



PARKVILLE ASSOCIATION INC
Box 54, Parkville 3052

1967 – 2017 Celebrating 50 years protecting Parkville’s heritage and amenity

Melbourne Planning Scheme - Amendment C258

Local heritage policy review

1 Introduction

This submission is lodged on behalf of the Parkville Association Inc (the Association) which welcomes this Amendment in principle. The Association looks forward to the incorporation of the finalised components into the Melbourne Planning Scheme (the Scheme) which will assist the implementation of the Heritage Overlay - particularly in relation to the assessment of planning permit applications in Parkville.

Given the Association’s comments made on the Amendment documents, the Association considers that it would be appropriate for an Independent Panel to be appointed to review submissions and provide advice to the Melbourne City Council on the final form of the Amendment. If such a Panel is appointed, the Association would wish to present at a Panel Hearing.

In addition, for the reasons set out in this submission, the Association submits that this policy review should not be seen by Council as the last word on heritage planning for heritage places outside the Capital City Zone (CCZ) especially for Parkville. There is an on-going need for further heritage information gathering and analysis and preparation and communication of guidelines to assist property owners to achieve identified heritage outcomes when planning alterations and additions to significant heritage places.

2 Clause 22.05 Heritage Places Outside the Capital City Zone

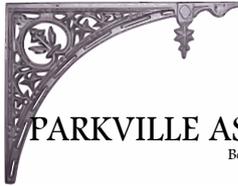
The Association welcomes the introduction of a Local Policy that will guide the assessment of planning permit applications in areas covered by the Heritage Overlay. In particular, we hope that application of this policy will result in built outcomes that are more consistent with the heritage significance of the Parkville precinct than has been the case in relation to a number of recent developments.

Major concerns

An overriding and on-going concern of the Association is the assessment of applications for proposed alterations and additions to the **rear of ‘significant’ or ‘contributory’ places** within the Parkville Precinct and which are visible from and/or directly abut rear lanes. In this regard, the Association is not convinced that Clauses 22.05-6 and 22.05-8 will give sufficient clear direction as to planning and design elements that are consistent with the original fabric and form as well as heritage significance of elements other than the ‘front or principal part of a building’. The Association does not wish for Parkville’s heritage significance in the longer term to be respected and evident mainly along the street frontages while it is ‘open slather’ for development visible from and along the rear lanes in terms of built outcomes which are incompatible with the heritage significance of these laneways.

Throughout this clause, there appears to be a need to give more explicit inclusion of the **streetscape** as an element to be taken into account in the documentation and assessment of planning permit applications.

As noted below, the Association has a number of concerns about the content of the **Statement of Significance** and, as a result, how elements of this Statement will be used to



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inform the assessment of planning permit applications. Essentially, the Association considers that the Statement needs amendment and strengthening to provide a robust basis to assist in the achievement of the Policy Objectives set out in Clause 22-05-2 through the assessment of planning permit application.

While not strictly speaking a matter for the introduction of Amendment C258 into the Melbourne Planning Scheme, the Association considers that, over time, Council should use the **Policy Objectives** contained in Clause 22.05-2 as 'key performance indicators' to report on the progressive and on-going achievement of heritage protection in relation to discrete areas such as the Parkville Precinct.

Detailed comments

The Association has a number of detailed comments on and queries about the content of Clause 22.05 as follows:

- In Clause 22.05-1 – Policy Basis, in the fourth paragraph, the Association considers that, given the definitions that are included in Clause 22.05-18 the second sentence should read 'It encourages the **conservation** and restoration..... rather than '..preservation and restoration...'. This statement would then be more consistent with the intentions set out in the Policy Objectives. The Association recognises that Parkville is a living community and not a precinct that is set in aspic.
- In Clause 22.05-3, the Association considers that the default position in relation to the nominated information to be submitted with planning permit applications in the HO4 area is that, as appropriate, a Conservation Management Plan, Heritage Impact Statement, arboriculturalist report, sightlines and other information **will be** required. The onus must be on applicants to provide sufficient and appropriate information up front to assist the community to comment and Council to make better informed decisions.
- in Clause 22.05-4, first paragraph, suggest that the specific clause reference (22.05-18) for the definitions be included and delete 'at the end of this policy'. In the second paragraph, it is considered that the 'reasoned explanation' needs to relate to how the policy objectives will be achieved through any proposed variations – the emphasis needs to be focussed on the required **policy outcomes** rather than enabling applicants (and their architects) to provide a lot of 'weasel words' as to how they have addressed the objectives.
- Clause 22.05-5 Demolition:
 - second para – suggest add '..justification for **seeking or** permitting demolition' in order to discourage such applications in the first instance;
 - third para – suggest add '**Except in exceptional circumstances such as where there is a demonstrable existing risk to public safety**, a demolition permit **will** not be granted...' in order to indicate that grant of such permits is definitely by exception;
 - fifth para – As far as South Parkville is concerned, the provision 'Demolition of front fences and **outbuildings**.....will not normally be permitted' raises the spectre of how remaining freestanding outhouses/toilets and other structures will be treated. Also if this provision is to be upheld, the Association considers that the Statement of Significance needs to specifically strengthened in this regard;
 - sixth para, dot points – the streetscape context should be added, as appropriate to these dot points.
- Clause 22.05-6 Alterations:
 - third para, dot points – the streetscape context should be added, as appropriate to these dot points.
- Clause 22.05-7 New Buildings:
 - first para – suggest that new buildings should have a positive/complementary effect on the heritage significance rather than the lower order standard of 'not detract from the assessed significance of the heritage place';
 - second para, first dot point, second dot point – suggest adding where the identified 'key attributes' are documented (– in the Statement of Significance?) so that this



- material relates to agreed/documentated attributes and not those that the applicant thinks are relevant;
- second para, second dot point – need to add the locations from where ‘views of the front or principal part of adjoining significant or contributory buildings’ are not to be obscured;
- second para, seventh dot point - the term ‘historic elements’ is not defined – should this be ‘fabric’ (as defined in Clause 22.05-18?)
- third and fourth paras – from where is ‘concealment’ to be determined?
- Clause 22.05-8 Additions:
 - first para – suggest add ‘**The design of additions....**’
 - first para, first dot point - the term ‘historic elements’ is not defined – should this be ‘fabric’ (as defined in Clause 22.05-18?)
 - first para, second dot point – suggest add ‘streetscape’ – in large precincts such as the Parkville precinct, the characteristics of individual streetscapes need to be considered;
 - second para – in relation to the significance of lanes in the Parkville precinct, the Association considers that more policy guidance needs to be given in relation to the relationship of proposed additions to the actual elements and character of the relevant lane and the views along the streetscape of the relevant lane.
 - third para, second dot point – suggest add ‘..from visible secondary elevation(s) **such as from adjoining lanes.**’
 - fifth para – the Association considers that the requirement for concealment of additions to a significant or contributory building should relate to certain laneways which should be included in the Clause 81 inventory as ‘significant streetscapes’ (see comment in relation to Incorporated Document – Clause 81 Schedule – Inventory.
- Clause 22.05-9 Restoration and Reconstruction: - suggest add ‘ where there is **documented** evidence.... Note ‘renovation’ is not defined.
- Clause 22.05-12 Vehicle Accommodation and Access: From a heritage perspective, it would be helpful to have some guidance provided about the effect of these works on the streetscape of laneways of heritage significance.
- Clause 22.05-15 Street Fabric and Infrastructure: - the effect on ‘streetscapes of heritage significance’ and street trees should be included as a matter to be considered in the introduction of new street furniture.
- Clause 22.05-17 Gradings of heritage places: It is not what the basis will be for ‘other streetscapes may also be significant....’ if they are not included in the Clause 81 Schedule Inventory. If streetscapes are significant they should be explicitly identified and documented in the Scheme.
- Clause 22.05-18 – Definitions:
 - The Association suggests that the source of certain definitions should be identified such as those taken directly from the Burra Charter or the *Planning and Environment Act 1978* (the Act). Also if there is any potential conflict between definitions included in the Act such as ‘use’ and those in this clause, this should be rectified.
 - Is there a need for including definitions of both ‘context’ and ‘setting’ – potential for confusion;
 - a number of definitions include reference to ‘modern design’ or ‘modernity’ – as this could be interpreted to have a specific meaning in relation to architectural design (the Modern Movement), use of the term ‘contemporary’ may be more appropriate

3 Incorporated Document – Clause 81 Schedule – Statement of Significance – HO4 Parkville

The Association welcomes the preparation of a Statement of Significance in relation to HO4 which applies to most of the residential areas of Parkville. While the Association does not wish to cause any undue delay in the introduction of strengthen heritage planning controls to the HO4 area, it considers that such controls should be based on comprehensive and up to date research.



Need for updated Conservation Study of Parkville

It is widely recognised that contemporary planning policy should be 'evidence-based'. As a result, in order to provide a comprehensive and up to date information base for comprehensive heritage controls - including a Statement of Significance and an inventory of significant heritage places - the Association considers that there is a need for an updated Conservation Study for Parkville – given that the existing Study was prepared in 1979 by Jacobs Lewis and Vines – one of the first conservation studies to be undertaken in Victoria. The Association considers that some of the content of the 1979 study, while providing some useful information, would not be consistent with the *Model Consultant's brief For Heritage Studies* (January 2010) issued by Heritage Victoria for such studies, for example, the preparation of a comprehensive Thematic Environmental History for Parkville. Such a History is an important basis for preparing the Statement of Significance.

Indeed, the third dot point in the Policy Objectives in Clause 22.05-2 appears to acknowledge that there may be '.....limited information in the existing citation or Council documentation.

Comments on the draft Statement of Significance

A marked up copy of the draft Statement of Significance is attached. The mark up includes a mix of queries about the basis for some statements, factual and presentation corrections, and other suggestions.

4 Incorporated Document – Clause 81 Schedule - Inventory

The Association considers that there are a number of issues with the draft Incorporated Document.

Transfer of existing Gradings of heritage places to 'significant and 'contributory'

The Association considers that a comprehensive and up to date heritage assessment of South Parkville in particular may result in some individual buildings being assessed as being 'significant' rather than 'contributory' according to the applicable definitions included in Clause 22.05-18.

Streetscapes

The Association queries why some streetscapes in South Parkville in particular are identified as 'significant' when the majority or all of adjoining buildings are identified as 'contributory'. This assessment appears contradictory and suggests that some or all of the buildings within the specified streetscape should be reassessed as 'significant' based on more up to date assessment rather than relying on 'translation' of gradings from the 1979 study. The definition of 'Significant Streetscape (as referred to into Clause 22.05)' states that 'Significant streetscapes are **collections of buildings outstanding** (emphasis added) either because they are a particularly well preserved group from a similar period or style, or because they are highly significant buildings in their own right'.

Laneways

The Association considers that there is an urgent need for all rear lanes in the Parkville Precinct to be assessed and, where appropriate, identified as significant streetscapes in their own right and included in the Clause 81 Inventory.

By way of example, the existing scale of development adjoining laneways on both the east and west sides of Levers Reserve between Bayles Street and Flemington Road is generally of a fairly uniform single storey form (with a few exceptions) which, together with the fall of the land towards the Reserve, presents a harmonious streetscape redolent of the longstanding historical scale of development presenting to rear lanes.



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Mapping of heritage inventory

Council officers noted that the new inventory is being mapped at present and, during consultation with the Association, indicated that this mapping should be available for a community information session on 22 April. The Association was subsequently advised in early May that Council is '...hoping to complete the maps in the coming months, probably after we have received and analysed all the submissions for Amendment C258'. The Association is disappointed that this mapping is not available as part of the exhibition material given that Council has been working on this Review for approximately three years.

Need to review and update coverage of Heritage Overlay

While changes to the HO4 are not contemplated by Amendment C258, the Association considers that there are gaps in the extent of the existing HO4, for example:

- along Royal Parade north of McArthur Road;
- the southern section of Gatehouse Street and section of Flemington Road adjacent to the 'returned' section of Royal Park which is covered by HO1093.