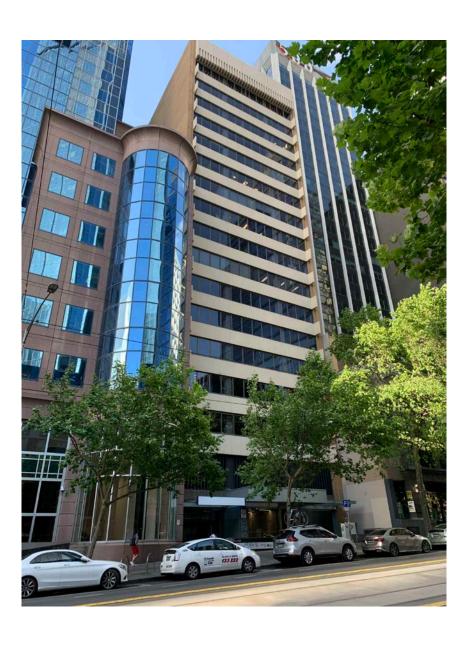
Statement of Evidence and Report to Planning Panel

Amendment C387 to the Melbourne Planning Scheme
520 Collins Street Melbourne



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Prepared by

Prepared for



Referencing

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Cover image: View of 520 Collins Street Melbourne

Source: Lovell Chen

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LOVELL CHEN iii

Statement of Instructions, Qualifications and Experience and Declaration

Authorship of this report

This statement has been prepared by Ms Kate Gray, Director of Lovell Chen Pty Ltd, Architects and Heritage Consultants, Level 5, 176 Wellington Parade, East Melbourne, assisted by Ms Libby Blamey, Senior Associate and historian and Ms Dana Foenander, Heritage Planner, both of Lovell Chen.

The statement incorporates material from earlier advice prepared by Lovell Chen in relation to the subject site as detailed below. That earlier advice was prepared by me and Mr John Statham, Senior Associate of Lovell Chen, with research support from Ms Libby Richardson (formerly of Lovell Chen).

The views expressed in the statement are those of Ms Kate Gray.

Qualifications and experience

I hold a Bachelor of Arts (Hons) and Masters of Arts (History), both from The University of Melbourne.

I also hold a Post-Graduate Diploma in Heritage Planning and Management from Victoria University.

I joined Lovell Chen (then Allom Lovell & Associates) in 1989 and have been involved in heritage practice and management for more than 30 years. This experience includes the preparation of numerous heritage appraisals and assessments of significance for individual sites and larger complexes, areas and precincts. I also have extensive experience in strategic planning and policy development for heritage places, and the assessment of impacts on heritage places. I am responsible for leading multi-disciplinary teams with expertise in architecture, history, planning and landscape.

As relevant to this matter, I have contributed in a variety of roles to numerous municipal heritage reviews including those for the former Cities of Fitzroy and Port Melbourne, the City of Boroondara, the City of Port Phillip and the Borough of Queenscliffe. Extensive work for the City of Boroondara undertaken since 2006 included managing a major project to review, assess and document a large number of individual B-graded (predominantly residential) buildings for the application of the Heritage Overlay and advice on the development of a new local Heritage Policy and input into the review of precinct citations and building gradings. In 2008-9 I managed the preparation of the Queenscliffe Heritage Review for the Borough of Queenscliffe. I also managed a review of a large HO precinct in Port Melbourne (HO1) in 2010 for the City of Port Phillip; this work included revisions to the boundaries of the area, the establishment of sub-precincts within it and recommendations for controls over individual sites in the area (Amendment C89). In 2014 I managed the White Hills and East Bendigo Heritage Study (Stage 1) for the City of Greater Bendigo. I am currently leading the Lovell Chen team for a major heritage review for the City of Melbourne (North Melbourne Heritage Review, work in progress).

I have been responsible for a number of other major strategic heritage projects including a Heritage Framework Plan for the Australian National University's Acton Campus in the ACT (2019). In recent years I have led Lovell Chen teams providing specialist historical heritage advice to major rail and road infrastructure projects including the Metro Tunnel, West Gate Tunnel and North East Link projects.

I have also been involved in the preparation of numerous conservation management plans, conservation analyses and heritage appraisals for a range of place types, listed at local, state and national levels. In 2020 I managed the review of the Heritage Management Plan for the world heritage listed Royal Exhibition Building and Carlton Gardens (currently in draft form).

I am a Full International Member of Australia ICOMOS.

As related to this matter, my expertise is in the areas of significance assessment and the application of statutory heritage controls.

Instructions

My instructions on this matter comprised a formal brief provided by Norton Rose Fulbright and a letter requesting the preparation of and expert witness statement and appearance at the subsequent hearing.

As relevant to my consideration of this matter, documents provided to me include:

Amendment C387 exhibited documentation including:

- Background Report Hoddle Grid Heritage Review, prepared by Context:
- Volume 1: Built & Urban Heritage Methodology
- Volume 2b: Postwar Thematic Environmental History and Postwar Places
- Incorporated Document -Office Building Statement of Significance (516-520 Collins Street Melbourne), July 2020
- Schedule to the Heritage Overlay
- Planning Scheme Map 8HO2

Other documents:

- Collins St Property submission to Council (14 December 2020)
- Future Melbourne Committee meeting agenda and minutes (18 May 2021)
- Planning Practice Note 1: Applying the Heritage Overlay (August 2018)
- Planning Permit TP-2019-1057B

Lovell Chen involvement

My involvement in this matter began in November 2020 when Lovell Chen was commissioned to provide a preliminary assessment of the proposal under Amendment C387, to apply the Heritage Overlay (HO) to the property at 516-520 Collins Street Melbourne. The preliminary assessment was prepared by Senior Associate John Statham and me, with research support from historian Libby Richardson. The conclusion of this preliminary heritage advice was that when considered against the relevant criteria (Criterion A and Criterion D) the building did not appear to be of sufficient significance to warrant inclusion in the HO. Some of the historical and descriptive material in that preliminary assessment has been incorporated into this statement of expert evidence.

Summary of opinion

In summary, it is my opinion that:

- Constructed in the mid-1970s, the building at 520 Collins Street is associated with the later part of a 20-year period of development and redevelopment in the central city, that resulted in a transformation of many central city sites and had a significant impact on the city's physical character. Undertaken by a commercial property developer, the 516-520 Collins Street project was a relatively modestly-scaled development by the standards of the day. Recognising that there is a general association with a period of great change and note in the history of the city, no specific historical associations of significance have been identified, nor does the building reflect particularly on specific historical themes of importance in a way that warrants heritage recognition.
- Considering the issue of 'representative' significance, the building's architecture, siting and form and use of materials mark it as an example of office tower design of the period, but not one that in the context of surviving buildings from that period, has been established as important in its ability to demonstrate key attributes or themes or as a design of a high order of merit (a 'fine' example).
- On the basis of this review of the amendment documentation as related to 516-520 Collins
 Street, and as assessed against the relevant criteria (A and D), my view is that the values
 identified for the building in response to the criteria are not at a level that warrants individual
 recognition for heritage reasons and the HO should not be applied.

Declaration

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.

Kate Gray

Kathan

1.0 INTRODUCTION

- 1. This statement of evidence has been prepared for Collins St Property Pty Ltd, owner of the property at 516-520 Collins Street.
- 2. The subject property is located on the north side of Collins Street between King and William streets. It supports a 16-storey commercial building constructed c. 1974.

2.0 AMENDMENT C386 AND C387

2.1 Overview

- 3. On 1 October 2020 the Minister for Planning approved and gazetted Amendment C386 to the Melbourne Planning Scheme, implementing the findings of the Hoddle Grid Heritage Review (the Review) including interim Heritage Overlay (HO) control to the subject site.
- 4. Permanent heritage controls are proposed as part of Amendment C387. Amendment C387 seeks to introduce a listing for an individual heritage place in the HO Schedule and amend the Planning Scheme Map HO08.
- 5. In the exhibited documentation, the subject property is identified in the HO Schedule as HO1326 Office Building, 516-520 Collins Street Melbourne, with the scheduled incorporated document being the Statement of Significance: Office building Statement of Significance (516-520 Collins Street, Melbourne) July 2020. The Schedule does not specify additional controls (paint, internal alteration or tree controls).
- 6. The exhibited HO mapping for the subject site is indicated on the mapping excerpt at Figure 2-1.
- 7. As relevant to the subject property, the incorporated document Heritage Places Inventory 2020 Part A would include the property as Significant on a permanent basis.
- 8. Significant heritage places are defined as follows at Clause 22.04 of the Scheme:
 - A significant heritage place is individually important at state or local level, and a heritage place in its own right. It is of historic, aesthetic, scientific, social or spiritual significance to the municipality. A significant heritage place may be highly valued by the community; is typically externally intact; and/or has notable features associated with the place type, use, period, method of construction, siting or setting. When located in a heritage precinct a significant heritage place can make an important contribution to the precinct.
- 9. The Hoddle Grid Heritage Review July 2020 would be referenced in the policy at Clause 22.04 (Heritage Places in the Capital City Zone).

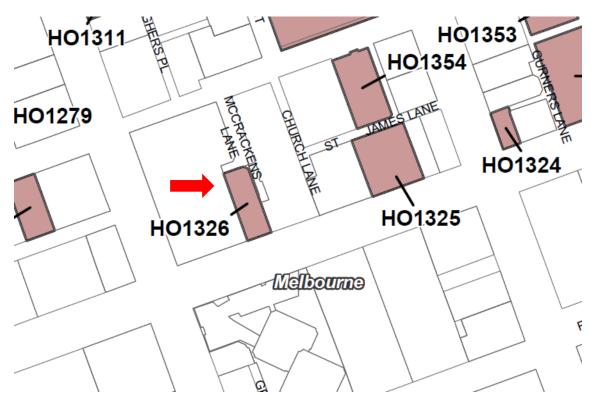


Figure 2-1 Exhibited HO map HO08 (part), subject site indicated

2.2 Hoddle Grid Heritage Review

- 10. The Hoddle Grid Heritage Review 2020 was prepared by Context Pty Ltd in stages between 2017 and 2020.
- 11. The Review makes recommendations for the introduction of 141 new HO places in the central city as well as five new precincts amendments to existing HO controls. Citations and statements of significance (the latter to be incorporated into the Planning Scheme) were prepared for individual places and precincts.
- 12. The heritage citation for the office building at 516-520 Collins Street recommends the property for inclusion in the Schedule to the HO as an individual heritage place.

2.3 Heritage citation and statement of significance: 516-520 Collins Street

- 13. The Review includes an extensive citation (assessment of significance) for 516-520 Collins Street(Volume 2B, p. 587-604). This includes a contextual history, site history, site description, comment on integrity and comparative analysis. An assessment against criteria is provided in tick box table form, and recommendations are made for the HO listing and scheduling.
- 14. This is followed by a short statement of significance (pp. 605-606), as follows:

What is significant?

The office building at 516-520 Collins Street, a multi-storey commercial building constructed c. 1974.

Elements that contribute to the significance of the place include (but are not limited to):

- The building's original external form, materials and detailing
- The building's high level of integrity to its original design.

Later alterations made to the lower levels of the building are not significant.

How it is significant?

The office building at 516-520 Collins Street is of historical and representative significance to the City of Melbourne.

Why it is significant?

Constructed in c1974, the office building at 516-520 Collins Street 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 office building at 516-520 Collins Street is a fine and highly intact representative example of a Post-War Modernist commercial building. The building strongly reflects the style which was popular in the 1960s through to the mid 1970s, particularly in central Melbourne. Constructed as a 16-storey structure, the building clearly demonstrates typical characteristics of a later postwar commercial building, including a strong horizontal emphasis and highly distinctive spandrels. These demonstrate important aspects of the Modernist style (Criterion D).

2.4 Previous assessments

- 2.4.1 Introduction
- 2.4.2 Previous heritage studies for the City of Melbourne

Central Activities District Conservation Study for the Melbourne City Council, Graeme Butler, 1985

15. This study sought to identify and document all buildings and/or groups of buildings within the central business district of 'individual architectural and historic importance' which had not been previously been investigated. Only a handful of post-war multi-storey buildings were identified by this report, with a note to the effect that the study 'halted comprehensive assessment at buildings less than 25 years old, except for award winners'. The subject building was not included.

Central City Heritage Study Review, Phillip Goad et al, 1993

- 16. The brief required the consultants to update Council's 1985 Central Activities District CAD Conservation Study. Emphasis was placed on analysis of the 1985 Study's response to the cultural and social significance of historic precincts, twentieth century buildings, including buildings constructed between 1956 and 1974, structures located on laneways and items of archaeological interest.
- 17. Only a handful of post-war multi-storey buildings were identified by this report and the subject building was not included.

Review of Heritage Overlay listings in the CBD, Bryce Raworth, 2002

18. This study is referenced in the subsequent Central City (Hoddle Grid) Heritage Review by Graeme Butler & Associates. Only a draft copy from March 2002 could be located online. The purpose as stated in that draft was to review graded buildings not subject to a HO and identify those

Study accessed via https://issuu.com/graemebutler21/docs/mcc cad conservation study 1985 par, accessed 4 August 2021, p. 2 'Recent Buildings'.

buildings that best warrant the control. The subject building was not identified in the draft report.²

Central City (Hoddle Grid) Heritage Review 2011

- 19. In 2010 the City of Melbourne commissioned Graeme Butler & Associates to provide heritage assessments of 98 buildings in the Melbourne Capital City Zone 1. Most of these buildings had been identified in the 1984-5 Central Activities District Conservation study as of potential cultural significance on a local, regional or State level. Subsequent reviews in 1993 (Goad et al) and 2002 (Bryce Raworth, review of Heritage Overlay Listings in the CBD, 2000-2002) had typically affirmed this evaluation, with some upgrades identified to the existing heritage values of the places selected. The aim of the project was to examine these reviews and any subsequent data found on the selected places and make recommendations for inclusion or otherwise in the schedule to clause 43.01 of the Melbourne Planning Scheme on the basis of local heritage significance.
- 20. The subject building was not identified in this study.

2.4.3 Other relevant studies

Twentieth Century Architecture and Works of Victoria for the Royal Australian Institute of Architects (Victoria), Graeme Butler, 1984

- 21. The study identified a selection of works and buildings for registration based on urban conservation studies of Brunswick, Melbourne City, North and South Fitzroy, Port Melbourne, Prahran, the Hawthorn commercial area, St Kilda, HMAS Cerberus and Essendon. Given the reliance on pre-existing heritage studies, the authors noted that the work had 'not been necessarily a representative one for all building eras, styles or use-types'. Some attempts were made to put a relative value scale (that is, a grading) against each building.
- 22. The subject building does not appear in this report. However, given the early date and the breadth of the study, this would not be expected.

Melbourne's Marvellous Modernism: A Comparative Analysis of Post-War Modern Architecture in Melbourne's CBD 1955 -1975, National Trust of Australia (Victoria), September 2014.

- 23. Melbourne's Marvellous Modernism was prepared / overseen by the National Trust's Built Environment Advisory Committee to support future assessment of post WWII places in Melbourne's CBD following Amendment C186 to the Melbourne Planning Scheme. The document was intended to provide 'baseline comparative data of potentially significant post-war places in Melbourne's CBD' and potentially 'to be used at future Planning Panel Hearings to support this critical issue'. The document notes it did not claim to be an exhaustive list but could be further developed.
- 24. In this study the postwar period was identified as one of modernisation of the CBD as multistorey buildings of modern construction began to replace earlier building stock, changing the 19th century character of the city. While its purpose is different, the study addresses post-War Modern architecture in central Melbourne, with a scope that is very similar to that of the Hoddle Grid Heritage Review's investigation of the period. *Melbourne's Marvellous Modernism* examines a range of post-war multi-storey building designs characterised as: International Style: Curtain Wall & Metal; International Style: Curtain Wall & Masonry; Expressed Structure; Brutalism, and; Small Commercial.

Bryce Raworth, Review of Heritage Overlay Listings in the CBD (draft March 2002)https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.comparticipate.files/4415/3871/6395/82_Review_of_HO_listings_in_CBD_Raworth.PDF

25. The study addressed architectural categories of direct relevance to at 516-520 Collins Street, but the subject building was not referenced.

3.0 HISTORY AND DESCRIPTION

3.1 History

- 26. The building at 516-520 Collins Street was constructed for developer Hanover Holdings in c. 1974.
- 27. The building replaced a 1954 office building, designed by architects Buchan Laird and Buchan for the wool-broking firm of James W McGregor and Sons (Figure 3-1, Figure 3-2). The two-storey office was set back from Collins Street, providing off-street car parking for the company's executives. The building was an interesting contemporary design, presenting to Collins Street with a cream brick wall and projecting curtain wall. It was designed to allow for an additional four levels to be constructed at a later date.³
- 28. The company remained at the site through the 1960s, and was listed in the 1970 edition of the Sands & McDougall directory. By the early 1970s, however, the site at 516-520 Collins Street had been acquired by Hanover Holdings, a commercial property developer that constructed shopping centres, smaller retail and office buildings in Melbourne's city and suburbs, as well as in New South Wales and Queensland. New South Wales are constructed shopping centres, smaller retail and office buildings in Melbourne's city and suburbs, as well as in New South Wales are Queensland.
- 29. Directors' reports from the early 1970s indicate that Hanover developed a number of suburban shopping centres and arcades of varying scales, including at Ferntree Gully, Ringwood, Mooroolbark, Northcote, Dandenong, Footscray and Vermont South. The company saw an increase in revenue from \$535,868 in 1969 to over \$4 million in 1971. Its assets likewise increased in those years from \$6 million to \$17 million. By 1973, there were a number of Hanover subsidiaries relating to investments, management and developments. The company's head office was in a purpose-built building at 158 City Road, Southbank (c. 1973, Figure 3-4, Figure 3-5), and a 10-storey office development at 168 Exhibition Street (Figure 3-6, Figure 3-7) was also under construction in the early 1970s, and sold following its completion. Both buildings survive today. The company also acquired a number of properties in the city to lease with the potential for site redevelopment, including at 287-297 Bourke Street; and the corner of Spencer and Collins Streets. 10

³ Herald, 26 March 1954, p. 12.

⁴ Sands & McDougall directory, 1970.

Hanover Holdings Limited, Directors' Report and Accounts, 30 June 1972, p. 6, held by National Library of Australia.

Hanover Holdings Limited, Directors' Report and Accounts, 30 June 1971, p. 5 and 30 June 1972, p. 6, held by National Library of Australia.

Hanover Holdings Limited, Directors' Report and Accounts, 30 June 1971, p. 15, held by National Library of Australia.

Hanover Holdings Limited, Directors' Report and Accounts, 30 June 1973, p. 20, held by National Library of Australia.

Hanover Holdings Limited, Directors' Report and Accounts, 30 June 1971, p. 5, and 30 June 1972, p. 7, held by National Library of Australia

Hanover Holdings Limited, Directors' Report and Accounts, 30 June 1972, p. 6,7, held by National Library of Australia.

- 30. Reflecting on increased land value and development expectations, Hanover consolidated and developed two small sites, in the process demolishing the McGregor offices building of the 1950s, which was formally acquired in 1973 (Figure 3-3). 11
- 31. The 1971 company directors' report notes that it had been active in the acquisition of new sites including 516-520 Collins Street for 'development with offices.' An architect's impression of the building was included in the following year's directors' report (Figure 3-8), with a note:

Planning is well advanced for a new development of 16 levels at 516-520 Collins Street, Melbourne. Demolition is to take place shortly and construction is scheduled to commence early in 1973. An architect's impression of the completed building is depicted on page 2 [Figure 3-8] of this report.¹³

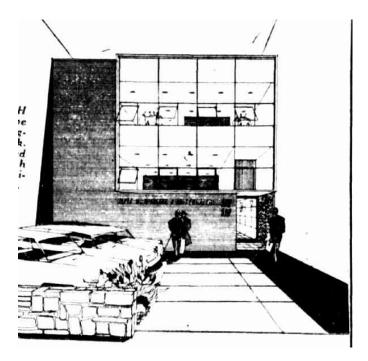


Figure 3-1 Sketch of James W McGregor & Sons office at 520 Collins Street Source: *Herald*, 26 March 1954, p. 12

Certificates of title (cancelled), Volume 6072 Folio 341 and Volume 6914 Folio 748, Landata, Victorian Land Registry Services.

Hanover Holdings Limited, Directors' Report and Accounts, 30 June 1971, p. 5, and 30 June 1973, p. 15, held by National Library of Australia.

Hanover Holdings Limited, Directors' Report and Accounts, 30 June 1972, p. 6, held by National Library of Australia.



Figure 3-2 McGregor House, photographed by Wolfgang Sievers
Source: Pictures Collection State Library of Victoria Buchan Group architectural photographs, H2016.35/25

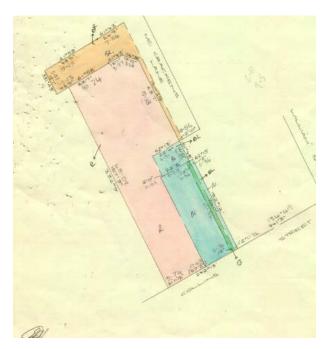


Figure 3-3 Title plan, showing the consolidated sites acquired by Hanover Holdings for the 516-520 Collins Street development

Source: Certificate of Title, Volume 9074 Folio 693, Landata, Victorian Land Registry Services



Figure 3-4 Project (Hanover House), 158 City Road, Southbank (sold and leased back to Hanover following completion)

Source: Hanover Holdings Limited, Directors' Report and Accounts 30 June 1972, p. 17



Figure 3-5 Former Hanover House, Southbank
Source: https://www.theurbandeveloper.com/articles/beulah-hanover-house-melbournes-tallest-tower-island-site

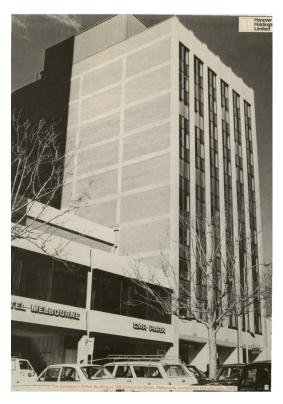


Figure 3-6 Completed office building, 168 Exhibition Street Melbourne Source: Hanover Holdings Limited, Directors' Report and Accounts 30 June 1973, p. 7



Figure 3-7 168 Exhibition Street

- 32. An application for the construction of a 16 storey office building was made to the Melbourne City Council in May 1973. ¹⁴ The City of Melbourne does not hold architectural drawings for the development, but an elevation (Figure 3-9) by the concrete contractors, Pioneer Concrete Services Limited, reflects the design shown in the illustration at Figure 3-8. Construction of the building was underway by mid-1973 (Figure 3-10). ¹⁵
- 33. The exact completion date of the building at 520 Collins Street is not known, but it appears to have been substantially constructed by 1976, when it is visible in an aerial photograph (Figure 3-11). A number of applications were made for internal alterations from 1978, including for internal partitions, suggesting the various floors were being occupied by a mix of tenancies from the late 1970s; the heritage citation in the Review notes the building was being marketed as a 'new prestige building' in *The Age* in 1978. ¹⁶ In June 1978, at least one floor had been let, for an office furniture showroom on the tenth floor. ¹⁷ Other tenants in this period included a risk management firm, transport management service, and law firm. ¹⁸ The ground floor appears to have comprised retail with shops either side of a central 'arcade'. ¹⁹ In 1979, approval was sought for a takeaway shop at the rear of the ground floor (Figure 3-12) and the same plans were submitted to the City of Melbourne for the creation of mezzanine levels within the top two floors, but it is unclear whether these proceeded. ²⁰
- 34. Title records show that ownership of the property was transferred from Hanover Holdings to Binate Pty Ltd in January 1979, to Burns Philp Trustee Company in 1984 and to an entity known as 520 Collins Street in 1987.²¹ By the mid-late 1980s, the building was known as Hooker House (Figure 3-13), after Hooker Corp Ltd, and came within the portfolio of Hersfield Developments Corp, owned by former Hanover executive, George Herscu.²² It was offered for sale in May 1989, where it was said to offer 'future redevelopment potential' (Figure 3-14).²³ In 1994, it was acquired by Maxiplus Pty Ltd.²⁴

City of Melbourne, Building Application Index, 516/520 Collins Street, Melbourne, accessed via https://www.ancestry.com.au/, 29 June 2021.

Hanover Holdings Limited, Directors' Report and Accounts, 30 June 1973, p. 11, held by National Library of Australia.

City of Melbourne, Building Application Index, 516/520 Collins Street, Melbourne, accessed via https://www.ancestry.com.au/, 29 June 2021, Hoddle Grid Heritage Review, volume 2b, p. 591

¹⁷ *Canberra Times*, 19 June 1978, p. 19

Australian Jewish News, 16 March 1979, p. 4; Bulletin, Vol 100, no. 5207, 15 April 1980, p. 24; Overseas Trading, Vol. 35, No. 3, 11 February 1983, p. 30.

BA49683, plan and file, 21 March 1979, held by City of Melbourne.

BA50148, plans, 8 May 1979, held by City of Melbourne.

²¹ Certificate of Title, Volume 9074 Folio 693, Landata, Victorian Land Registry Services.

²² *Canberra Times*, 13 October 1989, p. 12.

Australian Jewish News, 26 May 1989, p. 5.

²⁴ Certificate of Title, Volume 9074 Folio 693, Landata, Victorian Land Registry Services.



Figure 3-8 Architect's impression of the 520 Collins Street development by Hanover Holdings Source: Hanover Holdings Limited, Director's Report, 30 June 1972, p. 3



Figure 3-9 South elevation, taken from a drawing set by Pioneer Concrete documenting precast panels and fixing details

Source: BA43759, held by City of Melbourne

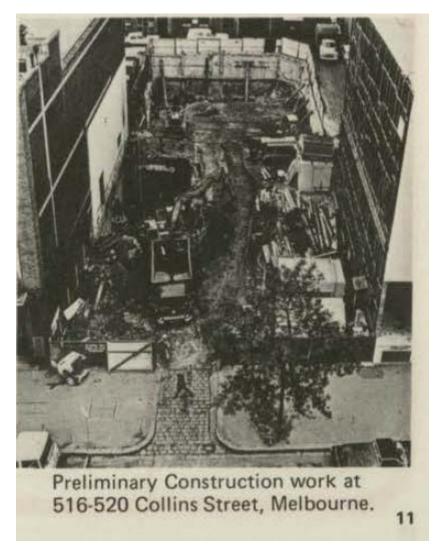


Figure 3-10 Work in progress on the site
Source: Hanover Holdings, Directors' report, 30 June 1973, p. 11

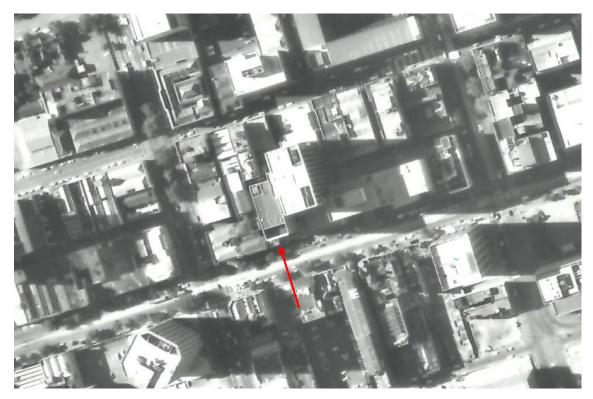


Figure 3-11 Aerial photograph of Collins and King streets, Melbourne, 1976, with subject site indicated Source: Historical Aerial Photography Collection, Landata, Victorian Land Registry Services

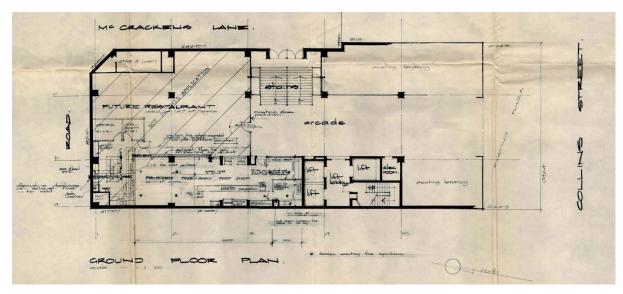


Figure 3-12 Proposed takeaway shop at the rear of the ground floor, 1979 Source: BA 49683, held by City of Melbourne

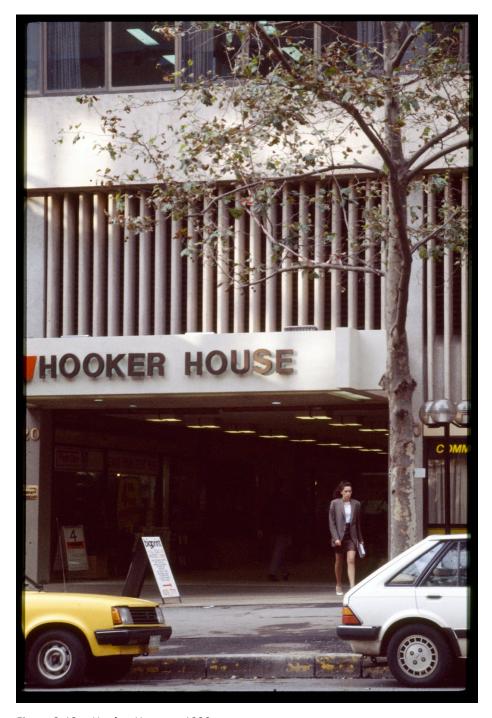


Figure 3-13 Hooker House c. 1980s
Source: Pictures Collection, State Library of Victoria, photograph by Rennie Ellis,
reproduced by permission of the Rennie Ellis Photographic Archive, H2011.150/2687

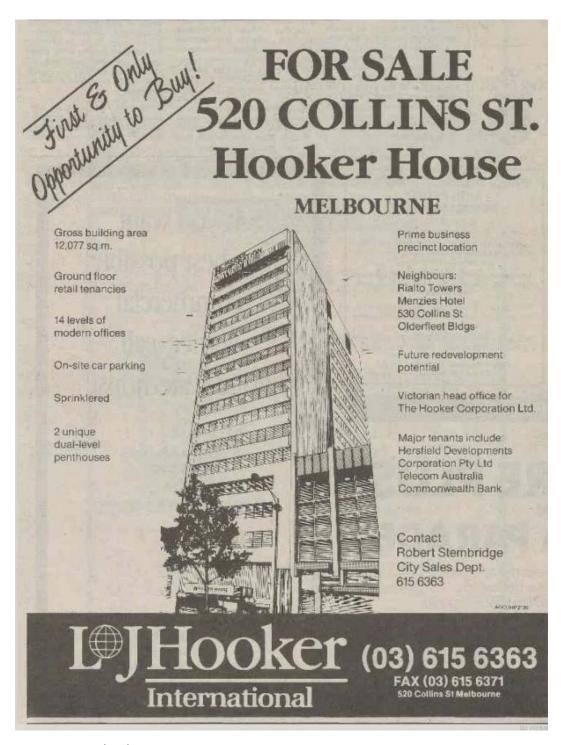


Figure 3-14 Sale advertisement Source: *Australian Jewish News*, 26 May 1989

3.2 Description

- 35. The building at 516-520 Collins Street is tall and narrow, with a deep set-back/forecourt. It is composed of brown masonry side walls with what appears to be a curtain wall system to the street. As it presents to Collins Street the principal facade comprises alternating rows of aluminium framed glazing and fixed concrete spandrel panels which produce a horizontal emphasis across the facade. The spandrel panels are smooth with no texture and appear to be painted beige. At the end of each spandrel row a projecting panel creates an unusual 90-degree angle detail which projects forward of the side walls. The uppermost 'crowning' spandrel panel is deeper and incorporates long dentilated patterning. The precast concrete elements were manufactured by Pioneer Concrete Services Limited.²⁵
- 36. At ground level the central canopy originally also featured precast panels with a criss-cross corner detail. This element has been changed or re-clad and the ground floor street interface is generally extensively altered, including through the enclosure of the central open arcade which extended into the building and introduction of new glazed shopfronts, later cladding and projecting awning structures. The forecourt area has also been modified and new paving and stone-clad plinths introduced. The contemporary tripartite spherical lamp visible in the Ellis photograph at Figure 3-15 has been removed. Level 1 of the building provides for car parking concealed behind a vertical grill comprising precast concrete fins, which have been painted black. Major internal refurbishment works were undertaken in 2017 (City of Melbourne building records, BA-2017-704).
- 37. The City of Melbourne has issued planning permit no. TP-2018-1057/B allowing for further substantial remodelling of the ground floor on Collins Street. The approved works include the demolition of the existing canopies (central and flanking) and ground floor façade including shopfronts, forecourt, plinths and shopfronts and a central section of fins at first floor level. The works involve bringing the building line out to the street edge over the existing forecourt with an entirely new architectural treatment including a striking projecting angled black metal canopy element.
- 38. The rear and east side elevations (the latter to McCracken Lane) comprise brown brickwork alternating with bands of aluminium windows (Figure 3-18, Figure 3-19).

²⁵ BA 43750, held by City of Melbourne



Figure 3-15 516-20 Collins Street, Melbourne, south elevation



Figure 3-16 View of the modified forecourt to Collins Street, altered ground floor level and painted concrete fins to the carpark above



Figure 3-17 Western side of the lower levels on Collins Street



Figure 3-18 Rear and east side elevations from McCrackens Lane

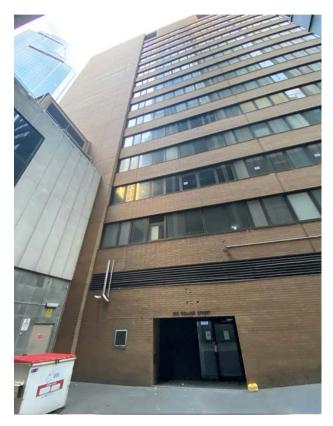


Figure 3-19 Another view of the east elevation

4.0 ASSESSMENT OF HERITAGE ISSUES

- 39. The Practice Note provides guidance in relation to the application of the HO. It requires that the following recognised heritage criteria are used for the assessment of the heritage value of heritage places.
 - Criterion A: Importance to the course or pattern of our cultural or natural history (historical significance).
 - Criterion B: Possession of uncommon, rare or endangered aspects of our cultural or natural history (rarity).
 - Criterion C: Potential to yield information that will contribute to understanding our cultural or natural history (research potential).
 - Criterion D: Importance in demonstrating the principal characteristics of a class of cultural or natural places or environments (representativeness).
 - Criterion E: Importance in exhibiting particular aesthetic characteristics (aesthetic significance).
 - Criterion F: Importance in demonstrating a high degree of creative or technical achievement at a particular period (technical significance).
 - Criterion G: Strong or special association with a particular community or cultural group for social, cultural or spiritual reasons. This includes the significance of a place to Indigenous peoples as part of their continuing and developing cultural traditions (social significance).
 Criterion H: Special association with the life or works of a person, or group of persons, of importance in our history (associative significance).
- 40. In this instance, the thresholds to be applied in the assessment of significance is 'Local Significance'. 'Local Significance' includes those places that are important to a particular community or locality.
- 41. The Practice Note continues:

To apply a threshold, some comparative analysis will be required to substantiate the significance of each place. The comparative analysis should draw on other similar places within the study area, including those previously included in a heritage register or overlay.

- 42. A place is only required to meet one criterion at the local level in order to warrant the HO.
- 43. In the Hoddle Grid Heritage Review the subject property was assessed against the criteria and found to meet Criterion A and Criterion D. No assessment against other criteria was documented.
- 44. In making this assessment, the heritage citation notes the historical thematic context for this assessment as follows:
 - [Postwar Themes] 1 Shaping the urban landscape and 3 Building a commercial city
 - [Dominant Sub-themes] 1.8 Expressing an architectural style, 1.9 Beyond the curtain wall, 3.2 Business and finance²⁶
- 45. The statement of significance (refer to section 2.3 above) also identifies elements contributing to the significance of the place as including (but not limited to):
 - The building's original external form, materials and detailing
 - The building's high level of integrity to its original design.

Later alterations made to the lower levels of the building are not significant.

Hoddle Grid Heritage Review, heritage citation for 516-520 Collins Street, Volume 2b, refer to p. 588.

4.1 Criterion A

Criterion A: Importance to the course or pattern of our cultural or natural history (historical significance)

4.1.1 Review assessment

46. The Review assessment against Criterion A is as follows:

Constructed in c1974, the office building at 516-520 Collins Street 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)

- 47. In meeting Criterion A, the statement of significance articulates the following associations and attributes:
 - A clear association with the postwar building boom which transformed Melbourne into a modern high-rise city
 - Design attributes related to commercial demand and prestige of the central city
 - Many architect-designed

4.1.2 Comment

Historical context

- 48. The central city has undergone a number of periods that have been characterised as 'building booms'. The most well-known of these is the 1880s period, during which construction was so prevalent that the decade is known as the 'boom era'. As the city recovered after the economic crash of the 1890s, there were also various phases through the twentieth century which have been characterised as 'booms'. Aside from the 1880s boom period, the 1920s and 1930s also saw substantial change in the built form in the city, with the introduction of new building technologies, particularly reinforced concrete.²⁷ The *Herald* reported the 'city building boom' of the interwar period in October 1923, observing the 'transformation [of Melbourne] is taking place rapidly'.²⁸ The newspaper reiterated this the following month, noting 'over £1,000,000' being spent in the city, including large reinforced concrete buildings replacing older buildings which had 'outlived the requirements of present-day Melbourne'.²⁹
- 49. There was then a distinct building boom in the postwar period as identified in the Review, but is interesting to note that the period between the mid-1950s and the mid-1970s was not one of continued and sustained growth and construction, but one of peaks and troughs of development. There were fluctuations in fortunes during this period and this is noted in the Review's *Postwar Thematic Environmental History 1945-1975*. 30
- 50. The immediate postwar period saw an 'unprecedented demand for office space in central Melbourne', as well as decentralisation to areas including Carlton and St Kilda Road.³¹ With the

Miles Lewis, Melbourne: The City's History and Development, Volume 1, City of Melbourne, 1994, p. 99.

²⁸ *Herald*, 23 October 1923, p. 3.

²⁹ *Herald*, 27 November 1923, p. 3.

Hoddle Grid Heritage Review, Postwar Thematic Environmental History, Vol. 2b, p. 19.

Heritage Alliance, Survey of Post-War Built Heritage in Victoria: Stage One, Volume 1: Contextual Overview, Methodology, Lists & Appendices', prepared for Heritage Victoria, October 2008, p. 19.

lifting of height restrictions in the CBD in 1956, buildings of significant height could be constructed. An article in the *Sydney Morning Herald* of 1960 was headlined 'optimistic city thrives', and noted that Melbourne was 'growing faster than any other city'. In the preceding four years, 'twenty-five large new office buildings [had] been completed [with] another 22 major buildings' under construction - 'the city has never before had such a building boom'.³² Although the credit restrictions of the early 1960s had only a limited immediate impact on the construction of offices in the central city, there was a downturn in the value of offices constructed in 1962-3, before an increase again in the mid-1960s.³³ The years between 1967 and 1971 saw a doubling of office space construction in the city compared to the preceding five years.³⁴

51. By the 1970s, numerous large towers had been constructed, and the *Victorian Year Book* of 1973 observed that :

The steel frame, reinforced concrete, and glass and metal panels have swept away ornament and decoration and established the rectangular silhouette. In central Melbourne, buildings of twenty storeys or so have been rising at the rate of about one a year. Seen from a distance, such buildings soon lose their identity.³⁵

- 52. The Victorian Year Books of the mid-1970s include data on the value of developments in the City of Melbourne, and the relative value of major construction. It was a period the year book of 1977 characterised as that of 'the developer and the conservationist', noting that developers typically involved 'considerable finance' and the 'acquisition of large consolidated sectors of the city.' The process of 'complete demolition of old buildings and ... replacement by new buildings', contrasted with the increasing public awareness of 'the importance of Melbourne's heritage', led by the National Trust of Australia (Victoria). The process of the importance of Melbourne's heritage', led by the National Trust of Australia (Victoria).
- 53. The Victorian Year Books of the early to mid-1970s are interesting in that they report the estimated value of construction in these years and this provides an insight into the overall trends and scale of individual developments. The early 1970s was buoyed by a number of large projects, with an estimated value over \$9 million, with more modest projects valued at \$500,000 to \$3.5 million, including the subject development. The large projects included Collins Place (\$23 million plus), Commonwealth Bank at 359-73 Collins Street (\$17.4 million), Nauru House in Exhibition Street (\$13.2 million), 150-8 Lonsdale Street (\$9.8 million), all projects reported to be under construction in 1972, with tower developments at 500 Bourke Street (\$17.1 million), and 226-60 Elizabeth Street (\$9.8 million) under construction in 1973 and 1974. Smaller developments were reported at 30-34 Collins Street (\$1.8 million), 452-56 Lonsdale Street (\$1.8 million) and 399-413 Lonsdale Street (\$3 million). In consideration of these significant

³² Sydney Morning Herald, 4 July 1960, p. 89.

Victorian Year Book, 1963, Australian Bureau of Statistics, Victorian Office, p. 347, Victorian Year Book, 1967, Australian Bureau of Statistics, Victorian Office, p. 606.

Context, City of Melbourne Hoddle Grid Heritage Review, Postwar Thematic Environmental History 1945-1975, March 2020, p. 19.

³⁵ Victorian Year Book, Australian Bureau of Statistics, Victorian Office, 1973, p. 183.

Wictorian Year Book, Australian Bureau of Statistics, Victorian Office, 1977, p. 325.

³⁷ *Victorian Year Book*, Australian Bureau of Statistics, Victorian Office, 1977, p. 325.

Wictorian Year Book, 1974, p. 671, 1975, p. 308 and 1976, Australian Bureau of Statistics, Victorian Office, p. 301. Note these editions provide statistics from two-three years prior.

- developments, a peak value of construction was reached in 1973 of over \$175 million, dropping to an estimated \$86 million in $1974.^{39}$
- 54. This construction boom ended in the mid-1970s as a result of economic and global factors. ⁴⁰ The 1976 *Victorian Year Book* noted that the years to the mid-1970s had had seen a 'marked slowing down in city building, largely because of the economic conditions of the time.' ⁴¹ In the following 15 years, the central city lost its dominance of new offices, falling from 70% of new construction in 1971 to less than 55% by the mid-1980s. ⁴²

Comment on assessment

- 55. The assessment in the heritage citation is that 516-520 Collins Street warrants inclusion in the HO against Criterion A because of a 'clear association' with this postwar building boom in central Melbourne, and with a further a reference to 'commercial buildings from the late 1950s to the mid-1970s'.
- 56. In considering this assessment, my view is that the attribution of local significance against Criterion A only on the basis of an association with a development or historical/developmental phase of such breadth (postwar building boom with a reference to commercial office buildings) is a challenging proposition. The subject building was demonstrably part of a period of concentrated development in Melbourne, in which large commercial/office buildings were constructed, aided by economic and business confidence and favourable (or lack of) planning regulations. This period forms an important part of the longer history of Melbourne and was notable for the transformative impact on the central city. Recognising this importance and the impact on central Melbourne, however, the association with the postwar building boom as a basis for inclusion in the HO is broad, even with the additional reference to 'commercial office buildings'. In preference a further critical lens should be applied as to how local historical significance is identified as related to the phase. A key issue is the *importance* of the historical association, and a relevant question is whether the subject building is associated with or able to reflect strongly on important historical themes of this period.
- 57. In this case, based on the contextual history provided in the heritage citation, the building is associated with a focus on office accommodation and also the theme of property development and investment in the central city (both would fall under the Postwar Thematic Environmental History's theme of 'business and finance in the postwar period' and this sub-theme is referenced in the heritage citation). 43 However these associations and themes remain relatively general rather than specific.
- 58. Considering the specific history and associations of the building, in the context of its c 1974 date of construction, the subject building came towards the end of the boom and, constructed at a value of \$2.3 million, was a relatively modest development when compared with the multimillion-dollar tower developments under way at the time. It is associated with Hanover Holdings, a commercial property developer with a broad city, suburban and regional portfolio at the time. The building clearly was delivered to a scale and standard in line with expectations for the central city, and was marketed as a 'new prestige building' by *The Age* in 1978, as noted in

³⁹ *Victorian Year Book*, 1976, Australian Bureau of Statistics, Victorian Office, p. 301.

Hoddle Grid Heritage Review, Vol. 2b, heritage citation for 516-520 Collins Street, p. 591.

Victorian Year Book, 1977, Australian Bureau of Statistics, Victorian Office, p. 326.

⁴² City of Melbourne Strategy Plan 1985, p. 35, via https://planningmelbourne.org/pages/p035, accessed 3 August 2021.

See Building a Commercial City, sub-theme Business and finance', Volume 2b, p. 19.

the heritage citation. ⁴⁴ However, unlike some other examples in the Hoddle Grid Heritage Review, it does not have claims to have been designed as an expression of corporate branding where the building is seen as expressive of the owner/client's aspirations through the 'establishment of a dominant city presence'. ⁴⁵ Rather the building was part of a Hanover's commercial development operations, with a pattern of site acquisition, development, construction, leasing / sale with the aim of realising a profit. It is interesting to note that Hanover itself did not seek to have a presence in the city, rather it built its headquarters, Hanover House, in the far less prominent and prestigious location of City Road, Southbank.

- 59. Beyond its status as a development project of the early to mid-1970s, it is not clear that the subject building has any historical associations or demonstrates particular qualities that would elevate it over any other commercial office building of the 1970s for reasons of historical significance. It does not demonstrate the key developmental themes in a way that would be distinguished from other examples.
- 60. On this basis my view is that 516-520 Collins Street is not a place that meets the local threshold for historical significance against Criterion A.

4.2 Criterion D

4.2.1 Review assessment

61. The following assessment is provided against Criterion D:

The office building at 516-520 Collins Street is a fine and highly intact representative example of a Post-War Modernist commercial building. The building strongly reflects the style which was popular in the 1960s through to the mid 1970s, particularly in central Melbourne. Constructed as a 16-storey structure, the building clearly demonstrates typical characteristics of a later postwar commercial building, including a strong horizontal emphasis and highly distinctive spandrels. These demonstrate important aspects of the Modernist style (Criterion D).

4.2.2 Comment

Historical context

- 62. The class of place identified for Criterion D is 'Post-War Modernist commercial buildings', with the subject building assessed as 'a *fine, highly intact and highly representative* example of this class of place'.
- 63. In considering the assessment against of Criterion D, the context of commercial office tower design is the most relevant consideration. The Hoddle Grid Heritage Review Postwar Thematic Environmental History (in Volume 2b) provides a useful summary of developments in commercial office tower design in the postwar period (see sections 1.8-1.11) and a detailed overview is also provided in the National Trust's *Melbourne's Marvellous Modernism*. The following overview draws on these sources.
- 64. Both documents describe the enthusiasm in the mid-to-late 1950s for the expression of multistorey office buildings as fully glazed curtain walled glass boxes. 46 The aesthetic successes of these early buildings were achieved through the selection of materials and the composition of façade grid patterns, which could be used to emphasise a vertical or horizontal character. The

Hoddle Grid Heritage Review, Vol. 2b, heritage citation for 516-520 Collins Street, p. 591.

⁴⁵ As referenced in the Contextual History, Hoddle Grid Heritage Review, citation for 516-520 Collins Street, Vol. 2b, p. 589.

See 'International Style: Curtain Wall and Metal', Melbourne's Marvellous Modernism, p. 5

first fully glazed curtain-walled office building completed in central Melbourne was Gilbert Court at 100 Collins Street, designed by J A La Gerche, 1954-55, but the most notable example of glazed curtain wall construction was ICI House at 1 Nicholson Street (1958), designed by Bates Smart McCutcheon, which broke through Melbourne's 132 foot height limit in dramatic fashion. (Figure 4-1)

- 65. Both the Postwar Thematic Environmental History and *Melbourne's Marvellous Modernism* point to the way in which the expression of curtain walls relatively quickly moved on from the 1950s 'glass box' to provide greater novelty and achieve differentiation from other developments while still in many cases using the same structural technologies. The 1960s saw greater diversity of curtain wall designs as architects sought fresh solutions and aesthetic approaches. Many combined glazing with metal or the new lightweight concrete or reconstituted stone materials to create bolder grid patterns. Examples include Yuncken Freeman's Scottish Amicable Insurance Building, 124-146 Queen Street (1964-66) which used concrete panels, and the later Eagle House (1971-72), see Figure 4-2, with its aluminium spandrels. Others included heavier masonry spandrel panels or balconies (see for example BP House in St Kilda Road, 1964, Figure 4-3) and projecting grid profiles. **Melbourne's Marvellous Modernism** also explains that there was a parallel theme of 'traditional expression of solidity through masonry', including the use of precast concrete panels and brick. As a consequence, many buildings of the 1960s and early 1970s exhibit a heavier character than the earlier 'glass boxes.' **
- 66. This period also saw the emergence of Brutalism. Of the AMP Square and Tower Building of 1965-69 by Bates Smart McCutcheon in association with American firm Skidmore Owings and Merrill 555 Bourke Street, *Melbourne's Marvellous Modernism* comments the building created an almost Brutalist expression with precast reconstituted polished brown granite mullions and spandrel panels (Figure 4-3). ⁴⁹ Another more obvious example was the YMCA building at 489 Elizabeth Street, just south of Therry Street (Perrott, Lyon, Timlock & Kesa, 1975).

^{47 &#}x27;International Style: Curtain Wall and Masonry', Melbourne's Marvellous Modernism, p.22.

^{48 &#}x27;Expressed Structure', Melbourne's Marvellous Modernism, p. 38.

⁴⁹ As noted in *Melbourne's Marvellous Modernism*, p. 70.





Figure 4-1 (L)1955, Gilbert Court, 100 Collins Street, G A La Gerche, architect, 1958; (R), ICI House, Nicholson Street, East Melbourne.

Sources: both photographs by Wolfgang Sievers, Pictures Collection, State Library of Victoria, (L) H88.40/950; (R) H2003.100/1941972



Figure 4-2 (L) 1964-66, Scottish Amicable Insurance, 140 Queen Street, Yuncken Freeman (R) 1971-72, Eagle House, 473 Bourke Street, Yuncken Freeman, both photographs by Wolfgang Sievers, source: Pictures Collection State Library of Victoria H99.50/135, H99.50/344.

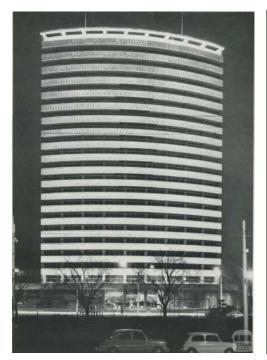




Figure 4-3 (L) BP House, St Kilda Road, Melbourne, 1964, R.S. Demaine, Russell, Trundle, Armstrong &Orton (L) AMP Square, 555 Bourke Street. 1965-69, Bates Smart McCutcheon with SOM. Sources: (L) Victorian Places, https://www.victorianplaces.com.au/node/64328; (R) photograph by Peter Wille, Pictures Collection, State Library of Victoria H91.244/324

67. The following comment from the Review's Postwar Thematic Environmental History confirms that rather than consistency, the diversity of the response to multi-storey commercial towers was characteristic of the period 1960s into the 1970s:

A broad range of design approaches became apparent in multi-storey commercial buildings of the 1960s and early 1970s. The horizontality of curtain walling was often balanced by the addition of vertical elements such as façade columns, strips or fins, which introduced textural patterns and visual strength to the facades of a number of buildings. Other multi-storey towers clearly expressed their structure externally with grid-like facades which clearly reflected the internal trabeated structural system. Sun screening provided additional patterning to facades, either as a repetitive decorative motif across the façade, as an expression of the window frames ..., in the form of balconies ... or occasionally as an entire screen attached to the exterior face of the building.

- 68. The curtain wall in its diverse forms may be seen as synonymous with modernism, but in reality individual buildings were notable for the degree of experimentation and variety rather than their consistency. In this context, the suggestion that any individual building is *representative* of the class of *Post-War Modernist commercial buildings* may serve to understate the diversity found in the group. In terms of the implications for assessment, while any single example might be said to demonstrate at least some 'typical characteristics of a later post-war commercial building', it is considered that this would be too broad a test to establish local significance.
- 69. In the assessment against Criterion D, my view is that there should be a further level of analysis that seeks to consider the *importance* of the building's 'representativeness,' including the extent to which it demonstrates particularly important aspects of the class of place, or was *important* in the development of a theme, and this should include consideration of design merit.

70. Typically, this would be done through comparative analysis, and the Practice Note *Applying the Heritage Overlay* comments on the role of comparative analysis in confirming a threshold for significance:

To apply a threshold, some comparative analysis will be required to substantiate the significance of each place. The comparative analysis should draw on other similar places within the study area, including those previously included in a heritage register or overlay.

71. The methodology statement in the Review (see section 3.2.4, Assessment, in 3.2.4) also recognises the importance of thresholds; the statement notes that comparative analysis was undertaken to substantiate the significance of each place, drawing on other similar places within the study area.⁵⁰

Comparative analysis

- 72. In the heritage citation for 516-520 Collins Street, the comparative analysis includes an illustrated list of buildings which are said to have been 'constructed in the same period and display similar characteristics as the office building at 516-520 Collins Street'. This comprises commercial office towers constructed in the period 1960-1975 as follows:
 - Five VHR-listed places (date range 1964-1972, all architect-designed, including a cinema)
 - Four commercial office towers currently in precinct-based HOs (mid-1960s-mid-1970s), recommended for individual HO controls in this amendment
 - One commercial office tower included in a site-specific HO (1966)
 - 29 commercial office towers proposed to be included in the HO in this amendment (date range 1960-61 to 1975).
- 73. The heritage citation provides the following comment in introducing the 29 referenced examples proposed for HO controls in this amendment (emphasis added):

Despite the demolition of many 1960s and 1970s multi-storey commercial buildings in the City of Melbourne, a number of fine and highly representative examples of this building type that are not currently included in the Heritage Overlay on a permanent basis have been retained with sufficient integrity to demonstrate this class of place. These buildings 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. The podiums of the majority of these places have been modified at street level. Examples include:....

[photographs with construction dates and architects follow].

74. Having reviewed the examples provided, in terms of direct comparisons, the earlier Bates Smart McCutcheon design for 251-257 Collins Street (1971-73) presents with some similarities in its narrowness and overtly horizontal treatment (albeit through a structural, rather than curtain wall façade, with deeply set windows), as does the later Former Australia Pacific House by McIntyre McIntyre Partners at 136-144 Exhibition Street (1975-78) with its bow-shaped edge beams but again, a far heavier structural expression (Figure 4-4). Some other examples are related in scale and form but not particularly in façade articulation. Some are of very limited relevance.

Hoddle Grid Heritage Review, Vol. 1, p. 13.





Figure 4-4 (L) Former Commercial Banking Company of Sydney Building, 251-257 Collins Street, (Bates Smart & McCutcheon, 1971-73, (R) Former Australia Pacific House, 136-144 Exhibition Street (McIntyre McIntyre & Partners, 1975-78)Source: reproduced from Hoddle Grid Heritage Review

75. The 'Analysis' section at the end of the comparative analysis does not provide any commentary on the place of the subject building in the context of the other examples, other than to suggest the subject building is 'Similar to 'a number of 1960s to mid-1970s buildings' in that it 'clearly demonstrates' the 'class of place' (Post-War Modernist commercial building).

Analysis

As a fine, highly intact and highly representative example of a Post-War Modernist commercial building, the building at 516-520 Collins Street clearly demonstrates an important phase in the architectural development of multi-storey commercial buildings within the Hoddle Grid in the City of Melbourne. Similar to a number of 1960s to mid-1970s buildings listed above, the subject building clearly demonstrates this class of place. ⁵¹

- 76. Beyond this, no analysis is provided in the heritage citation of the relative merits of the examples selected or their relevance or relationship to the subject building.
- 77. Because of this lack of commentary, it is difficult to see how the comparative analysis provides insight into a threshold for local significance or how that might be applied in the case of the subject building beyond the following conclusions:
 - There are surviving 'fine and highly representative' examples of this building type
 - These have 'sufficient integrity to demonstrate this class of place'
 - The majority have been modified at street level.

Hoddle Grid Heritage Review, heritage citation for 516-520 Collins Street, Vol. 2b, p. 600.

Impact of alterations

- 78. As part of its methodology, the Review establishes 'benchmarks' for integrity, a means through which the impact of physical changes on significance can be assessed. Refer to Volume 1, Appendix A5 Benchmarking integrity for built heritage places. 52
- 79. The following benchmark indicators were established for High Rise (above 8 storeys), 1950s-1975:

Type of building	At benchmark	Above benchmark	Below benchmark
High Rise (above eight storeys)	Original scale of building legible but may have one or two storeys added. Glazing or curtain wall may have been replaced but still reflects original characteristics. Ground floor changed. No balconies added.	Original scale maintained – no upper floor additions. Original glazing pattern including early curtain wall glazing. Ground floor may be changed but not excessively. Wall surfaces of the original materials.	Original scale not legible. Curtain wall replaced, and glazing pattern considerably changed. Ground floor changed. Wall surfaces changed by recladding. Balconies added.

- 80. The establishment of guidelines or benchmarks for intactness or integrity can be useful, particularly when comparing like places, while noting there might be exceptions which warrant varying the assessment outcome (this is acknowledged in the Review). The appendix of buildings that did not proceed to assessment in the Review (Volume 1, A6) suggests that the issue of intactness was considered in earlier stages of the Review; for the majority of postwar office towers, the reasons given for exclusion from the group of places assessed was 'substantially altered' and / or 'low integrity'.
- 81. It is commented, however, that benchmarking guide provided at Appendix A5 does not fully acknowledge the impact change at ground floor level can have on the presentation and appreciation of buildings of this period. The benchmarking guide notes as follows:

Ground floor alterations

Generally, the city centre has a high degree of alteration to ground floors. There will be very few places with intact shopfronts or entries. The extent will vary considerably but often it is the presence of other changes that will be more important. 53

82. For many modernist buildings, the way they come to ground and/or engage with the street is a key aspect of the overall design. It is accepted that it is common for changes at street level to have occurred in the central city, but the changes do have an impact, and in some cases one of note. This goes beyond the replacement of shopfronts and can result in changes to aspects of

Hoddle Grid Heritage Review, Volume 1, pp. 77-80.

Hoddle Grid Heritage Review, A5, Vol. 1, pp. 77-80.

- design that were both typical of the period and a notable aspect of their design, including recessed ground floor lobbies with street entries set behind edge columns, as well as plazas and the like. ⁵⁴
- 83. In this case, the heritage citation for 516-520 Collins Street comments that 'works to the building at street level have had minimal impact on the overall intactness of the place', and further that '[W]hile the building has undergone some alterations at street level, there do not diminish the ability to understand and appreciate the place as a fine example of a Post-War Modernist multistorey commercial building'. ⁵⁵
- 84. In response, it is agreed the building is intact above ground floor level, accepting the change in colour to the concrete fins to the carpark. It remains clearly recognisable as an office tower of the period. However, the current condition of the ground level and street interface is significantly changed, particularly in terms of the fabric itself, albeit the current arrangement does retain or reference aspects of the original configuration including the forecourt and central canopy. The works approved under Permit TP-2018-1057/B would have a further and more significant impact on the legibility of the original design, in that they bring the building line forward over its forecourt, an integral part of the original design, and in the process remove the canopy element, replacing it with a design that is entirely unrelated to the original.

Assessment

- 85. When considered against Criterion D, 516-520 Collins Street presents as an office tower of the 1970s that is intact above ground floor level. It is recognisably of the period and its origins are reflected in its design and materials. To that extent it is clearly the case that it is an example of the identified place type 'Post-War Modernist commercial buildings'.
- 86. While it is not the purpose of this statement to re-examine the findings of the study as a whole, as noted above, my general observation in relation to Criterion D is that the referenced class of place ('Post-War Modernist commercial buildings') is very broad. Criterion D requires consideration of 'importance in demonstrating the principal characteristics of a class of cultural or natural places or environments'. In light of this, in order to meet Criterion D at a level that is indicative of local heritage value, my view is that a threshold should be established for places assessed as representing this place type, not only for intactness/integrity, but also for merit.
- 87. In the case of 516-520 Collins Street, the building is said to be a *fine* and highly intact representative example of a Post War Modernist commercial building, however it is not clear from the material provided, including the comparative analysis, how it has been assessed as a *fine* example that meets Criterion D at a level indicative of local 'representative significance'.
- 88. Specifically,
 - The building has not been identified in any of the previous surveys of postwar period buildings in central Melbourne and is not referenced in the National Trust of Australia's Melbourne's Marvellous Modernism, established as a baseline survey.
 - The building presents as a late and unremarkable example of a Post-War Modernist commercial building (at 1974 it comes toward the end of the identified period), constructed at a time when other forms of architectural expression were emerging, notably Brutalism.
 - It is very likely that the design was the work of an architect (either in-house at Hanover or external), but no link with a notable architect has to date been established. This comment

See the discussion of plazas and ground floor level setbacks at pp. 3-4 in Melbourne's Marvellous Modernism, see also reference to siting in the Hoddle Grid Heritage Review Thematic Environmental History, Vol. 2b, p. 15.

Hoddle Grid Heritage Review, heritage citation for 516-520 Collins Street, Vol. 2b, p. 593.

- is not intended to suggest that only architect-designed buildings would meet Criterion D or that the significance of this example would be elevated if such an attribution is made. Equally, the statement of significance for 516-520 Collins Street specifically references the fact that many of these commercial towers were designed by architects. This may be a generic part of the statement, but in the absence of a known architect seems not to be particularly relevant to the subject building.
- The building does not appear to have been considered to be of note when constructed and
 was one of many projects being undertaken by the developer Hanover across Australia in
 this period. The company tailored its development approach to the context (city, suburbs,
 regional centres); in this case the context was the central city and the building reflects that,
 just as Hanover's 168 Exhibition Street development, completed two years before, in 1972,
 and not assessed in the Review, does.
- The aspects of the design that are identified in the statement of significance as demonstrating 'important aspects of the Modernist style' are identified as its 'strong horizontal emphasis' and 'highly distinctive spandrels'. The horizontal emphasis is of no particular note being common across the breadth of buildings of the period while the use of horizontal concrete elements was already well-established in Melbourne, notably at BP House, and pre-cast concrete panels were also widely used. The curved detail to the spandrel ends here is noted but this is not considered an attribute that would elevate the significance of the design in a heritage context.
- 89. In the case of 516-520 Collins Street the comparative analysis and assessment in the heritage citation does not establish a strong case for local significance against Criterion D, including with reference to other examples and it is my view is that the building does not meet the criterion at a level that would warrant the HO.

5.0 CONCLUSION

- 90. Constructed in the mid-1970s, the building at 520 Collins Street is associated with the later part of a 20-year period of development and redevelopment in the central city, that resulted in a transformation of many central city sites and had a significant impact on the city's physical character. Undertaken by a commercial property developer, the 516-520 Collins Street project was a relatively modestly-scaled development by the standards of the day. Recognising that there is a general association with a period of great change and note in the history of the city, no specific historical associations of significance have been identified, nor does the building reflect particularly on specific historical themes of importance in a way that warrants heritage recognition.
- 91. Considering the issue of 'representative' significance, the building's architecture, siting and form and use of materials mark it as an example of office tower design of the period, but not one that in the context of surviving buildings from that period, has been established as important in its ability to demonstrate key attributes or themes or as a design of a high order of merit (a 'fine' example').
- 92. On the basis of this review of the amendment documentation as related to 516-520 Collins Street, and as assessed against the relevant criteria (A and D), my view is that the values identified for the building in response to the criteria are not at a level to that warrants individual recognition for heritage reasons and the HO should not be applied.