Amendment C258

Melbourne Planning Scheme

Statement of evidence

Prepared for City of Melbourne

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1. Introduction

This statement of evidence has been prepared by David Helms for the City of Melbourne in relation to Amendment C258 to the Melbourne Planning Scheme.

This statement of evidence provides:

- My opinion as to whether the methodology used by Lovell Chen in the conversion of the 'alphabetic' ('A', 'B', 'C' and 'D') grading system to the proposed three-level system provides a sound and justified basis for the new gradings, and
- A review of submissions where the new level of significance is disputed, and my opinion as to whether the methodology used by Lovell Chen has resulted in a correct assessment. This is limited to submissions for places within the precincts reviewed by Lovell Chen, which includes those within the Central City Zone and the heritage precincts outside of the CCZ.

I have not been asked to review submissions in relation to places in areas where heritage reviews have been recently completed or are currently underway, as follows:

- *Kensington Heritage Review* (implemented by Amendment C215)
- *City North Heritage Review* (Amendment C198)
- *Arden Macaulay Heritage Review* (Amendment C207)
- *West Melbourne Heritage Review* (part of this amendment)

1.1 Preparation of this report

This statement has been prepared by David Helms, Heritage Consultant, of David Helms Heritage Planning (PO Box 1225, Chapel Street, Windsor, 3181) in accordance with *Planning Panels Victoria Guideline No.1 – Expert Evidence*.

I have prepared this statement of evidence with no assistance from others. The views expressed in this statement are my own.

Consistent with the approach taken by Lovell Chen, the review of gradings in response to submissions was undertaken as a 'desktop' exercise, using the available information (see section 1.1.3, below). No site inspections were undertaken; properties were inspected using online streetview and aerial imagery (Google Maps and Nearmaps).

1.2 Qualifications and experience

My qualifications and experience are set out in section 3. My specific area of expertise is in the assessment of the post-contact heritage significance of places and in the application of heritage planning controls and policy in planning schemes.

I have been retained by various Councils to provide expert witness evidence on heritage matters at Independent Panel Hearings (please refer to section 3 for a full list).

At the time I commenced my professional career as a heritage planner in 1999 the phasing out of the 'letter' grading system had recently commenced. The first heritage study that I prepared (for South Gippsland Shire, completed in 2000) used the new three-level system of individually significant places (of local or State significance), contributory and non-contributory places within precincts.

Since then I have undertaken several reviews of older heritage studies that used the letter grading system, some of which have required me to convert that system to the present three-level system of 'Significant', 'Contributory' and 'Non-contributory'. I have also

appeared as expert witness before numerous panels where the issue of what makes a building 'Significant', 'Contributory' or 'Nil/Non-contributory', as well as the related issues of how a heritage precinct is identified and defined, and what makes a building Contributory or not to that precinct, have been debated and explored.

Because of this I have extensive first hand experience and knowledge of the issues and challenges in translating a 'letter' grading system into the present system, and in the identification of the significance levels of places either as part of precinct or on an individual basis.

1.3 Reports consulted

In preparing this statement of evidence, I have consulted the following reports and other information provided to me by the City of Melbourne:

- *City of Melbourne Heritage Review: Local heritage policies and precinct statements of significance methodology report*, prepared by Lovell for City of Melbourne (September 2015, Updated May 2016).
- An Excel spreadsheet table prepared by Lovell Chen, which lists the 'C' and 'D' places reviewed and provides the rationale for a change in grading from Contributory to Significant or Non-contributory (hereafter referred to as the 'Lovell Chen Review Table').
- A copy of all submissions received (redacted to remove names of submitters and personal contact information).
- The Council report to the 20 February 2018 meeting (Agenda item 6.4) of the Future Melbourne (Planning Committee) providing a response to all submissions to Amendment C258 (hereafter referred to as the 2018 Council Report).
- The detailed Council response to Submission No.9.
- All Amendment C258 documentation.

1.4 Abbreviations

Abbreviations used in this statement of evidence include:

- Heritage Overlay: HO
- Heritage Places Inventory 2016: '2016 HPI'
- Heritage Places Inventory proposed by Amendment C258: 'C258 HPI'
- Victorian Heritage Register: VHR

1.5 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.

David Helms

26 July 2018

2 Summary of my opinions

My experience in undertaking large heritage reviews such as this is that, inevitably and despite all best efforts, mistakes will occur simply because of the sheer numbers of places involved. This happens for various reasons, but a common one is what I refer to as 'address confusion', particularly when using addresses identified in an older study, which may have changed or have been incorrectly recorded originally.

Usually, the process of review and consultation undertaken as part of heritage studies, which includes the planning scheme amendment process, will ensure that most if not all such errors will be identified, reviewed and rectified as appropriate.

Accepting that mistakes will sometimes occur, I don't believe the existence of errors discredits the methodology employed in a heritage study or its findings and recommendations. The aim of my review instead is to determine whether such errors are evidence of systemic issues that point to underlying flaws in the methodology or approach (and consequent findings and recommendations).

My review has not identified any systemic errors in the approach taken by Lovell Chen in the conversion of gradings. Overall, the methodology is sound and has resulted in what I believe to be a largely correct translation of the existing alphabetic grading system to the new three level system.

Having said this, my review of submissions has still identified some errors. That is, places that are graded in the current 2016 HPI and which have been 'lost in translation' to the re-exhibited C258 HPI. Also, there are some places where (although the translation has been carried out correctly in accordance with the methodology) I believe the grading is incorrect due to problems with addresses, including some where I believe the grading from the original study has been incorrectly translated into the HPI due to incomplete address information.

Because of this, I recommend some changes to the re-exhibited C258 HPI to correct these errors, which are set out in Table 2.1. I also have suggestions for minor improvements to the C258 HPI to improve its usability.

My review of the methodology and of the submissions has also considered the lack of review of Ungraded places. I agree that the direct translation of Ungraded places to Non-contributory is logical and a full review of these places would not have been feasible within the scope of the project undertaken by Lovell Chen. That said, my review of submissions has identified two areas in particular, which have not been subject to recent heritage reviews (HO2 East Melbourne & Jolimont and HO6 South Yarra), where there are numerous examples of Ungraded places that are potentially Contributory or even Significant and that I believe should be given priority for review, as part of future work.

None of these findings or recommendations in my opinion should be seen as an impediment to proceeding with this Amendment. The changes I have recommended represent minor refinements rather than fundamental changes. Also, this amendment is just a step in a larger strategic process, which will include more comprehensive reviews that will address other issues such as the review of Ungraded places. I believe it provides a sound foundation for undertaking this future work.

On this basis, my specific findings and opinions are set out below

Methodology

My review of the methodology responds to the following questions:

- Is a 'desktop' review appropriate? (for details, see section 3.2)
- Are the proposed definitions of Significant and Contributory appropriate? (section 3.3)
- Is the translation of 'A' and 'B' places, or included in an individual HO regardless of grading to Significant without review appropriate? (section 3.4)
- Does the review provide a reasonable basis for 'C' and 'D' places that are proposed to become Significant? (section 3.5)
- Is it appropriate to translate the balance of 'D' grade places to Contributory without review? (section 3.6)
- Is the translation without review to Non-contributory of currently Ungraded places appropriate? (section 3.7)

Is a 'desktop' review appropriate?

It is my opinion that a desktop review as used by Lovell Chen is appropriate as:

- Lovell Chen is a well-established practice with extensive experience in undertaking heritage studies and reviews in Melbourne and Victoria.
- It builds upon and has been informed by previous heritage studies and reviews of several of the major precincts carried out recently. Importantly, this has included the *Thematic History. A history of the City of Melbourne's urban environment*, prepared in 2012, which provides an essential context for identifying, assessing and/or reviewing the significance of heritage places and precincts.
- It has been informed by the preparation of citations with statements of significance for each of the key HO precincts outside of the central city.
- Finally, I am instructed it is intended as an interim measure until comprehensive reviews can be undertaken of the remaining areas that have not been reviewed thus far.

Are the proposed definitions of Significant and Contributory appropriate?

It is my opinion that the proposed definitions for Significant, Contributory and Non-contributory are correct. However, I believe they could be improved to focus on the definition of significance alone and avoid matters that may affect the consideration and assessment of significance (see section 3.3 for details).

Review of 'A' and 'B' grade and individual HO places

The translation of 'A' and 'B' grade places, and places with an individual HO to Significant, is supported.

For the properties that I have reviewed this will correct an anomaly where places of individual significance and with an individual citation that were assessed by earlier heritage studies are graded 'D'.

I agree with the recommendation of Lovell Chen that, as part of future work, statements of significance should be prepared for all Significant places that do not currently have one.

The lack of consistency of property numbering in the HPI, both current and exhibited, can result in confusion and could be improved.

Review of 'B' and 'C' grade places

The methodology used in the translation of 'C' and 'D' grade places to either Significant or Contributory is appropriate.

The interim assessments made in support of 'C' and 'D' grade places that are now Significant should be made publicly available.

As part of future work, these interim assessments should be confirmed following a detailed assessment undertaken either on a precinct-wide or a thematic/typological basis.

Ungraded places

Incorrect translation of original heritage study information in my opinion has led to graded buildings being incorrectly identified as Ungraded and therefore omitted from the 2016 HPI. While many errors have been corrected, some still exist. 191 and 197 Errol Street, North Melbourne are two examples, which I believe should be added to the C258 HPI as Contributory places.

The translation of Ungraded places to Non-contributory without review is acceptable as an interim measure. However, future comprehensive heritage reviews should re-assess Non-contributory places with priority given to:

- The places specifically identified in submissions, particularly in relation to the HO2 East Melbourne & Jolimont and HO6 South Yarra precincts (see my comments in the following section).
- The places identified as 'no match' or 'query' in the Lovell Chen Review Table.

Review of submissions

The table in Appendix A.1 provides my detailed response to the submissions, and Table 2.1 (see below) provides a summary of 'errors' in the HPI that I believe should be corrected in Amendment C258. These include:

- Places that are graded in the current 2016 HPI and which have been 'lost in translation' to the re-exhibited C258 HPI.
- Places where, although the translation has been carried out correctly, I believe the grading is incorrect due to problems with addresses, including some where I believe the grading from the original study has been incorrectly translated into the HPI due to incomplete address information.
- Places with an individual HO within the Central City Zone (see response to Submission 98).

Many of the submissions relate to C or D grade places and in almost all cases I agree with the proposed new grading applied by the methodology. In only one case do I disagree with the recommended new grading (see response to Submission 23). On this basis I do not see any evidence of systemic issues with the transfer or review of 'A', 'B', 'C' or 'D' 'grade places.

The table also identifies specific Ungraded places that should be reviewed as part of future work. Many of these are within the HO2 East Melbourne & Jolimont or HO6 South Yarra precincts - see responses to Submissions 9 & 93 (HO2), and 15, 48 or 74 (HO6).

Review of the C258 HPI

Finally, my review of submissions has also identified some issues with the presentation of information in the C258 HPI, which I believe could be improved. Appendix A.2 shows how this could be done. Specific changes could include:

- Including the names of key sites, particularly those that are named in the 2016 HPI table, and ideally, all places with a Significant grading. I note the table could readily be adjusted to provide more space for the name/number column.
- Replacing 'Building Grading' with 'Place Grading' or 'Grading'.
- For large or complex sites with multiple buildings of different grading, consider adding individual listings for component buildings, as has been done for some sites like Melbourne University. See Appendix A.2 for one suggestion using the example cited in Submission 77.
- Use a consistent system of numbering throughout including listing places with a number range by their full address – that is, 15-17 rather than 15 or 17.
- If properties have two addresses (e.g. corner sites), or a 'commonly understood address' that is different to the address in Council's database then list under both addresses.
- As part of future work, creating maps of each precinct showing the gradings for each place.

Table 2.1 – Summary of recommended changes to C258 HPI and future work

Submission no.	My recommendations
5	(Error due to address issue) 2 Youngs Lane is now 26 Youngs Lane, while nos. 1 and 3 Youngs Lane are now 40A & 40B Molesworth Street. All three graded 'C' in 2016 HPI, but missing from the C258 HPI. Add all properties to the C258 HPI with the updated addresses and a 'Significant' grading.
9 & 93	(Errors due to 'lost in translation' or address issues) Change the C258 HPI for HO2 East Melbourne & Jolimont, as follows: ▪ Add 105 Powlett Street as a Contributory place. ▪ Change the listing for 42-44 Simpson Street to 66 George Street and move to the correct place. ▪ Add Powlett Reserve and Darling Gardens as Contributory places. ▪ Change 56-70 Wellington Parade to Significant and add 'Eastbourne House' as the name. Add 8 & 10 Simpson Street as Significant places. ▪ Add the Greek Orthodox Church, 186 Victoria Parade, and the pair of houses at 376 & 378 Victoria Parade as Significant places. (Ungraded places) As part of future work, undertake a thorough review of the Ungraded places in the HO2 East Melbourne & Jolimont precinct, particularly interwar flats. This should be done in conjunction with a review of the new precinct citation to determine whether greater emphasis needs to be given to the significance of flats within the precinct. Also give priority to review of the following Ungraded places, which are potentially Contributory:

Submission no.	My recommendations
	▪ 33 Albert Street, 18 Berry Street, 25-27 Burchett Lane, 28 Charles Street, 40 George Street, 10 Grey Street, 12 Lansdowne Street, 46 Simpson Street, and Jolimont Railway Station 175 Wellington Parade. ▪ As part of future work, extend HO2 to include 8 & 10 Vale Street South as Contributory places
15	(Error due to lost in translation or address issues) Review the potential inadvertent deletion of the Myer Music School, which is included in the 2016 HPI with the address 75 Domain Street as a 'C' Grade place. The correct address according to Land Victoria is 79 Domain Street, as part of the corner site that also includes 3 Bromby Street. (Ungraded places) As part of future work, review the following places, which are potentially Contributory to the HO6 precinct: ▪ 92 Domain Street, South Yarra. ▪ 100 Domain Street, South Yarra.
23	(Errors due to address issue) Remove 17-21 Barnett Street (c.1970s block of flats) from the C258 HPI, as it is a Non-contributory place. Reinstate the former Uniting Church at 17 Brougham Street in the C258 HPI at least as Contributory and undertake a review to determine if it is Significant. (Incorrect grading) Change the grading of 91 Barnett Street in the C258 HPI from Significant to Contributory.
48	(Ungraded places) As part of future work, undertake a thorough review of the Ungraded places in the HO6 South Yarra precinct, particularly interwar flats, including: ▪ 100 Pasley Street North (also known as 86 & 86A Pasley Street). ▪ 555 & 559, 565-569 (Lanark), 571 (High Royd) and 641 (The Astor), Punt Road.
72	(Ungraded place, address issue) As part of future work, review 364-366 Victoria Street, North Melbourne for potential Significant grading.
74	(Errors due to address issue) ▪ Incomplete address – In the C258 HPI add St Margarets to 2 Park Street in addition to 100-104 Toorak Road, and use the name 'St Margarets' to help identify both listings. Consider doing the same for all properties that have two street addresses. ▪ Remove Non-contributory 2-14 Hope Street from the C258 HPI. ▪ Reinstate 'Fawkner Club Hotel, 52 & 52W Toorak Road West' as a Contributory place to the C258 HPI.
98	All the places listed in this submission that currently have individual HOs should be listed in the C258 HPI as Significant places. (Address issues) Add the following places to the C258 HPI under their common street address as

Submission no.	My recommendations
	well as Council's address: ▪ 124-126 Elizabeth Street (listed as 330 Little Collins Street in the C258 HPI) ▪ 164 Flinders Lane and describe as 'Richard Allen & Sons Warehouse' (listed as 141-153 & 161 Collins Street in the C258 HPI) (Ungraded places) As part of future work, give priority to the review of the following Ungraded places: Potential Significant place: ▪ The shops and Chinese Mission Church at 119-121 (Shops) & 123-127 (Church) Little Bourke Street Potential Contributory places: ▪ 34-36 Block Place. ▪ 345-347 Bourke Street ▪ 165-167 Exhibition Street ▪ 172-178 Little Bourke Street. The following places require also further review and assessment for potential individual significance: ▪ 13-15 Collins Street, within HO504 Collins East precinct. 1971 building designed by Kurt Popper. ▪ 111-113 Collins Street. Intact interwar commercial building with fine details (part of consolidated site that includes the individual HO573 that applies only to the building at 107 Collins St). Also, where two buildings were historically separate and have distinct histories and identities, they should be listed separately wherever possible with their historic names. One example is 250-252 Collins Street, which comprises the former Lyric House at 250 and Kodak House at 252, both Significant.
-	(Error due to address issues) Add 191 & 197 Errol Street, North Melbourne to the C258 HPI as Contributory places.

3 Review of methodology

3.1 Introduction

My experience in undertaking large heritage reviews such as this is that, inevitably and despite all best efforts, mistakes will occur simply because of the sheer numbers of places involved. This happens for various reasons, but a common one is what I refer to as 'address confusion', particularly when using addresses identified in an older study, which may have changed or have been incorrectly recorded originally.

Usually, the process of review and consultation undertaken as part of heritage studies, which includes the planning scheme amendment process, will ensure that most if not all such errors will be identified, reviewed and rectified as appropriate.

Accepting that mistakes will sometimes occur, I don't believe the existence of errors discredits the methodology employed in a heritage study or its findings and recommendations. The aim of my review instead is to determine whether such errors are evidence of systemic issues that point to underlying flaws in the methodology or approach (and consequent findings and recommendations).

Methodology used by Lovell Chen

The conversion of gradings by Lovell Chen (and the preliminary assessments of some 'C' and 'D' grade places) was undertaken largely as a 'desktop' based project, with limited fieldwork and research. That is, the majority of places reviewed were not the subject of a site inspection and the consultant relied upon existing information and images contained in the i-Heritage and Hermes databases, and gathered during the preparation of the new precinct statements of significance (which included historic research and some fieldwork).

Based on some preliminary 'sampling' to test the potential for a direct translation or transferral of alphabetical gradings to 'Significant' or 'Contributory', and an analysis of numbers of A, B, C, D places within precincts (to identify the relative distribution of higher to lower graded places within areas), the approach adopted by Lovell Chen was as follows:

- All places graded 'A' or 'B' have been directly translated to Significant without further review.
- All 'C' grade places (except in Parkville where all 'C' grade place became Contributory without further review) required a desktop review to determine whether they would warrant a Significant grading or remain as Contributory.
- For 'D' grade places the relatively high numbers of this grading in Kensington and North and West Melbourne warranted a review to determine whether any might become Significant. In all other precincts, 'D' grade places became Contributory without further review.
- Ungraded places, that is places within precincts and not listed in the 2016 HPI, have not been reviewed. They become Non-contributory and remain unlisted in the C258 HPI.

On this basis, my review of the methodology will respond to the following questions:

- Is a 'desktop' review appropriate?

- Are the proposed definitions of Significant and Contributory appropriate?
- Is the translation of 'A' and 'B' places, or those included in an individual HO regardless of grading to Significant without review appropriate?
- Does the review provide a reasonable basis for 'C' and 'D' places that are proposed to become Significant?
- Is it appropriate to translate the balance of 'D' grade places to Contributory without review?
- Is the translation without review to Non-contributory of currently Ungraded places, appropriate?

3.2 Is a desktop review appropriate?

Discussion

When undertaking heritage studies or reviews it is common and accepted practice to undertake a preliminary or 'desktop' review, particularly when dealing with large areas or numbers of places for which full assessment is not feasible. A 'desktop' review is an efficient method of 'sorting the wheat from the chaff', by identifying issues with representation of heritage places including gaps, and undertaking preliminary assessments of places likely to be of individual significance.

'Desktop' reviews are most effective when they have been informed by previous research and investigation such as earlier heritage studies, typological or thematic reviews and thematic histories. The experience of the consultant in undertaking such reviews is also critical.

However, a 'desktop' review should not be regarded as an end in itself, but as an important first step in the process. 'Desktop' reviews should always be followed by detailed assessments to confirm (or deny) the preliminary findings made by the review.

Summary of my opinions

It is my opinion that a desktop review as used by Lovell Chen is appropriate as:

- Lovell Chen is a well-established practice with extensive experience in undertaking heritage studies and reviews in Melbourne and Victoria.
- It builds upon and has been informed by previous heritage studies and reviews of several of the major precincts carried out recently. Importantly, this has included the *Thematic History. A history of the City of Melbourne's urban environment*, prepared in 2012, which provides an essential context for identifying, assessing and/or reviewing the significance of heritage places and precincts.
- It has been informed by the preparation of citations with statements of significance for each of the key HO precincts outside of the central city.
- Finally, I am instructed it is intended as an interim measure until comprehensive heritage reviews can be undertaken of the remaining areas that have not been reviewed thus far.

3.3 Are the proposed definitions of Significant and Contributory appropriate?

Discussion

Several of the submissions made to this amendment reveal confusion about the levels of significance that are proposed by Amendment C258 and believe, for example, that all places within precincts are of local significance. For example, Submission 74 includes the following:

> *The 'contributory' classification downgrades the current level of heritage importance which classes all C and D as significant in their own right and also contravenes the government Practice Note, which states that all C's are individually significant.*

In fact, the VPP Practice Note: *Applying the Heritage Overlay* advises:

> *The threshold to be applied in the assessment of significance shall be 'State Significance and 'Local Significance'. 'Local Significance' includes those places that are important to a particular community or locality. Letter gradings (eg "A', "B', "C' etc) should not be used.*

Places of local significance can include an individual place or a precinct and some submissions have interpreted the VPP Practice Note advice as meaning contributory places within a precinct should be identified as being of 'Local Significance'. However, within precincts, there are three levels of significance of Significant, Contributory and Non-contributory.

There is no single, formally adopted set of definitions for the above terms, including within the current VPP Practice Note. Several other Councils have created their own definitions. Many of these are similar to those in the *Heritage Overlay Guidelines* prepared by Heritage Victoria and the Heritage Council, which describes a place subject to an 'Individual HO' as:

> *… a single place that has Cultural Heritage Significance* ***independent of its context****. Some places covered by an Individual Ho also make a contribution to the significance of an Area HO*. (emphasis added)

In the same guidelines, 'Contributory Elements' are described simply as 'those that contribute to the significance of the Heritage Place', and similarly 'Non-contributory Elements' as those 'elements that do not contribute to the significance of the Heritage Place'.

The definitions for 'Significant', 'Contributory' and 'Non-contributory' proposed by Lovell Chen are generally consistent with the above. Generally speaking, I believe they are appropriate and will not lead to a 'downgrade' in significance for places.

However, they do include information that, in my opinion, moves beyond what is necessary to explain the definition of each term and into how the level of significance has been assessed and applied.

A similar issue was discussed by the Panel appointed to consider submissions to Amendments C117 & C118 to the Stonnington Planning Scheme (Stonnington being the one other Council that still uses an alphabetical grading system, albeit a hybrid system – see below). Referring to previous panel recommendations for Stonnington Council to revise its grading system, the C117 & C118 Panel made the following comments:

> *Again, the Panel proposes that Policy should relate to a system of grading significance; guidelines should elaborate the way the policy is understood and applied. In this model*

the levels of grading would simply refer to one issue – significance (scientific, aesthetic, architectural or historical interest, or otherwise of special cultural value) of a place. Other issues (which may indeed increase or decrease significance):

- *Reduction of integrity due to alterations or additions;*
- *Inclusion in a precinct;*
- *Proximity to significant buildings;*
- *Inclusion in a streetscape;*

These are matters, which may best be dealt with through guidelines.

Confusion of significance *and those* matters which may affect a consideration of significance *creates uncertainty for respondents and difficulties for Panels.*

(Stonnington Planning Schemes Amendments C117 & C118 Panel Report, 30 May 2011, pp.31-32)

Stonnington has recently updated their local policy (Cl. 22.04-2 – see extract in Appendix C) generally in accordance with the Panel recommendations to include new simple definitions of 'Significant', 'Contributory' and 'Ungraded' – this is a hybrid approach that still refers to the historic letter gradings.

On this basis, I would suggest potential changes to the definitions set out by Lovell Chen on p.12 of their methodology report (deleted text shown as ~~strikethrough~~, new or amended text is underlined), as follows:

Significant heritage place
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.

Contributory heritage place
A 'contributory' heritage place is important for its contribution to the ~~a precinct. It is of~~ historic, aesthetic, scientific, social or spiritual significance of a ~~to the~~ precinct, but is not of individual significance. ~~A 'contributory' heritage place may be valued by the community; a representative example of a place type, period or style; and/or combines with other visually or stylistically related places to demonstrate the historic development of a precinct. 'Contributory' places are typically externally intact, but may have visible changes which do not detract from the contribution to the precinct~~.

No changes to the definition for a 'Non-contributory place'.

Summary of my opinions

It is my opinion that the proposed definitions for Significant, Contributory and Non-contributory are correct. However, I believe they could be improved to focus on the definition of significance alone and avoid matters that may affect the consideration and assessment of significance.

3.4 Review of A and B grade and individual HO places

Discussion

Typically, 'A' and 'B' grade places are those of local or State significance, with the higher significance of most 'A' places and some 'B' places reflected by their inclusion on the Victorian Heritage Register. Even with the passage of time it is highly unlikely that the level of significance of these places would have changed to the extent that they no longer satisfy the threshold of local significance, unless there have been significant changes due to demolition or redevelopment. I have seen no evidence of this in the submissions I have reviewed.

Similarly, the inclusion of places within an individual HO usually implies that there was an assessment that supported the inclusion of this place in the HO as an individual place – that is, an assessment that found the place to be of local significance.

However, I understand that some 'B' grade places, as well as some places within individual HOs do not have statements of significance. Also, some places within individual HOs are, oddly, graded 'D'.

This issue was recognised by Lovell Chen, which recommends (as part of future work) to prepare statements of significance for all 'Significant' places in precincts and individual heritage overlays (excluding places on the VHR).

This issue of the lack of citation for places with an individual HO was highlighted by two submissions that I reviewed. Submission 65 relates to Melbourne University, which is currently subject to a series of site-specific HO controls. The submission questions the methodology used, which converts all of these site-specific HO places to 'Significant' regardless of the A, B, C or D grading currently attributed to the place. Because of the number of buildings involved (36 in total within the main Parkville campus) a full review of this submission was outside the scope of my review and I am unsure as to how many have an individual citation or statement of significance. I do note, however, that of the 36, half are 'A' (including several on the VHR), a further four are graded 'B', while 12 are 'C' and only two are 'D'.

Submission 46 relates to an early interwar (c.1919) block of flats at 322 Walsh Street, South Yarra, which is subject to an individual HO457 and also adjoins part of the HO6 South Yarra Precinct. Currently, this building is graded 'D'. However, it does have a citation including a statement of significance, prepared in 1999 by Allom Lovell & Associates for the *City of Melbourne Heritage Review*[i]. This aim of this study was to 'justify continued heritage protection, if appropriate, for D graded buildings outside Heritage Overlay precincts, and all E and F graded buildings'. The study, which was limited to areas outside of the Capital City Zone was a requirement of the sunset clause attached to the new format Melbourne Planning Scheme approved in 1999 by the Minister for Planning.

It appears that the 1999 Review maintained the 'D' grading, but concluded the place was still worthy of an individual HO listing.

Several nearby individual HO places in Walsh and Clowes Street (see Figure 3.1 below) were similarly reviewed in 1999, while others appear to be included on the basis of assessments made by the South Yarra Conservation Study, prepared in 1984 by Meredith Gould. These include:

- Four currently graded 'D': HO406 (interwar house/flats), HO409 (interwar house), HO437 (interwar house) and HO454 (interwar flats). HO406, HO437 and HO454 each have citations with statements of significance prepared for the 1999 Study, while HO409 has an incomplete citation prepared by the 1984 Study with what is referred to in the i-Heritage database as 'Description/Notable features' (the statement of significance field has 'Not assessed'), as follows:

  A two storey residence with pared-down detailing consisting of vertical piers with wall panels between. Materials and projecting rafter ends give this building a 'rustic' character. Compatible with nearby Federation houses. Notable features include unpainted cement render; retains evidence of early colours or finishes.
- All, bar one, of the other places are graded 'C' (HO405, HO407, HO408, HO410 HO411, HO439) and all have incomplete citations originally prepared for the 1984 Study, with a single 'Description/Notable features' statement, similar to above.
- The remaining place is the Robin Boyd House II at 290 Walsh Street (HO453), now included on the VHR. Despite the VHR listing, this is currently graded 'B' and also has an incomplete 1984 Study description.
- All the above places are proposed to have a Significant grading in the new HPI.

This limited survey appears to explain this historical anomaly where some individually listed HO places in South Yarra (and possibly elsewhere) still have a 'D' grading. It also highlights that individual places in South Yarra graded 'C' and originally assessed by the 1984 Study have incomplete citations and no statements of significance in the current format.

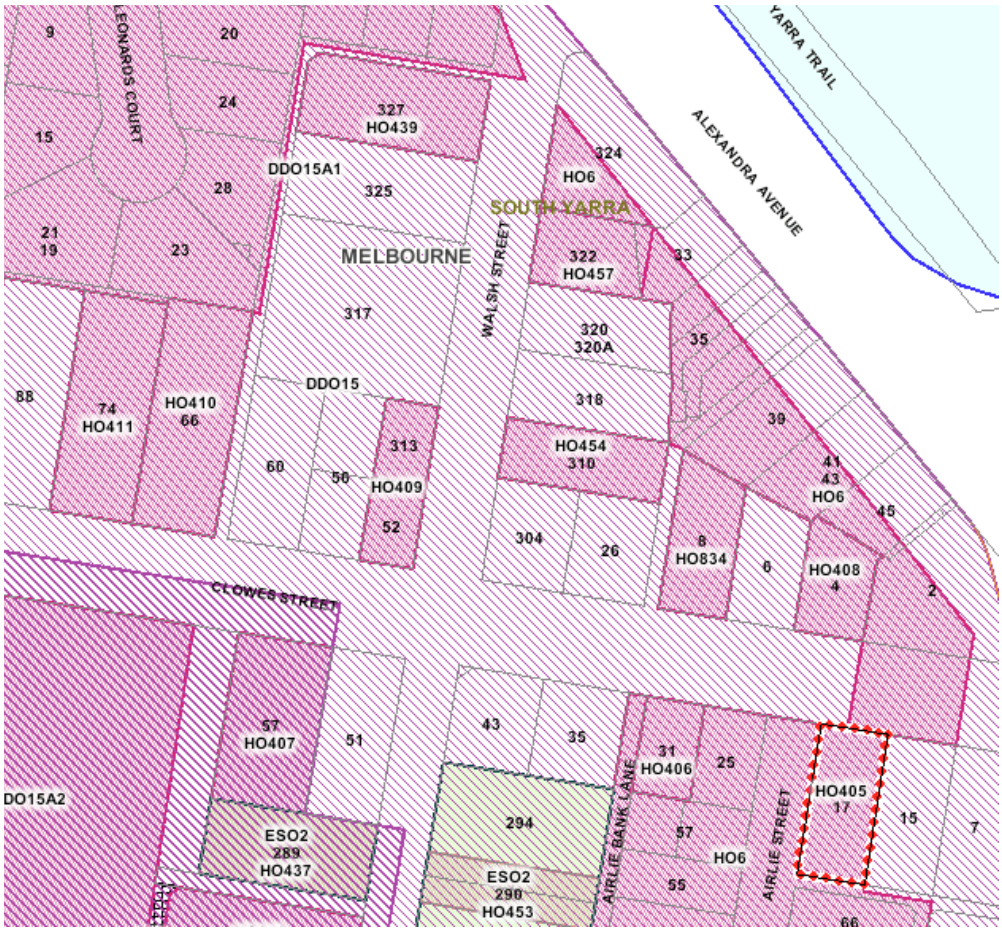

Figure 3.1 – Showing individually listed HO places in the vicinity of 322 Walsh Street (Source: Planning Schemes Online)

This review has also revealed inconsistencies in the way street numbering is applied. Most of the above property addresses have a number range (e.g., 17-19), whereas most of the places in the HPI (current and C258) use a single number, however this is not consistently the first or the last number and can, at a first glance, lead to confusion about whether a place is included on the list or not.

For example, in Clowes Street nos. 17-19, 31-33 and 57-63 are numbered in the new C258 HPI as 17, 31 and 63, respectively. The last address is an example of how someone looking for a building they know, as no.57 Clowes Street may believe that it is not listed. One way of solving this would be to supplement the HPI with maps.

Summary of my opinions

The translation of 'A' and 'B' grade places, and places with an individual HO to Significant, is supported.

For the properties that I have reviewed this will correct an anomaly where places of with an individual citation that were assessed by earlier heritage studies to be of local significance are graded 'D'.

I agree with the recommendation of Lovell Chen that, as part of future work, statements of significance should be prepared for all Significant places that do not currently have one.

The lack of consistency of property numbering in the HPI, both current and exhibited, can result in confusion and could be improved.

3.5 Review of 'C' and 'D' grade places

Discussion

Depending on the approach taken by the original heritage study, places graded 'C' were sometimes of potential individual significance (usually, at the local level) and on occasion were included in the planning scheme on an individual basis even though a complete citation and statement of significance was not prepared. This appears to have happened for some places in South Yarra, for example, as noted above.

'D' grade places, on the other hand, were usually places of contributory significance as part of a precinct, and did not satisfy the threshold for local significance at the time of original assessment. Although, again, there appear to have been exceptions.

However, given the time that has elapsed since the last major heritage reviews in the areas under review, it is possible that the significance of some places may have changed. This may be because the Thematic History and the new precinct citations have identified historic themes that were not thought important before (for example, the interwar period is under-represented in some areas), or the rarity of certain types of buildings (e.g., very early buildings) may have increased over time. There is also increasing awareness of the importance of places with social values, and post-war buildings are now seen as much more important than they were 30 years ago.

In addition to the submissions referred to me I have undertaken a review of rationale applied by Lovell Chen in support of 'C' and 'D' grade places, which are proposed to be Significant. Because of the sheer number of places I could only review a small sample (See Appendix B), but my conclusion is that the proposed Significant gradings are justified by the preliminary assessments and I have not identified any that raise concerns. Generally speaking, most of the places fall into one of the following categories:

- Early buildings (c.1860s or earlier).
- Large or otherwise distinctive terrace rows of various eras.
- Corner shops and residences (particularly those that are very intact with original shopfronts and verandahs or awnings).
- Community buildings including a number of notable churches, and a baby health centre.
- Hotels.
- Interwar buildings, including blocks of flats in South Yarra and commercial buildings in the Central City.

Having said that, these preliminary assessments are only suitable as an interim measure and should be confirmed following a detailed assessment undertaken either on a precinct-wide or a thematic/typological basis.

In reviewing the Lovell Chen Review Table I also observed that some places were 'downgraded'; that is, removed from the HPI to become an Ungraded or Non-contributory place. This was usually due to demolition or redevelopment. The Table also includes some Ungraded places that are marked with 'query' and a note to 'Recommend assess heritage grading'. This demonstrates to me that the review was undertaken with rigour and was not just narrowly focussed on the places under specific review.

An issue, however, with this Table is that it was not made publicly available during the Amendment process and I understand the reasons for assigning a Significant grading was only made available to building owners or managers 'on request'. This information needs to be made publicly accessible as a matter of course.

This issue of accessibility to information about places within the HO also extends to existing HO places and precincts. Information about heritage places is contained within Council's i-Heritage database, as well as the Hermes database, and in PDF reports on Council's website. Consequently, there is no one easily accessible location to find up-to-date information about heritage places. This is a matter that Council also needs to address in future, preferably prior to undertaking the next major heritage review to ensure a consistency of approach and to improve public access.

Summary of my opinions

The methodology used in the translation of 'C' and 'D' grade places to either Significant or Contributory is appropriate.

The interim assessments made in support of 'C' and 'D' grade places that are now Significant should be made publicly available.

As part of future work, these interim assessments should be confirmed following a detailed assessment undertaken either on a precinct-wide or a thematic/typological basis.

3.6 Ungraded places

Discussion

As noted above, Ungraded places were not subject to review. I agree with this approach in principle, as the purpose of the Lovell Chen review was primarily to undertake a direct 'conversion' with only a limited amount of re-assessment of places where necessary. The sheer number of Ungraded places and the lack of information about these places would

also make a review, even undertaken as a 'desktop', very time consuming and impractical within the scope of the project. Also, I agree it would be more appropriate to undertake such a review as part of a comprehensive re-assessment of precinct areas or on a thematic or typological basis, and I understand that this is to be done as part of Council's on-going heritage strategy.

Nonetheless I am concerned about the lack of review of Ungraded places for two reasons:

1. *Places may have been identified as Ungraded due to incorrect or incomplete translation of address information from the original heritage studies.*

Several submissions have raised the issue of address inconsistencies leading to potential Contributory or Significant places either not being listed in the 2016 HPI (and hence not being reviewed), or 'disappearing' from the new C258 HPI. Following the initial exhibition period, which revealed some errors and omissions, I understand that Council officers undertook a thorough review, which resulted in the re-exhibition of the C258 HPI with several corrections (see discussion on pp. 16-17 of the 2018 Council Report).

While it appears that most of the mistakes identified in submissions have been resolved in the re-exhibited C258 HPI I have identified some others in my review of submissions (see following section) and I am concerned that there may still be other errors.

For example, the Lovell Chen Review Table includes the note 'no match' for certain properties, which was added by City of Melbourne officers. I understand this to mean that a match could not be found for a property in the Review Table with the current 2016 HPI.

Because of this, it appears the assumption has been made that these places were assessed as 'Ungraded' by the original heritage study and therefore should be directly translated to Non-contributory. I did not have the time to review all the 'no match' places, but one example in Errol Street, North Melbourne (part of HO3) appears to demonstrate that an error occurred in the translation of the original heritage study grading into the HPI.

191-197 Errol Street is a row of four two-storey Victorian shops and residences (see Figure 3.2). Some alterations have been made to nos. 191 & 193, but nos. 195 & 197 remain largely intact including their original shopfronts. As a terrace row of very similar buildings you would expect the gradings to be the same.

Despite this, only numbers 193 & 195 are included in the 2016 HPI as C grade places. This accords with the i-Heritage database, which includes two records, one for 193 and the other for 195, which presumably reflects the datasheets prepared for these properties by the original heritage study. However, in looking that photos in the database it is apparent that '193' actually includes both 191 and 193, while '195' also includes no.197 (see Figure 3.2). While these are not the original heritage study photographs they are likely to be the same view or similar.

Because of this (what I believe to be) historic error in translating the original study, nos. 193 and 195 have been translated to Contributory, while nos. 191 and 197 have not been reviewed and remain as Non-contributory.

For this reason, I believe all buildings recording a 'no match' in the Lovell Chen Review Table should be given priority for review in future.

2. *When submissions were made about specific Ungraded places they received a generic, rather than specific response.*

In response to submissions made following the initial exhibition of Amendment C258 Council made corrections to the HPI, which was then re-exhibited. The changes included making corrections to addresses, as well as re-adding graded places that had been 'lost in translation', or deleting some graded places that had been demolished.

Some submissions also identified Ungraded places that they believed should be added to the HPI. For example, Submission 9 identified a range of Ungraded properties within the HO2 East Melbourne & Jolimont precinct, which included Victorian and Federation houses, interwar flats, a Modernist church, and some public buildings (a railway station, electricity substation and a tennis pavilion).

As noted above, I understand the reasons for not undertaking a detailed review of Ungraded places at this stage. However, given the decision was made to review, make corrections to and re-exhibit the C258 HPI I am surprised that Council did not also take the opportunity to at least undertake a preliminary review of the Ungraded places specifically identified in submissions to determine if there were any that did perhaps warrant a change in grading now or to identify the ones that should be given priority for review in future.

Submission no.9, for example, included no fewer than 17 interwar flats that are Ungraded in the HO2 precinct. A quick review of the C258 HPI reveals that several blocks of interwar flats are graded as Contributory or Significant within HO2. In my opinion the Ungraded flats are comparable to these – that is, if judged by the same criteria would also receive a Contributory or Significant grading. Despite this, the response by Council to all of these flats is:

> *This heritage place was originally converted to 'Non-contributory', and upon review it was determined that this conversion was accurate.*

I am advised by Council that it is intended to review these places as part of forthcoming reviews; however, my concern is that this response does not make this explicit and, in fact, almost suggests the opposite – that a 'review' has been done (and I have been advised consistently that Ungraded places have not been reviewed during this process) and the conversion to Non-contributory is 'accurate'.

In my opinion, there should have been at least a preliminary review to determine the potential of the place for Contributory or Significant status, and for Council's response to these submissions to identify the places that should be given priority in future reviews. In conclusion, my concern is not that lack of review of Ungraded places per se, but that Council's response could have been better.

In this regard, I have reviewed the Ungraded places identified by submissions and have identified some that I believe are strong candidates for Contributory or even Significant status (see my comments in the following chapter).

Summary of my opinions

Incorrect translation of original heritage study information in my opinion has led to graded buildings being incorrectly identified as Ungraded and therefore omitted from the 2016 HPI. While many errors have been corrected, some still exist. 191 and 197 Errol Street, North Melbourne are two examples, which I believe should be added to the C258 HPI as Contributory places.

The translation of Ungraded places to Non-contributory without review is acceptable as an interim measure. However, future comprehensive heritage reviews should re-assess Non-contributory places with priority given to:

- The places specifically identified in submissions, particularly in relation to the HO2 East Melbourne & Jolimont and HO6 South Yarra precincts (see my comments in the following section).Places identified as 'no match' in the Lovell Chen Review Table should be reviewed as a priority.
- The places identified as 'no match' or 'query' in the Lovell Chen Review Table.

Figure 3.1 – 191-197 Errol Street. Source: Google Streetview

Figure 3.2 – i-Heritage images for '193 Errol Street' (top) and '195 Errol Street' (below)

4 Response to submissions

4.1 Overview

The table in Appendix A.1 provides my detailed response to the submissions, and Table 2.1 in section 2 provides a summary of 'errors' in the HPI that I believe should be corrected in Amendment C258. These include:

- Places that are graded in the current 2016 HPI and which have been 'lost in translation' to the re-exhibited C258 HPI.
- Places where, although the translation has been carried out correctly, I believe the grading is incorrect due to problems with addresses, including some where I believe the grading from the original study has been incorrectly translated into the HPI due to incomplete address information.
- Places with an individual HO within the Central City Zone (see response to Submission 98).

Many of the submissions relate to C or D grade places and in almost all cases I agree with the proposed new grading applied by the methodology. In only one case do I disagree with the recommended new grading (see response to Submission 23). On this basis I do not see any evidence of systemic issues with the transfer or review of 'A', 'B', 'C' or 'D' 'grade places.

The table also identifies Ungraded places that should be given priority for review as part of future work. Many of these are within the HO2 East Melbourne & Jolimont or HO6 South Yarra precincts - see responses to Submissions 9 & 93 (HO2), and 15, 48 or 74 (HO6).

Finally, my review of submissions has also identified some issues with the presentation of information in the C258 HPI, which I believe could be improved (see section 4.4). Most of these can be fixed with some relatively straightforward changes to the HPI.

4.2 Submissions nos. 9 & 93: HO2 East Melbourne & Jolimont Precinct

These are detailed submissions, by the same submitter, which raise issues with the change in grading (or omission from the C258 HPI) of many properties within the HO2 East Melbourne & Jolimont precinct.

Discussion

Council prepared a detailed response to the Submission 9 and many of the errors were corrected in the re-exhibited C258 HPI (Council's response to this submission also highlighted the issue of 'address confusion' for many properties, which had not been removed from the HPI, but were listed under a different address or were no longer named). However, the second submission (Submission 93) still identified some places that have been 'lost in translation' from the 2016 HPI to the re-exhibited C258 HPI, as follows:

- Three 'A' grade places in the 2016 HPI that have been omitted completely or partially in the re-exhibited C258 HPI. These are:
  - The building known as 'Eastbourne House' at the east corner of Simpson Street and Wellington Parade.

  - The Greek Orthodox Church at 186 Victoria Parade, and
  - The pair of terrace houses at nos. 376 & 378 Victoria Parade.

  The omission of the church is an error and so should be reinstated. I understand that the houses at nos. 376 & 378 form part of the property known in Council's property database as 214-222 Clarendon Street and are listed under this address instead. In my opinion, this is confusing and could lead to errors. They should be listed under both addresses. Eastbourne House is similar, but is a bit more complicated – see discussion below.

- One 'C' grade place at 105 Powlett Street. This is an altered but recognisable Victorian townhouse and stables. Graded C in the 2016 HPI, not listed in the C258 HPI.

In addition, 8 & 10 Vale Street South are an intact pair of Edwardian terrace houses, which were graded 'C' in the 2016 HPI. However, they have been removed from the C258 HPI as they are, oddly, not included within the HO2 precinct. In my opinion they should be added, as they form part of an intact streetscape – this should be done as part of any future review of the HO2 precinct.

As previously noted, the submission also identifies numerous Ungraded places of potential significance including several interwar flat blocks, a smaller number of single Victorian or Federation residences, one Modernist church, two buildings within the Powlett Reserve and, oddly, the Jolimont Railway Station. Of these, there are some that I believe are logical changes and could be added now (e.g., terrace houses where adjoining houses are graded Contributory, Council-owned properties), while others (e.g., interwar flats, Modernist church) should be given priority for review in future.

Interwar Flats

I prepared a typological study of interwar flats for the City of Stonnington and I'm currently undertaking a review of flats for the City of Port Phillip. The suburbs of South Yarra and Toorak, along with St Kilda and Elwood are well known as being popular locations for flats during the interwar period. However, my research also revealed the popularity of East Melbourne, which shared many of the historic and locational attributes that proved attractive for flat development (proximity to public transport and parks, high land values and medium to large sites suitable for redevelopment) and some of the earliest and notable flat developments were located here. As in other areas, there seems to have been a minor boom in flat building in the mid to late 1930s when areas like Garden Avenue were developed. The flats in East Melbourne are of a high quality and most were designed by architects.

I therefore find it surprising that the majority of interwar flats in the HO East Melbourne precinct are Ungraded. I agree with the submission that this is a serious omission, particularly when some interwar flats are graded, for example, the Garden Avenue enclave, and 29-35 George Street, all graded Significant while others are Contributory.

For example, Figure 4.1 shows examples of Ungraded apartment blocks in Albert Street. The block on the left is a fine example designed by the noted architect Robert B. Hamilton, while the block on the right (and its neighbour) are of interest as they retain what appears to be the front fence potentially associated with the former mansion on this site. These are typical examples of the types of flats that are Ungraded throughout the precinct. Most would be graded Contributory, but some such as the Robert B. Hamilton flats may be Significant.

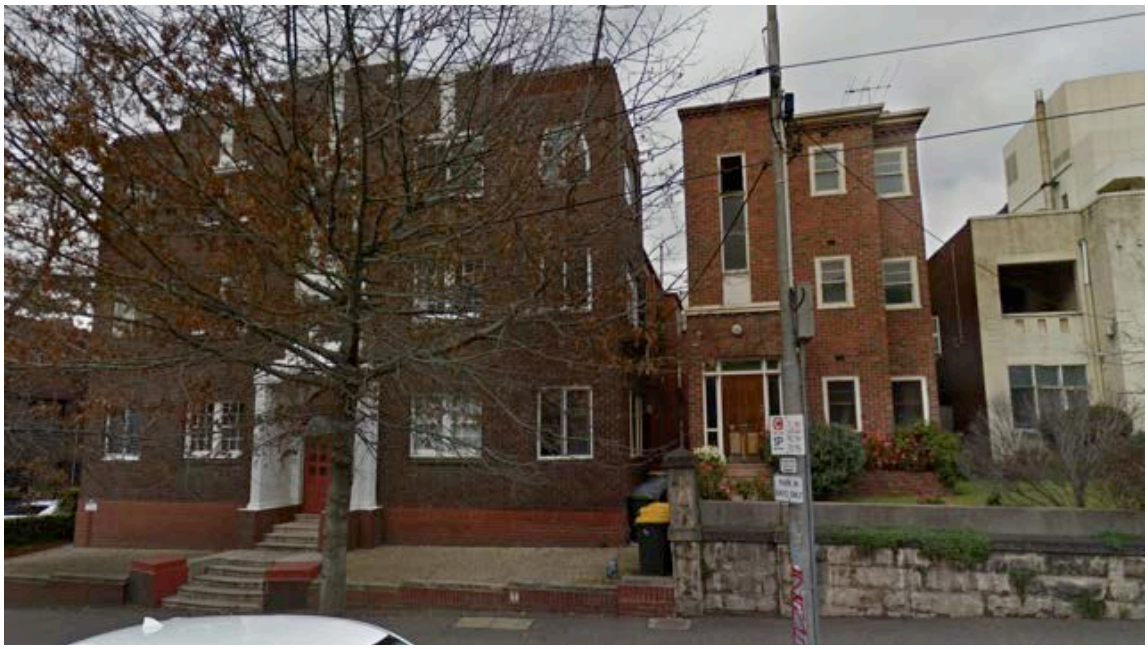

Figure 4.1 – Ungraded interwar flats in Albert Street, East Melbourne, note early stone front fence at right. (Source: Google Streetview).

Part of the reason lies with the proposed new HO2 citation. While it does identify interwar and flat development as contributing to the significance of the precinct, it does not place the same emphasis on this theme as is done in the citation for the HO6 South Yarra Precinct.

St Mark's Lutheran Church (former)
The former St Mark's Lutheran Church at 39 Hotham Street is a Modernist church and has previously been left ungraded presumably because it is a post-war building. Opened and dedicated in December 1953 it was described in a contemporary newspaper article (The Age, 12 December 1953, p.22) as 'probably Victoria's most modern church'. Designed by the noted architectural firm Godfrey & Spowers, Hughes, Mewton & Lobb the building featured a 'sloping roof to contrast with a strong vertical bell-tower, with a symbolic white cross in the form of an inverted sword'. St Mark's was established to serve the 'thousands of Lutherans of more than a dozen nationalities' who had settled in Melbourne in the post-war period.

Although it is no longer used (it appears to now be a residence), St Mark's still appears to hold many of the characteristics described in the article, including a Modernist sculpture in the front garden, although some visible changes including a garage have been made (see Figure 4.2 below). Because of this, St Mark's would appear to present a strong case for potential individual significance for historic, architectural and aesthetic values.

Figure 4.2 – Former St Mark's Lutheran Church (Source: Google Streetview)

Powlett Reserve and Darling Square

The two buildings within the Powlett Reserve include the elegant interwar substation at the corner of Grey and Powlett streets, and the tennis club pavilion, also a fine interwar bungalow style building. These buildings are clearly Contributory, but also the Powlett Reserve itself (with its mature plantings of Canary Island Palms, as well as the VHR-listed Old Men's Shelter at the corner of Powlett & Albert streets) contributes to the significance of East Melbourne, as does the nearby Darling Square. This is recognised in the new HO2 precinct citation (see specific references in the history on p.70 and the description on p.73) and the statement of significance includes the following under 'Why is it is significant' in relation to the aesthetic/architectural significance of the precinct:

> *East Melbourne's streets are mostly wide, straight and tree-lined, interspersed with parks and squares, following the highly regular gridded pattern of the 1840s subdivision.*
>
> *… Historic parks and gardens further enhance the aesthetic significance, including Fitzroy Gardens, the smaller squares of Powlett and Simpson reserves, and the extensive Yarra Park. These variously retain elements of their original or early landscape design, including specimen trees, mature tree avenues, perimeter and garden bed borders; and some remnant indigenous vegetation, including in Yarra Park. There are views into and out from the parks and gardens to the bordering residential areas*

In my opinion Powlett Reserve and Darling Square should be listed as Contributory places in the HPI. I believe this could be done as part of Amendment C258, as these are Council-owned assets.

Eastbourne House

Eastbourne House is situated at the east corner of Simpson Street and Wellington

Parade. According to the i-Heritage database the buildings with their extraordinary Art Nouveau detailing were designed by the noted firm of Sydney Smith & Ogg and built in the early 1900s. Eastbourne House comprises the building at 58-62 Wellington Parade and the pair of terrace houses facing Simpson Street, ostensibly nos. 8 & 10 (see Figure 4.3). They form part of a larger property in single ownership that incorporates the two two-storey Victorian terrace houses at nos. 12 & 14, and the single storey Edwardian house at no.16 Simpson Street.

The 2016 HPI included the houses at 8 & 10 Simpson Street as 'A' grade places, but there was no listing for the building at the corner of Wellington Parade.

In the re-exhibited C258 HPI 8 & 10 Simpson Street are not listed, but Eastbourne House is listed at 56-70 Wellington Parade as a Contributory Place. This is because the Lovell Chen Review Table incorrectly identifies it as a 'D' grade place.

Consistent with the methodology, the 'A' grading previously assigned to 8 & 10 Simpson Street means a Significant grading should be applied to whole of this building.

Figure 4.3 – Eastbourne House, building at the corner of Wellington Parade at right, '8 & 10 Simpson Street' at left (source: Google Streetview)

Other places

Of the other Ungraded places identified in the submission, I agree that the following present strong cases for Contributory status:

- 33 Albert Street – Some alterations but clearly recognisable as a c.1900s house with original form and details such as the brick and render chimneys (see Figure 4.4).
- 18 Berry Street – This forms part of a row of three terrace houses with notable decoration, no.14 is currently graded 'D' and no.16 is 'C': both are proposed to be Contributory. Although there is a visible addition and the verandah is not original no.18 remains recognisable as part of the row and also retains the original front and side fences (see Figure 4.4).
- 25-27 Burchett Lane. Victorian stables (visible on 1898 MMBW plan).
- 28 Charles Street. Victorian stables, converted to residence, but façade and street wall still intact. Note: the reason why this property does not appear in the 2016 HPI is that it has only recently been created as the result of a subdivision from the adjoining property at 28 Jolimont Terrace, which is graded Significant.

- 40 George Street, one of an identical pair, both much altered but recognisable as Victorian terrace houses. 42 is graded Contributory in the C258 HPI.
- 10 Grey Street. Relatively intact Victorian house.
- 12 Lansdowne Street. Relatively intact single storey Victorian cottage with original fence.
- 46 Simpson Street, Intact Victorian Italianate house (note: the listing for 42-44 Simpson St appears to be incorrect as there is no such address, this possibly refers to the adjoining interwar flats at the corner of George Street, which is 66 George St)
- Jolimont Railway Station, 175 Wellington Parade.

Figure 4.4 – 33 Albert Street (above) and 18 Berry Street (below, at left) (Source: Google Streetview)

Summary of my opinions

Change the C258 HPI to correct errors due to 'lost in translation' or address issues, as follows:

- Change the listing for 42-44 Simpson Street to 66 George Street and move to the correct place.
- Add Powlett Reserve and Darling Gardens as Contributory places.
- Add 105 Powlett Street as a Significant place.
- Add the Greek Orthodox Church, 186 Victoria Parade, as a Significant place
- Add the houses at 376 & 378 Victoria Parade as Significant places.
- Change 56-70 Wellington Parade to Significant and add 'Eastbourne House'. Add 8 & 10 Simpson Street as Significant places.

As part of future work, undertake a thorough review of the Ungraded places in the HO2 East Melbourne precinct, particularly interwar flats. This should be done in conjunction with a review of the new precinct citation to determine whether greater emphasis needs to be given to the significance of flats within the precinct. Also give priority to review of the following Ungraded places:

- 33 Albert Street, 18 Berry Street, 25-27 Burchett Lane, 28 Charles Street, 40 George Street, 10 Grey Street, 12 Lansdowne Street, 46 Simpson Street, and Jolimont Railway Station 175 Wellington Parade, as potential Contributory places.

Also as part of this review, extend HO2 to include the houses at 8 & 19 Vale Street South as Contributory places.

4.3 Submissions nos. 15, 48 & 74: HO6 South Yarra Precinct

Discussion

The proposed new statement of significance for the HO6 South Yarra Precinct identifies buildings of the interwar period as contributing to the significance of the precinct. The introductory sentence under 'What is significant' is:

> *South Yarra Precinct is predominantly residential, where significant and contributory development dates from the 1850s through to the mid-twentieth century, including the post- World War II period. While nineteenth century development is well represented, the twentieth century is also an important period.*

Flats of the interwar and later periods are specifically identified as contributing to the historic and aesthetic significance of the precinct.

Submission 48 questions the proposed gradings of several places in and around Pasley Street, South Yarra. These include:

- Several places (mostly 1960s and 1970s flats and houses) proposed to be Non-contributory.
- Two Victorian houses proposed to be Contributory.
- Several interwar flats proposed to be Non-contributory.

I agree with gradings recommended for most of the above properties. The exception is the interwar flats at 641 Punt Road, which is currently Ungraded, which I believe should be Contributory. I note the Lovell Chen Review Table recommends a review of the grading for this property. This raises the issue of the consistency of gradings applied to interwar flats throughout HO6.

Other interwar apartment blocks within this area, but not mentioned specifically in this submission, that I believe should be reviewed for potential Contributory (or higher) grading include:

- The duplex at 100 Pasley Street North (note: This address is based on the number on the front wall of the building, which actually forms part of a L-shaped property known as 86 & 86A Pasley Street that has a secondary frontage facing west to Pasley Street).
- The Moderne style blocks at 555 & 559 Punt Road (Lovell Chen Review Table includes the notes 'Query. Recommend assess for heritage grading')
- The Old English style block 'Lanark' at 565-569 Punt Road (Lovell Chen Review Table: 'No match')
- The Moderne style block 'High Royd' at 571 Punt Road (Lovell Chen Review Table: 'No match')

Submission 74 is also very detailed and expresses concern about the methodology applied in the conversion of gradings. The submission cites several specific examples of C and D graded properties that were omitted from the C258 HPI as originally exhibited and also implies there are other grading errors (though these are not specified), and strongly advocates for a more thorough review. This assertion is supported by my review of Submission 15, which has identified two Ungraded places in Hope Street that I believe could be Contributory, and one place that has been 'lost in translation' from the C258 HPI (See Appendix A.1).

It appears that most of the specific examples cited in Submission 74 have been added to the re-exhibited C258 HPI. There are two key exceptions, which are examples of address confusion on corner sites:

- 2 Park Street. St Margarets is a three storey flat block with two entrances, one to Park Street and one to Toorak Road. Because of this, it has two street addresses, 2 Park Street and 100-104 Toorak Road. In the 2016 HPI it is listed as 2-4 Park Street, however, in the C258 HPI it is listed under 100-104 Toorak Road.
- 52-56 Toorak Road West. This is the former Fawkner Hotel. Like St Margarets, this is a corner site and has two addresses. The historic hotel building is contained on 52 & 52W Toorak Road West, while modern townhouses have been built at 2-14 Hope Street. In the 2016 HPI, the Fawkner Club Hotel is listed at 52-56 Toorak Road West as a 'C' grade place, however in the C258 HPI it is listed under 2-14 Hope Street.

To resolve this issue, where properties have two addresses I believe they should be listed under both. The use of identifying names for key buildings such as hotels or blocks of flats would also help.

In the specific case of the Fawkner Club Hotel I agree with the submission that the identification of 2-14 Hope Street as Contributory is incorrect. As a Non-contributory place this should be removed from the HPI and the Fawkner Club Hotel reinstated with the address of 52 & 52W Toorak Road West as a Contributory place.

Summary of my opinions

Change the C258 HPI due to errors with 'lost in translation' or address issues as follows:

- Add St Margarets to 2 Park Street in addition to 100-104 Toorak Road, and use the name 'St Margarets' to help identify both listings. Consider doing the same for all properties that have two street addresses.
- Remove the Non-contributory 2-14 Hope Street from the C258 HPI, and re-insert the Fawkner Club Hotel as a Contributory place with the correct address of 52 & 52W Toorak Road West.

As part of future work, undertake a thorough review of the Ungraded places in the HO6 South Yarra Precinct, particularly interwar flats. This should include the flats at 100 Pasley Street North (rear of 86 & 86A Pasley Street), and 555 & 559, 565-569, 571 and 641 Punt Road.

4.4 HPI issues

Discussion

Address confusion due to incorrect, incomplete or inconsistent address information has led to errors. However, the way sites have been arranged in the C258 HPI has also caused confusion. As Submission 68 notes:

> *We understand that property addresses have been amended in the Heritage Places Inventory 2017 to align with the City of Melbourne's rate records, adding an additional layer of complexity which makes it difficult to assess whether properties have been missed, or are simply listed under a different address.*

For some sites, the 2016 HPI includes a name of the place, which assists with identifying the property and helps to navigate the list, particularly in long streets with multiple properties. In the C258 HPI these names have (mostly) been discarded and this is one reason why so many 'errors' were identified in some initial submissions.

There are many examples where this has occurred, but two serve to illustrate. One is St Jude's Church and Hall in Lygon Street, which is named and listed in the 2016 HPI between the properties at 337-341 and 379. In the C258 HPI St Jude's is now presumably the unnamed property listed at no. 349-371, which is between the two aforementioned addresses. The other is the former Carlton Refuge, an 'A' grade place which in the 2016 HPI is included at the end of the Keppel Street listings. Presumably, it's address has changed in the C258 HPI as it is no longer listed in Keppel Street, but as the name is no longer included, it is impossible to know where it has gone.

Also problematic are sites with multiple addresses such as large sites containing several buildings or sites on corners or with multiple frontages. This is revealed in Council's response to Submission 77 (see my response in Appendix A.1):

> *All of the properties noted in this submission are known as the Walk Arcade, 309-325 Bourke Street, Melbourne which is in the Post Office Precinct Heritage Overlay HO509. Because this is identified as the one property in Councils address system, it is listed just once in the exhibited C258 Heritage Inventory as 309-325 Bourke Street, Significant.*
>
> *Having one property address, the whole property has been converted to Significant, even though there are multiple buildings with different gradings on the property.*

See also my response to Submission 74 in section 4.3.

My review of Submission 46 has also revealed an inconsistent approach in the C258 HPI where single properties with a number range (for example, 15-17 or 52-54) are listed by either the first or second number but rarely consistently, even in the same street. Other

examples of submissions with 'address confusion' include nos. 5, 23 (in part) & 72 (see Appendix A.1) and Submissions 6 and 93 (see section 3.2, below).

One solution, which could assist is as part of future work to prepare maps of each precinct showing the gradings.

Another minor issue is terminology. Consistent with the current use of the all-encompassing term 'heritage place' (as used in the definitions of Significant and Contributory and recognising that not all the graded places are buildings), the table heading of 'Building Grading' should be replaced with 'Place Grading' or simply 'Grading'.

Summary of my opinions

I believe the presentation of the information in the C258 HPI could be improved. Appendix A.2 shows how this could be done. Specific changes could include:

- Including the names of key sites, particularly those that are named in the 2016 HPI table, and ideally, all places with a Significant grading. I note the table could readily be adjusted to provide more space for the name/number column.
- Replacing 'Building Grading' with 'Place Grading' or 'Grading'.
- For large or complex sites with multiple buildings of different grading, consider adding more information about component buildings, as has been done for some sites like Melbourne University. See Appendix A.2 for one suggestion using the example cited in Submission 77.
- Use a consistent system of numbering throughout including listing places with a number range by their full address – that is, 15-17 rather than 15 or 17.
- If properties have two addresses (e.g. corner sites), or a 'commonly understood address' that is different to the address in Council's database then list under both addresses.
- As part of future work, creating maps of each precinct showing the gradings for each place.

5 David Helms – qualifications & experience

B App Sci (Urban & Regional Planning), Grad Dip (Heritage Planning & Management)
I am a strategic planner with over twenty-five years experience, and now specialise in cultural heritage planning and management. I have worked in a variety of local and state government and private organisations in Melbourne, Sydney and regional Victoria. As a strategic and statutory planner who has also undertaken numerous cultural heritage studies, I combine my knowledge of cultural significance with a clear understanding of how heritage studies may be most effectively translated into practical planning controls, policies and guidelines that are easy to understand and use.

Heritage studies

I have prepared numerous municipal heritage studies and reviews in my own practice or in collaboration with Context Pty Ltd including:

- Baw Baw Shire: *Baw Baw Shire Heritage Study* (2011).
- Cardinia Shire: *Cardinia Shire Heritage Review* (2010), *St James Estate Comparative Heritage Study* (2014), *Pakenham Structure Plan Heritage Review* (2018).
- Casey City: *Casey Heritage Study* (2004).
- Darebin City: *Darebin Heritage Study* (2010).
- Latrobe City: *Latrobe City Heritage Study* (2010).
- Manningham City: *Manningham Heritage Study Review* (2005).
- Mitchell Shire: *Mitchell Shire Heritage Amendment: Review of heritage precincts* (2012), *Mitchell Shire Stage 2 Heritage Study Review* (2013), *Wandong & Heathcote Junction Heritage Review* (2016), *Mitchell Shire Heritage Anomalies Review* (2018).
- Moonee Valley City: *Moonee Valley Gap Heritage Study Review* (2009), *Review of HO precincts* (2011), *Moonee Ponds Activity Centre Heritage Assessment* (2011), *Moonee Valley Racecourse Heritage Assessment* (2012), *Moonee Valley Racecourse Conservation Management Plan* (2014), *Heritage Overlay Review (2014), Post-war Thematic Precincts heritage Study* (2014), *Moonee Valley Heritage Study* (2015) and the *Moonee Valley Heritage Study* (2018- currently underway).
- Moreland City: *Moreland Local Heritage Places Review* (2009), *Moreland North of Bell Street Heritage Study* (2010), *Moreland Heritage Study Review* (2017).
- Mornington Peninsula Shire: *Ranelagh Estate Conservation Management Plan* (2009), *Mornington Peninsula Heritage Review: Area 1 – Mt Eliza, Mornington & Mt Martha* (2011).
- Murrindindi Shire: *Murrindindi Shire Heritage Study* (2010).
- Port Phillip City: *Heritage assessment of four places in the City of Port Phillip* (2005), *City of Port Phillip HO6 Precinct Heritage Review* (2016).
- South Gippsland Shire: *South Gippsland Shire Heritage Study* (2002), *South Gippsland Amendment C92 Heritage Citations* (2014).
- Yarra City: *Review of 17 Precincts* (2014), *Central Richmond Gaps Study* (2015), *Heritage Gap Study: Review of Johnson Street East* (2016).
- Yarriambiack Shire: *Yarriambiack Shire Heritage Study* (2014).

My other projects for Context Pty Ltd included heritage assessments and heritage impact analysis for the Regional Fast Rail project (Latrobe and Bendigo lines), the *Royal Exhibition Buildings & Carlton Gardens Conservation Management Plan* (in association with Lovell Chen), and the *Yan Yean Water Supply System Conservation Management Plan* and the *Regional Water Supply Heritage Study*, both for Melbourne Water and Heritage Victoria and *Homeward: the Thematic History of Public Housing in Victoria* for the Department of Human Services.

Summary list of Planning Panel expert witness appearances

I have appeared as expert witness or Council advocate at many Planning Panel hearings in relation to heritage amendments, mostly recently for Moonee Valley City Council in relation to Amendment C164. Other expert witness appearance for MVCC have included Amendment C109, the Advisory Committee Hearing for Amendments C120 & C124, Amendment C143 and Amendment C144.

For other Councils, this has included Amendment C5 to the Port Phillip Planning Scheme (as Council advocate), Amendments C17 and C34 (Part 2) to the Hobsons Bay Planning Scheme (Council advocate), Amendment C80 (Part 2) to the Casey Planning Scheme, Amendment C50 to the Greater Shepparton Planning Scheme, Amendment C26 Part 1 to the Wellington Planning Scheme, Amendment C68 and Amendment C108 Part A to the Darebin Planning Scheme, Amendment C14 to the Latrobe Planning Scheme, Amendments C117 and C163 to the Stonnington Planning Scheme, Amendments C86 & C90 to the Baw Baw Planning Scheme, Amendment C129 and Amendment C134 to the Moreland Planning Scheme, Amendment C77 to the Banyule Planning Scheme, Amendment C56 to the Mitchell Planning Scheme, and Amendments C173 & C183 to the Yarra Planning Scheme.

APPENDIX A – Review of submissions

A.1 All submissions

Submission no.	Grading issue	My response
Submission 3	Requests review of 'Contributory' grading of 465 Dryburgh Street, North Melbourne.	This is a timber cottage, one of pair with an undivided hip roof (which suggests an early construction date). Some alterations, but good integrity. The Contributory grading is appropriate.
Submission 5	Potential omission – 1-3 and 2 Youngs Lane, which were previously graded 'C' in the 2016 HPI, are not included in the C258 HPI.	The address of these properties has changed. 2 Youngs Lane is now 26 Youngs Lane, while nos. 1 and 3 (which are situated on the south side of the Lane at the very end) are given the addresses of 40A & 40B Molesworth Street (as they are at the rear of houses fronting that street). The houses appear to be much the same as described and shown in the citations prepared by Allom Lovell & Associates in 1999, which include statements of significance for each. Based on these assessments, a 'Significant' grading is appropriate for these houses and they should be added to the C258 HPI.
Submissions 9 & 93	Very detailed submissions, which raise issues with the change in grading (or omission) of many properties within the HO2 East Melbourne & Jolimont precinct.	Please refer to section 4.2 of my statement of evidence.
Submission 15	Disagrees with the proposed 'Contributory' grading of the three properties at 92 and 100 Domain Street, and 129 Hope Street.	All three places are situated within the HO6 South Yarra Precinct and are not listed in the 2016 HPI. They were included in the C258 HPI as originally exhibited, but removed from the re-exhibited version in response to this submission. The proposed new statement of significance for the HO6 precinct identifies buildings of the interwar period as contributing to the significance of the precinct. The introductory sentence under 'What is significant' is: *South Yarra Precinct is predominantly residential, where significant and contributory development dates from the 1850s through to the mid-twentieth century, including the post- World War II period. While nineteenth century development is well represented, the twentieth century is also an important period.* I agree that 129 Hope Street, a relatively recent building, is Non-contributory and should be removed from the re-exhibited C258 HPI.

Submission no.	Grading issue	My response
		However, I disagree with the removal of the other two properties from the re-exhibited C258 HPI for the following reasons: ▪ 92 Domain Street. While there have been some alterations this remains recognizable as an early twentieth century gable-fronted cottage, with some original details such as the moulding around the front windows, and forms part of a streetscape of related dwellings. This is potentially Contributory to the precinct. ▪ 100 Domain Street. This is a relatively intact two storey interwar house with Old English style detailing. This is potentially Contributory to the precinct. As Ungraded places, these should be reviewed as part of future work. In reviewing these two properties I have identified another potential error. On the opposite side of the road the Myer Music School, a fine and intact Modernist building, is included in the 2016 HPI (with the address 75 Domain Street – the correct address according to Land Victoria is 79 Domain Street, as part of the corner site that also includes 3 Bromby Street) as a 'C' grade place. It has disappeared from the C258 HPI and should be re-inserted.
Submission 23	Disagrees with the proposed grading changes for the following properties: ▪ 19 Barnett Street, Kensington – currently 'C', proposed to be Contributory ▪ 91 Barnett Street, Kensington – currently 'D', proposed to be Significant ▪ 45 Pitt Street, Carlton – currently 'C', proposed to be Significant ▪ 9-17 Brougham Street, North Melbourne – proposed to be Non-contributory, should be Significant	My response to each property is set out below. 19 Barnett Street The proposed Contributory grading appears to be an error, probably due to 'address confusion', as this property contains a 1970s brown brick block of flats. In the 2016 HPI '13-19 Barnett Street' is graded 'C', but this in itself appears to be wrong, as the original datasheet from the Flemington/Kensington Conservation Study assigns a 'E' grade to the altered Victorian timber house at 13-15 Barnett Street. The C258 HPI identifies 13 as Contributory (correct) and 17-21 (this property) also as Contributory. As a Non-contributory place, I recommend removing 17-21 Barnett Street from the C258 HPI. 91 Barnett Street This also appears to be an error. This property contains a representative Victorian timber cottage, which is located within the HO1163 Barnett Street South Residential

Submission no.	Grading issue	My response
		precinct. The Council rationale for the Significant grading is that this property is 'located in a heritage overlay outside of a large precinct', however, this is not the case as HO1163 is a medium sized precinct and not an individual HO place. Because of this, I recommend changing the grading of 91 Barnett Street to Contributory in the C258 HPI. 45 Pitt Street The Lovell Chen Review Table provides the following rationale for the proposed Significant grading: *One of an unusual red brick Edwardian pair with simple rendered detailing, timber framed windows to the street, and setback side entrances. The cottage pair is distinguished by its prominent two-storey rear wings with chimneys set back from the single-storey front section.* I agree that the rear two-storey section is a rare and unusual detail that distinguishes this dwelling (and its attached pair at no.43). I assessed houses with a similar form in the City of Yarra and could find only one other comparison in that municipality. A Significant grading is appropriate, however, these houses (like all 'C' graded properties proposed to be Significant) would benefit from detailed assessment to confirm this. 9-17 Brougham Street, North Melbourne This is a large property, which contains many relatively recent buildings that are Non-contributory. However, the site also contains a nineteenth century former Uniting Church, constructed of bluestone. In the 2016 HPI this is identified as 'C' grade place with the address of 17 Brougham Street. However, it is missing from the C258 HPI, possibly because under the City of Melbourne property system it forms part of the larger site that contains Non-contributory houses at nos. 9-15. Because of this, I recommend reinstating the former Uniting Church at 17 Brougham Street in the C258 HPI as Contributory and, as part of future work, review to determine if a Significant grading is applicable.
Submission 32	Objects to proposed grading change from 'D' to Significant for 139-149 Flemington Road, North Melbourne	The Lovell Chen Review Table provides the following information in support of the change in grading: *Anna House opened in 1915 as a Presbyterian Neglected Children's Home, and was*

Submission no.	Grading issue	My response
		then converted to destitute women's hostel in 1939, run by the Legion of Mary, a Catholic welfare agency. Architecturally, it is a highly intact and distinctive brick building with a domestic bungalow form and presentation to Flemington Road, albeit on a large scale. It has a large and prominent tiled roof form with chimneys, and an arched elevated and inset central main entry, emphasized by brick buttresses and bracketed eaves. I agree this is a distinctive building and the historic use of the place adds to its significance. A 'Significant' grading is appropriate and further research and comparative analysis is likely to reveal more information that will enhance the understanding of the historic and possible social significance of this place.
Submission 35	Objects to the proposed grading change from 'D' to Contributory for 181 Abbotsford Street, North Melbourne. Cites a VCAT decision in support of submission.	This is a small brick cottage, one of a pair with no.179, with which it shares an undivided transverse gable roof. Despite alterations, it is recognizable as an early building and a Contributory grading is appropriate
Submission 36	Objects to the proposed grading change from 'D' to Contributory for 179 Abbotsford Street, North Melbourne. Cites a VCAT decision in support of submission.	As above.
Submission 46	Objects to the proposed grading change from 'D' to 'Significant for 322 Walsh Street, South Yarra. Also raises issues of conversion of Individual HO sites graded D converted to Significant.	This is an interwar block of flats, built c.1918, originally known as 'Ivel'. It has an individual citation including a statement of significance, prepared in 1999 by Allom Lovell & Associates. Based on the description in the citation, there have been no significant changes to the building since the citation was prepared. See also discussion in section 3.4. A Significant grading is appropriate.
Submission 48	Questions the proposed gradings of several places in and around Pasley Street, South Yarra, which forms part of the HO6 South Yarra precinct. These include: ▪ Several places (mostly 1960s and 1970s flats and houses) proposed to be Non-contributory.	See my detailed response in the table in Appendix A.2, which provides a complete list and my response to each. In most cases, I believe the grading proposed by Amendment C258 is appropriate. See discussion in section 4.3.

Submission no.	Grading issue	My response
	▪ Two Victorian houses proposed to be Contributory. ▪ Several interwar flats proposed to be Non-contributory.	
Submission 56	Objects to the proposed change in grading from 'D' to Contributory for 206 Albert Street, East Melbourne.	This is an altered, but still recognizable late Victorian terrace, which is complemented by most of the original front fence. A Contributory grading is appropriate.
Submission 59	Objects to the proposed change in grading from 'D' to Contributory for 4 Harris Street, North Melbourne.	Although there are some alterations, this house remains as a recognizable early twentieth century timber cottage. A Contributory grading is appropriate.
Submission 62	Objects to the proposed change in grading from 'B' to Significant for 28 Marne Street, South Yarra.	This house does not have complete citation, but the i-Heritage database includes the following information from the *South Yarra Conservation Study 1984*. *Notable features include the fence, and unpainted decorative brickwork. An unusual composition of asymmetrical gable and intersecting pitched roof, reminiscent of Arts & Crafts houses, with Moorish arcading Revival gable end decoration in half timbering and patterned brick infill. The building is very carefully detailed and executed, and whilst no architect can be found it is likely that one would have been involved. A most unusual design.* This is an intact and finely detailed interwar dwelling and a Significant grading appears justified. Similar places assessed by the 1984 Study outside of the HO6 precinct that are B or C grade are usually included within an individual HO. However, as part of future work it would be desirable to undertake a full assessment of this place, and all former B-grade places now graded Significant that do not have complete citations.
Submission 65	This submission relates to the University of Melbourne, which is currently subject to a series of site-specific HO controls. The submission questions the methodology used, which converts all of these site-specific HO places to a 'Significant' grading "regardless of the A, B, C or D grading currently attributed to the place". It submits that a more appropriate course would be to undertake a review of the places with C or D gradings to determine whether they are individually significant or	The 2016 HPI lists 36 buildings within the University's Parkville Campus. Of these half (18, includes 2 graded 'A, B') are graded A, a further four are 'B' graded, while 12 are graded 'C', and only two (Richard Berry Building and the Agriculture and Forestry Building) are graded 'D'. A full review of all of the affected buildings within the University was outside the scope of this peer review. However, a preliminary review has confirmed the fragmented and inconsistent approach to the application of the HO to the University. For example, in some cases

Submission no.	Grading issue	My response
	could be included within a serial listing.	only specific buildings are included (e.g. HO352 that applies only to the main buildings at Queens College and not to the related and important landscape setting, which includes the semi-circular driveway, lawned areas with specimen trees and the front fence) whereas elsewhere all the land and buildings are included (e.g. HO344 Newman College and HO323 Ormond College), usually because of their inclusion on the VHR. As an interim measure, I support the conversion of the gradings to Significant, as the inclusion in a site-specific HO does strongly imply a higher level of significance than Contributory and the majority are currently graded A and B. However, as part of future work I agree that it is important to undertake a review of all buildings and prepare a comprehensive citation (or citations) for the University and revise the gradings of individual buildings (and the consequent application of the HO or other overlays) accordingly.
Submission 67	Amongst other things, this submission questions the proposed gradings of several properties, all within North and West Melbourne. In some cases, the submission believes that 'C' grade places deserve a 'Significant' grading rather than the 'Contributory' proposed by Amendment C258.	A full review of all the places listed in the submission is outside the scope of this peer review. However, I have reviewed a select number of 'C' grade places in Shiel Street recommended for Contributory grading following review by Lovell Chen, as follows: ▪ 18-20 Shiel Street. Representative, but not outstanding pair of terrace houses. The Contributory grading is appropriate. ▪ 22 Shiel Street. Representative, but not outstanding terrace house. The Contributory grading is appropriate. ▪ 28 Shiel Street. Representative, but not outstanding terrace house. The Contributory grading is appropriate. Based on this sample, I am confident that the gradings applied by Lovell Chen in their review of 'C' graded places is appropriate within this area.
Submission 72	Amongst other things, this submission questioned why 364 Victoria Street, North Melbourne, which is graded 'C' in the 2016 HPI, is not included in the Amendment	The address of this property is 364-366 Victoria Street, North Melbourne. As the 2016 HPI affords this property a 'C' grade it was reviewed by Lovell Chen, and the Lovell Chen Review Table includes the following brief comment:

Submission no.	Grading issue	My response
	C258 HPI.	*i-Heritage appears to refer to adjacent building at no. 368. Not a heritage building.* However, the i-Heritage database in fact has two records, both with the address of 364-366 Victoria Street (and both featuring an image of this building). One of the records (unfortunately, the records do not have unique identifiers) includes the following notes about this building from the *North and West Melbourne Conservation Study 1984*: *Notable features include intact shop front; shop verandah; curtain wall; stainless steel.* The other record in i-Heritage for 364-366 does appears to be for the adjoining basalt shop at no. 368. No.368 was reviewed by Lovell Chen and is proposed to become Significant in the C258 HPI. This building at no.364-66 is an anomaly within what is otherwise a predominantly Victorian era precinct. However, I believe it is of potential individual significance for its aesthetic/architectural values as a fine and intact example of a late interwar or early post-war shop and should be reviewed as part of future work.
Submission 74	This is a very detailed submission (which relates specifically to the HO6 South Yarra precinct) that expresses concern about the methodology applied in the conversion of gradings and cites several specific examples of C and D graded properties that were omitted from the C258 HPI as originally exhibited. The submission also implies there are other grading errors and strongly advocates for a more thorough review.	Most of the specific examples cited in the submission have been added to the re-exhibited C258 HPI. The exceptions are: ▪ 2 Park Street. St Margarets is a three storey flat block with two entrances, one to Park Street and one to Toorak Road. Because of this, it has two street addresses, 2 Park Street and 100-104 Toorak Road. In the 2016 HPI it is listed as 2-4 Park Street, however, in the C258 HPI it is listed under 100-104 Toorak Road. ▪ 52-56 Toorak Road West. This is the former Fawkner Hotel. Like St Margarets, this is a corner site and has two addresses. The historic hotel building is contained on 52 & 52W Toorak Road West, while modern townhouses have been built at 2-14 Hope Street. In the 2016 HPI, the Fawkner Club Hotel is listed at 52-56 Toorak Road West as a 'C' grade place, however in the C258 HPI it is listed under 2-14 Hope Street. These are examples of the issue of address confusion caused by the C258 HPI. To resolve this issue, where properties have two addresses I believe they should be listed under both addresses. The use of identifying names for key buildings such as

Submission no.	Grading issue	My response
		hotels or blocks of flats would also help. In the specific case of the Fawkner Club Hotel I agree with the submission that the identification of 2-14 Hope Street as Contributory is incorrect. As a Non-contributory place this should be removed from the Inventory and the Fawkner Club Hotel reinstated with the address of 52 & 52W Toorak Road West as a Contributory place. Also, the submission believes 30-41 Airlie Street should have been 'upgraded' to Significant rather than Contributory. This is a handsome pair of Victorian houses, complemented by the original front fence. However, the verandah has been altered/reconstructed and the authenticity of the details is unknown. A more detailed assessment and comparative analysis are required.
Submission 77	This submission relates to a large site extending from Bourke Street to Little Collins Street, currently known as 'The Walk' Arcade. 'The Walk' incorporates eight originally separate buildings with current heritage gradings, as follows: ▪ 309-311 Bourke Street (Edment's Stores), Ungraded? ▪ 313-317 Bourke Street (Diamond House), C graded ▪ 319-321 Bourke Street (unnamed), Coles Place building (Arco House), Ungraded? ▪ 323-325 Bourke Street (Public Bootery Building), (C, 1 graded) ▪ 288-290 Little Collins Street (The Book Buildings, (D, 2 graded) ▪ 292-296 Lt Collins Street (York House), (D, 2 graded) ▪ 300-302 Lt Collins Street (Allans' building, also	Council's response to the submission is that, despite the site containing multiple buildings, because it is a single property in Council's address system it is listed just once in the C258 HPI as Significant. This site is situated within the Post Office Precinct. According to the citation, the key attributes of this precinct are: ▪ *The traditional character of the precinct as a major retail centre.* ▪ *The scale, form and appearance of the buildings constructed before the Second World War and of the surviving 19th century buildings.* The Lovell Chen Review Table provides the following information in support of the Significant grading for this site: *The significant grading applies to the buildings at 313-317 and 323-325 Bourke Street, within this group. 313-317 is an interwar building, Diamond House, constructed in 1936 in the Moderne style, and designed by Tompkins Bros architects. It is distinguished by its simple detailing, terracotta tile cladding, and vertical elements including slim pilasters and narrow windows. The parapet steps up to a central high point. The Walk Arcade entry is at ground floor level. 323-325 was constructed in 1924 to a design by Grainger Little and Barlow. It was originally the Public Benefit Bootery (the name remains on the facade) and is a tall elegantly proportioned rendered building with a classically ordered facade (base, middle and*

Submission no.	Grading issue	My response
	known as Sonara House), D, 2 graded) The submission objects to the proposed classification of the entire site as Significant and believes the exhibited C258 HPI is flawed, as it fails to recognize the wide variety of buildings on the subject site. Specifically: ▪ Three buildings have no heritage qualities or value and are currently ungraded. ▪ The integrity of the current D graded buildings is questionable –for instance 288-290 Little Collins Street (The Book Building) is a significantly modified building.	*top components). It is distinguished by it rusticated banding, columns and pilasters which divide the facade into three bays, and tall bands of multi-paned steel windows which stretch to just below the parapet. The Public Benefit Bootery were purveyors of one priced boots. It relates closely to the adjoining 327-329 Bourke Street.* I agree with this preliminary assessment of these two buildings and the Significant grading, pending a full assessment. However, I note it does not mention any of the other buildings on the site. In my opinion, of the other buildings on the site: ▪ 309-311 Bourke Street, known as the former Edment's Building. Currently ungraded, this was not reviewed by Lovell Chen. It is a post-war building with a glass curtain wall. Post-war buildings are under-represented in the HO in the Central City. Difficult to assess without further research and comparative analysis. ▪ 319-321 – this appears to be the building occupying the gap between Diamond House and the Public Bootery. Agree that it should be Ungraded. ▪ Three buildings facing Little Collins Street. While there has been a major addition on top of the former 'Book Buildings', this group is recognizable as an interwar grouping and forms part of a fine collection of late nineteenth to mid-twentieth century commercial buildings in this block, which includes Significant buildings such as the former Coles Store, Yule House, Royal Arcade, the former ANZ Bank at the corner of Causeway Lane and others that form part of the Post Office Precinct. A Contributory grading for each building is appropriate. For single sites containing multiple buildings I believe it is appropriate for the highest applicable grading to apply to the site, provided there is an applicable statement of significance that explains the various levels of significance that apply to each building. The description provided by Lovell Chen does not do this, and I agree the way the site is listed in the C258 HPI is confusing. I understand the reasoning of Council for listing the site as one place in the C258 HPI, but I believe this could be improved and I note this approach is different for that used for the University of Melbourne, which (according to Land Victoria) also is listed

Submission no.	Grading issue	My response
		as a single property address, but has multiple listings in the C258 HPI. Using the University of Melbourne as a guide, Appendix A.3 provides one suggestion about how the different gradings could be recognized, until the Hoddle Grid Heritage Review is completed (this approach could also be applicable to other large sites with multiple buildings).
92	This submission (by a different submitter to Submission 65) points out errors and inconsistencies with the application of heritage overlays and gradings to the University of Melbourne.	See response to Submission 65. I agree that a review of the heritage controls applying to Melbourne University is required.
94	Objects to the proposed inclusion of the modern office building at 661 Bourke Street within the Significant grading that applies to the former Hudson's Stores on the adjacent site at 655 Bourke Street	The same issue as for Submission 77. I agree the modern building at no.661 has no heritage value, but the two buildings are contained on one property according to Council's property system and hence a Significant grading is applied to the whole. Forms part of the HO501 Bourke Street West precinct and will be reviewed, as part of the Hoddle Grid Heritage Review. As an interim measure, separate listings could be applied in similar manner as recommended for Submission 77.
98	Very detailed submission, which lists potential address errors/inconsistencies as well as places missing from the C258 HPI.	From Council's response I understand that properties within the Bourke Hill precinct were assessed under different gradings conversion methodology as part of Amendment C240. Because of this I have not reviewed any places within this area. I have not reviewed places outside of the HO. This submission identifies many places that are missing from the C258 HPI. While some are potential address errors, most are currently Ungraded places while a significant number have individual HOs, including at least one place on the VHR (Mac's Hotel, 34-38 Franklin Street). I agree that all the places that currently have individual HOs should be listed in the C258 HPI as Significant places. (Address issues) Add the following places to the C258 HPI under their common street address as well as Council's address: ▪ 124-126 Elizabeth Street (listed as 330 Little Collins Street in the C258 HPI)

Submission no.	Grading issue	My response
		▪ 164 Flinders Lane and describe as 'Richard Allen & Sons Warehouse' (listed as 141-153 & 161 Collins Street in the C258 HPI) As part of future work, give priority to the review of the following Ungraded places: Potential Significant place: ▪ The shops and Chinese Mission Church at 119-121 (Shops) & 123-127 (Church) Little Bourke Street Potential Contributory places: ▪ 34-36 Block Place. ▪ 345-347 Bourke Street ▪ 165-167 Exhibition Street ▪ 172-178 Little Bourke Street. The following places require also further review and assessment for potential individual significance: ▪ 13-15 Collins Street, within HO504 Collins East precinct. 1971 building designed by Kurt Popper. ▪ 111-113 Collins Street. Intact interwar commercial building with fine details (part of consolidated site that includes the individual HO573 that applies only to the building at 107 Collins St). Also, where two buildings were historically separate and have distinct histories and identities, they should be listed separately wherever possible with their historic names. One example is 250-252 Collins Street, which comprises the former Lyric House at 250 and Kodak House at 252, both Significant.

A.2 Review of submission 48 (Pasley Street, Park Place & Punt Road properties within HO6)

The places listed in the following table identified by this submission are proposed to be Non-contributory in Amendment C258, unless otherwise specified.

Address	Comments
PASLEY STREET	
2-6 Pasley Street	A c.1970s three-storey block of flats. Non-contributory grading is appropriate.
8-12 Pasley Street	A c.1960s three-storey block of flats, updated more recently. Non-contributory grading is appropriate.
40-42 Pasley Street	A c.1960s three-storey block of flats. Non-contributory grading is appropriate.
44-50 Pasley Street	Two storey Victorian house on corner site. Visible additions including garage and at rear. Restored, accuracy of detailing difficult to assess. Contributory grading seems appropriate as the degree of intactness is lower than the Significant dwellings in the street.
52-54 Pasley Street	A c.1970s three-storey block of flats. Non-contributory grading is appropriate.
56-58 Pasley Street	A c.1970s single storey house. Non-contributory grading is appropriate.
78-82 Pasley Street	A late twentieth century house. Non-contributory grading is appropriate.
PASLEY STREET SOUTH	
1, 3 & 5-9 Pasley Street South	Row of c.1990s townhouses in a mock period style. Non-contributory grading is appropriate.
11-13 Pasley Street South	A c.1990s townhouse. Non-contributory grading is appropriate.
15-17 Pasley Street South	Altered house – according to the submission it was constructed in 1925, but it may be an earlier house altered at that time. Partially hidden behind high brick fence and difficult to assess. Marginal contribution, particularly given the low integrity of the Pasley Street South streetscape – requires further review.
PASLEY STREET NORTH	
1-13 Pasley Street North	*Note: this property is situated at the corner of Punt Road and was previously known as 579 Punt Road, which is the address in the 2016 HPI.* The current grading of this property is C (within a Level 2 streetscape). The proposed new grading is Contributory, and it is listed by its new address of 1-13 Pasley Street North. Contributory is appropriate for this residence, which is representative, but

Address	Comments
	not outstanding.
100 Pasley Street North	*Note: This property is physically located within the section of street known as Pasley Street North and has the number '100' attached to front entrance stair, however, according to Land Victoria, it forms part of a L-shaped property known as 86 & 86A Pasley Street that has a secondary frontage facing west to Pasley Street. Also the property immediately to the east (at the corner of Punt Road) has the address of 1-13 Pasley Street North (even though the house faces toward Punt Road).* It is possible that this is the building identified in the 2016 HPI as 1 Pasley Street North, which has a 'D' grading. In the proposed new Heritage Inventory it does not appear to be listed, although 84-88 Pasley Street is listed as 'Significant' – this, however, likely applies to the Victorian house facing Pasley Street. As a relatively intact interwar apartment building/duplex, I believe this building potentially warrants a Contributory grading.
PARK PLACE	
56-58 Park Place	The building at the north end of Park Place on the corner was formerly a narrow, freestanding block of apartments in the interwar Moderne style. The most notable and distinctive feature was the projecting curved bay with metal-framed windows. This can be seen in the 2007 Streetview image. By 2009, a major renovation had been carried out, which incorporated the building into a new development that included a two storey addition. This has involved re-rendering of the entire façade. While the distinctive bay window remains, the integrity of the flats has been diminished to the extent that I believe a Non-contributory grading is appropriate.
PUNT ROAD	
641 Punt Road	Two-storey interwar apartment block known as 'The Astor'. Relatively intact apart from enclosure of balconies and colour scheme. Not included in the 2016 or proposed new Heritage Inventory, but the Lovell Chen table includes the notes: 'Query. Recommend assess for heritage grading'. A Contributory grading is more appropriate for this building, due to the historic importance of South Yarra in demonstrating the development of flats during the interwar period. It has also aesthetic value due to the distinctive Mediterranean style detailing, and features such as the over-scaled porch hood with integral nameplate above. Other interwar apartment blocks within this area, but not mentioned specifically in this submission and that I believe should be reviewed as part of future work for potential Contributory (or higher) grading include: ▪ The Moderne style blocks at 555 & 559 Punt Road (Lovell Chen table includes the notes 'Query. Recommend assess for heritage grading') ▪ The Old English style block 'Lanark' at 565-569 Punt Road (Lovell Chen table: 'No match') ▪ The Moderne style block 'High Royd' at 571 Punt Road (Lovell Chen table: 'No match')

A.3 Potential changes to the HPI using 309-325 Bourke Street as an example

Street	Name and Number	~~Building~~ Place Grading	Significant Streetscape
Bourke Street	David Jones (former Coles Store) 299-307	Significant	-
Bourke Street	'The Walk' complex, 309-325, includes:		-
	▪ 313-317 (former Diamond House)	Significant	-
	▪ 323-325 (former Public Bootery)	Significant	-
	▪ 288-290 Little Collins Street (former Book Buildings)	Contributory	-
	▪ 292-296 Little Collins Street (former York House)	Contributory	-
	▪ 300-302 Little Collins Street (Allan's Building, also Sonara House)	Contributory	-
Bourke Street	Deva House, 327-329	Significant	-
Bourke Street	Royal Arcade, 331-339	Significant	-

APPENDIX B – Selected places changed from 'C' or 'D' to Significant

Address	Current Grading	Lovell Chen Rationale
Baby Health Centre 505-513 Abbotsford Street, North Melbourne	C	*A single-storey interwar brick and roughcast render interwar building, built as a Melbourne City Council Baby Health Care Centre in c. 1925. It is distinguished by its domestic scale and form, typical for such centres, a large roughcast render side entrance portico (with entrance now infilled with glazing) with nameplate "MCC BABY HEALTH CENTRE". Although it has been altered by the addition of a front verandah and new door openings in windows, its early form can still be understood. The property has historical significance for the ongoing provision of health and welfare services for women and children from the interwar period.*
Flats 19-23 & 25-29 Adams Street, South Yarra	C (19-21) and Ungraded (25-29)	*This is a pair of late interwar three-storey flat blocks on two allotments at 21 and 25 Adams Street. The design displays an interesting use of site, with the two blocks oriented to a central courtyard and pedestrian access. Also displays high quality design including unpainted decorative brickwork, curved corner windows, and glass blocks to stairwells.*
Flats 9-11 Alexandra Avenue, South Yarra	C	*Heritage Inventory identifies this entry as 9-15, but there are three separate properties/buildings, all blocks of flats designed to look like large Tudor Revival houses. The significant property is no 9-11, which is externally intact. The adjoining buildings are at 13 and 15 and have been modified, but could be investigated for their contributory grading. See the Council citation for 13-15 Alexandra Avenue for more information.*
Salvation Army Barracks 68-74 Arden Street, North Melbourne	C	*Single-storey rendered bluestone, gable-roofed Salvation Army barracks of 1883. The building is simply detailed, with quoining to edges and to the arched window and door openings, slim moulded details, simple parapet with arched pediment at the apex with dateplate, and the Salvation Army insignia at the top of the facade. The Salvation Army expanded the complex through to O'Shannassy Street (nos 37 and 39) in 1917 with the addtion of two buildings for a Young People's Hall. It is reportedly one of the oldest Salvation Army halls or barracks in Australia (National Trust). The building has historical significance for its demonstration of the early involvement of the Salvation Army in North Melbourne.*
Shop and residence 442-450 Arden Street, West Melbourne	C	*c. 1880s two-storey rendered shop and residence, prominently located to the corner of Arden and Tennyson streets. The corner is sharp, resulting in the building having an unusual wedge shaped*

Address	Current Grading	Lovell Chen Rationale
		footprint, with a chamfered corner entrance. Notable features include the post-supported verandah which returns around the corner; the distinct residential entrance bay which reads as a two-storey terrace complete with first floor verandah with ironwork balustrade and frieze; intact shop front; and narrow pedimented parapet to the chamfered corner.
House 55 Baille Street, North Melbourne	D	*A modest single-storey weatherboard early Victorian cottage. It has a very simple form, with transverse gable roof, which retains early corrugated iron cladding, simple verandah awning, and central entrance flanked by timber-framed sash windows. Other early elements include chimney and timber verandah posts. It is a rare example of a relatively intact early Victorian timber residence.*
Lincoln Hotel 91-95 Cardigan Street, Carlton	D	*The Lincoln Hotel is a two-storey rendered corner hotel, with a splayed corner entrance and a well executed interwar remodelling. A hotel has existed on the site since the 1850s, and the splayed corner form and fenestration to the upper level is reflective of the earlier form of the building. The interwar alterations include the application of dado tiling to the exterior of the building, raised lettering (Hotel Lincoln) and streamlines to the upper level.*
Attached houses 3 & 5 Carroll Street, North Melbourne	D	Each described as: *One of a pair of intact single-storey rendered Victorian dwellings constructed on an elevated site. Distinguished by ornate detaling including balustraded parapet, pediment with shell motif, scrolls and urns, bracked cornices, dentilation and vermiculation. Also of note is the arched tripartie window arrangement, with expressed sill mouldings, shallow arched fanlight over doorway, cast iron pallisade fence and stone stairs to entry. Intact and nicely detailed elevated ss rendererd brick pair.*
Cottages 14-20 Chetwynd Street, North Melbourne	C	*One of a group of adjoining modest early cottages, 1868, rendered with simple detailing, early forms, including no setbacks, and trans-gable roof forms. Part of a significant collection which extends along Chetwynd and continues around the corner into Rosslyn Street, forming a triangle with an hemi-exagonal corner building incorporating shop and residence at the apex.*
Attached houses 169 & 171 Chetwynd Street North Melbourne	D	Each described as: *One of an early Victorian terrace pair, rendered, simply detailed, but distinguished by early form and coloured glass to windows and fanlights above doors*.

Address	Current Grading	Lovell Chen Rationale
Row houses 35-45 Derby Street, Kensington	D	*One of six modest interwar single-storey semi-detached dwellings, in free-standing pairs. Unusual in the Kensington context, and gain significance from being an intact group. Features of note include the pairs at either end which have rendered gabled facades with return side walls leading through arches to side entrance bays, set in contrasting face brick gables. The central pair has arched entries to the front gables. Simply detailed.*
Catholic Church 456-474 Dryburgh Street, North Melbourne	D	*Very substantial c. 1907 Catholic church. Important part of streetscape and demonstrative of importance of Catholic Church in North Melbourne. The adjoining two-storey red brick presbytery is also a signifcant component of the complex.*
Terrace 170-172 Errol Street (part of a larger row)	D	*Part of a terrace row at 172-182 Errol Street of early twentieth century single-storey red brick cottages with contrasting painted render bands, distinguished by a continuous repetitive patterning. The row is highly externally intact, simply detailed, and with prominent ornamented parapets stepping up the grade of the street to meet the double-fronted component at the top of the row. Details include a rough cement rendered stringcourse which follows the stepping up of the parapets, with the material repeated in the pediment, and central swags to the parapets. The dwelling at no. 172 is virtually the same with the addition of a projecting bay to the south.*
Causeway House (Former Union Bank) 304-306 Little Collins Street	C	*Interwar building, architect unknown*, large former bank at the corner of the Causeway. Has curved form to corner, rising some eight storeys, in render. Distinguished by a podium level with large arched windows, surmounted by the upper storeys which cantilever over the podium and the Causeway. Details include rusticated detailing to the podium, elaborate brackets, fine dentilated cornices, and the rounded corner entry.* [*Designed by A & K Henderson, this building was erected in 1938 for the Union Bank by Hansen and Yuncken Pty Ltd (*The Argus*, 26 July 1938, p.3)]
Dorchester Terrace 273 Rathdowne Street, Carlton (part of a terrace)	D	*One of a row of four two-storey brick terraces: 'Dorchester Terrace'. While overpainted, the terrace retains its original elaborately moulded render parapet, finely detailed cast iron verandahs, deep front garden setbacks and palisade fencing.*
House, 599-615 Spencer Street, West Melbourne	D	*One of a row of nine single-storey bichrome brick early Victorian cottages built in two stages in 1867 (nos 599-607) and 1879 (6609-615). The row is distinguished by its length and repeated brickwork detailing, including constrasting brick quoining to openings. The houses are grouped in threes, with a*

Address	Current Grading	Lovell Chen Rationale
		party wall between each trio, and the central trio has an arched pediment with nameplate, "YARRA COTTAGES", with urns and scrolls. All houses retain the early verandah awning and some friezes, and rendered chimneys.

APPENDIX C – Stonnington Local Policy extract

22.04 HERITAGE POLICY

26/01/2018 C132

This policy applies to all land within a Heritage Overlay.

22.04-1 Policy basis

26/01/2018 C132

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

22.04-2 Definitions

26/01/2018 C132

For the purposes of this policy the following meanings apply:

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

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

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

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

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

22.04-3 Objectives

26/01/2018 C132

To retain all significant and contributory heritage places.

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

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

To maintain views of and vistas to significant heritage places.

[i] This is the reference provided in the i-Heritage database as the original source. However, it appears that this may actually be the report formally known as *Report on the City of Melbourne Planning Scheme Heritage Review* and dated March 2000.