Melbourne), July 2020
- Shop and residence Statement of Significance (215-217 Swanston Street, Melbourne), July 2020
- Shop Statement of Significance (37 Little Collins Street, Melbourne), July 2020
- Shop Statement of Significance (171 Bourke Street, Melbourne), July 2020
- Shop Statement of Significance (215 Queen Street, Melbourne), July 2020
- Shop, café and office Statement of Significance (7-9 Elizabeth Street, Melbourne), July 2020
- Shops and dwellings Statement of Significance (201-207 Bourke Street, Melbourne), July 2020
- Shops and dwellings Statement of Significance (209-215 Bourke Street, Melbourne), July 2020
- Shops and offices Statement of Significance (359-363 Lonsdale Street, Melbourne), July 2020
- Shops Statement of Significance (173-175 Bourke Street, Melbourne), July 2020
- Shops Statement of Significance (470-472 Little Lonsdale Street, Melbourne), July 2020
- Shops, residence and former bank Statement of Significance (146-150 Bourke Street, Melbourne), July 2020
- Stella Maris Seafarer's Centre Statement of Significance (588-600 Little Collins Street, Melbourne), July 2020
- Swanston Street North Precinct Statement of Significance, July 2020
- Swanston Street South Precinct Statement of Significance, July 2020
- Swiss Club of Victoria Statement of Significance (87-89 Flinders Lane, Melbourne), July 2020
- The Former Houston Building Statement of Significance (184-192 Queen Street, Melbourne), July 2020
- The Waiters Restaurant Statement of Significance (20 Meyers Place, Melbourne), July 2020

- Treasury Gate Statement of Significance (93-101 Spring Street, Melbourne), July 2020
- Turnverein Hall Statement of Significance (30-34 La Trobe Street, Melbourne), July 2020
- Victoria Club building Statement of Significance (131-141 Queen Street, Melbourne), July 2020
- Wales Corner Statement of Significance (221-231 Collins Street, Melbourne), July 2020
- Warehouse Statement of Significance (1-5 Coverlid Place, Melbourne), July 2020
- Warehouse Statement of Significance (11-15 Duckboard Place, Melbourne), July 2020
- Warehouse Statement of Significance (11A Highlander Lane, Melbourne), July 2020
- Warehouse Statement of Significance (26-32 King Street, Melbourne), July 2020
- Warehouse Statement of Significance (27-29 Little Lonsdale Street, Melbourne), July 2020
- Warehouse Statement of Significance (34-36 Little La Trobe Street, Melbourne), July 2020
- Warehouse Statement of Significance (171-173 King Street, Melbourne), July 2020
- Warehouse Statement of Significance (353 Exhibition Street, Melbourne), July 2020
- Warehouse Statement of Significance (410-412 Lonsdale Street, Melbourne), July 2020
- Warehouses Statement of Significance (577-583 Little Collins Street, Melbourne), July 2020
- Willis' Buildings Statement of Significance (490 Flinders Street, Melbourne), July 2020
- o Supporting Document:
 - Guildford and Hardware Laneways Heritage Study 2017, Lovell Chen (Updated October 2018)
- Methodology Report: City of Melbourne Heritage Gradings Review, Lovell Chen, 21 June 2016
- Peer Review Report October 2020 GJM Heritage
- Submissions 1-66 inclusive to Amendment C387
- Melbourne Planning Scheme
- Planning Panels Victoria: *Guide to Expert Evidence*.