



Melbourne Planning Scheme - Amendment C258

Local heritage policy review – re-exhibition of Heritage Inventory (Incorporated Document – Clause 81 Schedule)

1 Introduction

This submission is lodged on behalf of the Parkville Association Inc (the Association) and should be considered in conjunction with the Association's earlier submission (May 2017) on aspects of Amendment C258 – see relevant extracts included at the end of this submission.

2 The re-exhibited Heritage Inventory

The Association notes that the approach to the conversion of the existing 'Gradings' inventory (A, B, C and D graded buildings) to 'significant,' 'contributory' or otherwise for Parkville was to be as follows:

In Parkville, the direct transfer was straightforward for all alphabetical gradings, i.e. A and B to significant, C and D to contributory. (Lovell Chen 2015 **Methodology Report** City Of Melbourne Heritage Gradings Review, p6)

However, there appear to be some anomalies in the transfer of Graded buildings to 'significant' or 'contributory' in South Parkville that, on the face of it, appear to relate more to change of ownership over recent decades than intrinsic heritage significance, for example:

- the A Graded Buildings at 21-23 Royal Parade have been downgraded to 'contributory';
- some buildings have been introduced to the new Inventory, for example, 27 and 31-37 Bayles Street (Parkville Post Office) and 39 to 43 Degraves Street (39 – 43 being neighboring houses to 'Wardlow') as 'significant'.

The Association queries why exceptions to the stated methodology has been made for these buildings only – the inclusion of the latter buildings in Bayles and Degraves Streets as 'significant' is welcomed. Some explanation would assist to understand why these exceptions have been made yet for the rest of Parkville, reliance is still placed on assessments and citations that were made as part of the original *Parkville Conservation Study* in 1979.

In the Association's view, the desk top conversion of gradings largely made in 1979 Heritage Study is essentially 'building a castle on sand' for the reasons presented in our May 2017 submission. South Parkville, in particular, as one of the most intact urban conservation areas in Australia, warrants an up to date evidence base for its heritage inventory. For example, in relation to 39-43 Degraves Street – if the connection to 'Wardlow' is put aside, arguably there are many other house in South Parkville that should be identified as 'significant' rather than 'contributory'.

The importance of this issue relates directly to the assessment of planning permit applications within the Heritage Overlay area. Based on the definitions of 'significant and 'contributory' presented in the exhibited Clause 22.05-17, there is likely to be a higher threshold of assessment for changes to an individual building identified as 'significant' compared to one identified as merely 'contributory' even if it is located in a 'significant' streetscape. The Association is of the view that the heritage value of South Parkville relates to the whole built form of the area, not just the views obtainable from and to significant streetscapes.



PARKVILLE ASSOCIATION INC.

In some circumstances, the inclusion of descriptive names for buildings/places would assist, for example, 188 Gatehouse Street as the former College Church Hall and inclusion of an address for some of the buildings within the University of Melbourne's property, for example, the Northern Market Reserve Wall – presumably the wall along Storey Street and Park Drive.

3 Conclusion

The Association notes that a Planning Panel will be appointed to consider this Amendment and wishes to be heard on this matter.

The Parkville Association Inc
28 January 2018



Relevant extracts from the Parkville Association's submission on Amendment C258 (9 May 2017):

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.

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 22.05-17.

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.