

AMENDMENT C403MELB NORTH MELBOURNE HERITAGE REVIEW

Statement of heritage evidence for
PLANNING PANELS VICTORIA

April 2023

Prepared by Kate Gray

Instructed by
City of Melbourne

Prepared for
CITY OF MELBOURNE

LOVELL CHEN



ACKNOWLEDGEMENT TO COUNTRY

This report was prepared on the lands of the Wurundjeri people who have been custodians of this land for thousands of years. We acknowledge their stories, connection to land, water and culture which is embedded in Country. We pay our respects to their Elders past and present and acknowledge that this report includes a post-contact history that forms only a small part of the ongoing story.

North Melbourne is located on the lands of the Wurundjeri people, who are, and have always been the custodians of this land. We pay our respects to the Elders past and present, and acknowledge the stories, traditions and cultures of all Aboriginal and Torres Strait Islander people.

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1.0 NAME AND ADDRESS

1. My name is Katharine Fiona (Kate) Gray, Director and Principal of Lovell Chen Pty Ltd, Architects and Heritage Consultants, Level 5, 176 Wellington Parade, East Melbourne.
2. Lovell Chen prepared the North Melbourne Heritage Review which forms the basis of Amendment C403 to the Melbourne Planning Scheme insofar as it relates to heritage controls in an area of North and West Melbourne.
3. I have been instructed by the City of Melbourne to prepare an expert witness statement in respect to the heritage aspects of the Amendment and give evidence before this Panel.
4. I have been assisted in the preparation of this evidence statement by Libby Blamey, Senior Associate and Anna Hyland, Associate, Lovell Chen. The views expressed in the statement are my own.

2.0 QUALIFICATIONS AND EXPERIENCE

5. I hold a Bachelor of Arts (Hons) and a Master of Arts (History), both from The University of Melbourne, and a Post-Graduate Diploma in Heritage Planning and Management from Victoria University.
6. I joined Lovell Chen (then Allom Lovell & Associates) in 1989 and have been involved in heritage practice and management for more than 30 years. This experience includes the preparation of heritage appraisals and assessments of significance for individual sites and larger complexes, areas and precincts. I also have extensive experience in strategic planning and policy development for heritage places, and the assessment of impacts on heritage places. I am responsible for leading multi-disciplinary teams with expertise in architecture, history, planning and landscape.
7. I have contributed in a variety of roles to numerous municipal heritage reviews in metropolitan Melbourne and regional Victoria. These include studies of for the [former] cities of Fitzroy and Port Melbourne and the cities of Boroondara, Port Phillip and Greater Bendigo and the Borough of Queenscliffe. I was the expert witness for the Melbourne City Council in the Panel Hearing for Amendment C405melb as related to the implementation of the recommendations of the Carlton Heritage Review (Lovell Chen with Extent Heritage, 2019). This study involved detailed review of existing HO controls of long standing and propose the introduction of new HO places, including precincts and individual heritage places.
8. In recent years I have led Lovell Chen teams providing specialist historical heritage assessments, advice and impact assessments for Environment Effect Statements for major rail and road infrastructure projects including the Metro Tunnel, West Gate Tunnel, North East Link and Suburban Rail Loop East projects. I have also been involved in the preparation of conservation management plans (CMPs) for a wide range of heritage places and recently led the Lovell Chen team preparing the review of the Heritage Management Plan for the world heritage-listed Royal Exhibition Building and Carlton Gardens. I have also undertaken heritage appraisals of residential buildings, industrial sites and institutional complexes across Melbourne and in regional Victoria.
9. I am a Full International Member of Australia ICOMOS, the Australian national committee of the International Council on Monuments and Sites, an international organisation concerned with

cultural heritage conservation. I have served as an external member of the Heritage Council of Victoria's specialist advisory committee on Archaeology and Underwater Cultural Heritage and am currently a Technical Expert member of the City of Melbourne's Design Review Panel.

3.0 PREPARATION OF NORTH MELBOURNE HERITAGE REVIEW

3.1 Role in the preparation of the North Melbourne Heritage Review

10. The North Melbourne Heritage Review was prepared by Lovell Chen in association with specialist subconsultant Extent Heritage. The Review commenced in September 2019 and was conducted largely during 2020-2021.
11. I led the Lovell Chen team comprising:
 - Libby Blamey, historian and Senior Associate (current role)
 - John Statham, Senior Associate
 - Michael Cook, landscape specialist and Senior Associate (current role)
 - Charlotte Jenkins, Associate (current role)
12. Mr Statham is no longer employed by Lovell Chen.
13. The Review was completed and issued in full in March 2022. The Review was updated and reissued in July 2022. The July 2022 version included a revised statement of significance for HO3 to respond to Department of Environment, Land, Water and Planning (DELWP) requirements.
14. Following exhibition of the amendment, I was involved in reviewing submissions, undertaking additional site inspections, preparing responses to issues raised and advising on changes to the Amendment documentation. This work was undertaken with the assistance of Ms Blamey.

3.2 Significant contributors to the North Melbourne Heritage Review

15. Significant contributors to the North Melbourne Heritage Review were as follows:

Lovell Chen

- Libby Blamey, Senior Associate, Historian, BA(Honours), MA (Public History)(Monash), 15 years' experience in heritage, specialising in historical research and writing (including thematic and place-based histories) and assessment of heritage places. Undertook historical research and writing and analysis and assessment of significance for the project.
- John Statham, B Arch (Hons) (Melb) B Planning and Design (Melb) RAIA, formerly Senior Associate. 24 years' experience in heritage practice. Responsible for fieldwork and input to significance assessment.
- Michael Cook, Senior Associate, Master of Landscape Architecture (University of Toronto), landscape architect and heritage consultant. More than seven years' professional experience in Canada and Australia engaging in various aspects of industrial, landscape and infrastructure heritage, focusing on heritage landscape issues. Undertook research and analysis and assessment of significance of landscapes for the project.

- Charlotte Jenkins, Bachelor of Arts (La Trobe), Master of Arts (Cultural Heritage Management (York), Associate. Primary focus was desktop review work and research support.

Extent Heritage

- Ian Travers, Senior Associate (now Chief Executive Officer). Led Aboriginal / Traditional Owner engagement.
- Luke James, Senior Heritage Advisor (now Principal Heritage Adviser). Undertook Aboriginal / Traditional Owner engagement, research, and inputs to Thematic Environmental History and select citations.
- Benjamin Petkov, research assistant (now Heritage Adviser). Undertook research, and inputs to Thematic Environmental History and select citations.

16. Additional photography for some sites was undertaken by Amanda Lee of Lovell Chen in April 2023.

4.0 SCOPE AND APPROACH

4.1 Instructions

17. My instructions in this matter were received on 24 February 2023 and comprised a Brief to Expert prepared by the City of Melbourne and emailed by Katherine Smart, Strategic Planner at the City of Melbourne.
18. The instructions were as follows (paragraphs 41 and 42):

You are kindly instructed to:

- review the documents in your brief;
- prepare an expert evidence statement and appear as an expert witness in relation to this proceeding.
- Your statement of evidence should:
 - explain your involvement and provide an overview of the North Melbourne Heritage Review as it relates to the amendment;
 - consider and express opinions about the heritage aspects of the amendment including the strategic basis for the amendment having regards to the PPN01 Planning Practice Note (Applying the Heritage Overlay) (**PPN01**);
 - consider and respond to the heritage issues raised in all North Melbourne related submissions received to the Amendment (noting that some submissions may not disclose any substantive matters to respond);
 - express your expert opinion on the Amendment (distinguishing between the exhibited version and the Council preferred version, as applicable).
 - be prepared in accordance with the Expert Evidence - Planning Panel Victoria (PPV) Practice Note 1.

4.2 Reference documents and materials

19. In addition to the North Melbourne Heritage Review and other exhibited documents for Amendment C403melb, I have referenced the following:

- Submissions received during exhibition period (Submissions 1 to 23 inclusive).
- Report to the Future Melbourne Committee Agenda Item 6.6, 12 April 2022 North Melbourne Heritage Review – Commencement of Melbourne Planning Scheme Amendments C402 and C403
- Report to the Future Melbourne Committee meeting held on Tuesday 21 February 2023, Agenda Item 6.3, North Melbourne Heritage Review – Planning Scheme Amendment C403.

I note that I appeared as an expert witness in the Panel Hearing for Amendment C405melb in 2022, which considered the recommendations of the Carlton Heritage Review (prepared by Lovell Chen for the City of Melbourne). A number of issues considered in Amendment C405 are also of relevance to this amendment and I have incorporated some material from my expert evidence statement in Amendment C405 in this statement.

4.3 Panel Directions

20. I have been provided with the Panel Directions dated 27 March 2023, and the updated version dated 4 April, and in preparing this evidence statement, I have addressed a number of matters raised in these directions.

4.4 Questions falling outside the expert's expertise

21. The preparation of a municipal heritage review requires a range of skills and expertise. In this case, that is reflected in the combined Lovell Chen and Extent Heritage team.
22. In relation to my own expertise, I note that while I have experience in considering heritage landscapes, I am not an expert in arboricultural matters. I note that the Lovell Chen team for the North Melbourne Heritage Review included a specialist in heritage landscapes (Michael Cook).
23. I also note that I am not an expert in Aboriginal cultural heritage and that consultation with the Traditional Owner groups and the input to the study arising from that engagement was undertaken by Extent Heritage.

4.5 Corrections and clarifications

24. There is an inconsistency in the revised statement of significance for HO3 (North and West Melbourne Precinct) where one of the sub-areas within the precinct is referred to as the *Victoria and Errol streets Civic and Commercial Area* (under 'What is significant?') and the *Errol Street Civic and Commercial Area* (on the map in the statement). There are other inconsistent references throughout the Review documents. The preferred name is *Victoria and Errol streets Civic and Commercial Area*. The Amendment and Review documents should be updated accordingly.

4.6 VHR registration under the Heritage Act 2017 of Actor's studio house, Rear, 22 Shiel Street, North Melbourne

25. In the course of the work for the North Melbourne Heritage Review, a 1970s artist's studio of potential heritage significance was identified at the rear of the site at 22 Shiel Street, within the

North and West Melbourne precinct (HO3). The studio was designed by the architect Suzanne Dance for the actor Max Gillies and was the first building designed by a female architect to win a Royal Australian Institute of Architects (Victorian Chapter) medal. As the building was not visible from the street, a site inspection was required, however, was not possible due to the Covid-19 pandemic and no recommendations were made in relation to the place.

26. Since the completion of the study, the place has been added to the Victorian Heritage Register (gazetted 18 August 2022). It is expected in due course that the Planning Scheme will be updated to include the place as a separately scheduled and mapped HO place.

4.7 Summary of opinion and recommendations

27. In summary, it is my opinion that:

- A. The North Melbourne Heritage Review has been prepared using a sound methodology that is consistent with accepted heritage practice and with the requirements of the Planning Practice Note PPN01 Applying the Heritage Overlay
- B. The study provides documentation of an appropriate format and standard of evidence to support and justify the changes proposed by Amendment C403 to the Melbourne Planning Scheme
- C. Additional places proposed to be included in the HO under the amendment have been assessed against the relevant criteria and found to be of local significance as required by PPN01
- D. The heritage assessment work across the study has also been undertaken having regard for the existing heritage policy frameworks in the Melbourne Planning Scheme and consistent with other strategic heritage assessment work undertaken by the City of Melbourne
- E. The documentation is to an appropriate standard to support the ongoing administration of the HO controls within the study area under the Melbourne Planning Scheme
- F. Through the Thematic Environmental History and the detailed place citations, the North Melbourne Heritage Review additionally presents the outcome of significant additional historical research and community engagement exploring the history and cultural values of the study area. This has included, very significantly, the input of Traditional Owners, in identifying and recognising Aboriginal cultural themes and associations.
- G. Amendment C403 as exhibited reflects the findings of the North Melbourne Heritage Review. The 'Council-preferred' version of the Amendment incorporates a series of proposed changes in the post-exhibition period and I support those changes (with the following additional comments on the Council position on the Flemington Bridge Railway Station).
- H. In relation to the Council position on the proposed application of the HO to the Flemington Bridge Railway Station (exclusion of the ramps), I recommend consideration of an alternative approach whereby the HO mapping is retained as per the exhibited version and the question of the potential future requirement for upgrade works impacting on the ramps and/or the platforms is referenced through the use of an incorporated document. Such an approach would still result in the recognition of a place of local heritage value.

- I. The exhibited HO3 statement of significance and Review documentation should be corrected to consistently reference the *Victoria and Errol streets Civic and Commercial Area* as one of the four areas with identified built-form characteristics within the precinct.

5.0 OVERVIEW OF NORTH MELBOURNE HERITAGE REVIEW

5.1 Introduction

28. The following provides a summary overview of the scope, approach and methodology for the North Melbourne Heritage Review.
29. More detail is provided in the North Melbourne Heritage Review Methodology Report.

5.2 Background

5.2.1 Context for the study

30. The North Melbourne Heritage Review and Amendment C403 can be seen in the context of a broader strategy by the City of Melbourne to undertake a program of heritage reviews across the municipality, seeking to review and update existing HO controls, supporting documentation (place-based statements of significance, place gradings/categories, thematic histories) and heritage policy frameworks. This is consistent with the intent of the City of Melbourne's Heritage Strategy 2013 <https://www.melbourne.vic.gov.au/SiteCollectionDocuments/heritage-strategy.pdf>.
31. As for other areas within the City of Melbourne, North Melbourne was the subject of a heritage study in the 1980s, this was the North and West Melbourne Conservation Study (Graeme Butler and Associates, 1983). Large areas of North and West Melbourne had heritage controls implemented because of the 1983 study, including a large precinct extending across North and West Melbourne (now known as HO3, North and West Melbourne Precinct).
32. Since then, there have been various reviews that have been either limited in scope or in area, including the Allom Lovell & Associates Heritage Review 2000 (a municipality-wide gradings review exercise), the RBA Architects City North Heritage Review (2013), Graeme Butler & Associates Arden Macaulay Heritage Review (2012) and Graeme Butler & Associates West Melbourne Heritage Review (2016).
33. Three of these studies reviewed geographical areas which directly intersect with the study area for the North Melbourne Heritage Review, these are as follows (refer to Figure 1):
 - Arden Macauley Heritage Review (2012)
 - City North Heritage Review (2013)
 - West Melbourne Heritage Review (2016)
34. The City North Heritage Review and the Arden Macaulay Heritage Review both included parts of North Melbourne and those areas were excluded from the study area for the North Melbourne Heritage Review. West Melbourne abuts North Melbourne immediately to the south. As noted above, this area was assessed in the same 1983 study as North Melbourne (North and West Melbourne Conservation Study, Graeme Butler and Associates, 1983), however West Melbourne was subject to a separate heritage review in 2016. Accordingly, it was also excluded from the

study area for the North Melbourne Heritage Review, albeit some limited review work was undertaken there as part of the review of the North and West Precinct (HO3).

5.2.2 Recent amendments

35. It is relevant to note three other amendments which provide a context for the North Melbourne Heritage Review and Amendment C403.

Amendment C258

36. Amendment C258 to the Melbourne Planning Scheme (gazetted on 10 July 2020) comprised a review of heritage frameworks in the planning scheme applicable across the municipality as a whole. In essence, Amendment C258:
- revised Melbourne's local heritage planning policies at Clause 22.04 and Clause 22.05 (subsequently amended by Amendment C409, see below)
 - incorporated new statements of significance for Melbourne's heritage precincts outside the Capital City Zone (Carlton, East Melbourne and Jolimont, North Melbourne and West Melbourne, Parkville, South Yarra and Kensington)
 - replaced the A to D property grading system with the Significant/Contributory/Non-contributory grading system
 - implemented the recommendations of the West Melbourne Heritage Review (Graeme Butler, 2016).
37. The Heritage Policies Review component of Amendment C258 was undertaken by Lovell Chen, commencing in 2015.
38. The North Melbourne Heritage Review adopted the post-C258 Significant/Contributory/Non-contributory grading system (now part of the Melbourne Planning Scheme). This is discussed further at sections 5.6.8 and 7.4.

Amendment C396

39. Amendment C396 (gazetted on 7 July 2022) followed on from Amendment C258 and sought to finalise the heritage gradings conversion work. It converted heritage gradings that were removed or excluded from Amendment C258 and made other associated changes to the Planning Scheme.
40. Amendment C396 had some overlap with the Amendment C403 in terms of timing, and there is also some overlap in terms of the amendments themselves, in that there are places in Amendment C403 that have already had their categories or other issues such as scheduling changed in Amendment C396. This is important in that these changes have been implemented following the gazettal of Amendment C396 but still appear in the documentation for Amendment C403. Attachment F to the North Melbourne Heritage Review includes all recommended gradings changes, including those that were addressed through C396.

Amendment C409

41. Amendment C409 was gazetted on 21 September 2022 and implemented the Planning Policy Framework (PPF) translation into the Scheme. The PPF translation involves translating the Local Planning Policy Framework (LPPF) content in planning schemes into the new integrated PPF and

Municipal Planning Strategy (MPS), consistent with the structure introduced by Amendment VC148 in July 2018.

42. Amendment C403 was exhibited prior to the gazettal of Amendment C409. Amendment C409 is relevant to Amendment C403 because of the following changes:
- Clause 22.05 Heritage Places Outside the Capital City Zone replaced with Clause 15.03-1L-02 Heritage.
 - Clause 21.06-2 Heritage replaced with Clause 02.03-4 Built environment and heritage
 - Clause 21.16-5 North Melbourne replaced with Clause 11.03-6L-10 North Melbourne (Built environment and heritage strategies)
43. I do not consider the changes as part of Amendment C409 to have a material bearing on my evidence in relation to Amendment C403.

5.3 Study area

44. The study area is shown at Figure 1 and Figure 2, and includes the majority of the suburb of North Melbourne. It generally incorporates properties and land located west of Capel Street; north of Victoria Street; south of Flemington Road; and east of sections of Dryburgh, Shiel and Melrose streets and Boundary Road. As noted earlier, the study area excludes the part of North Melbourne which was reviewed in the City North Heritage Review (2013) and the Arden Macaulay Heritage Review (2012) as well as the West Melbourne section of the existing HO precinct North and West Melbourne Precinct (HO3). Refer to the plan at Figure 1.
45. There are two areas where the study scope moved beyond the mapped study area.
- The Thematic Environmental History (TEH) prepared during the course of the study, addressed the whole of North Melbourne, including both the study area and areas beyond its boundaries.
 - Some consideration (limited fieldwork and desktop review) was given to those parts of HO3 outside the study area, including areas that were addressed in the West Melbourne Heritage Review, 2016 and City North Heritage Review, 2013. This was to support analysis and recommendations for amended documentation in relation to HO3.

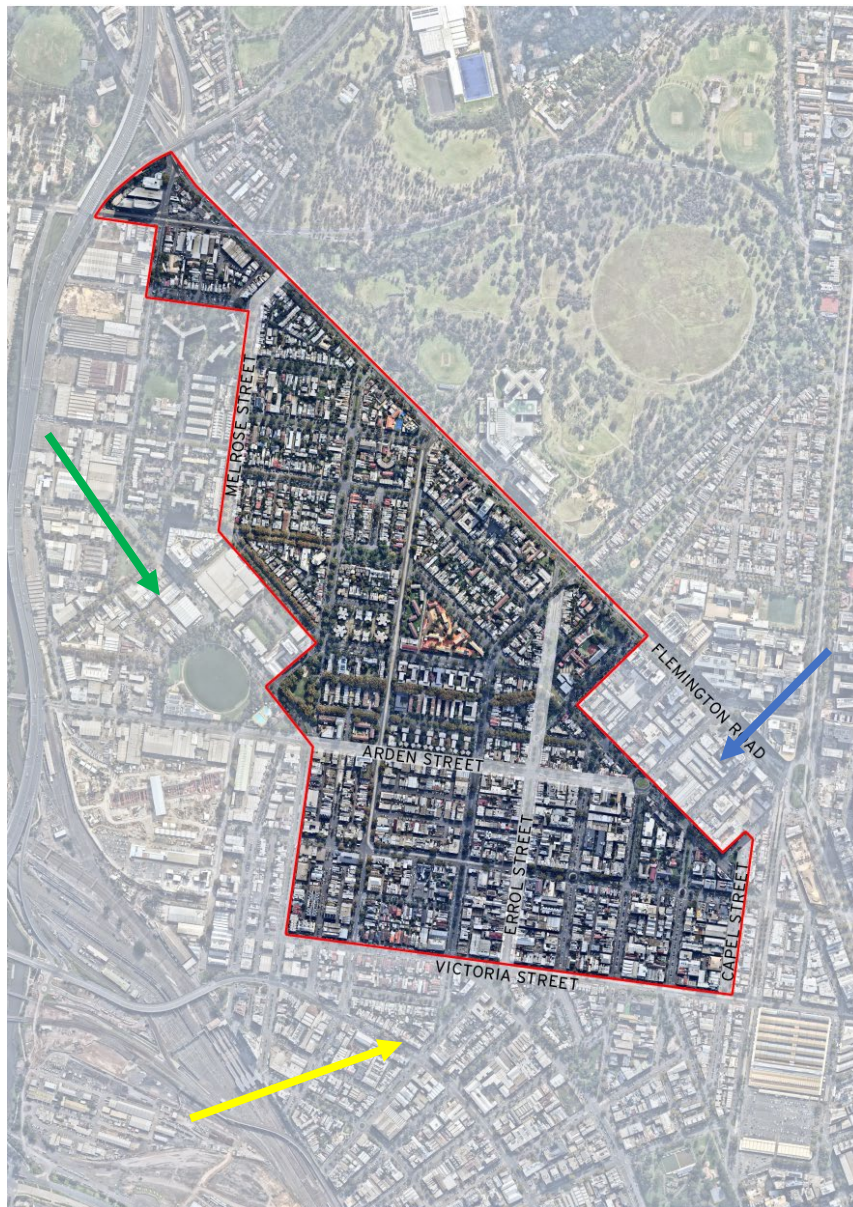


Figure 1 Aerial photograph, with the North Melbourne Heritage Review study area outlined in red; the general locations of study areas for the Arden Macauley (green), City North (blue) and West Melbourne (yellow) heritage reviews are indicated
Source: Nearmap

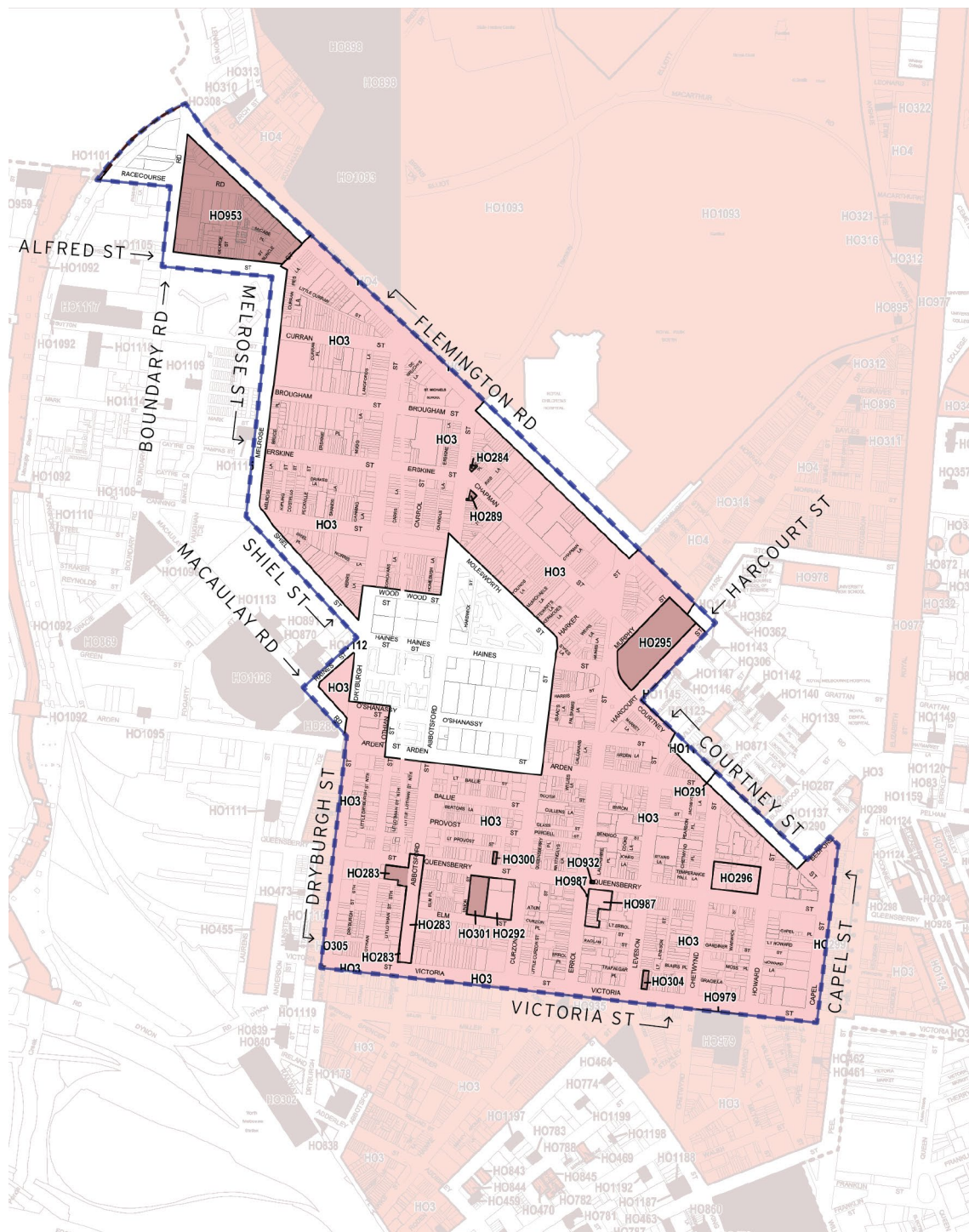


Figure 2 Extract from City of Melbourne Planning Scheme, with the study area outlined in blue; existing HO precincts (HO3 in pink and HO953 in darker pink at top left of study area) and individual HO places (in darker pink outlined in black) are also shown
Source: DELWP Planning Portal

5.4 Study scope

Introduction

46. The study proceeded based on a brief issued by the City of Melbourne on 18 April 2019. The original scope was for a review of North Melbourne (excluding areas addressed in the City North and Arden Macauley heritage reviews), Parkville and Royal Park, however this was subsequently amended to delete the Parkville and Royal Park areas. The study sought to review the extent and nature of existing HO places and the heritage significance and values of the area, including the identification of additional places and values.
47. Specific objectives were as follows:
 - Objective 1: Undertake a comprehensive review of heritage places in the study area including Aboriginal, shared and post contact heritage values in order to form a holistic understanding of the area's transformation over time and the heritage significance of the resulting urban fabric, places and culture.
 - Objective 2: Based on the above and with reference to Heritage Victoria's Framework of Historical Themes, create a thematic environmental history that depicts how the study area has developed and how the culture of the area has influenced the natural environment, buildings and structures.
 - Objective 3: Work with the City of Melbourne to engage Traditional Owners, historical groups, and others, as required, to discover and document their stories, histories, and relationship to places in the study area.
 - Objective 4: Create a comprehensive set of citations and spatial data that will inform future Planning Scheme Amendments and strategic work undertaken by the City of Melbourne.
48. The study had a strong focus on the statutory controls for heritage, specifically the HO places under the Planning Scheme (both existing and potential future or new HO places). This was not the only focus of the work, however, and another key outcome was the exploration and documentation of important stories, histories and connections to place within the study area. This was done through additional research and consultation with Traditional Owner groups, historical groups and individual community members.

Thematic Environmental History

49. A key foundational element within the study was the preparation of a Thematic Environmental History to provide a historical and social narrative, communicate the importance of North Melbourne and reflect on its key themes and stories. The Thematic Environmental History documented how the suburb developed and evolved, and how the culture of the area has influenced and impacted on the natural and built environment, and on the social and urban fabric. This included research and engagement with Traditional Owner groups to integrate awareness of cultural heritage sites and values to the history and the study more broadly. The Thematic Environmental History took a broad and inclusive approach; and addressed both the defined study area and the suburb more broadly.

Review of HO controls

50. At a high level, as completed to July 2022, the scope of work for the review of the HO controls and related documentation was as follows:

- Review of all existing HO places (including the North & West Melbourne Precinct (HO3) and preparation of citations including statements of significance for these places
- Review and update the North & West Melbourne Precinct (HO3) in detail and revision of the precinct statement of significance introduced as part of Amendment C258), including the identification of smaller areas with the precinct with particular built-form characteristics. For consistency, the scope of this work was expanded to include a limited review of those areas of HO3 located outside the study area (ie, in the City North and West Melbourne heritage review study areas).
- Recommend changes to place categories (Significant, Contributory and Non-contributory) where appropriate based on fieldwork and review, including recommendations for places which should be removed from the Heritage Places Inventory. These recommendations included places which had been addressed through the Amendment C396 review process, noting that amendment was in progress while the Review was in preparation
- Prepare additional statements of significance for select places in HO3 where the heritage values may not be as easily understood or require further explanation
- Identify any additional places for inclusion in the HO and prepare citations including statements of significance for these places
- Undertake site inspections and additional research and analysis of three large properties in HO3 with multiple buildings of varying ages and significance on each site but with a single category of Significant applicable. The purpose of this work was to clarify the appropriate categories for buildings within the complexes to assist owners and Council:
 - St Aloysius College, 52 Brougham Street
 - St Michael's Primary School, 4-18 Brougham Street
 - St Joseph's College, 367 Queensberry Street.
- Incorporation of the outcomes of Traditional Owner engagement and the Thematic Environmental History into citations and statements of significance where relevant.

5.5 Exclusions and limitations

5.5.1 *Victorian Heritage Register places*

51. The study did not review places which are included in the VHR under the Heritage Act 2017. This reflects the focus on statutory heritage controls under the Planning Scheme.

5.5.2 *Victorian Heritage Inventory and Victorian Aboriginal Register sites*

52. Historical archaeological sites included in the Victorian Heritage Inventory (VHI) under the Heritage Act 2017 and sites that are listed in the Victorian Aboriginal Heritage Register (VAHR) under the *Aboriginal Heritage Act* were not reviewed.

5.5.3 Review of areas outside the defined study area

53. As noted above, only limited review was undertaken of the area of HO3 outside the study area.

5.5.4 Review of places in the Heritage Places Inventory

54. It is important to note that the study scope did not include a *first principles* assessment of Significant/Contributory/Non-contributory listings in the Heritage Places Inventory (Part A) (Incorporated Document in the Melbourne Planning Scheme). These categories (gradings conversion) had been confirmed as part of the work for Amendments C258 and C396. Rather, the approach was one which sought to identify any apparent anomalies during the fieldwork and to recommend changes to the building category in the Heritage Places Inventory in those cases. The approach is described in more detail at section 5.6.8 below.

5.6 Study methodology

55. The following is a brief summary of the study methodology. Refer to the North Melbourne Heritage Review, Section 3.0 (p 12-22) for more detail.

5.6.1 Research and fieldwork

56. The following tasks were undertaken to support the assessment work:

- Review of previous heritage studies, reports and publications
- Research using primary and secondary sources, to inform both the Thematic Environmental History and the identification, assessment and documentation of existing and new HO places. The research utilised a comprehensive range of sources including but not limited to local histories, typological studies, digitised newspapers, archival records, and visual primary sources such as paintings, lithographs, photographs, maps and plans, Council records and archival material. For the research into Aboriginal and shared themes, the Traditional Owner engagement was a key source, together with secondary sources, oral history (both published and through engagement), historical images (maps, plans and sketches) and heritage and environmental reports. The community engagement processes (see below at 5.6.2) also provided valuable input to the research work; this included information provided by the Hotham History Project and from community members via Council's Participate Melbourne online forum.
- Fieldwork was confined to the public realm and was undertaken in blocks, with all streets, 'little streets' and public lanes walked. Council gradings data informed the fieldwork, with places and properties checked against the data in relation to current gradings. Historical and current aerial photographs also informed the fieldwork. Demolitions, significant change and new developments were noted, and again checked against existing information. These matters were generally the subject of recommendations for changes to Heritage Place Inventory Part A entries.

5.6.2 Community engagement and consultation

57. Community engagement and consultation activities undertaken as part of the Review are described in detail at section 3.4 of the Methodology Report. There were multiple forms of engagement undertaken by Council officers and/or Lovell Chen and Extent Heritage during the project including:

- Pop-up consultation at the North Melbourne 'Spring Fling' Festival on 19 October 2019
 - Participate Melbourne online forum (including interactive map)
 - Consultation with the Hotham History Project at the Public Records Office of Victoria
 - A plain English workshop at the North Melbourne Language and Learning Centre and drop-in mapping workshop at 54 Errol Street
 - I-pad station at the local library (North Melbourne Library)
 - Hotham History Project were also provided with drafts of the Thematic Environmental History and HO3 Statement of Significance
58. This engagement both informed the community about the project and provided valuable input back to the study in terms of the development of the Thematic Environmental History, and the identification of places of historical or community (social) value that could be considered in the assessment process.

5.6.3 Traditional Owner group consultation

59. Specialists Extent Heritage undertook a process of consultation with Traditional Owner groups (Wurundjeri Woi-Wurrung Cultural Heritage Aboriginal Corporation, Bunurong Land Council Aboriginal Corporation and Boon Wurrung Foundation) as part of the study. Details of this consultation can be found at section 5 of the Methodology Report.
60. The consultation with Traditional Owners included the exploration and discussion of themes and places of potential interest. This was an important input to the project, in particular the Thematic Environmental History, but also contributed to an appreciation of shared and Aboriginal cultural values as related to specific HO places.

5.6.4 Thematic Environmental History

61. The preparation of the Thematic Environmental History was an iterative process undertaken over the course of the project. The approach was to incorporate a range of inputs with the overarching intent being to reflect on and explore a broad variety of themes and stories relevant to the study area.
62. As well as the usual review of documentary and visual materials, the history incorporated important inputs from community engagement and the engagement with Traditional Owners. The document was also reviewed and updated following completion of the fieldwork and assessments of specific places where that research and assessment work provided additional information and relevant material.

5.6.5 Assessment of heritage places (existing and proposed HOs)

63. As described at section 3.8 of the Methodology Report, the assessment of existing and proposed new heritage places was undertaken consistent with Planning Practice Note 1 (PPN01) *Applying the Heritage Overlay* (August 2018). The same approach was used for the preparation of the citation and statement of significance for the existing HO place (North Melbourne Primary School, HO295) as for the four proposed new HOs.
64. Section 3.8 of the Review steps through the approach, including the application of criteria, use of comparative analysis and thresholding. Excerpts from, and a summary of, this section follow.

Assessment criteria

65. The assessment of HO places was undertaken in accordance with PPN01, including reference to the HERCON heritage assessment criteria:

- **Criterion A:** Importance to the course or pattern of our cultural or natural history (historical significance)
- **Criterion B:** Possession of uncommon, rare or endangered aspects of our cultural or natural history (rarity)
- **Criterion C:** Potential to yield information that will contribute to understanding our cultural or natural history (research potential)
- **Criterion D:** Importance in demonstrating the principal characteristics of a class of cultural or natural places or environments (representativeness)
- **Criterion E:** Importance in exhibiting particular aesthetic characteristics (aesthetic significance)
- **Criterion F:** Importance in demonstrating a high degree of creative or technical achievement at a particular period (technical significance)
- **Criterion G:** Strong or special association with a particular community or cultural group for social, cultural or spiritual reasons. This includes the significance of a place to Indigenous peoples as part of their continuing and developing cultural traditions (social significance)
- **Criterion H:** Special association with the life or works of a person, or group of persons, of importance in our history (associative significance).

66. Relevant considerations, which specifically informed the assessment against criteria, included:

- understanding the history of the place, and its associations
- understanding the social significance or values of the place, and its importance to a community
- reviewing the physical qualities of the place including the intactness, integrity, architectural or aesthetic merit, and/or other built form qualities or distinctive attributes.
- For a place to be assessed as of local significance, it only needs to meet one of the criteria, although places may meet more than one.

PPN01 note: the criteria used were those referenced in PPN01.

Comparative analysis and 'thresholding' places

67. PPN01 notes that the thresholds to be used in the assessment of places,

...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.

68. Comparative analysis is a key aspect of the assessment methodology for application of the HO, assisting in identifying whether a place meets the threshold of local significance as required for the application of a HO control. PPN01 notes:

To apply a threshold, some comparative analysis will be required to substantiate the significance of each place. The comparative analysis should draw on other similar places within the study area, including those previously included in a heritage register or overlay. Places identified to be of potential state significance should undergo analysis on a broader (statewide) comparative basis.

69. In undertaking the comparative analysis for this study, similar places were referenced to inform an understanding of how the place under review compared, including places within the study area and more broadly. Questions asked when comparing similar places included:

- Does the subject place have a more significant history or historical associations?
- Is the subject place more highly valued and regarded by a community?
- Is the subject place more intact?
- Is the subject place more architecturally or aesthetically distinguished?
- Is the subject place typical or does it stand out within the comparative group?

70. For example, if the place under review is an interwar hotel which is being assessed for an individual HO control, then the analysis examined other generally comparable interwar hotels including those which already have an individual control or are identified as Significant. This typically included buildings in the study area, or municipality, but could extend beyond these geographical confines if the analysis assisted with understanding the relative significance or importance of the place. For example, the assessment process for the Albion Hotel, 171-173 Curzon Street, included analysis of hotels in the study area and of comparative work of the building's architects, Sydney Smith, Ogg and Serpell (the relevant citation is at Attachment C of the Review).

71. Comparative analysis also assisted in identifying places which did not meet the threshold for a heritage control. An example of this was the assessment of the 1950s-1960s Hotham Gardens development. As part of the work of the Housing Commission of Victoria (HCV) a public-private partnership was established to develop 'own-your-own' flats in North Melbourne, as distinct from public housing developments also occurring in the suburb. The first section of the Hotham Gardens development was recommended for the HO control on the basis of its historical, representative, aesthetic and associative significance. Although the subsequent stages (second, third and fourth stages) demonstrate many of the characteristics and principles of the first stage, they were considered to not be as historically innovative as a housing development or in their design or as of high architectural standards when compared with the first stage. On this basis, they were not assessed as meeting the threshold for the HO.¹

1

Lovell Chen, North Melbourne Heritage Review Methodology Report, July 2022, p 15-17.

72. *PPN01 comment:* the approach is consistent with the guidance provided in PPN01 for comparative analysis as an input to assessment. As noted above, the referenced places were within the municipality, although for some places, it was also considered relevant to consider comparators outside the municipality.

5.6.6 Documentation of heritage places (place citations and statements of significance)

73. A citation format (content and design) was provided by the City of Melbourne for the documentation of existing and new HO places. This format is consistent across Council's recent and current heritage reviews. The citation format includes the following:
- Brief history
 - Brief description of the place
 - Comparative analysis to assist with understanding the relative significance of the place
 - Assessment against recognised heritage criteria (HERCON)
 - Statement of significance in the 'What? How? Why?' format
 - Grading in the Significant, Contributory and Non-contributory categories
 - Recommendations for statutory heritage controls (in the case of new HO places)
 - Recommendations for the Schedule to the Heritage Overlay (ie recommendations for the application of external paint controls, tree controls and other schedule elements)
 - Photographs (current and historic) and a map of the place.
74. *PPN01 comment:* The citation format accords with the requirements of PPN01 for statements of significance (adopting the 'What is significant?'; 'How is it significant?' and 'Why is it significant?' format). It also addresses the requirement under PP01 (at p. 3) that the supporting documentation,
- identify if further controls allowed by the schedule to the overlay are required such as external paint controls or tree controls (the identification of further controls should be based on the explanation of why a heritage place is significant).

5.6.7 Mapping and curtilage

75. The City of Melbourne prepared mapping for the place citations and statements of significance in consultation with Lovell Chen. The mapping showing updates to the HO3 precinct boundaries and sub-areas was prepared by Lovell Chen, overlaid on a City of Melbourne base map.
76. Generally, the mapping of heritage places followed the title boundaries of affected properties. One exception to this was the recommended extent of the HO recommended for the Harris Street Plane Tree Avenue (proposed new HO). Two sections of this tree avenue are located on the private lane Plane Tree Way, rather than on a public roadway. Accordingly, the central section of this laneway, between Curzon and Abbotsford streets, is located within the boundary of properties fronting O'Shanassy Street and there is also some private land included between Abbotsford and Dryburgh streets. The approach in this case has been to avoid any inclusion of the buildings to either side in the mapped extent, on the basis that the intention is not to control works to those buildings.

77. *PPN01 comment*: this approach is consistent with the guidance in PPN01 which notes that in many cases the mapping will likely accord with the whole of the property, but that there are a series of considerations in determining the appropriate boundaries (refer to the discussion at PPN01, pp. 5-6).

5.6.8 *Review of places in the Heritage Places Inventory*

78. As noted above at 5.5.4, the study scope did not include a *first principles* assessment of Significant/Contributory/Non-contributory categories in the Heritage Places Inventory (Part A) (Incorporated Document in the Melbourne Planning Scheme). Confirmation of the categories in the Inventory had been a key focus of Amendment C258 (completed and gazetted on 10 July 2020) and the conversion from the earlier alphabetical grading systems to the Significant/Contributory/Non-contributory system occurred in that amendment.

Grading system and definitions

79. The grading system and definitions adopted as an outcome of Amendment C258 and now in the Melbourne Planning Scheme were used for the North Melbourne Heritage Review; these are found in the incorporated document *Heritage Places Inventory March 2022 (Amended January 2023)* and are 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 a heritage precinct. It is of historic, aesthetic, scientific, social or spiritual significance to the heritage precinct. 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 heritage precinct. Contributory places are typically externally intact, but may have visible changes which do not detract from the contribution to the heritage precinct.

Non-contributory

A non-contributory place does not make a contribution to the heritage significance or historic character of the heritage precinct.

Scope and approach

80. The place categories or gradings in the study area were reviewed in the North Melbourne Heritage Review. In the course of the fieldwork for the study, the existing categories/gradings were checked and any apparent anomalies identified for further review. Issues identified in this process included property addressing or other errors, demolitions or major changes to heritage

buildings, and, in some cases, a question over the appropriateness of the existing building category and whether a category change was warranted.

81. Some of the category queries had been raised in submissions to Amendment C258 and these potential anomalies were referred to Lovell Chen by the City of Melbourne.
82. Additional significant historical themes, associations and values identified through the historical research and consultation and documented in the Thematic Environmental History were also relevant to the re-categorisation of some buildings.
83. While no formal comparative assessment was undertaken (or documented) as part of the gradings review, the review process did involve consideration of the context of other related places, including a consideration of levels of intactness of these.
84. Where change to a category was considered, this was done on the basis of experience of the definitions and the manner in which the categories have been applied (relevant issues include age, historical and social associations, intactness, design quality, notable features).
85. A relatively limited number of category changes were recommended, as below (and refer to the illustrations following at Figure 3-Figure 19):
 - **Upgrade from Non-contributory to Significant:** A distinctive late nineteenth century factory building in Jones Lane was not included in the Heritage Places Inventory and not inspected in the original phase of fieldwork; on review and site inspection following submissions this has been recommended to be upgraded to Significant. The North Melbourne creche, 28-34 Howard Street (1909) was also not included in the Inventory and this has also been recommended to be upgraded to Significant. Both display distinctive physical/design characteristics and relate to important historical themes.
 - **Upgrade from Contributory to Significant:** A number of Contributory buildings presented as of a particularly high level of intactness and/or with distinctive features/design attributes that were considered to support upgrading to a Significant grading.
 - **Upgrade from Non-contributory to Contributory:** Similarly, there were buildings that were previously unlisted (Non-contributory) but which were assessed as making a contribution to the relevant precinct values at a level comparable to other related Contributory heritage places and were recommended for upgrading to Contributory on this basis. The thresholding for Contributory heritage places was undertaken with reference to the definition, ie: the category includes buildings that are of a standard type which are either generally intact or have suffered a level of alteration but still be able to contribute to the precinct values in combination with other buildings. As suggested by the definition, the intactness of Contributory examples varies, some are relatively intact but are typical rather than distinctive examples, while others have suffered visible alterations but are recognisable and on balance are still considered to contribute to the precinct values.
 - **Downgrade from Contributory to Non-contributory:** Some buildings had been demolished and these properties were downgraded to Non-contributory. A relatively small group of Contributory buildings were considered to fall below the threshold of

Contributory and these were recommended for downgrading to non-contributory status. This was generally on the basis of impact of visible alterations diminishing or obscuring their contribution to the precinct.

- Some category changes were recommended in response to specific historical themes or developmental phases or patterns identified or confirmed of significance through the Thematic Environmental History and/or in the revised Statement of Significance for HO3. These themes may not in all cases have been recognised as of particular significance in the 1980s study.
- One key example is that of the interwar period of development in the suburb which is not the dominant phase (this remains the Victorian period), but which has been recognised, along with the Edwardian period, as of importance in the history of the suburb as a whole and in the North and West Melbourne precinct HO3. Valued interwar building stock in HO3 includes residential, commercial and industrial development.
- Another theme of importance is that of industry, recognised in the C258 precinct statement of significance for HO3 and confirmed in the work for the North Melbourne Heritage Review. A number of industrial buildings have been upgraded in the review work; these include a series of typical interwar factories and warehouses, as well as the nineteenth century factory building in Jones Lane (the latter included in the post-exhibition (Council-preferred) version of the Amendment.
- The redevelopment of the nineteenth century Benevolent Asylum Estate from the 1910s was an important change at the southern end of North Melbourne and extending into West Melbourne and buildings from the main phases of development (1910s through to the interwar period) have generally been upgraded to Contributory.
- Another example of a significant theme identified in the Thematic Environmental History relates to the history of initiatives to provide support to women and children (*Women and children's welfare*, see pp. 77-82). Three places were identified as associated with this theme; two were already listed as Significant in the Inventory and no change was recommended, but the third, the former North Melbourne Creche (1909), reportedly the first purpose-built creche in the metropolitan area, was previously not listed (ie: Non-contributory) and was recommended for a Significant category.
 - North Melbourne creche, 28-34 Howard Street (1909): **Unlisted, recommended Significant**
 - North Melbourne Baby Health Centre: Significant, no change recommended
 - Anna House, 139 Flemington Road: Significant, no change recommended.

Examples of grading changes

Following are some examples of grading review work as part of the North Melbourne Heritage Review.



Figure 3 North Melbourne creche, 28-34 Howard Street, **upgraded from Non-contributory to Significant**
Source: Lovell Chen, 2020



Figure 4 Former factory building at 8 Jones Lane, **upgraded from Non-contributory to Significant**
Source: Lovell Chen, 2022



Figure 5 445-447 Abbotsford Street, shop-residence **upgraded from Contributory to Significant**
based on high level of intactness including retained shopfront
Source: Lovell Chen, 2023



Figure 6 139-141 Errol Street, unusual terrace pair with unpainted render and cast-iron columns,
upgraded from Contributory to Significant
Source: Lovell Chen 2020



Figure 7 Finely detailed and highly intact residences at 36 (on left) and 32-34 (partly visible on right) Erskine Street, **upgraded from Contributory to Significant**
Source: Lovell Chen, 2022



Figure 8 Another view of 36 and 32-34 Erskine Street, **upgraded from Contributory to Significant**
Source: Lovell Chen, 2022



Figure 9 Early (c. 1860) shop residences at 514-520 Queensberry Street, **upgraded from Contributory to Significant**
Source: Lovell Chen, 2023



Figure 10 458-460 Abbotsford Street, typical Victorian pair, **upgraded from Non-contributory to Contributory**
Source: Lovell Chen, 2023



Figure 11 12 Baillie Street, part of Clifton Terrace, 8-16 Baillie Street, single-storey Victorian terrace, **upgraded from Non-contributory to Contributory**
Source: Lovell Chen, 2023



Figure 12 1 Curran Street, altered but recognisable Victorian residence, **upgraded from Non-contributory to Contributory**
Source: Lovell Chen, 2023



Figure 13 Edwardian residences at 1-3 (no. 3 is concealed) Elm Street, part of the subdivision and development of the Benevolent Asylum Estate, **upgraded from Non-contributory to Contributory**
Source: Lovell Chen, 2023



Figure 14 Interwar flat block, 23 Chapman Street, **upgraded from Non-contributory to Contributory**
Source: Lovell Chen, 2023



Figure 15 83 Howard Street, interwar remodelling of earlier residence, **upgraded from Non-contributory to Contributory**
Source: Lovell Chen, 2023



Figure 16 8-14 Howard Street, interwar factory, **upgraded from Non-contributory to Contributory**
Source: Lovell Chen, 2020



Figure 17 25-27 Leveson Street, interwar factory, **upgraded from Non-contributory to Contributory**
Source: Lovell Chen, 2022



Figure 18 27 Little Leveson Street, substantial alterations to the main elevation have distorted the presentation of the building, **downgraded from Contributory to Non-contributory**
Source: Lovell Chen, 2023



Figure 19 604-606 Queensberry Street, significant alterations have seen the early character of this pair lost, **downgraded from Contributory to Non-contributory**
Source: Lovell Chen, 2023

Local heritage policy

86. While not a consideration in the assessment of what heritage category should apply, it is relevant to note the policy settings as they apply to these categories under the local heritage policy (Clause 15.03-1L-02 Heritage), which applies to all places within a HO.
87. The majority of policies under Clause 15.03-1L-02 apply to both categories of heritage places, with a distinction drawn between them in some areas, as follows:

Demolition

88. Under the policy for demolition, demolition of Non-contributory places is *generally permitted* but full demolition of both Significant or Contributory buildings *will not generally be permitted*. For both Significant and Contributory buildings:

The poor structural or aesthetic condition of a significant or contributory building will not be considered justification for permitting demolition.
89. A distinction is drawn between Significant and Contributory buildings for *partial demolition*, in relation to the extent of demolition that can be contemplated at the rear.

Partial demolition in the case of significant buildings and of significant elements or the front or principal part of contributory buildings will not generally be permitted
90. The considerations for an application for full or partial demolition include consideration of the significance of the heritage place or building, as well as a range of other considerations.

91. The policy also includes an additional recording requirement for Significant buildings (archival photographic recording and/or measured drawings), in cases where an approval is granted for full demolition.

Alterations

92. In terms of the policies for applications involving alterations to heritage buildings, a distinction is drawn between Significant and Contributory buildings in that there is more flexibility for changes to significant external fabric to Contributory buildings where that fabric is not visible.

External fabric which contributes to the cultural significance of the heritage place, on any part of a significant building, and on any visible part of a contributory building, should be preserved.

93. The policy for alterations also references the assessed significance of the building and heritage place.

Additions

94. The policies for additions to Significant and Contributory buildings are generally consistent, except where they address concealment of additions. The policy recommends that additions for both Significant and Contributory buildings be concealed in significant streetscapes (as listed in the Heritage Places Inventory). For other streetscapes a distinction is drawn between significant and Contributory buildings as follows:

Concealed in other streetscapes for significant buildings, for a second-storey addition to a single storey building, concealment is often achieved by setting back the addition at least 8 metres behind the front facade.

Partly concealed in other streetscapes for contributory buildings, which means that some of the addition may be visible, provided it does not dominate or reduce the prominence of the building's façade(s) and the streetscape.

95. This is with the exception of additions to corner properties, where visibility can be contemplated for both Significant and Contributory properties.

Restoration and Reconstruction

96. Restoration and reconstruction are heritage conservation actions supported by the policy for both Significant and Contributory buildings, but as for the policy for alterations the focus for contributory buildings is on visible fabric.

Ensure where there is to be reconstruction or restoration to any part of a significant building, or any visible part of a contributory building, that it be an authentic restoration or reconstruction process, or should not preclude such a process at a future date.

Comment

97. While there are some differences in the policy settings, most policies apply to both Significant and Contributory places and protection is provided under the policy for both. Where distinctions are drawn, this is in recognition of the role played by Contributory heritage places within precincts, which is generally one of contributing to or supporting the identified heritage values of the precinct (generally expressed through visible fabric), as compared with the Significant

heritage places which in addition to their important contribution to a precinct - when so located - are considered to be of significance in their own right.

98. Both Significant and Contributory heritage places are provided protection under the Planning Scheme via the HO and relevant policies, and a Contributory heritage category ascribed in this or other studies undertaken in the municipality does not denote a lack of recognition or protection.
99. For Non-contributory places the focus is not on protection but rather, is on ensuring any change or new development occurs in a manner that does not impact on the significance of the heritage place (precinct) and is responsive to nearby Significant and Contributory buildings.

5.7 Study findings and recommendations

100. At a high level, the North Melbourne Heritage Review is a project that seeks to build on the significant review work undertaken by the City of Melbourne in recent years through the broader gradings review and conversions and policy review work in Amendment C258 and the additional review work in Amendment C396.
101. In doing so, the Review focuses on North Melbourne as a place, revisiting and reviewing the heritage controls that have been in place since the 1980s in a manner consistent with contemporary heritage practice and methodologies.
102. The recommendations of the North Melbourne Heritage Review are found at section 5.0 of the Methodology Report. Additional detail on some recommendations and study outputs is provided at section 4.0 of the Methodology Report. The following is a summary of the study findings and recommendations and identifies the relevant supporting study documentation.

5.7.1 Thematic environmental history

103. The table of contents for the Thematic Environmental History (Attachment A to the Review) sets out the significant historical themes identified in the study area.
104. The Thematic Environmental History was a key input to identification, assessment and documentation of heritage places for the HO control (both existing and proposed new). Importantly, the document also provides a means through which the rich history of the area can be acknowledged and explored, recognising that not all historical and social values find tangible/physical expression in heritage places that can be assessed for their suitability for statutory heritage controls.

5.7.2 Changes to HO3 (North and West Melbourne Precinct)

Boundary changes

Incorporation of two existing HO places

105. Two existing HOs within the study area were recommended for incorporation into HO3. These are:
 - Racecourse Road/Alfred Street, North Melbourne, HO953
 - 480-482 Abbotsford Street, North Melbourne, HO284.
106. HO953 is a precinct located to the north-west of HO3 and bounded by Alfred Street, Melrose Street, Boundary Road and Flemington Road and previously formed part of HO3. The origins of

HO953 as a separate precinct relate to a particular pattern of boundary changes between the City of Melbourne and City of Moonee Valley:

- 1983-5 – the area was within the boundaries of the City of Melbourne boundaries and was assessed as part of the North and West Melbourne Conservation Study. The area was included in the urban conservation area along with the rest of the precinct (now HO3)
 - In the late 1990s Council amalgamations saw the area become part of the City of Moonee Valley and included in the Moonee Valley Planning Scheme as a separate HO (HO29)
 - In 2008 – a further boundary change saw the area returned to the City of Melbourne but it remained a separate precinct (HO953).
107. Based on fieldwork and research undertaken as part of this study, the assessment was that the HO953 precinct values are consistent with those of HO3. The precinct does not have distinct values that would support its retention as a separate precinct and its amalgamation back into HO3 is recommended, with some adjustments to the boundaries based on additional fieldwork and research. The issues associated with the incorporation of HO953 are discussed in more detail in the response to Submission 20 (refer to section 7.8.4).
108. HO284 is an individual HO currently located within HO3. HO284 is part of Glendalough Terrace, an 1891 terrace row at 480-500 Abbotsford Street, which comprises a consistent row of Significant graded houses. The reason for the separate HO has not been established; the nature of the terrace is consistent with the values of HO3, and there is no difference in the HO schedule for HO284 and HO3 (ie no paint or tree controls are indicated). For consistency, it is recommended that the individual HO be removed and 480-482 Abbotsford Street be incorporated into HO3. This accords with the guidance provided in PP01, which confirms that individual properties within HO precincts should not be scheduled separately unless there is a variation in the scheduling in the HO (see p. 5):

The only instance where an individual property within a significant area should be scheduled and mapped is where it is proposed that a different requirement should apply. For example, external painting controls may be justified for an individual building of significance but not over the heritage precinct surrounding the building.

Alternatively, tree controls may be justified for a specific tree or property within a significant precinct but not over the whole precinct. In such situations the individual property or tree should be both scheduled and mapped.

109. PPN01 goes on to note that:

Significant buildings or structures within a significant precinct can be identified through a local planning policy.

Addition of the former British Hotel, 162-164 Arden Street

110. This building on the north-east corner of Arden and Abbotsford streets is a typical example of a corner hotel and it is proposed to be included in HO3 through an amendment to the boundary in this location.

Deletion of parts of the Flemington Road road reserve

111. Two sections of the Flemington Road road reserve that had been mapped within HO3 were deleted from the precinct. This was for reasons of consistency (the road reserve was mapped inconsistently along this edge of the precinct, part within and part outside HO3).

Identification of sub-areas

112. The rationale for this very large precinct were reviewed as part of this study and consideration was given to whether it would be appropriate to divide HO3 into smaller HO precincts.
113. Ultimately, based on the work undertaken, and particularly the Thematic Environmental History, it was recommended that HO3 remain as a single large precinct. This is based on the assessment that North Melbourne in particular is a distinctive place that has a cohesive historical and social identity, as described in the updated Statement of Significance and citation.
114. Accepting this, it was also observed that there were areas within HO3 with distinct built-form characteristics, including areas that straddle the present-day boundary between North and West Melbourne – and there would be purpose in identifying and describing these smaller areas. Four areas were identified within HO3:
- Hotham Hill Residential Area
 - Errol Street Civic and Commercial Area
 - Benevolent Asylum Estate Area
 - West Melbourne Residential Precinct
115. While all are integral to HO3, it was considered that these areas exhibit built-form characteristics that are distinct within the larger precinct and it was appropriate to recognise and describe these in the updated citation and statement of significance. It was considered that this would assist in a more nuanced understanding of the built form of the heritage place, while still maintaining a single HO.
116. This approach is one that has been adopted elsewhere. HO1 (Port Melbourne) in the Port Phillip Planning Scheme is a large and diverse HO which covers most of Port Melbourne. HO1 was subject to a review in 2011 (Lovell Chen, *Review of Heritage Overlay 1, Port Melbourne: Outcomes and Recommendations report*, for the City of Port Phillip, (July 2011). This review considered the boundaries of HO1 and the incorporation of additional areas into the precinct. It was also directed in part at considering whether there would be purpose in identifying smaller areas or 'sub-precincts' exhibiting particular characteristics.
117. The outcome of the review was that the precinct was retained as a single HO place, even despite its size. This was on the basis that the precinct as a whole was important for its ability to demonstrate themes in the development of a working-class maritime suburb developed from the mid-nineteenth and early twentieth century and for its ability to demonstrate important layout and subdivision patterns including specific topographical and other constraints which shaped its development. The option of breaking HO1 into smaller precincts (to be separately scheduled and mapped) was considered but it was considered this could undermine an understanding and appreciation of Port Melbourne's distinctive history. Instead, a number of smaller 'sub-precincts' were defined within HO1, which document and reflect on particular area characteristics within

the larger precinct while still maintaining a sense of the relationship of these sub-precincts to each other and as part of the broader HO1.

118. These recommendations are reflected in the documentation for HO1 in the Port Phillip Heritage Review (Version 36, December 2021), an incorporated document in the Port Phillip Planning Scheme. It includes a citation and statement of significance for HO1 which defines a series of sub-precincts, Port Melbourne West, Port Melbourne East, Port Melbourne Railway Reserve and Bay Street Commercial. These are not mapped in the Planning Scheme, where the full extent of HO1 is mapped as a single entity.
119. The Port Phillip example varies from the recommendations of the North Melbourne Heritage Review, in that the documentation for HO1 Port Melbourne includes an overarching heritage citation and statement of significance for HO1 as a whole, as well as attached heritage citations and statements of significance for each of the sub-precincts. In contrast, for HO3 North and West Melbourne Precinct, it is proposed that the statement of significance (to be an incorporated document in the Planning Scheme) would address the precinct as a whole but would include - under the heading What is Significant? - a section describing the 'key attributes' of the smaller areas identified within the precinct. No separate statements of significance are proposed for the sub-areas.
120. It is otherwise a similar approach, one that recognises and maintains the large precinct as an integrated whole which reflects a range of related themes and developmental patterns.

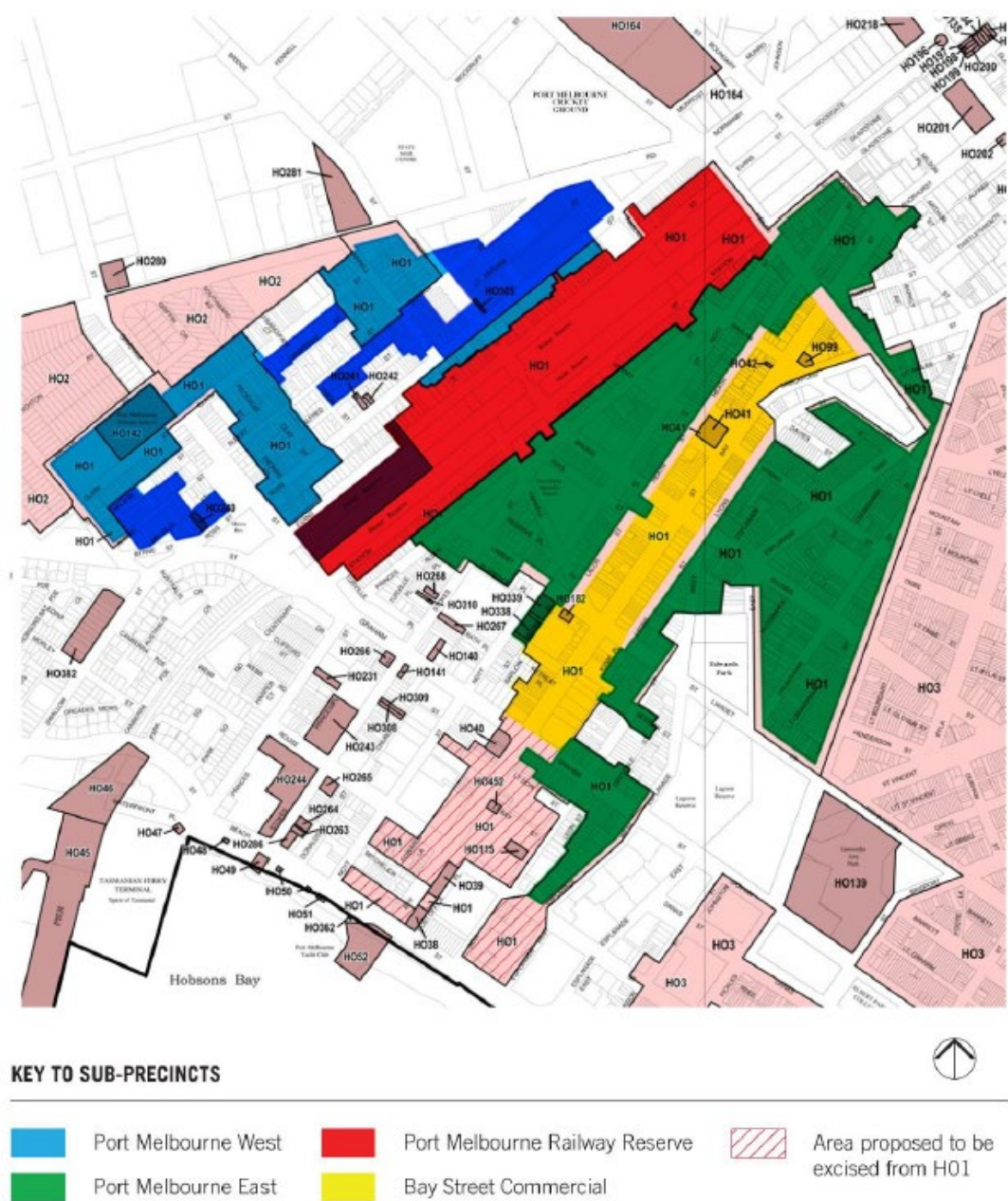


Figure 2 Map of Port Melbourne Heritage overlay precinct HO1

Figure 20 Map showing the sub-precincts within HO1 (Port Melbourne)
 Source: Port Phillip Heritage Review Volume 1 - Version 36, December 2021, p. 52,
 accessed via Port Phillip Planning Scheme (Incorporated documents)

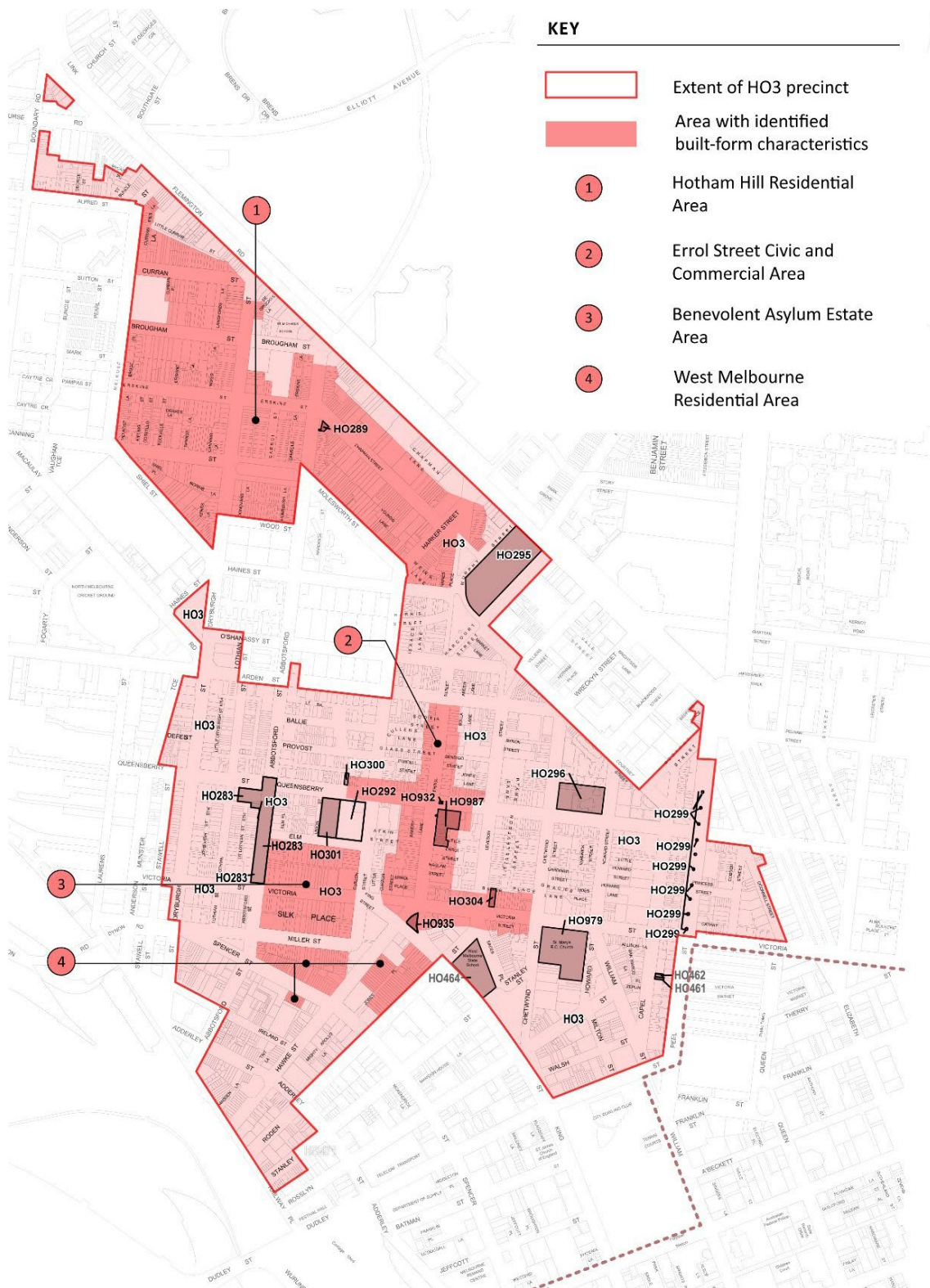


Figure 21 HO map showing HO3 with proposed boundary changes and areas within the precinct with identified built form characteristics (as exhibited)
Source: North Melbourne Heritage Review

Statement of Significance and heritage citation for HO3

121. The existing precinct statement of significance for the North and West Melbourne Precinct was originally introduced by Amendment C258, which included the statements of significance for HO precincts outside the Capital City Zone. As required by PPN01, the statement is included in an incorporated document in the Melbourne Planning Scheme (Heritage Precincts Statements of Significance February 2020 (Amended April 2022)).
122. The C258 statement of significance for HO3 was further refined and additional information included in the Review following the detailed research, fieldwork and investigation into the precinct as undertaken for this study, including preparation of the Thematic Environmental History. The amended statement also includes reference to the Aboriginal values and places identified in the engagement with Traditional Owners. The proposed changes to the statement of significance are shown in a tracked changes format at Attachment E to the Review.
123. The main changes were:
- deletion of the historical and descriptive material to accord with DELWP's (DTP's) format requirements (this information remains in the full heritage citation in the study itself)
 - addition of dot-point 'key attributes' for the recommended smaller areas within HO3 (under 'What is significant?')
 - revisions to the description of the values of the precinct (under 'How is it significant?') based on the additional fieldwork, research and analysis as part of the study
 - the addition of a map showing the specific areas with areas identified within HO3 (refer to Figure 21).
124. Changes were also made to the heritage citation, which contains the updated statement of significance as well as extensive additional supporting information. The citation was amended by the inclusion of more historical and descriptive detail as related to both the precinct as a whole and the four sub-areas within it. Refer to Attachment H to the Review for a tracked changes version.

Gradings changes

125. Various recommended gradings changes to properties within HO3 were identified in Attachment F to the Review. These are documented with the existing gradings, recommended gradings and a brief justification/explanation for the recommended grading.

Complex places

126. Three sites were identified that had an existing 'Significant' place category but comprised campuses with multiple buildings, including buildings not visible from the public domain. These sites were:
- St Aloysius College, 52 Brougham Street, North Melbourne
 - St Michael's Primary School, 4-18 Brougham Street, North Melbourne
 - St Joseph's College, 367 Queensberry Street, North Melbourne

127. It was recognised that the sites include a range of different buildings, not all of which are of heritage value. In this context, it was considered that it would assist both the landowners/managers and Council decision-makers if a more nuanced analysis of these sites could be undertaken, to identify buildings that should be identified as 'Significant' or Contributory and, conversely, those which could be identified as Non-significant.
128. The three sites were inspected and historical research undertaken to identify the appropriate gradings for various buildings within the sites. The research included maps and plans, historical aerial photography, newspaper searches and City of Melbourne building application index searches, with a focus on confirming phases of development. A memorandum outlining the conclusions of this work was provided to Council and included a table and a simple graphic identifying the heritage grading of individual buildings for each site (refer to Attachment G to the Review). The recommended building categories would be included in the Heritage Places Inventory.

Statements of significance for places within HO3

129. Two sites were assessed as Significant heritage places in HO3, but for reasons that do not relate to identified values of HO3. These are:
 - Wes Lofts & Co Office, 135-141 Abbotsford Street, North Melbourne (1971-72)
 - Ss Peter and Paul Ukrainian Catholic Cathedral, 35-37 Canning Street, North Melbourne (1962-63).
130. Both sites are proposed to be identified as Significant heritage places within HO3.
131. Statements of significance have been prepared for these sites to explain their identified values on the basis that these values vary from those of the precinct in which they are located. Notably, both buildings were constructed outside the dominant period of significance in HO3 (Victorian era with overlays of building stock from the Edwardian and interwar periods).
132. As indicated earlier, PPN01 does not support individual properties of significance located with precincts being scheduled and mapped separately unless it is proposed that a different requirement should apply under the HO Schedule.
133. In these two cases, there are no additional schedule requirements identified that would justify a separate HO control and on this basis, the sites are proposed to remain in HO3. Equally, the values are quite different from those of the precinct and for this reason, individual statements of significance were prepared to properly explain their significance.
134. Consistent with the approach contemplated in PPN01 and advice from DEWLP (DTP), these statements of significance are not proposed to be incorporated into the Planning Scheme. Rather, they would be included in the North Melbourne Heritage Review, which would be a policy document referenced at Clause 15.03-1L-02 (formerly Cl. 22.5).
135. It is noted that the decision guidelines at Clause 43.01-8 (Heritage Overlay) require the consideration of 'Any applicable statement of significance (whether or not specified in the schedule to this overlay), heritage study and any applicable conservation policy'. In that context, it would be expected that for applications for these properties, the incorporated statement of significance for HO3 would be relevant, as would the statements in the North Melbourne Heritage Review.



Figure 22 Wes Lofts & Co Office, 135-141 Abbotsford Street
Source: Lovell Chen, 2020



Figure 23 Ss Peter and Paul Ukrainian Catholic Cathedral, 35-37 Canning Street
Source: Lovell Chen, 2020

5.7.3 New heritage citations and statements of significance

136. New citations including statements of significance were prepared for five heritage places, including one existing (North Melbourne Primary School, HO295) and four proposed new HO places. The sites are described in the following table (reproduced from the Methodology Report). Places marked with an asterisk were identified as having Aboriginal cultural values or associations based on Traditional Owner consultation.

Table 1 New citations

No	Address	Heritage Overlay	Summary
1 *	North Melbourne Primary School 200-214 Errol Street, North Melbourne	Existing HO (HO295)	Preparation of a new citation for an existing HO. The North Melbourne Primary School, including the 1874 single-storey brick school building designed by Wharton and Vickers/Public Works Department and war memorial drinking fountain of 1919, is of local historical, representative and social significance.
2 *	Albion Hotel, 171-173 Curzon Street	Recommended for individual HO	The two-storey interwar hotel is of local historical and aesthetic significance. The Albion Hotel has been operating on this site since the 1870s. The current building is the work of prominent twentieth century architects Sydney Smith, Ogg & Serpell. It was constructed in 1926 on the site of the original hotel, in a period when many hotels were upgraded or refurbished. It is a prominent corner presence and remains substantially intact externally.
3	Hotham Gardens – Stage 1 55-101 O’Shanassy Street	Recommended for individual HO	Hotham Gardens, comprising six groups of three-storey blocks of flats, is of local historical and aesthetic significance. Hotham Gardens was developed in 1959-61 through a partnership between the Master Builders (Associated) Redevelopment Ltd, a panel of architects and the Housing Commission of Victoria. The panel of architects that undertook the design included noted mid-century Melbourne architects Roy Grounds of Grounds, Romberg and Boyd, John Mockridge of Mockridge Stahle & Mitchell, John Murphy of John and Phyllis Murphy, Phillip Pearce of Bates Smart and McCutcheon and Roy Simpson of Yuncken Freeman, with landscaping by Beryl Mann of Mockridge Stahle Mitchell.
4 *	Harris Street Plane Tree Avenue Harris Street and Plane Tree Way	Recommended for individual HO	The Harris Street Plane Tree Avenue is of local historical, representative and aesthetic significance. An avenue planting of London Plane trees (<i>Platanus x acerifolia</i>) established in 1905, extending approximately 500 metres from Dryburgh Street to Errol Street on the public right of way of Harris Street,

No	Address	Heritage Overlay	Summary
			on private parcels occupied by sections of the Hotham Gardens estate, and on the Plane Tree Way roadway and adjacent areas of City Gardens. The alignment generally follows the line of the channelised creek from Royal Park to West Melbourne.
5	Flemington Bridge Railway Station 211 Boundary Road	Recommended for individual HO	<p>The Flemington Bridge Railway Station, built c. 1944-45, is of local historical and representative significance as an example of a mid-twentieth century railway station.</p> <p>The station complex comprises a timber 'up' side station building, platform and access ramps on the City of Melbourne side of the railway line, and the station building, platform and ramp on the 'down' side, located in the City of Moonee Valley.</p> <p>This recommendation for the heritage place addresses the station as a single entity and assesses it as such. Accepting this, the recommendations apply only to those elements of the complex located within the City of Melbourne, being the timber 'up' side station building, platform and access ramps.</p>

6.0 AMENDMENT C403

6.1 Exhibition version

137. As detailed in the exhibited Explanatory Report, the amendment proposes to implement the recommendations of the *North Melbourne Heritage Review* on a permanent basis by:

- Amending the policy at Clause 22.05 (Heritage Places outside the Capital City Zone) to include the North Melbourne Heritage Review 2022 as a policy reference.
- Amending the Schedule to Clause 43.01 (Heritage Overlay) to:
 - Include four (4) new individual Heritage Overlays and Statements of Significance:
 - HO1386 The Albion Hotel, 171-173 Curzon Street, North Melbourne.
 - HO1387 Hotham Gardens, Stage 1, 55-61, 63-69, 71-77, 79-85, 87-93, 95-101 O'Shanassy Street, North Melbourne.
 - HO1388 Harris Plane Tree Avenue, Harris Street (between Errol and Curzon Streets), Plane Tree Way (between Dryburgh and Abbotsford Streets), Part 302-326 Abbotsford Street, Part 50-56, 58-64, 66-72, 74-80, 92-132 O'Shanassy Street and Part 141-157 Curzon Street, North Melbourne.
 - HO1389 Flemington Bridge Railway Station, 211 Boundary Road, North Melbourne.

- Delete two (2) Heritage Overlays:
 - HO953 Racecourse Road/Alfred Street, North Melbourne – 68 properties to be incorporated into HO3 and 13 properties to be removed from the Heritage Overlay.
 - HO284 - 480-482 Abbotsford St, North Melbourne to be added to the expanded HO3.
- Introduce a new Statement of Significance to existing individual Heritage Overlay HO295 North Melbourne Primary School No. 1402, 200-214 Errol Street, North Melbourne and correct the address.
- Amend the Heritage Precincts Statements of Significance February 2020 by changing the date to July 2022 and removing the North & West Melbourne Precinct Statement of Significance.
- Introduce a revised HO3 North & West Melbourne Precinct Statement of Significance July 2022 incorporated document.
- Amend Planning Scheme Maps 4HO and 5HO to:
 - Introduce four (4) new Individual Heritage Overlays and delete two Individual Heritage Overlays: HO953 and HO284.
 - Amend the boundary of HO3 North & West Melbourne Precinct as described below:
 - Expand the existing boundary to the north-west corner of the study area to incorporate 68 properties currently covered by deleted overlay HO953.
 - Introduce one property currently covered by the deleted overlay HO284.
 - Introduce one property not currently covered by a Heritage Overlay at 162-168 Arden Street, North Melbourne.
 - Delete two sections on Flemington Road: between Melrose and Abbotsford Streets and also Harker and Harcourt streets.
- Amend the Schedule to Clause 72.04 (Incorporated Documents) by:
 - Amending the Heritage Precincts Statements of Significance February 2020 by changing the date to July 2022 and removing the North & West Melbourne Precinct Statement of Significance.
 - Introducing a revised HO3 North & West Melbourne Precinct Statement of Significance July 2022.
 - Introducing Statements of Significance for five individual places:
 - HO1386 The Albion Hotel, 171-173 Curzon Street, North Melbourne.
 - HO1387 Hotham Gardens, Stage 1, 55-61, 63-69, 71-77, 79-85, 87-93, 95-101 O'Shanassy Street, North Melbourne.
 - HO1388 Harris Street Plane Tree Avenue, Harris Street (between Errol and Curzon Streets), and Plane Tree Way (between Dryburgh and Abbotsford Streets) and Part 302-326 Abbotsford Street, Part 50-56, 58-64, 66-72, 74-80 O'Shanassy Street, Part 141-157 Curzon Street, North Melbourne.
 - HO1389 Flemington Bridge Railway Station, 211 Boundary Road, North Melbourne.

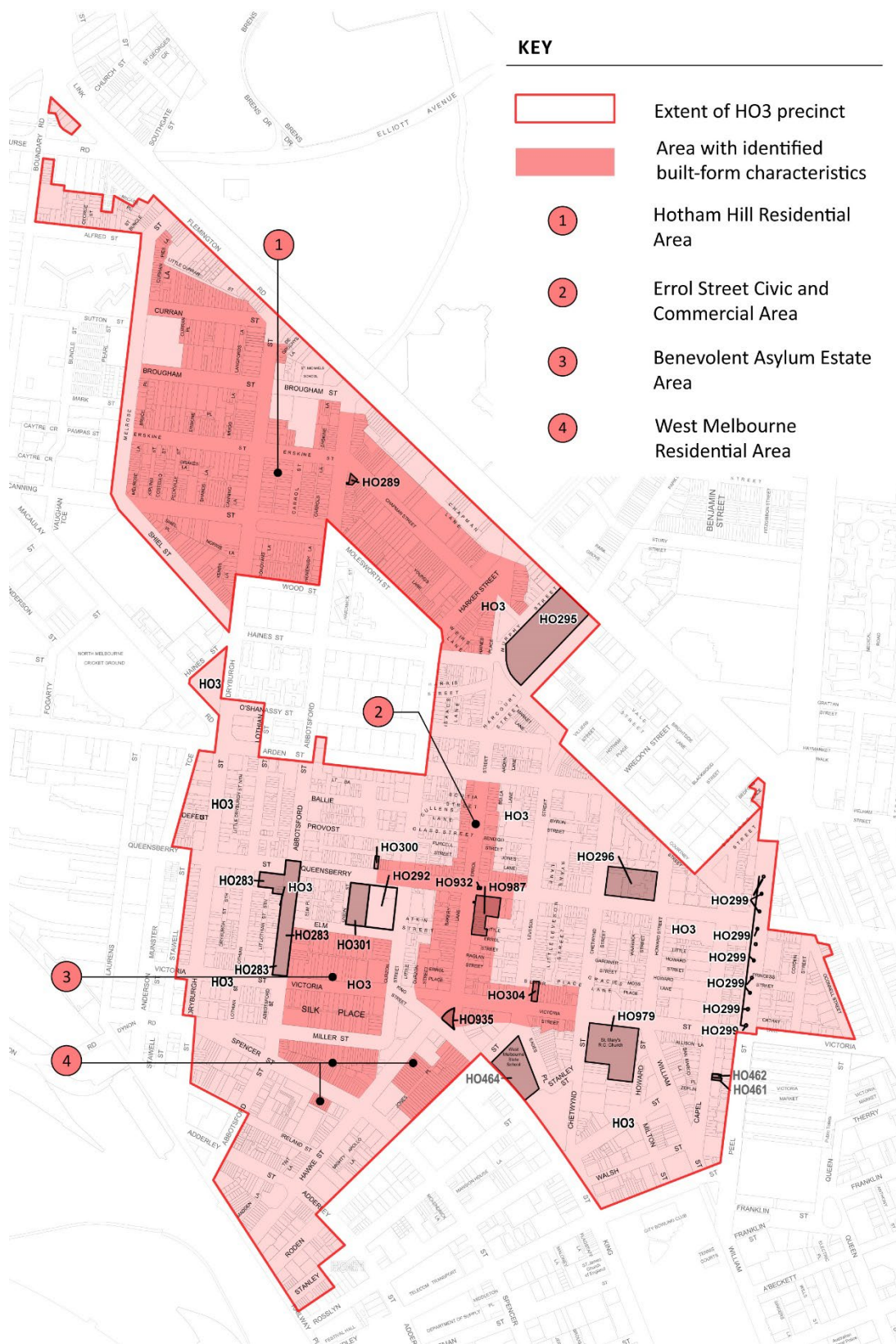
- HO295 North Melbourne Primary School No. 1402, 200-214 Errol Street, North Melbourne.
- Amending the existing incorporated document Heritage Places Inventory March 2022 to:
 - Change the date to amended July 2022.
 - Change the heritage building category of approximately 100 properties and add a significant streetscape category to nineteen properties.
 - Correct addressing and other anomalies.
- Amend the Schedule to Clause 72.08 (Background Documents) by adding the North Melbourne Heritage Review July 2022 as a Background Document.

6.2 Post-exhibition changes

138. The North Melbourne Heritage Review 2022 was placed on public exhibition as part of Amendment C403 to the Melbourne Planning Scheme between 8 August and 15 September 2022. A total of 23 submissions were received by City of Melbourne during this period. These submissions are discussed at section 7.0.
139. In the period following exhibition, the issues raised in submissions were reviewed and some changes were recommended to the Amendment as exhibited.
140. These were as follows:
 - Re-categorise 8 Jones Lane, North Melbourne from Non-contributory to Significant.
 - Re-categorise 588 Victoria Street, North Melbourne from Non-contributory to contributory.
 - Re-categorise 8 George Street, North Melbourne from Contributory to Non-contributory.
 - Remove 204, 206, 208 and 210-212 Boundary Road, North Melbourne from Heritage Overlay HO3.
 - Reinstate 10 Canning Street, North Melbourne to Non-contributory.
 - Extend the existing HO3 boundary to include the road reserves of Shiel and Melrose streets including the intersection at Canning Street, North Melbourne. Note, part of Melrose Street between Flemington Road and Alfred Street was already included in HO3.
 - Amend the exhibited Statement of Significance for the North and West Melbourne Heritage Precinct HO3 to change the map and address one date correction.
 - Amend the exhibited Statement of Significance for 211 Boundary Road, North Melbourne (Flemington Bridge Railway Station) to ensure changes to fabric are clear and reference the additional ramp structure (on the City of Moonee Valley side).
141. These changes are detailed in the Report to the Future Melbourne Committee dated 21 February 2023 and the attached documents. Reasons for the recommended changes are provided in the Response to submissions section of this evidence statement and in the table at Appendix A (Specific Properties Grading Review).
142. The Future Melbourne Committee in 'Resolutions of the Future Melbourne Committee meeting held on Tuesday 21 February 2023', Agenda Item 6.3, resolved as follows:

That the Future Melbourne Committee:

- 1.1 Considers the submissions received during the exhibition of proposed Melbourne Planning Scheme Amendment C403 - North Melbourne Heritage Review (the Amendment).
- 1.2 Endorses responses to all submissions, as set out in Attachment 2, subject to resolution 1.4.
- 1.3 Requests the Minister for Planning appoint a Panel to consider all submissions and refers all submissions to the appointed Panel in accordance with section 23 of the Planning and Environment Act 1987.
- 1.4 Endorses the revised form of the Amendment to be referred to the Panel, as set out in Attachment 3, but amended to delete from the statement of significance for Flemington Bridge Railway Station in the 'what is significant' section the words "Access ramps including form and location but excluding modern surfacing", and to reduce the extent of the proposed overlay itself to take in no more than the 1944-45 weatherboard station building and the platforms. The revised form of the amendment includes changes in response to submissions and is otherwise in accordance with the exhibited version of the Amendment.
- 1.5 Authorises the General Manager Strategy, Planning and Climate Change to make any further minor editorial changes to the Amendment.



7.0 RESPONSE TO SUBMISSIONS

7.1 Background

143. Following the exhibition period, Lovell Chen provided Council with responses to relevant issues raised in submissions. These are referenced in Council officers' report to the Future Melbourne Committee meeting of 21 February 2023. The issues and responses are summarised below. In some cases, additional comments have been included. As per the Panel's Directions, the approach has been, wherever possible, to group issues identified in submissions by:

- common issues that apply across multiple places or precincts
- Precinct-wide issues
- Individual places.

7.2 Submissions in support

Issues raised

144. Submissions 2, 3, 9, 16 18 and 22 were generally supportive of the amendment or reference additional sources of information (Submission 1). Submission 22 from National Trust of Australia (Victoria) expressed particularly strong support including specific reference to the acknowledgement of Aboriginal cultural heritage values. A number of submissions also expressed support for the inclusion of specific buildings, including 28-34 Howard Street (North Melbourne Crèche, recommended Significant in HO3, for which strong support was expressed) and the interwar warehouse/factory at 8-14 Howard Street (recommended Contributory in HO3).
145. Submission 12 (Hotham History Project) expressed broad support for the Review and many of its recommendations, while also raising a range of issues and concerns (responses are provided to these under the relevant headings below).
146. Of a more neutral character, Submission 17 relates to 300-308 Victoria Street and notes that there was no proposed change to the existing building category of "contributory" and no change to existing streetscape category of "none". No further submission were made.

Response

147. These submissions were noted with no changes made.

7.3 Adequacy of documentation

Issues raised

148. Submission 12 (Hotham History Project) raises concerns that the new statements of significance are only for the North Melbourne Primary School (HO295) and the North & West Melbourne Precinct (HO3). The West Melbourne Heritage Review (2016), the Arden Macaulay Heritage Review (2012) and the City North Heritage Review (2013) include statements of significance for all buildings assessed as Significant in these reviews. The submission notes that 'central core of North Melbourne' will not have revised or new statements of significance for all the Significant buildings in the Review area.

149. The Hotham History Project also provided comments provided on an earlier unexhibited draft of the Review, which identified various typographical and other errors, many of which were corrected in the exhibited version of the Review.

Response

150. In response to Submissions 12 and 19, individual statements of significance were not prepared for Significant places within HO3 (North and West Melbourne Precinct) as this was outside the scope of the Review. An appreciation of the heritage values of Significant places is supported by the updated citation and statement of significance for HO3. Significant places generally reflect the values for which the precinct is identified and the key attributes as set out in the statement of significance. Note also that PPN01, which is referenced in the submission, requires a statement of significance for each heritage place in the Schedule to the HO, not Significant places within precincts. The exception in the Review is two places within HO3 where the identified values vary from the precinct values. These are the Wes Lofts & Co Office, 135-141 Abbotsford Street and the Ss Peter and Paul Ukrainian Catholic Cathedral, 35-37 Canning Street. Refer to section 3.11 of the Methodology Report.
151. Many of the editorial issues raised by the Hotham History Project were addressed prior to exhibition. Additional comments and suggestions on historical and other information that could be amended or added in the Review could be addressed by further minor updates. Council has been provided with a table with responses to the detailed comments and suggestions for further corrections. None require significant change to the Review.

7.4 Gradings system

Issues raised

152. Submission 4 raised a concern that there should be a cleaner and more definitive statement of statement of the characteristics which cause a property to be assigned “contributory” or “significant”, and asserted that the definitions used on page 17 of the Review were too general.
153. Submission 12 (Hotham History Project) raised a concern about the change of streetscape gradings, noting that as a result, ‘North Melbourne now only has approximately 10% of its heritage located in a Significant streetscape’.

Response

154. In response to Submission 4, the definitions of Significant, Contributory and Non-contributory referenced in Submission 4 form part of the Melbourne Planning Scheme and are in use across the municipality. The definitions are set down in the Incorporated Document Heritage Places Inventory March 2022 (Amended January 2023). The definitions were not reviewed as part of the North Melbourne Heritage Review. The majority of gradings in the Review are unchanged from Amendment C258.
155. The comment in Submission 12 about streetscape gradings appears to be a reference to a change to the heritage gradings system made as part of Amendment C258. As part of Amendment C258, it was recommended that the streetscape gradings be removed across the municipality. It was concluded that the streetscape grading system did not necessarily assist in providing a better outcome or understanding of the particular importance of part of a precinct. A review of the streetscape gradings was not undertaken as part of Amendment C258. Streetscape gradings for

Level 2 and Level 3 streetscapes were removed and Level 1 streetscapes were designated 'significant' streetscapes.

156. Significant streetscapes are defined in the Heritage Places Inventory March 2022 (amended January 2023) as follows:

Significant streetscapes are collections of buildings outstanding either because they are a particularly well-preserved group from a similar period or style, or because they are a collection of buildings significant in their own right.

157. The heritage policy at Cl. 15.03.0-1L-02 of the Melbourne Planning Scheme includes policy guidance for proposals affecting Contributory and Significant buildings and significant streetscapes.
158. As part of the work undertaken for the North Melbourne Heritage Review, anomalies in streetscape gradings were identified, and recommendations were made in relation to these. This included a recommendation that the full extent of Carroll Street and an additional portion of Queensberry Street (nos. 439-483) be identified as significant streetscapes. Refer to Attachment F to the Review, pp. F52 and F62. These recommendations were made in recognition of the high level of intactness of the nineteenth century streetscape and the proportion of significant buildings in these streets.
159. No change is recommended.

7.5 HO3 (North and West Melbourne Precinct): Changes to the precinct/precinct-wide issues

7.5.1 Boundary changes

Issues raised

Eades Place, West Melbourne

160. Submission 12 (Hotham History Project) queries why Eades Place was not included in the West Melbourne Residential Area of HO3, noting that the street is comprised of only Significant and Contributory buildings, and is identified as a significant streetscape.

Shiel and Melrose streets

161. Submission 23 raises two issues in relation to part of the western edge of HO3, namely:
- Inclusion of Shiel Street's north-eastern streetscape in HO3
 - Recognition of the historically recognised street tree row on the north-eastern side of Shiel Street
162. The submitter notes that the residential side of Shiel Street has been recognised as part of the North Melbourne heritage area (now HO3) since the 1985 North and West Melbourne Conservation Study, and includes many nineteenth century houses. The north-eastern side of the street also includes an intact row of 100 year old London Plane trees and a re-laid bluestone kerb and channel. The street is not included in the mapped extent of HO3. The submitter also notes the Elm trees on the south-west side of Shiel Street. The submitter suggests that the trees would likely have been planted as part of the local improvements undertaken by North Melbourne

Town Council in the early twentieth century, also reflected in the proposed HO1388 Harris Street/Plane Tree Way Plane Trees.

163. In relation to the bluestone kerbs and channels in Shiel Street, the submission notes that this infrastructure is identified in the HO3 statement of significance

Response

Eades Place, West Melbourne

164. Those parts of HO3 that are located in West Melbourne were not part of the original study area for the Review. However, the HO3 extent in West Melbourne was reviewed as part of a broader HO3 precinct-wide exercise where specific areas with identifiable and distinct characteristics were identified within the precinct. This was done to assist in a more nuanced understanding of the built form of the precinct, even though the precinct remains as a single HO place.
165. The four areas identified were:
- Hotham Hill Residential Area
 - Errol Street Civic and Commercial Area
 - Benevolent Asylum Estate Area
 - West Melbourne Residential Area
166. Of these, the West Melbourne Residential Area is comprised of mid-late nineteenth century residential buildings in parts of Roden, Hawke, King, Spencer and Miller streets, West Melbourne. Eades Place is located to the east of the West Melbourne Residential Area. It is comprised of residential buildings on the east side (within HO3), and the nineteenth century school on its west side (HO464 - Primary School No. 1689). The east side of Eades Place is a significant streetscape in the Heritage Places Inventory, as a relatively intact nineteenth century streetscape of one and two storey masonry dwellings. The former school site on the west comprises the nineteenth century school building to Eades Place, with the recent low-rise crisis accommodation development fronting King and Roden streets.
167. In response to the suggestion made by the submitter, Eades Place is well-separated from the West Melbourne Residential Area, with the school/crisis accommodation block located between the two. Because of this separation, its inclusion within the West Melbourne Residential Area is not recommended. This does not in any sense result in a lesser level of protection or recognition, noting the building and streetscape gradings that apply.
168. No change recommended.

Shiel and Melrose streets

169. As part of the North Melbourne Heritage Review, the boundaries of HO3 North & West Melbourne Precinct were reviewed within the study area. Recommendations were made for changes to the precinct boundary, including at the north-west to incorporate the existing HO953, to have a consistent approach along property lines on Flemington Road, along with some other minor boundary changes.
170. The boundary of HO3 at Shiel Street follows the property line along the north-east side of the street. It is acknowledged that the then North Melbourne Town Council undertook street tree

planting programmes and the planting of some reserves in the early twentieth century, prior to amalgamation with the City of Melbourne. The Plane trees on the north-east side of Shiel Street were part of these early planting programmes. The most notable and intact of these street plantings is the Harris Street Plane Tree Avenue, an avenue of London Plane trees established in 1905. The Harris Street planting is recommended for an individual HO.

171. The HO3 precinct citation and statement of significance identifies street tree plantings as part of the significance of the place. It is noted that there are no tree controls for HO3, and that the trees are identified in the statement of significance for their contribution to the aesthetic value of streets within the precinct.
172. In response to Submission 23, a further review of the precinct boundaries has confirmed that the Plane and Elm tree plantings on Shiel Street are relevant to recognition of the HO3 precinct. The Plane trees (north-east side) were established in a 1905 planting undertaken by the North Melbourne Town Council.² The Elm trees appear to be of a roughly similar age, but the two sides of the street do not appear to have been planted in the same programme, and the road layout has been subsequently altered. The plantings on Shiel Street contribute to the aesthetic quality of the adjoining residential streetscape to the north-east, and in this sense are consistent with the value attributed to street tree plantings in the HO3 statement of significance. It is appropriate to expand the boundaries of the precinct to include Shiel Street to the extent of the street trees on both sides of the roadway. It is not proposed to include the properties on the south-west side of the street within the HO.
173. In considering street trees, it is recognised that Melrose Street also incorporates a consistent planting of Plane trees in the central median. A date for these trees has not been confirmed; they are visible on the 1931 aerial photograph, although they appear to be younger than the adjacent Shiel Street examples. A consistent approach to the precinct boundary would be to include the width of Melrose Street within HO3; as with Shiel Street the approach would be to continue to exclude the properties to the west of Melrose Street where these are not already included within HO3 (Melrose Street between Alfred Street and Flemington Road is included in the existing extent of HO3).
174. Extending the precinct boundaries on both streets would include two street tree plantations in a manner consistent with the recognition afforded to the street plantations in the statement of significance. These street plantations are generally intact and contribute to the streetscape character of the adjoining residential blocks included within the precinct. While noting that the plantings on these streets are of early twentieth century origin, the historical provenance of the plantings is not the primary consideration for their inclusion in HO3. The precinct's statement of significance also refers to the Eucalypt plantings found in the centre medians of other streets in the precinct, and these trees are certainly later plantings. The inclusion of street tree plantings in the precinct is not addressed to their historical value, but rather to their contribution to the aesthetic significance and architectural expression of key streetscapes.
175. Other precinct edge streets have been reviewed and no further changes are proposed.
176. **Recommendation: It is recommended that the boundary of HO3 be extended to include Shiel Street (between Canning and Dryburgh streets) and Melrose Street (between Canning Street**

² North Melbourne Courier and West Melbourne Advertiser, 9 June 1905: 2

and Flemington Road). The map in the HO3 citation and statement of significance should be amended to reflect this change in boundaries.

7.5.2 Statement of significance

Issues raised

177. Submission 12 (Hotham History Project) questions the removal of the sections 'History', Description, Pattern of Development etc' previously included in the statement for HO3 and found in the other precinct statements for areas outside the Capital City Zone.
178. Submission 12 also queries why two shop rows in Errol Street are not specifically mentioned in the HO3 citation and statement of significance:
- 61-7 Errol St (c.1855), identified in the submission as the earliest shop row in the street; and in part in continuous use as a pharmacy (No. 67, amalgamated with No. 65 in 1864)
 - 1-13 Errol Street (1870-1), known as 'The Colonnade', and identified as the second oldest shop row
179. The submission included recommended amendments to the Key Attributes section of the statement, specifically:
- Include reference to 1850s (rather than 1860s) retail development to Queensberry Street
 - Add explicit reference to views and vistas to six specific buildings as a key attribute of HO3. This suggestion is made on the basis it would 'provide extra protection' for these buildings. [The statement already includes the following Key Attribute: *Undulating topography which has allowed for views and vistas of prominent elements such as the town hall tower and church spires*] The additional buildings requested to be referenced are:
 - North Melbourne Town Hall roof and clock tower
 - Former Presbyterian Union Memorial Church Spire
 - Weston Milling silos, Munster Terrace, North Melbourne
 - Ukrainian Catholic Church, Canning Street, North Melbourne
 - St Mary Star of the Sea, Howard Street, West Melbourne
 - St Michael's Catholic Church, Dryburgh Street, North Melbourne
 - In particular, the submission identifies the Presbyterian Union Memorial Church and Weston Milling Silos Site as two 'landmark buildings at risk'.

Response

180. In relation to the structure of the statement (responding to Submission 12), the incorporated statement of significance adopts a standard format as required by DEWLP/DTP.
181. The more detailed version of the citation and statement of significance (which includes the more detailed historical and descriptive material) is included at Attachment H to the Review, which

would be a Background Document to the Melbourne Planning Scheme. As noted above, an appreciation of the heritage values of places within HO3 is supported by the relevant updated statement of significance for the HO3 precinct which they form part of and contribute to. Both the incorporated statement of significance and the background document would be available to the community and of relevance in the assessment of planning applications under the HO.

182. In relation to the shop rows in Errol Street, the referenced properties are identified as Significant in the Heritage Places Inventory March 2022 (amended January 2023). No change to these gradings is recommended as part of the Review.
183. The documentation for HO3 - including both the citation and statement of significance - provides extensive information to support an understanding of the significance of the heritage precinct. In the case of the citation this includes history, description, areas with identifiable built form characteristics, and the statement of significance provides a summary in the 'what, how, why' format. In both cases, the early development of North Melbourne is recognised as a key attribute of the precinct and its historical significance. Likewise, within the precinct, the Victoria and Errol streets Civic and Commercial Area (where the subject properties are located) is recognised as the commercial heart of the precinct, with two-storey commercial premises the typical form of the Victorian period.
184. The citation and statement of significance are not intended to identify every Significant place within the precinct. Rather, a select number of places are used as examples of particular phases of development, architectural styles or historical themes. The fact that a Significant heritage place is not specifically identified in the citation does not imply it is of less significance than other Significant places which have been identified in the documentation.
185. However, I agree that based on the additional information provided by the submitter, it would be appropriate to update the key attributes for the Victoria and Errol streets Civic and Commercial Area to acknowledge an earlier (1850s) phase of development.
186. The existing wording under Key Attributes (Victoria and Errol streets Civic and Commercial Areas) should be changed as below:
- Replace the existing wording:
- *Early (from 1860s) retail development to Queensberry Street.*
- with
- *Early (from 1850s and 1860s) retail development to Errol and Queensberry streets.*
187. In relation to the second dot point and the matter of views and vistas, the current version of this key attribute (under What is Significant?) in the HO3 statement of significance reads as follows:
- Undulating topography which has allowed for views and vistas of prominent elements such as the town hall tower and church spires.
188. This version is preferred as the intent is to describe a particular characteristic/attribute of HO3 rather than seeking to identify or protect particular views or vistas to specific buildings within or outside the precinct. For this reason, the suggested wording of listing six specific sites, including

the Presbyterian Union Memorial Church and Weston Milling Silos, is not supported. In relation to these two sites, it is noted that:

- The Presbyterian Union Memorial Church Complex is entered in the Victorian Heritage Register as H0007. Any proposed changes to the place would be assessed by Heritage Victoria under the Heritage Act 2017.
- The Weston Milling silos site, Munster Terrace, is located outside HO3, within a separate HO, the North and West Melbourne Biscuit Making & Flour Milling Precinct (HO455). It is also outside the study area for the Review.

189. No change is recommended.

7.5.3 *Bluestone lanes*

Issues raised

190. Submission 12 (Hotham History Project) queried whether historic street materials, including bluestone lanes and kerbs, are protected by HO3.

Response

191. The revised statement of significance for HO3 references the importance of the subdivision pattern, laneways and roads and traditional street materials and acknowledges the contribution of these to the precinct.

192. The City of Melbourne owns and manages most lanes and much of the historic bluestone street materials. Under the HO a permit is required for roadworks which change the appearance of a heritage place or which are 'not generally undertaken to the same details, specifications and materials'. Additionally, the City of Melbourne has developed an operating procedure for streets and lanes. This provides guidance in relation to the management of bluestone assets and materials, balancing issues such as accessibility and safety with heritage and urban character considerations.³

193. No change is recommended.

7.6 Gradings (individual properties)

194. A number of submissions raised issues related to the category (Significant, Contributory, Non-contributory) of specific properties. Each has been reviewed and the summary response is in Table 2 below. Further detailed responses are provided in Appendix A or elsewhere in this evidence statement (cross-references are provided).

195. Where a change to the exhibited Heritage Places Inventory has been recommended, this is noted in bolded text and reflected in the Heritage Places Inventory (Council-preferred version).

³ City of Melbourne Operating procedure: bluestone in Melbourne's streets and lanes, January 2017, access via <https://www.melbourne.vic.gov.au/SiteCollectionDocuments/operating-procedure-bluestone.pdf>.

Table 2 Summary table of grading review responses

Property and submission number	Exhibited Review	Response	Reference (detailed response)
Submission 5 680-684 Queensberry Street	Upgrade from Non-contributory to Contributory	No change to recommendation	Appendix A
St Aloysius College, 31-55 Curran Street – School building (Block D, 1940) Submission 6	Varied gradings across site. Change is from Significant (applies to whole site) to Contributory (recommended to apply in the case the case of Block D)	No change to recommendation	Section 7.8.1
Submission 7 8 George Street	Upgrade from Non-contributory to Contributory	Change to recommendation. Recommended to remain Non-contributory This change has been made in the Heritage Places Inventory (Council-preferred version)	Appendix A
Submissions 8 and 12 8 Canning Street	Upgrade from Non-contributory to Contributory	Change to recommendation. Recommended to remain Non-contributory This change has been made in the Heritage Places Inventory (Council-preferred version)	Appendix A
Submission 11 6 Baillie Street	Upgrade from Non-contributory to Contributory	No change to recommendation	Appendix A
Submission 12	None. No change to Non-contributory grading	Change to recommendation.	Appendix A

Property and submission number	Exhibited Review	Response	Reference (detailed response)
586-588 Victoria Street		<p>Recommended to be upgraded to Contributory</p> <p>This change has been made in the Heritage Places Inventory (Council-preferred version)</p>	
Submission 12 8 Jones Lane	None. No change to Non-contributory grading	<p>Change to recommendation.</p> <p>Recommended to be upgraded to Significant. The Heritage Places Inventory should identify that the significant category applies only to the three-storey late nineteenth century building.</p> <p>This change has been made in the Heritage Places Inventory (Council-preferred version)</p>	Appendix A
Submission 12 38 Curran Street and 40-42 Curran Street	None. No change to Non-contributory grading	No change to recommendation	Appendix A
Submission 13 59-63 Curran Street	Upgrade from Non-contributory to Contributory	No change to recommendation	Appendix A
Submission 14 25-27 Leveson Street	Upgrade from Non-contributory to Contributory	No change to recommendation	Section 7.8.3
Submission 15 48 Baillie Street	Upgrade from Non-contributory to Contributory	No change to recommendation	Appendix A

Property and submission number	Exhibited Review	Response	Reference (detailed response)
Submission 19 32-34 Erskine Street	Upgrade from Contributory to Significant	No change to recommendation	Appendix A

7.7 Planning scheme provisions

Issues raised

196. Submission 4 asserted that a town planning permit should not be required for alterations to a heritage building where the façade is not affected.

Response

197. A review of permit triggers under the Heritage Overlay (Clause 43.01 of the Melbourne Planning Scheme) was beyond the scope of the Review.

7.8 Individual places

7.8.1 Submission 6 St Aloysius College

Issues raised

198. Submission 6 relates to St Aloysius College, 31-55 Curran Street. Currently, a grading of 'significant' applies to all buildings on the site, and the amendment proposes that:
- The original convent (1891), chapel (1925) and high school building (1903) remain 'significant'
 - The school building (1940) changes from 'significant' to 'contributory'
 - Other buildings and structures change from 'significant' to 'non contributory'
199. The submission includes an extract from heritage advice prepared by heritage consultant David Wixted (Heritage Alliance), which focuses on the 1940s School Building (referenced as Block D).
200. The Heritage Alliance document does not include a firm conclusion in relation to the proposed Contributory grading, but it does question its contribution:

The 1940s building may be notionally of importance for its pre-war date in the early phase of the site development. The Lovell Chen report allocates a status of Contributory to the building and gives prime importance to the other three buildings. However, the building contributes little in the way of heritage and adds little to the collective importance of the other buildings on the site (p. 3).

201. The advice also:
- Comments on masterplan intentions for the site (pp. 1 and 7) and suggests the site currently occupied by the Block D may be required for outdoor courts.
 - Notes the building was 'by Robert A Harper' (p. 1)
 - Speculates that the building may have been intended to be a larger complex (p. 1)

- Provides a list of church works of the architect Robert L Harper (noting he died in 1935)
- Notes that the 1940s building compares unfavourably to Harper's works ('it is really nothing. It is just an unpretentious building – a brick container for some classrooms', p. 3)
- Notes that a Contributory category 'is a signal that the building may or may not be able to be demolished based on further research', compared with a Significant category where buildings 'should not be demolished unless there is some inevitable reason to do so...' (p. 3)
- Comments on criteria referenced in PPN01
- Suggests that it would be hard to elevate the building to 'of Significance' unless it was associated with an important person or group, another factor could be architectural interest or importance (p. 3).
- Provides a description of the building including interior, and notes the building appears to be 'mostly intact' externally with the exception of some infilling of doors (p. 4)

Response

202. St Aloysius was one of three large or complex Significant sites comprising multiple buildings which were reviewed in order to confirm whether individual buildings within the site should be identified with varied gradings - Significant, Contributory or Non-contributory.
203. A site visit and historical research were undertaken to inform the recommended gradings for the individual buildings at the school site. The recommendations are set out in the memorandum at Attachment G to the Review. They are also documented at section 1.1.3 *Recommended gradings changes in HO3* in Attachment F to the Review. In summary, the three earlier buildings (1891 Convent, 1903 high school building and 1925 Chapel) are all proposed to be Significant, the 1940 School building is proposed to be Contributory and the balance of buildings in the complex would be Non-contributory.



Figure 25 Proposed categories St Aloysius complex (original convent building (blue star, 1891), high school building (yellow star, 1903) and Chapel (green star, 1925), all Significant, and 1940 school building (red), Contributory, all other buildings Non-contributory



Figure 26 View from Melrose Street to the west (High School on the left and Convent on the right)
Source: Lovell Chen, 2022



Figure 27 High School building, St Aloysius
Source: Lovell Chen, 2020



Figure 28 St Aloysius Convent (left) and Chapel (right)
Source: Lovell Chen, 2020



Figure 29 View of School Building from Curran Street to the north
Source: Lovell Chen, 2022



Figure 30 View of School Building (1940) from Brougham Street
Source: Lovell Chen, 2022

204. Submission 6 focuses on the Contributory category for the 1940 School Building (Block D). This is a two-storey red brick building that was part of the development of educational buildings at the site in the first half of the twentieth century.
205. In response, Catholic education is an important historical theme in North Melbourne. Schools and the Catholic Church are identified in the HO3 Revised Statement of Significance. My view is that the buildings of heritage value at St Aloysius are important in contributing to an understanding of this theme in the context of the significance of the precinct.
206. While not of individual significance, based on the Lovell Chen review and my own site inspection (the latter from the street), the 1940 school building is recognisably an institutional/educational building of the late interwar period which relates to and complements the earlier buildings at St Aloysius, and contributes to the significance of this particular complex as part of HO3. Although simpler in form and detailing when compared with the earlier buildings on the site, it is designed in a way that responds to these, including the pitched slate-clad gable roof and the use of red brick. The completion of the building was an event of note for the college; a contemporary account notes that the building was built in response to growing enrolments and demand for places and the new building was blessed and opened by the Archbishop of Melbourne, Daniel Mannix on 31 March 1940.⁴

⁴ *Advocate*, 4 April 1940, p. 4

207. In response to the discussion in Submission 6 in relation to the criteria in PPN01, no assessment against the criteria has been undertaken for the 1940 building. This is not necessary; it is not claimed that the building is of individual significance or should be listed as an HO place in its own right. It is equally not necessary for the building to compare favourably to other much earlier works by the architect Robert L Harper (pp. 1-2). Note also that at p. 5, Submission 6 suggests the building was designed and constructed by R A rather than R L Harper.
208. Submission 6 notes at p. 3 that the building 'would be hard to elevate as being *of Significance*' but to confirm, the 1940 building is proposed to be a Contributory heritage place not a Significant heritage place in the Heritage Places Inventory.
209. The definition for Contributory heritage places is as follows:
- A contributory heritage place is important for its contribution to a heritage precinct. It is of historic, aesthetic, scientific, social or spiritual significance to the heritage precinct. 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 heritage precinct. Contributory places are typically externally intact, but may have visible changes which do not detract from the contribution to the heritage precinct.
210. In response, the building is recognisably of the interwar period but relates to the earlier (more highly graded) buildings on the site. It combines with these earlier buildings to demonstrate the historical development of the St Aloysius complex, and in doing so, contributes to an understanding of the theme of Catholic education in North Melbourne. Additionally, the interwar period is an important layer and phase of development in HO3.
211. For these reasons, the building is considered to meet the definition of a Contributory heritage place and the recommended grading is considered appropriate. No change is recommended.

7.8.2 Submissions 10 and 21 Flemington Bridge Railway Station

Issues raised

212. Submission 10 was an individual submission and Submission 21 was an officer level submission from Moonee Valley City Council. Both submissions supported the inclusion of the Flemington Bridge Railway Station in an individual HO, but limited to the extent of the station buildings, not including the platforms and ramps. This is on the basis that they are modified and are unfit for purpose and do not meet standards of safety, accessibility and convenience. Both submitters expressed concern that a HO control may hamper upgrades or improvements, which have been the focus of advocacy by Moonee Valley City Council.
213. Submission 21 provided detail on the following matters:
- Changes have occurred to the up (city-bound) and down (outward bound) sides of the complex (including changes to decking, supports and alignment on the outbound (Moonee Valley City Council) side and changes to supports on the inbound (City of Melbourne) side). The submission notes that the original ramp shown in Figures 3 and 4 of the heritage citation have been removed and realigned.

- Concern that application of an HO may hamper efforts to improve accessibility and functionality
 - Efforts to advocate for improvements.
214. In relation to the same issue, I note that on 21 February 2023 the Future Melbourne Committee resolved to:
- [Endorse] the revised form of the Amendment to be referred to the Panel, as set out in Attachment 3, but amended to delete from the statement of significance for Flemington Bridge Railway Station in the ‘what is significant’ section the words “Access ramps including form and location but excluding modern surfacing”, and to reduce the extent of the proposed overlay itself to take in no more than the 1944-45 weatherboard station building and the platforms.

Response

215. The Flemington Bridge Railway Station complex falls partly within the City of Melbourne (upside or City-bound side, Figure 31 and Figure 32) and partly within the City of Moonee Valley (downside). The station was assessed as a whole in the Review and found to be of local historical and representative significance. Amendment C403 makes recommendations to apply HO controls only to that part of the railway station within the City of Melbourne. As noted, however, the whole of the station complex was considered, and the study recommended the assessment be referred to the City of Moonee Valley for consideration and potential inclusion in the HO to the Moonee Valley Planning Scheme.
216. The citation acknowledges that a level of physical change has occurred to the platforms and ramps. Changes noted in the citation include those referenced in Submission 21 (re-decking of the ramps in concrete, structural augmentation, resurfacing of the platforms, as well as later handrails and fencing). It would be possible to include additional detail on the various alterations. It is also noted that there has been an additional ramp structure constructed on the Moonee Valley side which should also be referenced in the citation. The reference in Submission 21 to the removal and realignment of original ramps appears to be to the earlier arrangement of stairs up to platform level (replaced by ramps in 1944-45).
217. My view is that the physical alterations are not considered to be so significant as to justify excluding these elements from the proposed HO on heritage grounds alone. The platforms and ramps contribute to an understanding of the distinctive design of the station and retain their original form and siting and much of their fabric. When considered from a heritage perspective, they should be included.
218. Submissions have been made that the extent of the proposed HO should be reduced to exclude the ramps and platforms to avoid heritage controls posing an impediment to upgrade works. Submissions 10 and 22 recommend the exclusion of the platforms and ramps, whereas the City of Melbourne’s Future Melbourne Committee resolution supports the HO but confined to the buildings and platforms. (ie, the ramps would be excluded and reference to these elements under ‘What is significant?’ would be removed from the statement of significance).
219. I acknowledge the issues raised by Council and the submitters in relation to accessibility, public safety and amenity and further, I accept that to resolve these issues, it is likely that a future proposal would involve significant physical change at the station, including changes to elements

identified in the statement of significance as contributing to heritage significance, whether that be the platform buildings, the platforms themselves and/or the ramp structures.

220. In such a scenario, and with a HO in place as recommended, it would be expected that some consideration would be given to heritage issues and impacts, but this would be alongside other objectives. In my experience it is not unusual for projects relating to the upgrade of stations and other infrastructure across the rail network to be delivered to a high standard of functionality and compliance even in cases where a heritage listing is in place. In many cases heritage impacts such loss of fabric and/or introduction of new elements necessarily are accepted to meet the requirements of an operating transport system. Examples I am aware of would include Footscray Railway Station (VHR place, pedestrian overpass replaced early footbridge structure), North Melbourne Railway Station (VHR, also with major new structure with escalators landing on multiple platforms) and a number of heritage-listed stations affected by Level Crossing Removal Project works.
221. Considering a reduced scope HO (excluding the ramps as per Council's resolution), given the direct interface between the ramps, platforms and station buildings, it is difficult to conceive of an approach to the mapping of the place that could remove the ramp structures from the extent, and still achieve the intent of PPN01 in terms of mapping curtilages (whereby land is included as a setting to the heritage place). An alternative may be to retain the HO mapping as proposed but address the question of the future upgrade to the ramps (and potentially the platforms) in the statement of significance or via an incorporated document. Of these, the preference would be for an incorporated document that is separate from the statement of significance. This is on the basis it is not common to address management of heritage places in a statement of significance. An incorporated document could function as a means of 'turning off' the permit triggers in the HO for certain actions (modification of the platform and modification/demolition of the ramps) in the event this was required for necessary upgrade works.
222. In the alternative, where the ramps are excluded by being 'mapped out', there would be some change to the heritage values when compared to those set out in the statement of significance. Equally, even without the inclusion of the ramps, the station buildings on their elevated structure together with the platforms would still be distinctive and broadly demonstrative of the historical themes and would still reflect on many of the values against Criterion A. The assessment against Criterion D (representativeness) would be largely unaffected.
223. I do not support a further reduction (deletion of the platforms from the proposed HO altogether) as this would leave the station building/s as isolated with no context. This would be contrary to accepted heritage practice and the guidance in relation to mapping curtilages in PPN01 (at p. 5). In terms of the concerns about upgrading works to the platforms, I also note that platforms across the metropolitan network are frequently modified in terms of length and width and that could occur in this case likely with no impact on the buildings or the heritage values.
224. I note that the listing has been proposed on the basis of the place as a complete entity (both Moonee Valley and Melbourne sides) with the citation referred to Moonee Valley council for its consideration for the application of the HO to the downside. I recognise the listing of the downside may well not proceed.

225. In the event the place is included in the HO in part or in full, the citation and statement of significance for Flemington Bridge should be reviewed and updated as relevant to the extent of any listing.



Figure 31 Ramp on the up (City of Melbourne) side of the station
Source: Lovell Chen, 2022



Figure 32 View of the station within the proposed HO
Source: Lovell Chen, 2022



Figure 33 View of the station building within the proposed HO
Source: Lovell Chen, 2022

7.8.3 Submission 14 - 25-27 Leveson Street

Issues raised

226. Submission 14 was received from the owner of 27-35 Leveson Street. The submitter opposes the amendment in its current form based on the proposed regrading of the site from ungraded to contributory within HO3. The submitter has engaged heritage consultant Peter Andrew Barrett to prepare an independent assessment and this is provided (memorandum dated 13 September 2022).
227. Mr Barrett accepts the Contributory grading (within HO3) ascribed to the building. However, he suggests that further information should be included in the Review to justify the Contributory grading. He also suggests that the Review should be amended to confirm that the Contributory value is limited to the Leveson Street façade.

Response

228. This former factory/industrial building is recommended to be upgraded to Contributory, on the basis that it contributes to an understanding of a significant historical theme and period of development (interwar period) in HO3.
229. As noted in the submission, the subject building was constructed in 1935, and was leased to seed merchants Law, Somner & Company as a factory and warehouse. The 1935 *Herald* article identifies G Rothwell as having designed and constructed the building.⁵
230. The building clearly presents as an interwar factory/warehouse which adopts a simple Moderne style in its relatively intact facade. Its original use for industrial purposes is also evident in the large central door opening, multi-paned steel framed windows to its main elevation, and the utilitarian but distinctive brick gable forms expressed along Little Errol Street. While the principal façade to Leveson Street is clearly important, I do not agree that this is the only aspect of the building that expresses its origins as an interwar factory/warehouse.
231. In addition, in relation to the comments on the extent of contributory fabric, the Review does not seek to define the extent of significant fabric for Contributory (or Significant) heritage places in the manner suggested.
232. No change is recommended.

⁵ *Herald*, 20 November 1935, p. 14



Figure 34 Main façade to Leveson Street (top)



Figure 35 View of the north elevation along Little Errol Street

7.8.4 210-212 Boundary Road and 435-447 Flemington Road

Issues raised

233. Submission 20 relates to 210-212 Boundary Road and 435-447 Flemington Road. The submission queries the Contributory grading of these two sites (which comprise multiple properties), and requests that the HO be removed from these properties.
234. The submission notes that while they might ‘technically qualify’, the buildings are ‘physically divorced’ from the rest of the North Melbourne precinct, and questions how they contribute to the broader precinct or whether they qualify as a precinct in their own right.
235. The submission references heritage advice which questions whether the buildings meet the threshold for Contributory heritage place, notes that they make a minimal contribution to the North Melbourne precinct to the south, and that the properties are generally not externally intact, have previously attracted low heritage gradings and have a low level of internal amenity. It further suggests that a strategic review of the area should be undertaken rather than just a heritage review.
236. The Boundary Road property is also subject to a PAO (public acquisition overlay).

Response

237. The submission addresses the following properties:
- 210-212 Boundary Road
 - 435-437 Flemington Road
 - 439-441 Flemington Road
 - 443 Flemington Road
 - 445 Flemington Road
 - 447 Flemington Road
238. The response below also references the properties at 204-208 Boundary Road, which were not referenced in the submission but abut 210-212 Boundary Road.

Overview

239. The properties which are subject to the submission are currently located in HO953 (Racecourse Road/Alfred Street North Melbourne). They are proposed to be retained with the HO control but incorporated into HO3 through a revision to the HO3 boundary.
240. As noted in the Methodology Report (section 3.12, p. 19), the area currently designated as HO953 was part of the North and West Melbourne conservation area as it was identified in the 1983 study. Refer to Figure 36. The distribution of graded buildings in the 1980s is indicated at Figure 37.
241. Council amalgamations of the 1990s saw part of North Melbourne (west of Melrose Street) transferred to the Moonee Valley City Council. As part of this change a large triangular area in North Melbourne north of Alfred Street was designated as a separate HO precinct in the Moonee Valley Planning Scheme (Racecourse Road/Alfred Street Flemington, HO29, refer to Figure 38).

242. The municipal boundaries were realigned again in 2008 (Amendment C134), and the area was returned to the City of Melbourne. HO29 Moonee Valley was not reincorporated into HO3 but remained a separate precinct in the Melbourne Planning Scheme (HO953, Racecourse Road/Alfred Street North Melbourne) and this is the current situation (Figure 39).
243. When HO953 was reviewed as part of the Review, the assessment was that the character of the valued heritage building stock in HO953 was broadly consistent with that of HO3 (as reflected in the earlier heritage study assessments where this area was included in the larger precinct). The connection is particularly clear at the interface between the two current HO precincts (in the Melrose Street/Alfred Street area) in that the character of heritage building stock is continuous. On this basis it was considered appropriate to amalgamate the two, returning to the earlier (pre-amalgamation) arrangement.
244. In the process, it was clear that HO953 contained a significant number of contiguous Non-contributory buildings on the south-west side of Flemington Road and on both sides of Racecourse Road and it was recommended that the boundaries of the HO be redrawn to exclude these areas. [Note that the 1980s mapping indicates that many of these 'gaps' in the precinct were present at the time of that earlier assessment (Figure 37).] Where buildings were Contributory or Significant these were generally retained in the revised HO3, for the most part with their existing gradings.
245. The effect of the change as indicated in the exhibited version of Amendment C403melb is that the southern portion of the current HO953 is drawn into HO3. Additionally, there would be a smaller portion in the north of the current HO953 where the HO would be retained, including the properties referenced in Submission 20. This would also form part of HO3, albeit separately mapped. In the exhibited version of the amendment, the boundary in this location was redrawn to include the existing Contributory buildings, and two Non-contributory properties. It also included one interwar building (435-437 Flemington Road) which is proposed to be upgraded from Non-contributory to Contributory. An existing Non-contributory building between 435-437 Flemington Road and the existing Non-contributory building at 433 Flemington Road would also be retained in the HO but with its existing Non-contributory status unchanged; similarly an existing Non-contributory property at 204 Boundary Road would also be retained in the HO, and its existing grading unchanged. This vacant property was retained in the HO in error.

Boundary Road properties

246. The detail of the proposed HO boundary has been further considered in the light of the issues raised in Submission 20 and one change is recommended to the exhibited Amendment C403. This is on the Boundary Road edge, where there are three single-storey residences (nos 206, 208, 210-212, all Contributory but all with façade alterations of long-standing (mostly existing in the 1980s), and the Non-contributory property at 204 Boundary Road. In the case of the northernmost (210-212 Boundary Road) of the three houses, this has had further, unsympathetic alterations since the 1980s including the replacement of interwar windows and alterations/infill glazing to brick balustrade and verandah.
247. Based on this further review, it is proposed that all three be downgraded to Non-contributory and the HO3 precinct boundary re-drawn to exclude them. It is also recommended that 204 Boundary Road be excluded from HO3 as a result of this change.



Figure 36 Excerpt from map of the Urban Conservation Areas in the City of Melbourne, key indicates the hatched area as existing Urban Conservation Area No. 1 areas, dotted area to the north as Urban Conservation Area No. 2 areas.
Source: Graeme Butler, North and West Melbourne Conservation Study, 1983, City of Melbourne (c. 1985 pages inserted in Lovell Chen library copy)



Figure 37 Individual buildings graded A-E
Source: City of Melbourne, Urban Conservation Areas: Guidelines for owners - North and West Melbourne, c. 1985-6

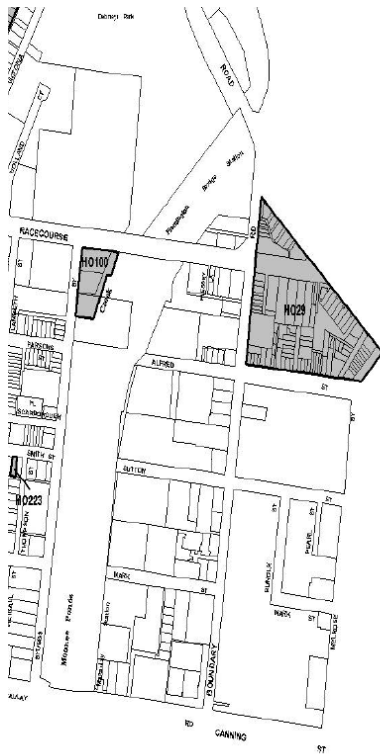


Figure 38 Map 16-ho, HO29, Racecourse Road/Alfred Street, Flemington
Source: NPS1, 6 May 1999, Moonee Valley Planning Scheme

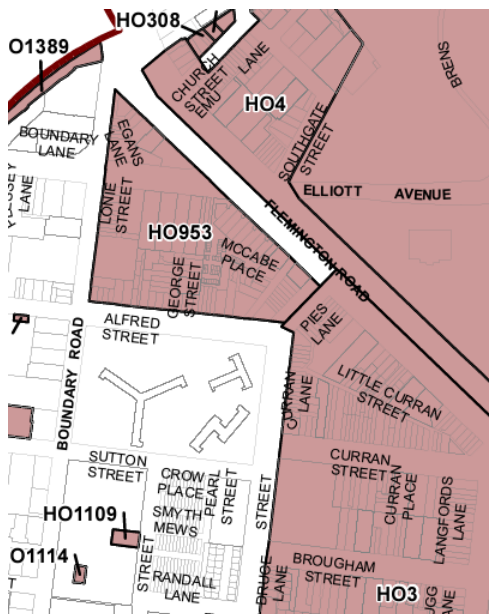


Figure 39 Current HO mapping, showing HO953 intersecting with the north-west boundary of HO3
Source: Melbourne Planning Scheme, map melbourne04h0

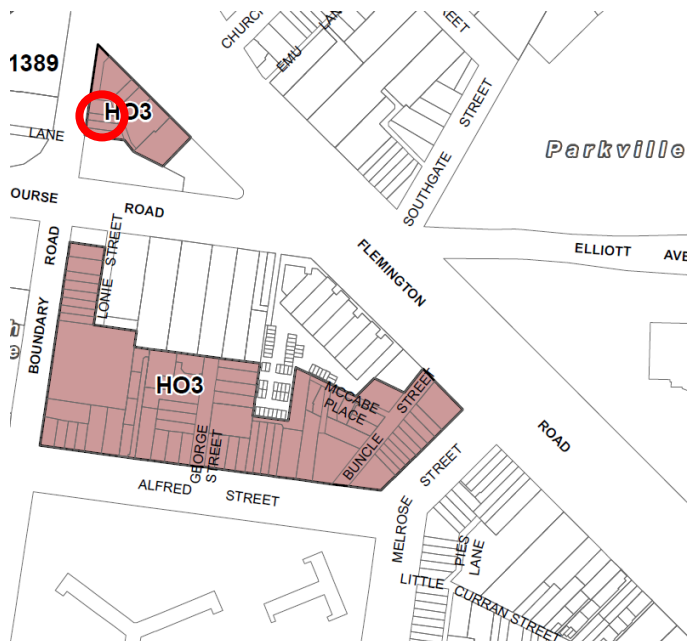


Figure 40 Exhibited mapping under Amendment C403melb showing the removal of the HO from part of HO953 and the incorporation of the balance into HO3. Boundary Road properties proposed to be removed from HO3 are indicated by the red circle
Source: Amendment C403



Figure 41 (left to right) 210-212, 208 and 206 Boundary Road
Source: Lovell Chen, 2022



Figure 42 210-212 and 208 Boundary Road in 1983
Source: Photograph by Graeme Butler)

Flemington Road properties

248. 435-437 Flemington Road ('Braemar') is a two-storey interwar flat block which dates from 1935 (26 November 1935, BA16892, 435/7 Flemington Road), currently Non-contributory in HO953, proposed to be retained in HO3 and upgraded to Contributory. Though not dominant, the interwar phase of development has been identified in the HO3 statement of significance (Refer to Attachment E to the Review) as important in the precinct and a range of interwar buildings within the study area have been upgraded to Contributory. The brickwork to the building has been overpainted but its interwar origins are recognisable and still is considered to contribute to an understanding of this phase of development in HO3.



Figure 43 View of 435-437 Flemington Road from the street edge
Source: Lovell Chen, 2022



Figure 44 435-437 Flemington Road, view from the north-west
Source: Lovell Chen, 2020

249. 441 Flemington Road is an existing Non-contributory place in HO953 and would remain Non-contributory in HO3.
250. 443 Flemington Road is an existing Contributory heritage place and would remain as Contributory in HO3. This is a single-storey Victorian brick residence, typical of the modestly scaled and ornamented residences in North Melbourne. While the brickwork is overpainted, it remains relatively intact, including overall form, verandah, window and door openings and chimneys.
251. 445 Flemington Road is an existing Contributory heritage place and would remain as Contributory in HO3. This is a modest single-storey nineteenth century brick residence. It retains its overall form and characteristic features including transverse gable roof form (reclad) with chimney, double-hung sash windows and central entry and with a modern replacement verandah.
252. 447 Flemington Road is an existing Contributory heritage place and would remain as Contributory in HO3. This is a single-storey brick residence constructed in c. 1910-1915, and initially operated as a boarding house (Sands & McDougall directory, 1910 and 1915). It is an interesting building which adopts an unusual form with projecting bays at each end, and the central section set back between these bays. The principal elevation appears to remain relatively intact, with decorative glazing to the bay windows, verandah, parapet and urns, but aerial photography and limited views from the street indicates extensive change behind.



Figure 45 441-437 Flemington Road
Source: Lovell Chen, 2022



Figure 46 443 Flemington Road
Source: Lovell Chen, 2022



Figure 47 445 Flemington Road
Source: Lovell Chen, 2022



Figure 48 447 Flemington Road
Source: Lovell Chen, 2022

Concluding comments

253. This small Flemington Road group would form part of HO3 but would be physically detached from the main body of the precinct. Submission 20 has noted this separation (in the exhibited version) and questioned how the subject properties contribute to the precinct or whether they qualify as a precinct in their own right. In response, it is agreed that this northern portion of HO3 (currently HO953) comprises mostly Contributory properties of varying levels of intactness. It is also recognised that this group would be separated from the main body of the precinct and there is no visual connection between the two. I acknowledge that this separation and the isolated nature of this group makes it difficult to appreciate its relationship to the main body of HO3. I also acknowledge that it is relatively uncommon for precincts to have a smaller mapped portion separated from the main precinct in this manner. This condition is of long-standing within the original precinct and the current HO953, however, and is not materially changed by the proposed HO3 precinct boundary changes.
254. In response to a question raised in Submission 20, the exclusion of the properties from HO3 would not impact the balance of the HO3 precinct (because the properties are currently not in HO3) but it would reduce the extent of heritage building stock in this part of the municipality with the HO control. Recognising the mixed nature of graded buildings within the Flemington Road group and its limited extent, the group would not qualify as a precinct in its own right. Accepting this, the group still retains a recognisable heritage character (generally as identified in the 1980s study) that is consistent with the identified values of HO3. It is on this basis that the retention of the HO control over contributory building stock in this location was recommended in the Review.
255. **It is recommended that the properties at 206, 208 and 210 Boundary Road be downgraded to Non-contributory and removed from the proposed HO3 along with the Non-contributory property at 204 Boundary Road. Further, the map in the HO3 citation and statement of significance be amended to reflect this change in boundaries. No change is proposed in terms of the extent of the HO on Flemington Road.**

8.0 SUMMARY OF CONCLUSIONS AND RECOMMENDATIONS

In conclusion, it is my opinion that:

- A. The North Melbourne Heritage Review has been prepared using a sound methodology that is consistent with accepted heritage practice and with the requirements of the Planning Practice Note PPN01 Applying the Heritage Overlay
- B. The study provides documentation of an appropriate format and standard of evidence to support and justify the changes proposed by Amendment C403 to the Melbourne Planning Scheme
- C. Additional places proposed to be included in the HO under the amendment have been assessed against the relevant criteria and found to be of local significance as required by PPN01
- D. The heritage assessment work across the study has also been undertaken having regard for the existing heritage policy frameworks in the Melbourne Planning Scheme and consistent with other strategic heritage assessment work undertaken by the City of Melbourne

- E. The documentation is to an appropriate standard to support the ongoing administration of the HO controls within the study area under the Melbourne Planning Scheme
- F. Through the Thematic Environmental History and the detailed place citations, the North Melbourne Heritage Review additionally presents the outcome of significant additional historical research and community engagement exploring the history and cultural values of the study area. This has included, very significantly, the input of Traditional Owners, in identifying and recognising Aboriginal cultural themes and associations.
- G. Amendment C403 as exhibited reflects the findings of the North Melbourne Heritage Review. The 'Council-preferred' version of the Amendment incorporates a series of proposed changes in the post-exhibition period and I support those changes (with the following additional comments on the Council position on the Flemington Bridge Railway Station).
- H. In relation to the Council position on the proposed application of the HO to the Flemington Bridge Railway Station (exclusion of the ramps), I recommend consideration of an alternative approach whereby the HO mapping is retained as per the exhibited version and the question of the potential future requirement for upgrade works impacting on the ramps and/or the platforms is referenced through the use of an incorporated document. Such an approach would still result in the recognition of a place of local heritage value.
- I. The exhibited HO3 statement of significance and Review documentation should be corrected to consistently reference the *Victoria and Errol streets Civic and Commercial Area* as one of the four areas with identified built-form characteristics within the precinct.

9.0 DECLARATION

256. In submitting this report I declare that I have made all the inquiries that I believe are desirable and appropriate and that no matters of significance which I regard as relevant have to my knowledge been withheld from the Tribunal.



Kate Gray