

PANEL HEARING—AMENDEMENT C142 to the PORT PHILLIP PLANNING SCHEME  
322-332 ST KILDA ROAD, ST KILDA  
THE CITY OF PORT PHILLIP



**HERITAGE EXPERT WITNESS STATEMENT**

by

**JOHN BRIGGS**

Instructed by

**RIGBY COOKE LAWERS**

on behalf of

**OWNERS CORPORATION (Plan No. 23531)**

**October 2019**

**John Briggs Architect  
And Conservation Consultant**

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I am the Principal of John Briggs Architects Pty Ltd, Architect and Conservation Consultant at 331A Bay Street, Port Melbourne. This Statement of Evidence reviews the heritage significance and appropriate heritage cover for the former Gresham Laundry building at the above address.

I am a Registered Architect, No. 4972, a member of the RAIA and hold a Bachelor of Architecture, University of Melbourne.

Of the 33 years that I have worked in the practice of Architecture, the last 29 years have been predominantly in the field of Conservation Architecture. My training in conservation architecture was in my employment with the firm Allom Lovell and Associates over 8 years where I was the Project Architect responsible for the heritage works at both the Regent Theatre and the Gothic Bank at 380 Collins Street, amongst other works. I left Allom Lovell and Associates in 1998 to pursue practice in architecture and as a heritage consultant.

My work has provided me with broad experience in all aspects of heritage architecture including historical research, preparation and production of conservation reports and conservation plans for projects at all scales, as well as the preparation and presentation of submissions to Councils, Heritage Victoria, Planning Panels and to the Victorian Civil and Administrative Tribunal. I am a heritage advisor to the City of Melbourne. I have significant experience in the design, documentation and administration of restoration works, works to reconstruct missing historic elements and works to facilitate the adaptation of historic buildings for new use.

In preparing this statement I have been instructed by Rigby Cooke Lawyers on behalf of the Owner Corporation (Plan no. 23531) to provide expert evidence on the subject site.

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.



John Briggs  
John Briggs Architects Pty Ltd

October 2019

**Introduction**

This statement of evidence addresses the proposed extension of the precinct boundary of the Heritage Overlay, HO6, the St Kilda East heritage precinct to take in the whole of the property at 322-332 St Kilda Road extending to the Pakington Street frontage. Also addressed is the proposed elevation of the property from the existing non-contributory status afforded to the property to that of 'Significant'.

The documents provided to me to assist in my assessment are as follows:

- HO6 St Kilda East Precinct Review Report - David Helms Heritage Planning;
- Summary Table prepared by David Helms - Changes to the heritage grading of places within the existing HO6 and HO391 precincts;
- Explanatory report;
- Notice of preparation of amendment;
- Instruction sheet;
- Exhibition Map;
- Clause 21.07 – Incorporated Documents;
- Clause 22.04 – Heritage Policy;
- Schedule to Clause 43.01 – Schedule to the Heritage Overlay;
- Schedule to Clause 72.04 – Schedule to Documents incorporated in this Planning Scheme;
- Port Phillip Heritage Review – May 2019 (extract);
- Port Phillip Heritage Policy Map – May 2019 (extract);
- Port Phillip Neighbourhood Character Map – May 2019 (extract);
- Revised Citation – HO6 – May 2019;
- New Citations – individually significant properties; and
- Revised existing Citations.

I have also been provided with the Submission made on behalf of the Owners Corporation, 28 June 2019 and Council's consideration of the submission, at its ordinary council meeting of, 28 August 2019. I have inspected the site and its interior. In making my assessment I have had regard to the heritage provisions of the Port Phillip Planning Scheme and to the proposed draft amendments to those provisions. I have also had regard to the Planning Practice Note 1, and provisions of other municipalities and panel reports with respect to attribution of significance to the front, principal, or primary part of a heritage entity as appreciated from the public realm.

**Summary of Opinion**

It is my assessment that the portion of the subject property with frontage to Pakington Street which is not included within the current mapping of the East St Kilda Heritage Precinct is without any heritage values and that there is no justification for the inclusion of this rear portion of the land within the Heritage Overlay.

In my view an appropriate appreciation of the integrity of the subject heritage entity would be provided by controlling the air space behind the parapet to a depth of 10 metres. It is appropriate that the subject property is encumbered by the Heritage Overlay no more than is necessary to identify and protect the heritage value as those are now proposed. I note that there are no internal heritage controls to this heritage overlay.

I concur with the view that entities defined as 'Significant' within a heritage precinct, whilst contributing to the significance of the precinct, are places that would warrant an individual heritage overlay if they were not located within the precinct context. In my view places of heritage significance worthy of individual heritage recognition should, ideally, all have individual citations. In my opinion where no controls or citation differentiates a heritage entity from a wider precinct it can only be considered 'Contributory' to that precinct significance. It is not proposed to provide an individual citation or statement of significance for the subject site and instead the statement of significance for the St Kilda East Precinct is relied upon for explanation of what is of value, and following from this, what needs protection. With recognition of the extent and precedent of the work on the Heritage Policy Map and gradings in the City of Port Phillip, it is my view that little if anything turns on whether the subject property is graded 'Significant' or 'Contributory', although in my view the significance of the subject site is not clearly established in the material.

Beyond the front wall of the subject site there is no fabric, features or components of the building that are recognized as contributing to heritage significance, as an individual place of the precinct. It is however my view that the open air space over the front or principal part of the subject heritage entity is an 'object' that contributes to heritage value because that void ensures there is the appreciation, from the public realm, that the heritage entity survives with integrity.

In my assessment the perception and appreciation that the subject heritage entity retains integrity would be adequately ensured by locating the boundary of the heritage overlay at 8 to 12 metres from the front façade of this industrial building in the St Kilda Road context. It is my recommendation that a depth of 10 metres be adopted. Given the existing non-contributory grading it is my view that a depth to the heritage overlay greater than 12 metres has not been justified for this property, nor is it necessary to include the whole property as the default approach.

## Place Description

The subject site, located on the east side of St Kilda Road, where the original High Street streetscape has survived, is an Edwardian commercial complex formerly a laundry.



Figure 1 Streetscape including “The Gresham” former laundry



Figure 2 Google extract showing the subject site and context

The building retains its original parapet with Art Nouveau rendered detailing however the shopfronts, including verandah have been entirely replaced adopting detail referencing historical detail. Behind the façade the internal timber truss structure to the central bay has been retained as well as the clearstorey lantern to that central bay which extends some 25-30 metres behind the front façade. The roof and lantern is not

visible from the street behind the parapet. Beyond that original building the property has been redeveloped and no further early fabric exists. The site also extends to what appears to have once been a separate property with frontage to Pakington Street and this section of the property also has no fabric that exhibits any heritage character or has heritage value.



Figure 3 Shop fronts and veranda of the subject site that are wholly recent constructions



Figure 4 New development to the rear of the original laundry building



Figure 5 Interior looking to the street



Figure 6 Interior looking towards the rear



Figure 7 Existing extract of the Port Phillip Heritage Policy Map showing the property as non-contributory

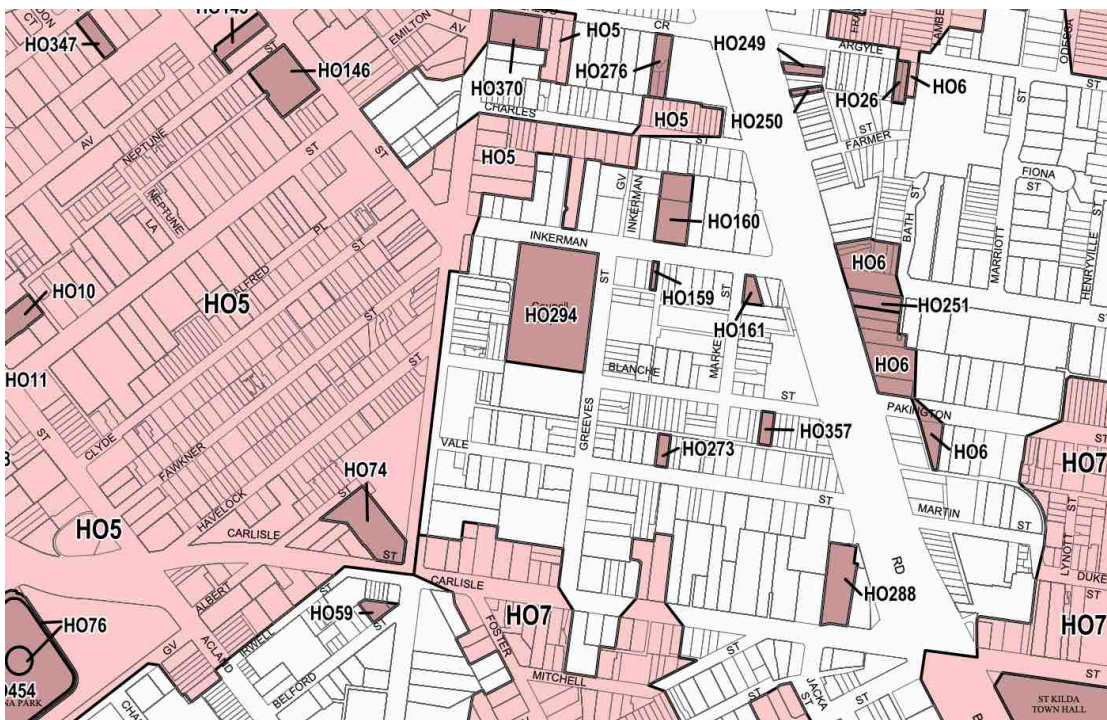


Figure 8 Existing extract of the Heritage Overlay map showing the front of the within HO6

**Port Phillip Heritage Review and Significance of the Site**

In Volume 1 Version 22, January 2017 of the Port Phillip Heritage Review at page 32 under the heading St Kilda Road Commercial the following description is provided:

*To the south [north] of Pakington Street is 'The Gresham' at nos. 322-332, which retains an intact Edwardian style parapet divided into four bays with arched panels separated by engaged piers. The central panel with 'The Gresham' in relief framed by sinuous Art Nouveau floral decorations and flanked by hexagonal piers is of note.*

It is only the front parapet that is addressed. In the review under 6.10.2, *History*, and the heading *The interwar boom c.1919 to c.1940*, at page 13 there is further description of both the High Street context of the subject site and mention of the site itself, as well as discussion of the historical value of the street:

*In the High Street shopping centre new buildings included 'The Gresham' laundry opened c.1920 to the south of the Post Office, while next door the Queens Arms Hotel was rebuilt in 1923-24 to designs prepared by architects Sydney Smith & Ogg. The Post Office Hotel further to north was remodeled in 1931. The construction of several motor garages including the one designed by Oakley & Parkes and erected in 1925 for the Canada Cycle & Motor Co. at the south corner of Charnwood Crescent demonstrated the growth of car ownership. Ironically, it was the increase in motor traffic that had by late 1920s led to the decline of High Street as a shopping centre because of the dangerous traffic conditions: only sixty feet wide, it had become the most notorious bottleneck in Melbourne. Competition from newer centres such as Acland Street and Carlisle Street was also a factor in its demise. The Mayor of St Kilda, Cr. Burnett Gray said in August 1934:*

*"High-street as a shopping centre is now a memory and will never again be what it was before modern transport was introduced."*

*The decline of the centre continued during the late 1960s and early 1970s when the rebuilding of St Kilda Junction and widening of High Street/St Kilda Road resulted in the destruction of all the buildings along the west side between the Junction and Carlisle Street.*

The following are extracts of Council's Heritage Review that in my view are pertinent to the understanding of the heritage value of the precinct and particularly the assessment of the heritage values of the subject property. Underlining is my emphasis.

### *1.3 Background*

*The HO6 precinct is one of the original heritage precincts introduced by the Port Phillip Heritage Review 1998 (the 1998 Review). The precinct as defined by the 1998 Review incorporates (wholly or in part) several smaller precincts identified by the St Kilda Conservation Study Area 1 (1982) and Area 2 (1984):*

*St Kilda Road Conservation Area – Alma Road to Martin Street (Area 2 study)*

*The 1998 Review was one of the first to be implemented using the then new VPP Heritage Overlay and the precinct boundaries reflect the thinking of the time, which was to draw the HO boundaries tightly around the areas of identified*



*significance to exclude as many Non-contributory properties as possible from the HO.*<sup>1</sup>

Although the subject property was graded as Non-contributory at the time, the property was not one that was excluded from the Heritage Overlay boundaries and the St Kilda streetscape was not one that was fragmented.

*The Panel appointed to consider submissions to Amendment C5 that implemented the 1998 Review questioned the fragmented nature of some of the other precincts (for example, HO7), but didn't make any comment about the HO6 precinct, which it generally supported. (page 4)*<sup>2</sup>

*The East St Kilda Heritage Study 2004 (the 2004 Study) did not review the HO6 precinct, ... (page 4)*

There is no certainty that the heritage value of the subject site was not overlooked in Amendment C5, however it is reasonable that property owners are provided with clear understanding of the change now proposed in the current stage of heritage review.

#### *1.4 Key issues identified by Stage 1*

*The history focuses upon the nineteenth century and includes specific detail about several individually significant places (which have their own citations containing the same information and so doesn't need to be repeated in such detail here), but very little information about the development of the precinct more generally. Much of the history also comprises descriptions of historic buildings or areas (for example Lambeth Place) that should be in the description. There is no or limited information about:*

*The commercial development along the east side of St Kilda Road, which is the remnant of what was once the main shopping district in St Kilda.*

*Similar to the history, the description focuses very much on nineteenth century development with a lot of information about individually significant places (that have their own detailed citation), but limited detail about the various sub-precincts within the precinct.*<sup>3</sup>

*The significance of some places within the HO6 precinct (Significant, Contributory or Nil) as shown on the Port Phillip Heritage Policy Map may be incorrect. There may be some additional places of individual significance, including some places outside of the HO6 precinct...*

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<sup>1</sup> Volume 1 Version 22, January 2017 of the Port Phillip Heritage Review, Page 3.

<sup>2</sup> Volume 1 Version 22, January 2017 of the Port Phillip Heritage Review, Page 4.

<sup>3</sup> Volume 1 Version 22, January 2017 of the Port Phillip Heritage Review, Page 5

On the basis of the above it can be understood that the frontage of “The Gresham” was previously not addressed and its contribution to the character and appearance of the heritage significant former High Street should be revised.

#### *Fieldwork*

*Fieldwork and site inspections were carried out during Stage 1 and again in Stage 2. The fieldwork was based on an examination of fabric visible from the street, using aerial photography where required. No internal inspections were undertaken.*

*During Stage 1 the entire HO6 and HO391 precincts, as well as all streets in the immediate vicinity (this included all streets in the block bounded by St Kilda Road, Wellington Street/Dandenong Road, Orrong Road and Alma Road, and between Alma Road and Argyle Street between St Kilda Road and Chapel Street) were inspected.*

*The purpose of the Stage 1 fieldwork was to:*

*Identify heritage gradings (Significant, Contributory or Nil) that may be incorrect;*

It is my view that “The Gresham” frontage as it presents to the public realm, including appropriate air space over the front or principal part of the building, contributes to the understanding and appreciation of the historical development and importance of the former High Street shopping centre of St Kilda. The balance of the site is of no significance or value.

#### *Reviewing precinct boundaries*

*Please refer to Appendix A for a discussion about how precincts are defined.*

*It is understood the irregular boundaries of the HO6 precinct, which have been drawn to exclude as many ‘Nil’ grade (that is, Non-contributory) properties as possible, was intended to avoid unnecessary permit requirements. However, in doing so the boundaries have in some instances excluded Significant places that form part of streetscapes otherwise included within the HO, and this has led to inappropriate development.*

*The current approach to the application of the HO to precincts recognises that Nil grade places should be included within the HO if considered necessary to manage future development that could impact upon the precinct. To minimise the need for unnecessary permits, a permit exemptions plan may be incorporated into the planning scheme in accordance with Clause 43.01-2.*

The subject site was Nil Graded, however was included in the heritage precinct for continuity of streetscape. The intent of avoiding unnecessary permit requirements

remains an important concern. For the subject site there are two plateaus to which this same concern applies, that of the Pakington Street portion of the site and that portion of the site beyond 10 metres which make no notable contribution to the heritage values of the street as addressed from the public realm.

### *Reviewing heritage grading*

*The heritage grading (Significant, Contributory or Nil) of properties have been reviewed using the definitions in Clause 22.04 of the Port Phillip Planning Scheme as a guide, and having regard to the statement of significance, the date of construction and the intactness and integrity of the place based on assessment of fabric visible from the street (see discussion below under 'Comparative analysis' and also Appendix A for further discussion about 'intactness' and 'integrity' and how this affects the heritage status of buildings).*

*The definition in Cl. 22.04 notes that Contributory places 'may have been considerably altered, but have the potential to be conserved'. A review of a selection of 'Contributory' places shows that typically they have been stripped of much of their historic detail (for example, chimneys removed, windows replaced and/or enlarged, verandahs removed or modified, cladding and roof materials replaced) and in some cases, only the overall form remains. Some also have unsympathetic additions.*

*On the other hand, places may have some alterations and still be considered Significant,*

In my assessment it should be accepted as evident that the frontage of the subject site contributes to the heritage significance of the former High Steet that is a sub-precinct of the Heritage Overlay, HO6. I have not been able to conclude that the frontage is evidently of a higher heritage value, or is an individually significant destination to be considered 'significant'. It is however also my view that given the context, and my recommendation regarding the extent of the heritage overlay mapping, nothing turns on the distinction between 'contributory' or 'significant' for this property.

## *2 Findings*

### *2.1 Summary*

*The findings of this review are:*

*► HO6 precinct. The citation has been reviewed and updated. The revised citation now includes a history, description, and a statement of significance in the current format that explains what is significant about the precinct and how and why it is significant at the local level. On this basis, the heritage status of some places has changed, several precinct extensions are recommended,*



Figure 9 Extract from the map of the study area showing the proposed extension across the subject land in purple, Attachment 1 to Council’s consideration of submissions



Figure 10 Google aerial 3D image of the site and surrounds

The following is the updated statement of significance for the HO6 St Kilda East precinct provided at Appendix B. The new statement of significance for the HO6 precinct is as follows:

*What is significant?*

*The St Kilda East precinct covers a large area contained in several parts with Wellington Street and Dandenong Road as its north boundary extending from St Kilda Road to Orrong Road. Development began in the 1850s and by the 1870s the area contained several mansions on large allotments, closely settled streets containing modest cottages, several private schools, as well as six churches and the St Kilda Drill Hall surrounding Alma Park. Much of the vacant land between St Kilda Road and Hotham Street was built upon during the boom of the 1880s, and successive building booms before and after World War I resulted in the development of the remaining vacant sites, as well as the redevelopment of the original mansion estates. By the end of the interwar period the precinct was almost fully developed, and the next development boom of the 1960s was characterised by the replacement of older building stock, mostly by flats, continuing the trend toward higher density living that began during the early 1900s. Primarily a residential area, the precinct includes the eastern side of St Kilda Road, which grew to become St Kilda's premier commercial centre by the early 1900s, but declined by the 1930s and was partially destroyed by road widening in the early 1970s.*

*The precinct comprises buildings predominantly from the Victorian, Federation/Edwardian and interwar periods interspersed with a lesser number of post-war buildings, mostly flats. Many of the houses and flats, particularly those of the interwar period, retain original front fences. The buildings within the precinct are complemented by historic infrastructure and other features such as bluestone kerb & channels, bluestone laneways, the pillar post box on the north side of Alma Road east of Chapel Street, two remnant cast iron bases of former gas street lamps, and the mature street trees (*Platanus* sp.) in Charlotte Place, Charnwood Road, Cintra Avenue, Crimea Street, Dandenong Road and Redan Street.*

*Buildings and features that contribute to the significance of the precinct are shown on the precinct map.*

*How is it significant?*

*The St Kilda East precinct is of local historic, aesthetic, architectural significance to the City of Port Phillip.*

*Why is it significant?*

*It is historically significant as evidence of the successive waves of growth in St Kilda from the mid nineteenth to the mid twentieth century. It demonstrates how, by the late nineteenth century, the residential areas of St Kilda had advanced as far as Hotham Street (with the outlying areas such as Shirley Grove of note as evidence of the remote subdivisions partially developed during the 1880s boom) and, following the opening of the electric tramway along Dandenong Road in 1911, had reached the easternmost municipal boundary at Orrong Road by the early twentieth century. The precinct is also significant as evidence of the rapid growth of St Kilda during the early to mid-twentieth century and the trend to higher density living during that time. This is demonstrated by the groups of Federation/Edwardian and interwar houses, and the sheer numbers*

*of duplexes and flats, which demonstrate the importance of St Kilda to the development of apartment living in Melbourne. (Criterion A)*

*Of particular significance are buildings dating from the 1870s or earlier, which are now rare within St Kilda, and the grand mansions and villas that demonstrate how the high ground associated with Dandenong Road and Alma Road and the building of some of St Kilda's earliest churches surrounding Alma Park led to this becoming one of the most prestigious residential areas in Melbourne by the end of the nineteenth century. The presence of these mansions alongside the modest cottages in nearby streets illustrates the diverse socio-economic groups that have co-existed in St Kilda since it was first settled. This is also demonstrated by the simple form and small scale of the General Baptist Church in Pakington Street that contrasts with the grand church complexes in Chapel Street and Dandenong Road. (Criteria A & G)*

*This group of churches surrounding Alma Park is significant as an expression of the status enjoyed by the churches during the nineteenth century and expresses it not only in architectural terms but also in the number of churches located within proximity of each other. The presence of the synagogue in Charnwood Crescent recalls the long-standing presence of the Jewish community in the area. (Criteria A & G)*

*The buildings along St Kilda Road are significant as the surviving remnants of the former High Street shopping centre that was St Kilda's most important retail centre until the 1930s. (Criterion A)*

*Collectively, the duplexes and flats within the precinct are significant for their ability to demonstrate the development of multi-dwelling and flat design in Melbourne during the early to mid-twentieth century and forms part of the important collection of flats within the broader St Kilda and Elwood area. (Criteria C & D)*

*Architecturally and aesthetically, the precinct is significant for its rich and diverse collection of residential buildings. The resultant streetscapes include those that were developed at one time and are more homogeneous in character to those that represent several phases of growth and are quite diverse. The latter streetscapes that comprise a mix of late nineteenth and early twentieth century houses interspersed with interwar and post-war flats are a distinctive characteristic that distinguishes St Kilda and sets it apart from other areas within Port Phillip. (Criteria D & E)*

It could be noted that the architectural and aesthetic significance is attributed only to residential buildings although there is evident character and appearance at least of interest to the Art Nouveau facade of the subject site.

*Within the precinct, the following streets are of note:*

*► Dandenong Road, which is a remarkable boulevard because of its very great width and landscaped plantation with rows of mature Plane trees and the central tramway reservation enriched by the row of decorative centre span poles.*

▶ *Chapel Street, which contains an impressive group of landmark buildings including three churches, the St Kilda Drill Hall and Astor Theatre, as well as three late nineteenth century mansions and two groups of Federation/Edwardian and interwar housing.*

▶ *Charnwood Crescent and Charnwood Grove, which comprise late nineteenth century houses interspersed with early twentieth century flats surrounding the landmark St Kilda Hebrew Congregation Synagogue and hall/school complex.*

▶ *Charnwood Road and Crimea Street, which contain a rich collection of late Victorian, Edwardian and interwar houses and flats including several individually notable examples, as well as the former Baptist Church in Crimea Street, and are also enhanced by the mature street trees.*

▶ *The highly intact and very consistent Edwardian housing in Charlotte Place & Cintra Avenue (and the intervening section of Chapel Street), Moodie Place, and along the west side of Lambeth Place.*

▶ *Palm Court, a very intact interwar cul-de-sac containing flats and duplexes with original front fences and garages.*

The former High Street streetscape is not addressed above.

#### *HO6 precinct boundary changes<sup>4</sup>*

*The review of the HO6 precinct has found that the intactness of the streetscapes has not changed significantly since the precinct was first applied.*

*Table 1 in Appendix C provides a complete list of the new properties proposed for inclusion within HO6.*

*To reduce potential permit requirements for Contributory and Nil/Non-contributory places the potential for a permit exemptions plan has been identified (see section 3).*

In my view whilst permit exemptions would go some way to providing clarity for owner, the significance of the subject site is most appropriately addressed by either clear explanation in a statement of significance, or appropriate mapping as is my recommendation in this case.

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<sup>4</sup> Volume 1 Version 22, January 2017 of the Port Phillip Heritage Review, Page 16.

#### *2.4 Changes to heritage grading (page 23)*

*There has been no change in the heritage grading for most places within the HO6 and HO391 precincts. The places where the grading has changed generally fall into one of the following categories:*

*□ Houses changed from Nil to Significant. This includes one place found to be of individual significance ('Toldara'/'Shirley', 40 Alma Road), as well as several places where the Nil grading appears to be a mistake as the buildings are relatively intact and associated with the historic period of development (for example, Interwar duplex, 155 Alma Road);*

The subject property is not addressed but the property frontage fits this category.

The recommendations of the review as they apply to the subject property are as follows:

*The recommended changes to the Port Phillip Planning Scheme are:*

*► Update the Port Phillip Heritage Policy Map incorporated document to show new inclusions and boundaries, and ensure the correct heritage grading is applied. Table 2 in Appendix C provides a complete list of changes.*

*322- 332, St Kilda Road , The Gresham*

*HO6 Precinct*

*Edwardian commercial complex. Altered, but retains original parapet with notable Art Nouveau detailing, and some internal fabric of interest. Altered and extended at the rear. Comparable integrity to Significant places within HO6.*

*Nil to be changed to Significant*

Importantly in my view the change to the mapping of the property as shown in figure 9 above is not discussed or analysed in the review, but rather appears to be simply assumed on the general convention that urban properties be mapped to their extent. Given the previous assessments of this site and wider heritage overlay, and the contribution to significance that is limited to particular and definable components of the property, I conclude that the most conservative position should not see any change to the existing Heritage Overlay boundary with regards to the subject site. It is however my recommendation that the extent of coverage would be appropriately reduced to around 10 metres from the front façade.

The following sets out the submission by the Owners Corporation for the subject property:



*The Owners Corporation objects to the identification of the property as having a 'Significant' grading on the basis that:*

*The Land does not include buildings that are individually important places of either State, regional or local heritage significance.*

*The proposed citation for HO6 and the Review of HO6 Report does not provide a thorough analysis of the Land such that the Owners Corporation has any certainty regarding the extent of façade that would need to be retained and the specific 'internal fabric of interest'.*

*The works undertaken along the façade and at the rear of the land have no heritage value.*

*The Review of HO6 report does not provide details of the comparative analysis undertaken to other significant places within HO6.*

*If the grading is upgraded to a 'Significant' grading, a Citation and Statement of Significance should be included to ensure that it is clear that only the façade incorporating the central panel of "The Gresham" sign should be retained. Any supporting Citation for the grading should make it clear that the extent of the façade that has been substantially modified and the rear office suites do not warrant inclusion as a 'Significant' grading.*

I concur with this submission with the addition that the protection of the perception and appreciation of the heritage entity require control over the front or principal part of the entity which can typically and safely be taken to be in the order of 10 metres in depth.

The following is Council's response to the submission:

*Refer to the response to submission #3 for an outline of the methodology for the Review and relevant considerations in determining the gradings of heritage places.*

*322-332 St Kilda Road is the former Gresham Laundry, constructed c.1920. Despite some alterations to the building, this building is distinguished by the surviving Edwardian style parapet which is divided into four bays with arched panels separated by engaged piers. The central panel with 'The Gresham' in relief framed by sinuous Art Nouveau floral decorations and flanked by hexagonal piers is of note. Overall the integrity is comparable to other Significant grade buildings in HO6. A significant grading is appropriate.*

*No internal controls are proposed to apply to this property.*

*This property is proposed to be Significant within HO6 and as such will be guided by the Citation and Statement of Significance for the precinct, which describes the specific components of the building of heritage interest.*

*Further decisions on future development would be guided by Clause 22.04 (Heritage Policy) of the Port Phillip Planning Scheme which sets out*

*objectives, policy statements and performance measures to guide decision making pursuant to the Heritage Overlay. This policy enables Council to consider applications on a case by case basis.*

*An individual Citation is not required on the basis the property is not individually significant, rather is significant for its contribution to the precinct.*

*Recommended position:*

*No change recommended.*

### **Assessment**

Presently the Heritage Overlay, HO6, extends some 40 metres back from St Kilda Road along the southern property boundary. The portion of the property with frontage to Pakington Street is not included within the current mapping of the East St Kilda Heritage Precinct. In my assessment there is no justification for the inclusion of this rear portion of the land as appears to be proposed with this amendment refer figure 9.

The nature of this commercial building is that the perspective for appreciation of its heritage value is from the public realm of St Kilda Road. With no heritage presence presented by the building in the streetscape perspective beyond the front façade it is my assessment that an appropriate appreciation of the integrity of the heritage entity would be provided by controlling the air space behind the parapet to a depth of 10 meters. Accordingly, given the existing and longstanding grading that the property is without heritage value, it would be appropriate to encumber the property no more than is necessary to identify and protect the heritage value that are now recognized.

Although the former laundry building extends approximately 25-30 metres from the St Kilda Road frontage, and the clerestory lantern consisting of 8 bays of timber trusses continues to survive, there are no internal heritage controls to this heritage overlay.

Given the Olderfleet and Windfield buildings and Record Chambers from 471 – 495 Collins Street, Melbourne, VHR no's H0037, H0685 and H0038 respectively, include a depth of "approximately 12 metres" of land on the Victorian Heritage Register it is not an unreasonable proposition that a similar depth of land be protected behind the subject façade at St Kilda Road. The development of new building presence that has recently occurred to the rear of the former St Kilda Post Office on the Inkerman Street corner is in the order of 8 metres.

Recent recommendations for the depth of the front parts of an industrial heritage building that should be retained have been one structural bay in depth. In my view this is insufficient as a building entity is usually at least two bays in depth. However in the case of the subject site, with structural bays at approximately 2.5 metres between the trusses and an angled front bay, a 10 metre depth of the building would retain four structural bays of the building. This is well beyond the depth of retention generally required to ensure the heritage significance of streetscapes is preserved. I therefore recommend that a depth of 10 metres be retained.

The typical depth of retention has generally been considered to be the two room depth for residential properties and a single structural bay for industrial properties. In both building types this depth is generally considered to be a depth of 8 metres.

In the Panel Report for Amendment C258 for the City of Melbourne the Panel has recommended against the use of 'Significant' and 'Contributory' within a heritage precinct. More broadly, such as in Boroondara, it has been accepted that entities defined as 'Significant' within a heritage precinct, whilst contributing to the significance of the precinct, are places that would warrant an individual heritage overlay if they were not located within the precinct context. With the present City of Port Phillip Heritage Review it is proposed to provide statements of significance for each heritage overlay, whether these are individual or precincts. It is not proposed to provide an individual citation or statement of significance for the subject site and instead to rely upon the statement of the significance for the St Kilda East Precinct for explanation of what is of value and following from this, what needs protection.

Individual heritage overlays are, on occasions, required within a heritage precinct to identify that the property is listed on the Victorian Heritage Register or because the significance of the heritage entity extends beyond the heritage perspective of public realm appreciation and warrant protection of either interiors, trees or outbuilding that are not generally activated on the Clause 43.01 Schedule for the precinct heritage overlay.

In the case of the subject site there is no fabric, features or components of the building that are recognized as contributing to heritage significance, as an individual place of the precinct, beyond the front wall of the building.

At the point that the heritage controls over the site are proposed to be elevated such that there is considerable potential for disadvantage for the property owners, fair and

orderly planning dictates the provision of clearly understandable explanation of what is significant and so what should be conserved.

With respect, it is often the case that heritage advice is directed by taste and subjectivity rather than reason and rigor. At VCAT, decisions are often widely variable even when addressing cases of very similar circumstances. It follows therefore that at this point when imposition of property owners is being substantially increased, it is incumbent upon the process to clearly, rather than generally, explain the significance of the heritage entity and ensure that the controls over the entity are sufficient to protect that significance but are not unnecessarily extensive.

It is not responsible to simply assume that the general heritage controls will provide appropriate management of the subject site, particularly at the extent currently proposed. That portion of the site with frontage to Pakington Street is without heritage significance or heritage context. It is isolated from the former corner hotel by the building to its rear constructed in 2000. Whilst facadism is to be avoided, only the front wall of the subject property contribute to the significance of the site and streetscape and, without internal controls, there would be no loss to heritage significance if the whole of the building behind the façade was to be altered or replaced. Whilst there may be heritage interest in the internal timber trusses and structure and the clearstorey lantern, no heritage value has been attributed to these elements. It is my view that the open air space over the front or principal part of the subject heritage entity is an 'object' that contributes to heritage value because that void ensures there is the appreciation, from the public realm, that the heritage entity survives with integrity. As the heritage perspective is only the public realm, and there are no internal controls activated for the precinct, it is the perception and appreciation of the integrity and authenticity of the street that is critical, rather than the condition of fabric that has no presence to the public realm. Facadism is a perception and presentation of the heritage entity rather than only relating to a material condition.

Given the above considerations regarding what is identifiably of significance at the subject site the question to be addressed with the review of the mapping of the heritage place is that of extent.

In my assessment the perception and appreciation of integrity of the subject heritage entity would be adequately protected with the boundary of the heritage overlay located at 10 metres from the front façade of this industrial building in the context of St Kilda

Road. It is my view that a greater depth to the heritage overlay has not been justified for this property.



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