



**Amendment C258 to the Melbourne Planning Scheme
Addendum to Planning Evidence Statement of July
2018**

Prepared for:

City of Melbourne

Prepared by:

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01 Introduction and Scope of Report

1. I have been requested by the City of Melbourne to prepare an addendum report to the statement of planning evidence that was dated 30 July 2018 which examined the proposed modifications to Clause 22.04 and 22.05 of the Melbourne Planning Scheme and forms part of Amendment C258 (the Amendment).
2. This addendum report has been prepared in response to the late submissions made in relation to various properties located within the Central City, all of which are subject to the Capital City Zone (CCZ). I have been instructed that 3 of the 12 submissions have now been formally withdrawn or have not requested to be heard.
3. In preparing this addendum report I have undertaken the following additional tasks since the preparation of the July 2018 evidence statement:
 - Reviewed the written submissions that were lodged during October and November 2018 in relation to 12 properties located within the CCZ;
 - Reviewed Amendment C327 and 328 including all relevant Council reports and Amendment documentation;
 - Reviewed any current permit applications and any relevant determined applications that relate to the 12 properties that are the subject of the late submissions;
 - Inspection of the 12 properties that are the subject of the late submissions;
 - Reviewed revised versions of the policies which were presented to the Panel following the presentation of my oral evidence in August 2018;
 - Reviewed reference documents to the Melbourne Planning Scheme that are relevant to the late submissions; and
 - Reviewed all directions published by the Panel in response to the late submissions.
4. I understand that Ms Anita Brady is to be recalled to also present additional

expert heritage evidence on behalf of the City of Melbourne. Ms Brady's evidence specifically examined the amended statements of significance, individual grading of properties across the municipality and the updated incorporated documents. As previously advised I have not assessed these aspects of the Amendment as they are outside of my expertise.

5. The following addendum report provides additional information regarding my assessment and opinions in relation to the local policies that are proposed to be modified as part of this Amendment and specifically the CCZ area. In this regard it should be read in conjunction with the full evidence statement prepared in July 2018 and presented to the Panel in August 2018 (referred to throughout this report as the July 2018 evidence statement).
6. Included at Appendix **A** is a copy of the "combined policy" circulated on 3 October 2018 by the City of Melbourne that incorporates various recommendations made by the expert witnesses called on behalf of the City of Melbourne and is based on the version originally attached to my July 2018 evidence statement. I note however that this version does not include, nor does the version that was attached to my July 2018 evidence statement, the text modifications regarding the definition of the terms concealment and visible which formed part of recommendation # 4 outlined in the July 2018 evidence statement.

02 Summary of Late Submissions

7. The table below represents a summary of the properties that are the subject of late submissions. This table also includes the current planning provisions for each property and, as a result of the interim controls introduced through Amendment C327, the grading of each property:

Site Address	Planning controls	Current grading (Amendment C327)
17-21 Bennetts Lane **	CCZ1, DDO10, PO1, HO1297	Contributory to Precinct
23 Bennetts Lane **	CCZ1, DDO10, PO1, HO1297	Contributory to Precinct
134-144 Little Lonsdale Street **	CCZ1, DDO10, PO1, HO1297	Contributory to Precinct
146-148 Little Lonsdale Street **	CCZ1, DDO10, PO1, HO1297	Contributory to Precinct
577-583 Little Collins Street	CCZ1, DDO10, DDO1-A2, DDO12, HO1278	Significant
31-35 Flinders Lane	CCZ1, DDO10, HO1286	Contributory to Precinct
96-98 Flinders Street	CCZ1, DDO10, DDO4, HO1272	Significant
243-249 Swanston Street	CCZ2, DDO1-A1, DD02-A1, DDO3, DDO4, DDO70, HO1288	Contributory to Precinct
134-136 Flinders Street	CCZ1, DDO10, PO1, HO1274 and HO1286	Significant
263-267 William Street	CCZ1, DDO10, PO1, PAO5, HO1231	Significant
146-150 Bourke Street	CCZ1, DDO2, DDO1, DDO3, PO1, HO1244	Significant
139 Little Bourke Street	CCZ1, DDO2, DDO1, DDO3, PO1, HO507, HO1266	Contributory to the precinct with one building form deemed Significant

** denotes properties that are the subject of a current (undetermined) planning permit application for full demolition and redevelopment of the site.

8. A written submission for each of the above property owners has been reviewed and the issues raised in these submissions regarding the Amendment can be summarised to include:

- The Amendment is deficient in supporting strategic justification and

background work;

- The 'combined policy' does not adequately acknowledge the strategic context of the CCZ;
- Requirements of the proposed Clause 22.04 would unreasonably constrain the redevelopment potential for land subject to a Heritage Overlay within with CCZ and lacks flexibility;
- The Amendment should not be applied to land that has been included within an interim heritage overlay until such time as Amendment C328 is resolved;
- The Amendment will unreasonably elevate the importance of heritage matters in respect to integrated decision making.

9. I have considered the above points in the context of my evidence statement to date and address these matters in the following section.

2.1 *Prior involvement with the relevant sites*

10. As noted in Appendix A of the July 2018 evidence statement, I held the position of planning officer at the City of Melbourne between December 1997 and mid 2001. During this time I managed and determined as a delegated officer a large number of permit applications within the Central City.

11. It is relevant to note that during this period I was the planning officer responsible or directly involved in the assessment of planning permit applications that related to demolition of existing built form and substantial redevelopment of the following properties:

- 11-21 Bennetts Lane, Melbourne - permit issued in 1998 (permit now expired)
- 134-144 Little Lonsdale Street, Melbourne – permit refused in 2001

12. Since leaving the City of Melbourne in 2001 I was not involved in permit applications for any substantial redevelopment of these or any other sites that are

the subject of late submissions to the best of my knowledge.

2.2 *Policy Changes relevant to the Amendment since the original evidence statement*

13. Since the preparation of the July 2018 evidence statement and the oral presentation in August 2018, Amendment C327 (interim controls) was approved by the Minister for Planning and came into effect on 18 October 2018. Amendment C327 applies the Heritage Overlay to 50 individually significant places and six precincts within the CCZ on an interim basis until 29 May 2020.
14. Amendment C327 is of relevance to the late submissions as each of the properties are now subject to a Heritage Overlay as a direct result.
15. Amendment C328 will seek to examine the introduction of 50 individually significant places and six precincts within the CCZ one on a permanent basis. At the time of writing this report I have been instructed that the Amendment was on hold pending the outcome of Amendment C258.

03 Response to Late Submissions

16. Whilst many elements of this Amendment are inter-related and seek to comprehensively update a number of planning controls that manage heritage within the whole of the municipality, the analysis undertaken that formed the basis of the July 2018 evidence statement and this addendum report has been focused solely on the proposed modifications to Clause 22.04 and 22.05 and the anticipated operation of these local policies.
17. Having considered the issues raised in the late submissions and the application of the proposed Clause 22.04 to these properties, the opinions I expressed within the July 2018 evidence statement remain unchanged, including the recommendations made for modifications to the policies. Whilst I acknowledge that the effect of Amendment C327 has resulted in a number of properties now being subject to a Heritage Overlay and therefore the relevant policies of the Melbourne Planning Scheme that relate to heritage matters also apply, my analysis is not required to consider the implications of Amendment C327. This will be a matter for Amendment C328 in due course which will consider the case for the individual sites and additional heritage precincts remaining within a Heritage Overlay.
18. In summary the conclusions reached through this analysis are outlined below and are intended to be read in conjunction with the July 2018 evidence statement. These conclusions are intended to address the matters raised by the late submissions and are relevant to the policy framework that applies to the CCZ environment.

3.1 Strategic justification for the Amendment

19. There has been considerable strategic work undertaken over a number of years by the City of Melbourne to articulate the overarching strategy around heritage and refining the heritage policy framework and grading system applying to all areas of the municipality. This background work supports the Amendment and provides the appropriate justification for the modifications to the policy framework that form part of the Amendment. I note that the July 2018 evidence statement included detailed discussion on this point at section 4.2 and I rely on this

summary.

20. In respect of Clause 22.04 and the CCZ area specifically, I consider there are several factors that provide strategic justification for this element of Amendment and support approach taken to the policy restructure. These include:

- The current policy is structured around a series of statements of significance pertaining to each of the pre C327 heritage precincts within the CCZ. The necessary translation of these statements of significance to the Incorporated Document would effectively leave the Clause 22.04 “vacant” of any significant built form guidance for heritage places across the CCZ beyond the broad policy objectives. Given the significant concentration of heritage fabric within the CCZ, a large proportion of which is significant to the City and critical to the identity of Melbourne, appropriate protection through a revised heritage policy is warranted.
- The structure of Clause 22.04 has not been comprehensively reviewed since before the new format planning scheme was introduced in 1999. This results in a policy which has not kept pace with development pressure and is lacking in detailed guidance pertaining to a range of development opportunities.
- Decision making has for an extended period of time been based on the opinion of the Council’s heritage advisers and somewhat outdated reference documents. Therefore a more transparent and consistent structure to the policy that clearly defines the objectives and requirements for development within a Heritage Overlay and importantly the guidance around decision making is overdue.
- Development pressure within the CCZ, including the desire of property owners to undertake substantial modifications, additions and demolition of heritage places continues to grow. This pressure in the last few years has resulted in some decisions being made without appropriate policy guidance and the protection of the city’s heritage assets has not been afforded the necessary protection.

3.2 *Addressing the Capital City Zone context in the combined policy approach.*

21. The recommendations made in the July 2018 evidence statement regarding the potential to combine Clauses 22.04 and 22.05 into one local policy addressing heritage matters across all areas of the municipality does not, in my view, create a situation where the unique environment of the Central City is disregarded or not appropriately recognised.
22. The combining of two policies into one was a recommendation of the July 2018 evidence statement and is a matter for the Panel to consider further. It was a recommendation made after undertaking a detailed examination of the content of the two proposed policies that had been exhibited, which identified that 13 of the 14 sub clauses addressing policy requirements and objectives were virtually identical. Furthermore the City of Melbourne had no strategic plan to refine or modify Clause 22.04 in the future to advance any point of difference regarding the assessment of heritage within the CCZ.
23. In making the recommendation to combine the policies I considered various matters with particular emphasis on the following two questions:
- Are the various policy requirements and objections that have been drafted with identical text between Clause 22.04 and 22.05 of equal relevance to the CCZ as they are to areas outside of this environment?
 - Can a combined policy be structured so as to allow for any important differences to be clearly articulated such that users of the planning scheme and decision makers appreciate the distinction between the pattern of development within and outside of the CCZ?
24. My answer to both of these points is yes.
25. Acknowledging the unique environment of the CCZ occurs firstly through sub clause 1 - policy basis of the combined policy that expresses the importance of the CCZ being the primary place where the key function of attracting business and investment must continue. Furthermore it recognises that the expectation for development within this zone, where a Heritage Overlay applies, will be considered differently:

Development within the CCZ has, and will continue to be, of a different intensity and result in varied built form outcomes compared to areas outside of the CCZ.

26. This approach sets the CCZ apart from the rest of the municipality and recognises the built form outcomes will be different.
27. Secondly a key point of difference between built form within the CCZ to areas outside of this environment relates to the concealment of new additions and new built form. Within the CCZ there is not the same expectation to fully or partially conceal new development for certain levels of heritage value and clear view-lines towards a new addition from a street or lane is considered acceptable.
28. To address this important distinction, I have recommended that sub headings within the policy be used to make this clear. This is an accepted practice when drafting local policy where it is necessary to adopt special requirements that are intended to apply to different areas such as a commercial precincts or a residential areas. Examples of this approach are evident in the planning schemes of Boroondara, Stonnington and Yarra, all of which have a single heritage policy apply across an entire municipality and provide for varied requirements depending on the location of a heritage place.
29. Furthermore, heritage studies included as reference documents can also be used to provide background information regarding the local heritage value of a particular precinct or area.
30. I note that very few planning schemes within Victoria have departed from the approach of a single heritage policy and where there are multiple heritage policies contained within a planning scheme, they are based on small precincts and typically outside of metropolitan Melbourne. This has not been the practice taken of recent times for planning schemes within metropolitan Melbourne.
31. I therefore consider that the “combining” of Clause 22.04 and 22.05 as drafted can appropriately address CCZ environment and the variations required to heritage planning.

3.3 *Constraint on development potential of land within the Capital City Zone as a result of the Amendment*

32. The application of a Heritage Overlay to a property or precinct can be perceived in some instances as a restriction on redevelopment potential. Depending on the significance of the heritage place, this level of restriction may vary from the extent to which demolition is considered appropriate through to the scale and architectural response of new built form that could be accommodated on the site. It may also depend on the heritage value of the streetscape, the surrounding environment and the opportunity for built form change to be accommodated, based on the pattern of development within the immediate area and the broader impact on the heritage place.
33. However in the case of the 12 sites that are the subject of the late submissions, the recent application of the interim Heritage Overlay is a matter for a different amendment to review and ultimately determine. The question I have therefore considered is whether the proposed local policy at Clause 22.04 will unreasonably constrain development beyond the existing heritage policy framework.
34. In considering this question it is firstly relevant to identify what other planning controls are in place that will guide or nominate a particular built form outcome or land use activity. As the proposed heritage policy will not be the sole determining factor as to the development potential of a site, a more comprehensive review of the planning framework is appropriate.
35. For 9 of the sites that are the subject of late submissions, Design and Development Overlay Schedule 10 (DDO10) applies already. The other 3 sites at 243-249 Swanston Street, 139 Little Bourke Street and 148-156 Bourke Street are affected by Design and Development Overlay Schedule 2 (DDO2) given they are positioned within Special Character Areas.
36. The DDO10 and DDO2 controls were introduced in 2016 on a permanent basis via Amendment C270, and include a number of design requirements (some mandatory) which will determine in a building envelope suitable for new built form.

37. In summary DDO10 designates that a building must have a street wall of between 20-40 metres in height (addressing the prevailing street wall character), provide a setback behind the street wall to any higher built form of between 5-10 metres, setback 5 metres (or greater depending on the tower height) from side and rear boundaries and achieve a separation of 10 metres between towers on the same site. These requirements have numerous variations applicable to corner sites, some laneway environments and towers over 80 metres. Further restriction exists for built form that may overshadow key public spaces and compliance with wind requirements.
38. DDO2 has very similar requirements for the tower and podium arrangement, however this DDO applies to areas that have different character to the rest of the Central City, and therefore a number of the built form outcomes are performance based to allow a proposal to respond appropriately. Unlike DDO10, DDO2 does however nominate preferred building heights of between 15 to 40 metres depending on the sub precinct. In the case of 243-249 Swanston Street there is a mandatory maximum building height of 40 metres. Design objectives for sub precincts A2 and A5 within DDO2 specifically reference the low rise nature of the precinct and that upper levels are to be visually recessive from streets and laneways. This control, although not imposing mandatory street wall or setback requirements, places significant emphasis on retaining the intimate scale of the streetscape and highlights the expectation that any new development will be more restrained. I consider this approach is consistent with the proposed Clause 22.04 framework and its policy requirements.
39. Unlike the requirements of either DDO2 or DDO10, the proposed heritage policy does not set any mandatory built form requirements, consistent with the role of a policy. Clause 22.04 does not seek to impose any preferred maximum height nor does it require new built form to a heritage place to be concealed in any way within the CCZ, consistent with the current Clause 22.04.
40. An examination of the DDO10 built form requirements that apply to 9 of the late submission sites and how the mandatory requirements would define an envelope for development identifies that the majority of properties are already significantly constrained. This is without any consideration being given to the proposed

Clause 22.04. This is in part due to the physical size of the allotment and the ability to comply with front, side and rear setbacks in order to achieve any reasonable tower component. Several of the late submitter's sites are particularly narrow, which would most likely result in a floor plate at the upper levels that is unserviceable, making it unlikely that any tower would proceed. It is important to highlight that the proposed Clause 22.04 would not alter this outcome.

41. In regards to the key changes that the proposed Clause 22.04 would introduce, I accept that new built form to be constructed within the air space directly above the front or principal part of a heritage building is to be discouraged. This element of the policy has been proposed by the City of Melbourne in direct response to recent developments to heritage places that have resulted in built form outcomes that, now constructed, are deemed by Council to be detrimental to a heritage place. These outcomes have, in part, occurred due to the current Clause 22.04 remaining silent on this pattern of development.
42. To consider the influence of this part of the proposed policy it is important to examine the extent to which building form can be constructed within this airspace (directly above the street wall) in accordance with DDO10 at present.
43. As previously summarised, DDO10 requires a street wall of 20 metres in height (maximum 40 metres where the streetscape supports additional height) and then a setback from this street wall to any taller tower element to be a minimum of 5 metres (preferred front setback is in fact 10 metres). These two controls are mandatory and effectively prevent any tower being constructed directly above a street wall, whether the site is within a Heritage Overlay or not. For a site that is located on a corner (with at least one street frontage being to a main street) this street wall is permitted to be up to 80 metres for a length of 25 metres.
44. So how would these street wall and setback clauses integrate with the proposed policy?
45. Assuming a new addition or possibly tower was proposed to a site of contributory or significant grading and also subject to DDO10, the proposed policy would encourage the front or principal part of the building to be retained. This component of the building may differ in size from place to place depending on the

type and significance of a building but is generally defined as being between 8-10 metres in depth. In this scenario the front or principal part of the heritage place would effectively become the street wall and also achieve the front setback to the tower element as required by DDO10. The scale of the tower or higher built form beyond this front setback is not specifically constrained by the proposed Clause 22.04. Again this is a matter that other relevant planning controls will determine.

46. For some heritage places where the existing façade to the street is particularly low scale, the policy would encourage this façade (together with the front or principal part of the building) to be retained without any extension to the façade height. In these circumstances the achievement of the maximum height of the street wall that may be permitted under DDO10 of up to 40 metres (or 80 metres to some corner sites) would be discouraged if it required cantilevering of new built form directly above the front portion of the heritage place. As previously discussed, this has been drafted by the City of Melbourne to achieve the broader objective of respecting the assessed significance of a heritage place.
47. However, I have not concluded that this element of the proposed policy as drafted imposes an unreasonable restriction on the development potential of all land within a Heritage Overlay as suggested by some of the late submissions. In reaching this conclusion I highlight the fact that policy seeks to guide discretion and does not impose a mandatory provision that must be applied in every circumstance. The application of the policy must be considered on a site by site basis where the significance of the heritage place, the streetscape, and the design of the proposed new built form are to be individually assessed.
48. At present the feasibility for a site to be redeveloped is influenced by a broad range of factors and may well be constrained by the matrix of existing planning controls and the local context in order to achieve an outcome that addresses all relevant objectives of the Planning Scheme. Where DDO10 applies to a site, the current mandatory provisions already shape a future building envelope that, due to the size of some allotments, may not be feasible irrespective of whether a Heritage Overlay and policy applies or not.
49. Whilst the proposed Clause 22.04 may discourage the extent to which new built form is sited directly above the front or principal façade of a significant and

contributory building, this is but one component of the overall development potential of a site which may differ significantly from one property to another and depends on the unique design response.

50. In the case of DDO2, there is already a clear objective to retain the low scale built form character of the various sub precincts and any new built form should be visually recessive. I consider the proposed Clause 22.04 only seeks to support this control and does not impose any requirement that is at odds with the anticipated scale and form of development already advanced by DDO2.

Demolition

51. The proposed heritage policy provides specific guidance regarding demolition of contributory and significant fabric that may further limit the potential envelope for development, subject to a careful assessment of the heritage fabric suitable for retention. However the existing policy at Clause 22.04 already includes policy objectives regarding demolition that would apply to these sites at present, stating that *“the demolition or alteration of any part of a heritage place should not be supported unless it can be demonstrated that that action will contribute to the long-term conservation of **the significant** fabric of the heritage place”*. (my emphasis)

52. Therefore the level of control over demolition is already embedded in the policy and is a relevant consideration for any future proposal for redevelopment of a heritage place. The Amendment does not seek to change the intent of this demolition control, simply to provide further guidance as to the extent of demolition that would generally be considered appropriate or not.

3.4 Application of Clause 22.04 prior to the resolution of Amendment C328

53. It is understood that a number of the late submitters have put forward the opinion that the final resolution of the interim heritage controls, which is the subject of Amendment C328, should be the priority before the proposed heritage policy at Clause 22.04 is imposed.
54. The effective of Amendment C327 has been to impose a Heritage Overlay across 50 individually significant places and 6 precincts on an interim basis for a defined

period of time in order to appropriately protect and conserve these areas until more detailed work can be undertaken. During this period the assessment and determination of any submitted planning application pertaining to these sites must take into account not only the provisions of Clause 43.01 but be guided by the Heritage Policy at Clause 22.04. No transitional clause has been introduced into the Melbourne Planning Scheme as part of Amendment C327 to suggest that Clause 22.04, or any other relevant clauses, are to be relaxed or disregarded simply because the Heritage Overlay has been applied on an interim basis. This is consistent with the way interim controls are typically treated.

55. From the gazettal date of Amendment C327, Clause 22.04 equally applies to the consideration of any permit application relating to the 50 individually significant places and 6 precincts, just as it does to the hundreds of other properties that have been affected by a Heritage Overlay across the Central City for many years. There is no strategic planning reason that this, or any other policy contained in the Melbourne Planning Scheme, should not apply on a temporary basis.
56. Therefore I consider any amended version of Clause 22.04 that may be introduced into the Planning Scheme prior to the resolution of Amendment C328 should equally apply.
57. If in the event that Amendment C328 was to remove the Heritage Overlay from any one property or precinct on a permanent basis, the application of Clause 22.04 would also cease to apply.

3.5 *Integrated decision making and the importance of heritage matters*

58. The question of whether the Amendment would result in there being greater emphasis given to or raise the importance of heritage considerations over and above other matters was raised during my oral presentation of evidence in August 2018 and formed part of my assessment when preparing the July 2018 evidence statement.
59. Firstly it is important to highlight that the primary purpose of a heritage policy, like any local policy, is to guide the exercise of discretion that exists under a planning scheme control in order to deliver a defined objective or strategy. When it comes

to heritage matters, the policy basis is nearly always focused on protection, conservation, restoration and enhancement of the municipality's identified heritage places and may provide detailed guidance regarding the approach to matters such as demolition and new built form. This approach supports and reflects the policy objectives and permit requirements of the Heritage Overlay provisions at Clause 43.01.

60. The application of the various objectives and requirements contained within a heritage policy must be balanced with all other pertinent policies relating to the CCZ area, including specific controls and State based policy directives. The weight to be given to these relevant considerations is a matter for a decision maker to evaluate, together with the merits of each individual permit application and physical context. These are the fundamental principles of integrated decision making and a corner stone of the Victoria Planning Provisions.
61. In the case of the Amendment, I do not consider the content of the proposed local policies and their expected application would change this accepted approach to integrated decision making. Furthermore, when compared with the current Clause 22.04 framework, the Amendment in fact seeks to introduce policy objectives and requirements that explicitly acknowledge the broader objectives for development within the Central City and the anticipated intensity of development when compared with land outside of the CCZ. These policy objectives make it clear to the decision maker that heritage is but one of the matters for consideration and there are many functions that the CCZ must perform to address its unique role in metropolitan Melbourne.
62. I accept that the proposed local policy does seek to provide more detailed guidance regarding the preferred approach to the development of heritage places compared with the current policy framework. However, this more detailed approach to guiding use and development of land within a Heritage Overlay should not be interpreted as elevating the importance of heritage matters over and above any other relevant policy or decision guideline relating to land the CCZ. It is intended to provide greater transparency about the responsible authority's preferred approach and provide the scope for circumstances that may diverge from the preferred approach.

63. Importantly the overall structure of the policy, its objectives and requirements give no suggestion that heritage matters are to be afforded a priority over other relevant considerations or that a departure from the accepted approach to integrated decision making espoused by Clause 71.02-3 should be expected.

04 Conclusions

64. Having considered the key planning issues raised by the late submissions and the relevance of these issues to the Amendment, I maintain my conclusions regarding the proposed local policies which are:

- There is clear strategic justification for a comprehensive review of the two local policies that seek to manage heritage places across the City of Melbourne. This review is, in part, required to implement the revised grading system for all heritage places and streetscapes and remove references to statements of significance;
- The revised structure of Clause 22.04 and 22.05, including the inclusion of all statements of significance in the Incorporated Document, and establishment of clear policy guidance and performance standards appropriate for both the CCZ Zone and outside of this environment is in line with the relevant Practice Notes for the preparation of local policies and application of the Heritage Overlay;
- The modifications to the objectives and performance standards of the policies will provide greater clarity and guidance for all users of the planning system as to the expected approach to the conservation, protection and restoration of heritage places throughout the City;
- The scope of the revised Clause 22.04 does not unreasonably restrict development potential for land within a Heritage Overlay, taking into consideration all relevant planning controls and policies; and
- The additional policy objectives and performance standards relating to detailed design matters have been appropriately drafted and will provide important guidance for a range of permit applications.

65. I am therefore supportive of the Amendment subject to the modifications outlined the July 2018 evidence statement and any matters that were raised during the oral presentation of August 2018.



Appendices

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Appendix A – Summary of expertise

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Name and professional and business address

Sophie Millicent Jordan

Director, Sophie Jordan Consulting Pty Ltd

Level 1, 580 Church Street

Richmond VIC 3121

Qualifications and experience:

- Bachelor of Planning and Design (Hons) University of Melbourne, 1996
- 1997 Town planner, City of Stonnington
- 1998-2001 Senior planner, City of Melbourne
- 2001-2003 Senior planner, Hassell
- 2003 – June 2005 Senior planner, Urbis Pty Ltd
- July 2005 – June 2008 Associate Director, Urbis Pty Ltd
- July 2008 – Dec 2011 Director, Urbis Pty Ltd
- January 2012 – present Director, SJ Consulting Pty Ltd

Area of expertise:

- Residential developments including medium density housing projects through to larger high rise apartment complexes;
- Special needs residential accommodation including student accommodation, retirement villages, nursing homes and social housing projects;
- Large scale commercial projects including office development within inner Melbourne;
- Large scale retail development within metro Melbourne and regional Victoria;
- Preparation of Urban Design Frameworks for regional town centres;
- Public Housing Estate redevelopment and social housing projects
- Gaming applications, including the VCGR approval processes; and
- Heritage applications, including Heritage Victoria approval processes.

Facts, matters and assumptions which the report relies upon:

- Reviewed the exhibited documentation as part of the Amendment including background reports;
- Reviewed all relevant planning controls and policies contained within the Melbourne Planning Scheme, including *Plan Melbourne 2017-2050*;
- Reviewed the written submissions that were lodged during the two exhibition periods;
- Reviewed the Council reports relevant to the Amendment;
- Reviewed relevant Practice Notes and Ministerial Directions; and
- Reviewed reference and incorporated documents to the Melbourne Planning Scheme that are relevant to this Amendment.

Documents taken into account in preparing this report:

Refer to paragraph 3 of the report for a summary of the documents that have been taken into account. The assessment and review outlined in the report has relied on these documents to inform my opinion.

Identity of any person who assisted in the preparation of the report

None

Summary of my opinions

Refer to report and conclusions for a detailed summary of opinions.

Expert Declaration

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

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Appendix B – Amended version of the “combined policy”

22.05

--/201-
Proposed
C258
Exhibition

HERITAGE POLICY

This policy applies to all places within the Heritage Overlay Area.

22.05-1

--/201-
Proposed
C258
Exhibition

Policy Basis

Melbourne's Municipal Strategic Statement identifies heritage as a defining characteristic of the municipality, and a major part of Melbourne's attraction. Heritage places enhance the city's appeal as a place in which to live, work, invest and visit.

Heritage places across the municipality, both within and outside the Capital City Zone (CCZ), encompass individual heritage places and heritage precincts. These places are variously of heritage value for their historic, aesthetic, social, spiritual and scientific significance.

The places include some of metropolitan Melbourne's most significant urban developments. They incorporate dwellings, institutions, industrial, manufacturing and commercial places, road and rail infrastructure, parks, gardens and places of recreation.

Within the CCZ, heritage places reflect the significance of the cultural, administrative and economic centre of the State. The places are fundamental to the depth of historic character of the CCZ as it developed on, and extended from the Hoddle Grid. Development within the CCZ has, and will continue to be, of a different intensity and result in varied built form outcomes compared for areas outside of the CCZ.

This policy provides guidance on conserving and enhancing heritage places and is informed by the conservation principles, processes and practices of the Australia ICOMOS Burra Charter. It encourages the conservation, preservation and restoration of heritage places, and development which enhances the heritage place and is compatible and in keeping with its cultural heritage values. The policy recognises that heritage places are living and working places; and that development should be considered in the context of the heritage policy objectives.

This policy should be read in conjunction with Statements of Significance as incorporated into this Scheme.

22.05-2

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Proposed
C258
Exhibition

Definitions

Term	Definition
Alteration	An alteration is to modify the fabric of a heritage place, without undertaking building works such as an addition.
Assessed significance	The assessed significance of an individual heritage place or heritage precinct is identified in the relevant statement of significance, as contained in the place citation. This normally identifies what is significant, how it is significant, and why it is significant.
Concealed/partly concealed	Concealed means cannot be seen from a street (other than a lane, unless the lane is classified as significant) or public park. Partly concealed means that some of the addition or higher rear part may be visible provided it does not visually dominate or reduce the prominence of the existing building's façade(s) and the streetscape.
Conservation	Conservation means all the processes of looking after a place to retain its heritage significance. It may include one or more of maintenance, preservation, restoration, reconstruction, adaptation and interpretation.
Context	The context of a heritage place can include; its setting (as defined under 'setting'), the immediate landholding, adjoining significant

Term	Definition
	or contributory places, and the surrounding area.
Contextual design	A contextual design for new buildings and additions to existing buildings is one which adopts a design approach, derived through analysis of the subject property and its heritage context. Such an approach requires new development to comfortably and harmoniously integrate with the site and its streetscape character.
Cultural significance	Cultural significance means aesthetic, historic, scientific, social or spiritual value for past, present or future generations.
Enhance	Enhance means to improve the presentation and appearance of a heritage place through restoration, reconstruction or removal of unsympathetic or intrusive elements; and through appropriate development.
Fabric	Fabric means all the physical material of the heritage place.
Facadism	The retention of the exterior face/faces of a building without the three-dimensional built form, and, without retention of an understanding of the function of the three-dimensional building form.
Front or principal part of a building	<p>The front or principal part of a building is generally considered to be the front two rooms in depth, with roof; or that part of the building associated with the primary roof form, whichever is the greater. For residential buildings this is generally 8 metres in depth.</p> <p>For most non-residential buildings, the front part is generally considered to be one full structural bay or generally 8 – 10 metres in depth, including the roof.</p> <p>For corner sites, the front or principal part of a building includes side and rear elevations, where these are of identified heritage value.</p> <p>For sites with more than one frontage, the front or principal part of a building can include each frontage, where these are of identified heritage value.</p>
Heritage place	A heritage place has been assessed to have natural or cultural heritage value and can include a site, area or space, building or other works, structure, group of buildings, precinct, archaeological site, landscape, garden or tree.
Heritage precinct	A heritage precinct is an area which has been identified as having heritage significance. It is identified as such in the Schedule to the Heritage Overlay, and mapped in the Planning Scheme Heritage Overlay Maps.
Individual heritage place	An individual heritage place is equivalent to a significant heritage place. It may be graded significant within a heritage precinct. It may also have an individual Heritage Overlay control, and be located within or outside a heritage precinct.
Key attributes	The key attributes or important characteristics of a heritage precinct are identified in the precinct statement of significance.
Lane	Includes reference to public or private lanes, and ROWs.
Maintenance	Maintenance means the continuous protective care of a place, and its setting, and is distinguished from repair which involves restoration or reconstruction.

Term	Definition
Massing	Massing means the arrangement of a building's bulk and its articulation into parts.
Preservation	Preservation is maintaining the fabric of a place in its existing state and retarding deterioration.
Reconstruction	Reconstruction means returning a place to a known earlier state, and is distinguished from restoration by the introduction of new material.
Respectful and interpretive	When used in relation to design, respectful and interpretive refers to design that honestly admits its modernity while relating to the historic or architecturally significant character of its context. Respectful means a modern design approach to new buildings, additions and alterations to buildings, in which prevailing building size and form inform the design, and proportions and details are referenced but not directly copied, and sympathetic colours and materials are used. Interpretive means a looser and simplified modern interpretation of historic building form, details and materials.
Restoration	Restoration means returning a place to a known earlier state by removing accretions or later additions, or by reassembling existing elements. It is distinguished from reconstruction through not introducing new material.
Services and ancillaries	Services and ancillaries include, but are not limited to, satellite dishes, shade canopies and sails, solar panels, water storage tanks, disabled access ramps and handrails, air conditioners, cooling or heating systems and hot water services.
Setting	Setting means the immediate and extended environment of a heritage place that is part of or contributes to its significance.
Streetscape	A streetscape is a collection of buildings along a street frontage. When referred to in relation to a precinct, a streetscape typically contains a majority of buildings which are graded significant or contributory.
Significant streetscape (as referred to in this policy)	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.
Visible	Visible means anything that can be seen from a street (other than a lane, unless the lane is classified as significant) or public park.

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Grading of heritage places

The grading (significant, contributory or non-contributory) of properties identified in the incorporated document *Heritage Places Inventory 2017* - Significant Streetscapes are also identified in this incorporated document.

‘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' place:

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

22.05-4 Policy Objectives

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- To conserve and enhance Melbourne's heritage places.
- To retain fabric, which contributes to the significance, character or appearance of heritage places and precincts.
- To recognise and conserve the assessed significance of heritage places and streetscapes, as referenced in this policy or incorporated into this planning scheme as the basis for consideration of development and works. Further information may be considered, including in relation to streetscapes, where there is limited information in the existing citation or Council documentation.
- To ensure new development is respectful of the assessed significance of heritage places.
- To ensure new development is respectful of the character and appearance of heritage places.
- To encourage high quality contextual design for new development, which avoids replication of historic forms and details.
- To encourage retention of the three dimensional fabric and form of a building and to discourage façadism.
- To encourage the adaptive reuse of heritage places.
- To ensure new development is consistent with the conservation principles, processes and practices of the Australia ICOMOS Burra Charter.
- To enhance the presentation and appearance of heritage places through restoration and, where evidence exists, reconstruction of original or contributory fabric.
- To protect significant views and vistas to heritage places.
- To promote the protection of Aboriginal cultural heritage.

22.05-5 Permit Application Requirements

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The following, where relevant, may be required to be lodged with a permit application.

- Where major or consequential development is proposed to significant heritage places, the responsible authority may require preparation of a Conservation Management Plan (CMP), which is in accordance with the Heritage Council of Victoria's 'Conservation Management Plans: Managing Heritage Places A Guide 2010'.
- The responsible authority may require preparation of a Heritage Impact Statement (HIS), which is in accordance with Heritage Victoria's 'Guidelines for preparing Heritage Impact Statements'. In a heritage precinct, the HIS should address impacts on adjoining significant or contributory buildings and the immediate heritage context, in addition to impacts on the subject place.

- Where works are associated with significant vegetation (as listed in the Schedule to the Heritage Overlay or vegetation of assessed significance), an arboricultural report should be prepared. The report should, where relevant, address landscape significance, arboricultural condition, impacts on the vegetation and impacts on the assessed significance of the heritage precinct.
- For development in heritage precincts, the responsible authority may require sight lines, and heights of existing and adjoining buildings, streetscape elevations, photos and 3D model, as necessary to determine the impact of the proposed works.
- A comprehensive explanation as to how the proposed development achieves the policy objectives.

22.05-6 Performance Standards for Assessing Planning Applications

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It is policy to assess of planning applications against the objectives and performance standards set out below.

22.05-7 Demolition

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It is policy that:

- The demolition of a non-contributory place will generally be permitted.
- Full demolition of significant or contributory buildings will not generally be permitted.
- 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.
- Retention of the three dimensional form is encouraged; facadism is discouraged.
- The adaptive reuse of a heritage place is encouraged as an alternative to demolition.
- The poor structural or aesthetic condition of a significant or contributory building will not be considered justification for permitting demolition.
- A demolition permit should not be granted until the proposed replacement building or works have been approved.
- The demolition of fences and outbuildings which contribute to the cultural significance of the heritage place is discouraged.

Before deciding on an application for full or partial demolition, the responsible authority will consider, as appropriate:

- The assessed significance of the heritage place or building.
- The character and appearance of the building or works and its contribution to the historic, social and architectural values, character and appearance of the heritage place, and the streetscape.
- The significance of the fabric or part of the building, and the degree to which it contributes to the three-dimensional form of the building, regardless of whether it is visible.
- Whether the demolition or removal of any part of the building contributes to the long-term conservation of the significant fabric of the building.

- Whether the demolition is detrimental to the conservation of the heritage place
- Whether there are any exceptional circumstances.

Where approval is granted for full demolition of a significant building, a recording program including, but not limited to, archival photographic recording and/or measured drawings may be required prior to demolition, to the satisfaction of the Responsible Authority.

22.05-8**Alterations**

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It is policy that:

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.

Alterations to non-contributory buildings and fabric are respectful of, and do not detract from the assessed cultural significance of the heritage precinct.

Sandblasting of render, masonry or timber surfaces and painting of previously unpainted surfaces will not generally be permitted.

Before deciding on an application to alter the fabric of a significant or contributory building, the responsible authority will consider, as appropriate:

- The assessed cultural significance of the building and heritage place.
- The degree to which the works would detract from the significance, character and appearance of the building and heritage place.
- Its structural condition.
- The character and appearance of the proposed replacement materials.
- Whether the works can be reversed without loss of fabric which contributes to significance.

Removal of paint from originally unpainted masonry or other surfaces is encouraged providing this can be undertaken without damage to the heritage fabric.

The introduction of awnings and verandahs to ground floor façades and shopfronts may be permitted where:

- The works reconstruct an original awning or verandah, based on evidence of the original form, detailing and materials; or
- The awning is an appropriate contextual design response, compatibly placed in relation to the building, and can be removed without loss of fabric which contributes to cultural significance.

22.05-9**Additions**

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It is policy that additions to buildings in a heritage precinct are respectful of and in keeping with:

- Identified 'key attributes' of the heritage precinct.
- Precinct characteristics including building height, massing and form; style and architectural expression; details; materials; front and side setbacks; and orientation.
- Character and appearance of nearby significant and contributory buildings.

Where abutting a lane, additions are to be respectful of the scale and form of heritage fabric to the lane.

Additions to significant or contributory buildings:

- are respectful of the building's character and appearance, scale, materials, style and architectural expression.

- do not visually dominate or visually disrupt the appreciation of the building as it presents to the streetscape(s).
- maintain the prominence of the building by setting back the addition behind the front or principal part of the building, and from other visible parts and moderating height.
- do not build over or extend into the air space directly above the front or principal part of the significant or contributory building.
- retain significant roof form within the setback from the building façade together with any chimneys or similar roof elements of original fabric. Not obscure views of façades or elevations associated with the front or principal part of the building.
- be distinguishable from the original fabric of the building.

The design of additions is to:

- Adopt high quality and respectful contextual design.
- Avoid direct reproduction of the form of historic fabric.
- Adopt an interpretive design approach to other details such as verandahs, fences, and shopfronts.

Concealment of additions outside of the CCZ:

It is policy that:

Additions to a Significant or contributory building are concealed in significant streetscapes. In other streetscapes, additions to Significant buildings are concealed. 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.

In streetscapes that are not Significant, additions to contributory buildings should be partly concealed. Some of the addition or higher rear part(s) may be visible, provided it does not dominate or reduce the prominence of the building's façade(s) and the streetscape.

All ground level additions to the side of a building should be set back behind the front or principal part of the building.

All additions to corner properties may be visible, but should be respectful of the significant or contributory building in terms of scale and placement, and not dominate or diminish the prominence of the building or adjoining contributory or Significant building.

22.05-10 New Buildings

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It is policy that new buildings are respectful of and do not detract from the assessed cultural significance of the heritage place.

New buildings:

- Are to be in keeping with:
 - 'Key attributes' of the heritage precinct such as:
 - Building height, massing and form; style and architectural expression; details; materials; front and side setbacks; and orientation and fencing.
 - Prevailing streetscape height and scale.
- Do not obscure views from the street(s) and public parks of the front or principal part of adjoining significant or contributory places or buildings.
- Do not visually dominate or visually disrupt the appreciation of the heritage place by:
 - maintaining a façade height which is consistent with that of adjoining significant or contributory buildings, whichever is the lesser, and
 - setting back higher rear building components.
- Do not adopt a façade height which is significantly lower than prevailing heights in the streetscape.
- Are neither positioned forward of the façade of adjoining significant or contributory heritage places or buildings, or set back significantly behind the prevailing building line

in the streetscape. For land within the CCZ, new buildings should be positioned in line with the prevailing building line in the streetscape.

- Do not build over or extend into the air space directly above the front or principal part of an adjoining significant or contributory building or place.
- Where abutting a lane, are respectful of the scale and form of historic fabric of heritage places abutting the lane.
- Do not impact adversely on the aboriginal cultural heritage values, as indicated in an archaeologist's report, for any site known to contain aboriginal archaeological relics.

The design of new buildings are to:

- Adopt high quality and respectful contextual design.
- Adopt an interpretive design approach to other details such as verandahs, fences and shopfronts.

Concealment of higher rear parts of a new building outside of the CCZ:

In significant streetscapes, higher rear parts of a new building should be concealed.

In other streetscapes, higher rear parts of a new building should be partly concealed. Some of the higher rear part may be visible, provided it does not dominate or reduce the prominence of the building's façade(s) and the streetscape.

22.05-11 Restoration and Reconstruction

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It is policy to encourage the restoration and / or reconstruction of a heritage place.

Any reconstructive or restoration buildings and/or works to any part of a significant building, or any visible part of a contributory building should form part of an authentic restoration or reconstruction process, or should not preclude such a process at a future date.

Restoration or reconstruction of a building and works is to be based on evidence of what a building originally looked like and may include other parts of the building or early photographs and plans.

22.05-12 Subdivision

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It is policy that subdivision of a heritage place:

- Reflect the pattern of development in the streetscape or precinct, whichever is most relevant to the place.
- Ensure that appropriate setting s and contexts for significant and contributory heritage buildings and places are maintained including the retention or any original garden areas, large trees and other features which contribute to the significance of the heritage place.
- Not provide for future development which will visually disrupt the setting and impact on the presentation of the significant or contributory building.
- Provide for three dimensional building envelopes for future built form to each lot proposed.

Subdivision of airspace above heritage buildings, to provide for future development, is discouraged.

22.05-13 Vehicle Accommodation and Access

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The introduction of on-site car parking, garages and carports, and vehicle crossovers is discouraged and should only be permitted where the following performance standards can be met:

- The car parking is located to the rear of the property, and this is an established streetscape characteristic.

- For a significant or contributory building, the new garage or carport is placed behind the principal or front part of the building (excluding verandahs, porches, bay windows or similar projecting features), and:
 - it will be visually recessive;
 - it will not conceal an original contributory element of the building (other than a plain side wall); and
 - the form, details and materials are respectful of the building, but do not replicate details of the building.
- Ramps to basement or sub-basement car parking are located to the rear of the property, or to a side street or side lane boundary, where they would not visually disrupt the setting of the significant or contributory building, or impact on the streetscape character.

22.05-14 Fences and Gates

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It is policy that new or replacement fences or gates to the front or principal part of a significant or contributory building may be permitted where:

- the works reconstruct an original fence or gate, based on evidence of the original form, detailing and materials; or
- the new fence is an appropriate contextual design response, where the style, details and materials are interpretive and consistent with the architectural period of the heritage place and established streetscape characteristics.

New fences and gates should also:

- not conceal views of the building; and
- be a maximum height of 1.2 to 1.5 metres; and
- be more than 50% transparent.

22.04-15 Trees

It is policy that buildings and works respect trees with assessed cultural significance (noted in the schedule to the Heritage Overlay) by siting proposed new development at a distance that ensures the ongoing health of the tree.

New buildings and works should also comply with the Australian Standard AD 4970-2009 Protection of trees on development sites for vegetation of assessed significance.

22.05-16 Services and Ancillaries

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The installation of services and ancillaries, in particular those that will reduce greenhouse gas emissions or water consumption such as solar panels, solar hot water services or water storage tanks, may be permitted on any visible part of significant or contributory buildings where it can be demonstrated there is no feasible alternative and the services and ancillaries will not detract from the character and appearance of the building or heritage place.

Items affixed to roofs, such as solar panels, should align with the profile of the roof.

Services and ancillaries should be installed in a manner whereby they can be removed without damaging significant fabric.

For new buildings, services and ancillaries should be concealed, integrated or incorporated into the design of the building.

22.05-17 Street Fabric and Infrastructure

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It is policy that street furniture, including shelters, seats, rubbish bins, bicycle racks, drinking fountains and the like, is designed and sited to avoid:

- impacts on views to significant or contributory places and contributory elements; and
- physical impacts on bluestone kerbs, channels and gutters, other historic street infrastructure and historic street tree plantings.

For existing significant and contributory street fabric and infrastructure, it is policy that:

- restoration, reconstruction and maintenance should be carried out in a way that retains the original fabric, form and appearance.

22.05-18 Signage

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It is policy that new signage associated with heritage places meet the following standards:

- Minimise visual clutter.
- Not conceal architectural features or details which contribute to the significance of the heritage place.
- Not damage the fabric of the heritage place.
- Be in keeping with historical signage in terms of size and proportion in relation to the heritage place.
- Be readily removable.
- Address all relevant performance standards of Clause 22.07 – Advertising Signage

Advertising signs may be placed in locations where they were traditionally placed.

The historical use of signage may be justification for new or replacement signage.

Existing signage that is deemed to have heritage value should be retained, and not altered or obscured, including historic painted signage.

22.05-19 Reference Documents

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Central Activities District Conservation Study 1985
 South Melbourne Conservation Study 1985
 Central City (Hoddle Grid) Heritage Review 2011
 Bourke Hill Precinct Heritage Review Amendment C240 2015
 City North Heritage Review, RBA Architects 2013
 East Melbourne & Jolimont Conservation Study 1985
 Parkville Conservation Study 1985
 North & West Melbourne Conservation Study 1985, & 1994
 Flemington & Kensington Conservation Study 1985
 Carlton, North Carlton and Princes Hill Conservation Study 1994 & 1985
 South Yarra Conservation Study 1985
 South Melbourne Conservation Study 1985 & 1998
 Harbour, Railway, Industrial Conservation Study 1985
 Kensington Heritage Review, Graeme Butler 2013
 Review of Heritage Buildings in Kensington: Percy Street Area, Graeme Butler 2013
 Arden Macaulay Heritage Review, Graeme Butler 2012
 West Melbourne Heritage Review 2016

