



# HOTHAM HISTORY PROJECT Inc.

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## City of Melbourne Heritage Review

### **MPS Amendment C258 – Submission to Planning Panels Victoria – August 2018**

#### General Comments

1. The Hotham History Project Inc (HHP) is a group based at the North Melbourne Library which is collecting and publishing the history of North & West Melbourne. We consider our historic building stock is an important part of the history of European settlement of the area and we are concerned that it is continuing to be lost.
2. HHP supports the City Of Melbourne Heritage Review MPS Amendment C258 (the Amendment or Amendment C258) with some reservations. We acknowledge that with such an enormous number of heritage places to translate into the new grading system, it is inevitable that there will be some errors and omissions. However, given that users of the City of Melbourne's i-heritage database are fully aware of the deficiencies and the enormous number of errors in the database, it is surprising that so much reliance was placed on it for the desk top survey. Some of the errors in the i-heritage database are still reflected in the entries listed in the Heritage Places Inventory as part of Amendment C258 (C258 HPI).

#### Heritage Places Inventory

3. Some of the features of earlier inventories, such as the identification of important buildings have not been reinstated. We therefore support David Helms' recommendations in his Statement of Evidence for the City of Melbourne to make C258 HPI more user friendly.
4. We agree with David Helms about address confusion and the lack of consistency in how addresses are listed in the different inventories as well as in the same inventory. The entries for rows of terraces for example are also inconsistent.
5. We are pleased that the heritage value of a number of our 'C' and 'D' graded buildings has been recognised and upgraded but concerned about the lack of documentation to justify the changes.
6. Despite David Helms' endorsement of the methodology employed by the Council's consultants, Lovell Chen, and his belief that on the whole the translation exercise has been a success, many submitters have identified numerous omissions, errors, and inconsistencies. Most of the errors listed in the spreadsheet relating to West

Melbourne which was attached to the HHP submission dated 12 May 2017 have been rectified but a significant number of our sample survey in North Melbourne still exist. As a Heritage Review of North Melbourne is included in the City of Melbourne Annual Plan and Budget for 2018-19, we have decided it is best to wait for a comprehensive heritage review rather than request a review of the various anomalies and inconsistencies that we have identified several times already. However it is imperative that a comprehensive heritage review of North Melbourne goes ahead as soon as possible.

7. Our one exception to this decision is to object to the removal of 552-68 Victoria Street from C258 HPI. We believe we cannot wait for a future North Melbourne Heritage Review for this prominent and sensitive site as what happens on the site could have serious repercussions for the whole Asylum Estate (See Appendix).
8. We appreciate that many of the omissions and errors identified by submitters from other areas of the municipality still need to be rectified or heritage reviews for those areas also conducted in the near future.

#### Removal of Streetscape Gradings

9. We have deep concerns about the decision to remove level 2 & 3 streetscape gradings which has serious ramifications for North & West Melbourne. Approximately one third of the heritage places outside the Capital City Zone (CCZ) are in North & West Melbourne. Under the A-D grading system there were just 30 'A' graded places but over 1200 'D' graded places in North & West Melbourne. We believe the importance of Heritage Overlay 3 lies in the presence of the large number of modest workers' cottages built to house those attracted to the area to work in the markets, railways, wharves and factories. These streets of workers cottages represented a thriving, close knit culture and the 'D' grading did not adequately reflect the social and historic importance of the area's industrial buildings and housing stock, which housed workers in industries that contributed to the economic prosperity of Melbourne as a whole. Over the years 'D' became known as 'D' for demolition and many such buildings have indeed been demolished, particularly in West Melbourne where whole streetscapes have been lost.

10. The loss of the grading system for streetscapes effects the way applications are assessed. As the introduction to C258 HPI states:

*"The performance standards applied by Council when considering relevant permit applications are dependent on the particular building grading **and whether it is in a significant streetscape**".(my emphasis)*

This is particularly concerning when under the proposed amendment, only **10%** of North & West Melbourne's heritage places has the added protection of the 'Significant' streetscape grading. With **62%** of our heritage places assessed as 'Contributory' in a 'Non significant' streetscape, we fear that this will become the new 'D' or expendable category.

11. We agree with Lovell Chen's recommendations on the need for a review of Significant Streetscape gradings across the Municipality. (Methodology Report, City of Melbourne Heritage Gradings Review by Lovell Chen, 1915, p16)

#### Definitions of 'Significant' and 'Contributory'

12. Like some other submitters, HHP preferred the term 'Local Significance' to 'Contributory' as per the State Government's Planning Practice Note 01: Applying the Heritage Overlay pp1-2:

*The thresholds 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 (for example, 'A', 'B', 'C') should not be used.*

We have read David Helms arguments on the various terms and accept that for the time being it appears to be accepted practice to use the term 'Contributory'.

13. We do feel however that David Helms did not address our suggestion that the former 'C' graded shopfront at 364-6 Victoria Street was probably downgraded to 'Non Contributory' because its Moderne facade did not meet the definition of 'Contributory' to the Victorian streetscape. Although acknowledging that no.364-6 is an anomaly within what is otherwise a predominantly Victorian era precinct he suggested it be assessed "for potential individual significance for its aesthetic/architectural values as a fine and intact example of a late interwar or early post war shop." The logical conclusion is that if buildings are deemed worthy of protection but do not contribute to the streetscape they should automatically receive a 'Significant' grading.

#### The competing status of Local Policies and Planning Scheme provisions in MPS

14. While outside the scope of this Panel, the hierarchy of priority given to the various local policies and planning scheme provisions when assessing applications continues to create uncertainty. It seems that heritage protection is often over ridden by other objectives – the arguments put forward by the University of Melbourne to this Panel are a very obvious example.
15. We strongly support the point made in the Carlton Residents' Association's (CRA) submission that "the Council must establish which Local Policy or Planning Scheme Provision is to be accorded priority in those cases where there is a conflict between the provisions of the Planning Scheme".

#### Expert Witness Statement for 611-617 (613) King Street, West Melbourne

16. We contend that 613 King Street, although altered, still represents the form, height and appearance of the original building and is an important visual landmark on this prominent corner site. Its height and scale complements the historic row of double storey Victorian terraces at 557-601 King Street. We understand that the building application drawings provide evidence for reinstatement. We agree with Graeme Butler that its interwar industrial uses make up a major visual and historical theme for the West Melbourne area and argue that it deserves to retain its 'Contributory'

grading. Once a building is gone it is gone forever and in some cases the history of the suburb is further diminished by its loss.

Concluding remarks

17. While the important errors and omissions in C258 HPI still need to be addressed, HHP generally supports the changes recommended by Sophie Jordan and David Helms in their Evidence Statements prepared for the City of Melbourne for this Amendment. We would like to see the Amendment proceed so that other urgent heritage reviews can be initiated.
18. We request that 552-68 Victoria Street be retained in the C258 HPI until it can be properly assessed.
19. We support a review of the Streetscape gradings system.
20. And finally, Melbourne Planning Scheme Amendment C258 has been a long, drawn-out and complicated process, especially for local community members who are not heritage professionals and are doing this on a voluntary basis. It would be good to see this Amendment finalised.

## APPENDIX

### 552-68 Victoria Street North Melbourne

HHP requests that the above property be retained in the Heritage Places Inventory Amendment C258 (C258 HPI or C258 Inventory) until it can be assessed for its historic and social significance by the forthcoming North Melbourne Heritage Review (provision for such a review is included in the City of Melbourne Annual Plan and Budget for 2018-19).

The property at 552-68 (552) Victoria Street is on a prominent elevated corner site at the intersection of Curzon and Victoria Streets and is located on the Asylum Estate. Of particular concern is the fact that this is the only building on the Estate to have had its heritage grading removed as part of the translation exercise.

The Asylum Estate is historically important as it occupies the site of the former Victoria (later Melbourne) Benevolent Asylum, the first permanent building in North Melbourne and a landmark building of early Melbourne. This Edwardian and inter-war estate is on a government model subdivision developed after the demolition of the Asylum in 1911 and we argue that it is historically significant as a large subdivision of early 20<sup>th</sup> century housing in the inner city set amidst a Victorian precinct. The Asylum Estate is half in North Melbourne and half in West Melbourne. Victoria Street was extended after the demolition of the Asylum and forms the boundary between the two suburbs. Refer to Plan on page A4 for scope of the Estate



*Benevolent Asylum Curzon St facade c. 1890*

The inclusion of the West Melbourne Heritage Review as part of Amendment C258 has highlighted the urgency of a comprehensive review of North Melbourne's heritage. This is exemplified in the different assessments of places in Victoria Street on the Asylum Estate. The West Melbourne Heritage Review has taken into account historical and social significance and all buildings on the West Melbourne side of Victoria Street between Curzon & Abbotsford Sts are either 'Significant' or 'Contributory'. On the opposite side of Victoria Street less than half the buildings are considered worthy of heritage protection in C258 HPI.

The factory building at 552 Victoria Street was erected on the most expensive block on the estate when the land was auctioned in 1913 and has justified its value by selling recently (i.e. since the removal of the grading in the draft version of the Inventory), for the reported record price of \$15.3 million. While its facade has been altered, its bulk and form still present as an industrial building from the early years of the Estate. We argue that it is historically and socially significant and warrants retention as one of the two original factory buildings on this model government subdivision. The other factory building, on the

northeast corner of Miller and Abbotsford Streets, has been extensively, but more appropriately, renovated and has been assessed as 'Significant' in the *West Melbourne Heritage Review* (although it does not appear to be listed in the City of Melbourne's i-heritage data base).



*552-68 Victoria St (photo from City of Melbourne -Melbourne Interactive Maps)*

The corner site is very sensitive. It could be regarded as the gateway to the Asylum Estate. It directly abuts the 'Significant' building known locally as the Loco Hall at 570-78 Victoria Street. These two buildings and the factory site at 60-80 Miller Street are two to three storeys and are the largest and highest on the four hectare estate.



*Victoria St facade of 552-68 Victoria St showing adjacent Loco Hall Photo from Melbourne Interactive Maps*

In October 2014 the Future Melbourne Committee approved an application for demolition of a heritage building graded 'Significant' in the draft West Melbourne Heritage Review, and the erection of a 6 storey building of 74 dwellings at the site bounded by King, Hawke & Curzon Streets diagonally opposite 552 Victoria Street. The application was above the 14 metre (4 storey) height limit for the area (Schedule 29 to the DDO) and against strong community opposition (221 objections) and the Council's own heritage advice. It has created a dangerous precedent for further medium rise buildings in the area.





60-80 Miller St, West Melbourne, originally The Britannia Tie Company factory (Photo from Melbourne Interactive Maps)

We have been informed that some home owners adjacent to a long unoccupied property on the western edge of the Estate have been approached to sell their properties to enable amalgamation of blocks. We are all aware of the potentially destructive power of precedent. If the old factory building at 552 Victoria Street is permitted to be demolished and a medium rise building erected, the entire predominantly single storey residential estate could be vulnerable.

#### Asylum Estate sub Precinct and Statement of Significance

The City of Melbourne Heritage Precincts Project (draft, Meredith Gould Architects, 2004) proposed a Benevolent Asylum sub-precinct for North & West Melbourne with its own Statement of Significance. The Council reassured the community during consultation for the project that this would protect those places which had not been given an individual grading until a new heritage review of North & West Melbourne was conducted. Despite an enormous amount of work by the consultant and Council officers with considerable input from the community this study did not proceed to an amendment and the places remained unprotected.

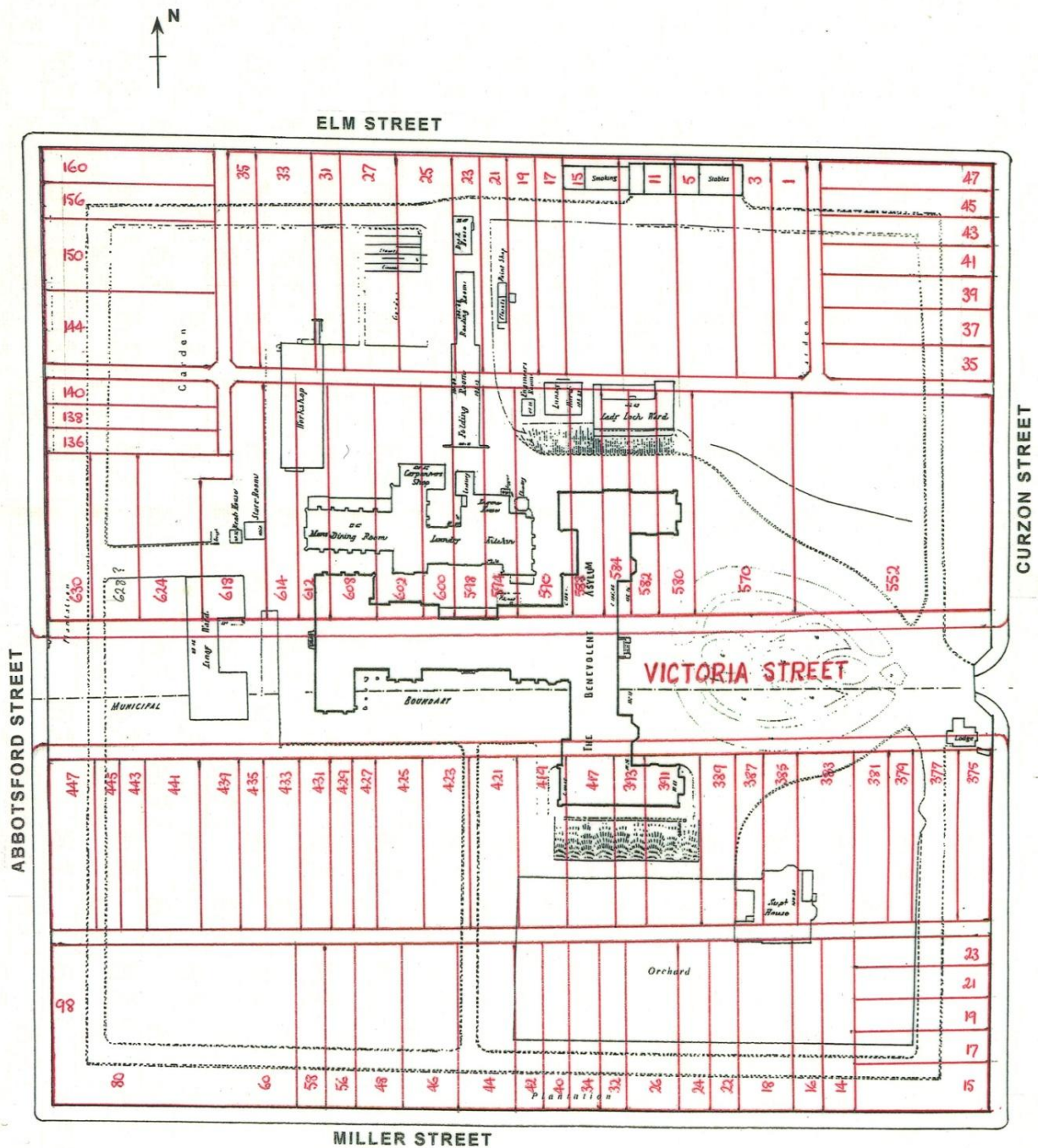
In Heritage Evidence: Amendment C258: West Melbourne Heritage Review, Graeme Butler's witness statement for the City of Melbourne to this Panel, Butler has recommended that:

*the Benevolent Asylum Estate does warrant its own Heritage Overlay and Statement of Significance given the distinctive character of the building stock and the associated management guidelines needed for its preservation. This could occur in any future North Melbourne heritage review.*

In conclusion, the presence of an almost intact four hectare Edwardian/interwar estate within a Victorian precinct so close to the city is extremely rare, if not unique, and we believe it is crucial to Melbourne's heritage credibility that this estate be preserved.

HHP therefore maintains that to remove any places on the Asylum Estate from the Heritage Places Inventory C258 before a comprehensive heritage review has been conducted is premature and requests that 552 Victoria Street be retained in the C258 HPI as 'Contributory' to the social and historic significance of North Melbourne.

# The Melbourne Benevolent Asylum & The Asylum Estate



Adapted from MMBW Plan forty feet to inch 1895-96 with plan of subdivision imposed