



Melbourne Planning Scheme Submission on the Local Heritage Policy Review

1 Introduction

This submission is lodged on behalf of the Parkville Association Inc (the Association) which welcomes this review. 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.

1.1 Lack of consultation during the Review

However, the Association is disappointed about how consultation has occurred in relation to this important review. Firstly, the Association was most concerned that there was no further consultation with local communities as committed to in the community presentations in March 2015 prior to the planned presentation of the material to Council's future Melbourne Committee for adoption in December 2015.

Secondly, the officer's report to the Future Melbourne (Planning) Committee meeting on 8 December 2015 claims that:

'...meetings [were held] with residents groups and their associated planning and heritage groups'.

No such meeting was offered or held with the Association.

Thirdly, providing a consultation period - albeit extended - over the December/January period is less than satisfactory for community associations in particular when many members are away and there is no scheduled Association meeting in January.

The Association notes that, in relation to the documentation of heritage buildings and places in Parkville, this Review relies on the 1985 Parkville Conservation Study and that no further work has been undertaken to update this information base or to undertake research that would assist in providing a broader basis for the cultural heritage significance of all parts of Parkville.

1.2 The draft Statement of Significance for Parkville

The Association's comments relate to:

- the 'fit' between the Statement of Significance (SoS) and the spatially unconnected sections of HO4 that apply to discrete sections of residential Parkville rather than the total Parkville precinct or suburb;
- insufficient material is presented in the SOS in relation to the explanation of why Parkville precinct is of social significance;
- whether Parkville should be considered significant relative to other heritage criteria particularly B (rarity), F (technical significance) and H (associative significance).

1.3 Clause 22.05 - Heritage Places outside the Capital City Zone

The Association's comments relate to:

- given the essential similarity of the two policies – Clause 22.05 Heritage Places outside the Capital City Zone and Clause 22.04 Heritage Places within the Capital City Zone -

the Association queries why the two policies cannot be combined into one policy that applies to all heritage places within the City of Melbourne.

- selected comments on the content and presentation of Clause 22.05 - Heritage Places outside the Capital City Zone and Heritage Places from the perspective of how this policy might be applied in relation to Parkville.

These matters are discussed in more detail in the following sections.

The Association would welcome the opportunity to meet with Council officers and/or the consultants to discuss these matters further and to present further comment on the historical material in the Statement of Significance (subject to the availability of relevant Association members).

2 The draft Statement of Significance for Parkville

2.1 *The 'fit' between the SoS and the spatially unconnected sections of HO4*

Heritage Overlay 04 (HO4) applies to three spatially unconnected residential areas of the suburb of Parkville - 'West' Parkville, 'South' Parkville and parts of 'North' Parkville. Most of the land in between these three areas is covered in the Scheme by other Heritage Overlays, particularly those applying to Royal Park (HO 1093) and the Melbourne Zoological Gardens (HO 364) and a number of place or building specific HOs.

The Association is concerned about the lack of 'fit' between the SoS, which, as drafted, appears to describe an undefined area called the 'Parkville Precinct' and refer/apply to parts of Parkville outside the three specific areas covered by HO4. As drafted, the SoS for Parkville appears to apply uniformly to the whole of the suburb of Parkville rather than just the areas of HO4 and apply a uniform level of significance to the three areas covered by HO4 even though there are distinct differences in heritage character and consistency as described and discussed in the SoS. Under the heading, 'What is Significant?', the 'key attributes' of the Parkville Precinct are a bit of a muddle of things that are largely identifiable with South Parkville with a few oddments thrown in for North Parkville and virtually nothing for West Parkville along with comments about areas beyond HO4.

Although there are similarities in their historical development - particularly the relationship with Royal Park - the three residential areas of Parkville are now, arguably, not of similar or uniform heritage character and significance.

The preparation of one SoS to apply to the three discrete areas covered by HO4 results in an awkward SoS that has differential content for these three non-contiguous areas. Also the Association queries the utility in forums such as VCAT of an SoS that refers extensively to and relies on the significance of areas beyond the subject HO.

2.2 *Insufficient material presented about the social significance of the Parkville precinct*

In relation to the three criteria which are identified in the SoS to underpin the significance of the Parkville precinct, the Association considers that insufficient material is presented in the SoS in relation to the explanation of why the Parkville precinct is of **social significance** (criterion G). Perhaps part of the reason for this is twofold:

- very little meaningful consultation was undertaken with the Parkville community which would have provided insight and detail in this regard and
 - very little guidance is given about what constitutes 'social significance' in a heritage context in documents such as *Planning Practice note 1 – Applying the Heritage Overlay*.
- As drafted, this section of the SoS refers to:

- The Parkville Precinct ‘.....is highly regard in Melbourne for its intact Victorian streetscapes and character’ – this statement is largely repeated and elaborated more fully in relation to the discussion under ‘aesthetic/architectural significance’. More engagement with the local community would have elicited views from the community that people like, if not love, living in Parkville because of the physical heritage character and the sense of community that comes partly from this shared community value. This sense of association and identification with Parkville (South Parkville in particular) is reflected in such social dynamics as a proportion of residents moving from one house to another within this area as family, economic and other circumstances allow (such as, ‘favourite’ houses coming on the market) and former students of Melbourne University of Melbourne coming back to live in Parkville because of happy memories of student days and the attractiveness of the area. Another community/social attribute that is evident in Parkville is the ongoing, community-based sense of protection of the heritage significance and related residential amenity dating back to the establishment of the Parkville Association in the early 1970s and various major campaigns since then, such as the Wade house case.
- *Royal Park is also highly valued for its landscape qualities and opportunities for formal and passive recreation* – this statement applies to an area **outside** but adjacent to the areas covered by HO4. For residents of Parkville (those areas covered by HO4), a highly valued attribute of living in these areas is the **proximity** to Royal Park and its distinct character - the visual linkages afforded to and from the residential areas, its large size and sense of space, its landscape character of the park and the associated fauna, and the formal and informal recreational opportunities that many residents avail themselves of regularly, if not daily in many cases. The bland statement that ‘residents of the precinct value their proximity to the park...’ goes no where capturing the social importance/value of the proximity of the residential areas of Parkville to Royal Park and the long standing campaigns that have been undertaken to maintain easy and safe access to the Park through, for example, the elimination of heavy traffic on Gatehouse Street and traffic calming on The Avenue.
- *Residents of the precinct value their proximity to the park, and to the University of Melbourne* – our response to this statement is largely covered by the above discussion.

2.3 Applicability of additional heritage criteria to HO4 areas

The Association queries whether ‘South’ Parkville in particular should be considered significant relative to other heritage criteria in addition to Criteria A (historical), G (social) and H (aesthetic/architectural) including:

- Criterion B – possession of uncommon rare or endangered aspects of our cultural or natural history (rarity) – as South Parkville is considered to be one of the most intact areas of Victorian residential architecture in Melbourne, Victoria and, arguably, at a national level, the Association considers that there is a case that this section of Parkville possesses and presents a rare aspect of our (Victoria’s) cultural history;
- Criterion F - importance in demonstrating a high degree of creative or technical achievement at a particular period (technical significance) - the scientific importance of the drainage works under South Parkville were mentioned in the community workshop but this aspect does not appear to have been researched in relation to this criterion;
- Criterion H – Special association with the life or works of a person, or group of persons, of importance in our history (associative significance) – as noted, essentially in passing in the section of the SOS relating to historical significance.;

The University of Melbourne was established on the eastern side of the road in 1853, and has historically been strongly linked to the precinct, with many academics taking up residence as did professionals attracted by proximity to the city’.

Arguably, more detailed historical and/or sociological research would document the special, long standing and continuing association between residents of Parkville in general and South Parkville in particular and the University of Melbourne, the Walter and Eliza Hall Institute, the Royal Melbourne Hospital, the Royal Childrens Hospital, and the Melbourne Zoological Gardens both in terms of academic and research achievements by Parkville residents over many decades and in the close links between many of these institutions and voluntary involvement by many Parkville residents.

3 Clause 22.05 Heritage places outside the Capital City Zone

3.1 Similarity of and need for two policies relating to heritage places

The Association notes that this policy is essentially similar to that drafted for *Clause 22.04 Heritage Places within the Capital City Zone (CCZ)*. While there are a number of matters that require similar treatment, it is surprising that, if two policies are required in the Scheme, there is not a greater difference between the two policies so that they more closely reflect the heritage character and significance in the two policy areas. For example, within the Capital City Zone, there are many heritage buildings of substantial built form and also the context of heritage buildings and place within the CCZ is generally substantially different in scale and built form to heritage places outside the CCZ.

3.2 Comments on Clause 22.05 – Heritage places outside the Capital City Zone

The Association queries where there has been any ‘consistency testing’ undertaken of the content of the policy and other policies and controls in the Scheme, that is, are there actual control mechanisms elsewhere in the Scheme that will effectively help in the achievement of the policy Objectives set out in this Clause.

The Association offers the following comments on Clause 22.05 – Heritage places outside the Capital City Zone:

A number of terms appear to be used interchangeably and in a way that may lead to confusion, for example, ‘heritage values’ and ‘heritage significance’;

22.05-2 Permit Application Requirements - The Association considers that the information requirements under this Clause should be mandatory not discretionary in order to provide an appropriate heritage information base on which decisions are made. Having this information requirement as discretionary is setting the bar too low and inconsistent with facilitating the achievement of the policy objectives.

22.05-4 Performance Standards for Assessing Planning Applications – as written, this is not policy but an invitation to applicants to provide reasons why they should avoid or vary the standards.

22.05-5 Demolition – The various statements that set out circumstances in which demolition of heritage elements ‘will not normally be permitted’ and that poor condition of a significant or contributory building is not a justification should all be grouped together at the start of this subclause in order to very clearly indicate, in effect, that demolition of significant heritage buildings or heritage fabric is unlikely to be permitted. This would unambiguously set the

policy objective and then follow it by decision making criteria. Recording of a significant building approved for demolition should be made mandatory not discretionary.

22.05-6 – Alterations – The Association considers that, if the stated policy objectives are to be achieved, retention/preservation of external fabric which contributes to the significance of the heritage place should be a mandatory not a discretionary requirement. The statements that set out circumstances in which sandblasting of render etc and painting of previously unpainted surfaces 'will not normally be permitted' should all be grouped together at the start of this subclause followed by the decision making criteria.

22.05-7 – New Buildings – The Association considers that, in order to achieve the policy objectives in relation to South Parkville, 'new buildings **must** not detract from the assessed significance of the heritage place'.

22.05-8 – Additions – The Association considers that, in order to achieve the policy objectives in relation to South Parkville, 'additions **must** be respectful of an compatible and in keeping with detract from the assessed significance of the heritage place'.

22.05-9 – Restoration and Reconstruction – no comment at this stage

22.05-10 – Subdivision – no comment at this stage

22.05-11 – Relocation - no comment at this stage

22.05-12 – Vehicle accommodation and Access – no comment at this stage

22.05-13 – Fences and Gates – no comment at this stage

22.05-14 – Services and Ancillaries – in the light of the recent installation of NBN and gas regulators and other infrastructure in South Parkville in particular with little or no regard to the heritage impact of such works, there is arguably a need for the policy to include a requirement for a Heritage Impact Statement to be undertaken in advance of widespread installation of services and ancillaries. Similarly for substantive changes to local road infrastructure such as installation of or changes to roundabouts.

22.05-15 – Street Fabric and infrastructure - there is arguably a need for the policy to include a requirement for a Heritage Impact Statement to be undertaken in advance of widespread installation of street fabric and infrastructure.

22.05-16 – Signage – there is arguably a need for the policy to include a requirement for a Heritage Impact Statement to be undertaken in advance of widespread installation of signage.

22.05-17 – Grading of heritage places – for consistency, as 'gradings' have been superseded, the Association suggests that this should be entitled 'Significance of heritage places'

Prepared by the Parkville Association Inc

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