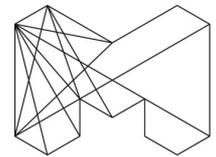


PLANNING PERMIT OBJECTION FORM

Planning and Environment Act 1987



CITY OF MELBOURNE

Important notes about the objection to permit application

Is this form for me? This is the form to object to a planning permit application where the City of Melbourne is the decision maker. Please do not use this form to object to Ministerial applications.

1. Your objection and the personal information on this form is collected by the City of Melbourne for the purposes of the planning process, as set out in the *Planning and Environment Act 1987* (the Act). If you do not provide your name and address, the City of Melbourne will not be able to consider your objection.
2. Your objection will be available at the City of Melbourne office for any person to inspect, during the relevant period set out in the Act. A full copy of your objection (including your name and personal information) will be made available on request to any person, for a limited period.
3. A summary of your objection will be included in a publicly available planning report, which may be published on Council's website. Your name will not be published in the planning report. Your objection, and the personal information supplied with it, will not be disclosed to any other external party, unless required or authorised by law.
4. You must not submit any personal information or copyright material of third parties without their informed consent. By submitting the material, you agree that the use of the material as detailed above does not breach any third party's right to privacy and copyright. You can request access to your personal information by contacting the City of Melbourne.

See also [Objecting to a planning application](#)

Who is objecting?

Name	Carlton Residents Association	Contact No.	
Postal Address	PO Box 1140 Carlton, Victoria	Post Code	3053
Email	planningcra@gmail.com		

What Planning Permit Application are you objecting to?

Address	23-31 Lincoln Square South, Carlton	Application No.	TP-2018-449
---------	-------------------------------------	-----------------	-------------

What are the reasons for your objection?

The Carlton Residents Association advocates on behalf of its members to:

Support the retention of the heritage assets within Carlton and to discourage new development that fails to respect these assets.

Maintain the quality of the public realm with a focus upon maintaining access to sunlight and sky views, and a pedestrian friendly scale.

Interpret and apply the performance based provisions of the Melbourne Planning Scheme fairly so that the interests of no one party are unfairly privileged over the interests of another party.

Key Issues Relating to TP-2018-449

- This Application fails to satisfy key aspects of the current Heritage Policy; the façade treatment of the new addition, in particular, is a poor response to the heritage guidance.
- Key objectives of the Design and Development Overlay, including the overall building height at 14 levels [exceeds the preferred maximum height by 2 levels – approx. 47m v 40m] and the preferred laneway edge height setbacks of 4m are not satisfied [there is NO setback on the western boundary to the Council Lane]
- Many of the key Apartment Design Standards “fall” short [See Schedule on p 44 of Plan File]



Heritage Assessment

Almost all the commentary included in CRA's VCAT Submission concerning the earlier development remains applicable.

The building at 23-31 Lincoln Square South has a C grading and is within a level 2 streetscape. The former Allan and Co piano factory and warehouse is a "landmark building in the Stripped Classical Style" City North Heritage Review, RBA Architects 2013. The building is illustrated in the image above.

The Heritage Policy requires the new development to be assessed against five key characteristics. The addition to the existing building is expected to be RESPECTFUL in relation to the following matters: Form, Materials and Building Height. The word RESPECTFUL has a particular meaning in the Local Heritage Policy of the Planning Scheme.

'Respectful' means a design approach in which historic building size, form, proportions, colours and materials are adopted, but modern interpretations are used instead of copies of historic detailing and decorative work. In the CRA's view, the external shape [form] of the addition is so different from the existing heritage asset, this addition cannot be considered **a modern interpretation of an historic building form**. Accordingly, it is not a respectful addition.

The surface materials, especially the folded and extruded façade screen system, cannot be considered respectful; they are neither historic nor closely equivalent. [See image below]



It is acknowledged that the scale of the existing heritage asset is already impressive, and not consistent with the height expectations of the Heritage Policy.

- This Policy states that the height of a building should respect the character and scale of adjoining buildings and the streetscape.
- However, does this justify an addition that exceeds the preferred maximum height of this precinct by at least two levels? In the CRA's view, the scale, form and detailing of the new addition will completely dominate the streetscape. This is not a respectful outcome.

In addition to the three characteristics noted, the Heritage Policy expects the new building addition to be INTERPRETIVE with respect to the façade pattern and colours and the details. This word INTERPRETIVE also has a specific meaning in the Heritage Policy. *'Interpretive' means a looser reference to historic size, form, proportions, colours, detailing and decoration, but still requires use of historic or closely equivalent materials.* The Statement of significance concludes that these heritage buildings “form a cohesive group by the common approach to façade articulation [regular vertical divisions and red brick, generally contrasting with some areas of render, and nearly all with original format multi-paned windows] ...” City North Heritage Review, RBA Architects 2013

In the view of the CRA, the façade pattern of the new addition ... couldn't be more different from the façade articulation of the heritage buildings and cannot be considered a “loose reference” to the historic pattern. And again, the relevant Design and Development Overlay DDO61 includes key heritage guidance. Key Part 1.0 Design Objectives include the following ...

- To ensure development responds appropriately with suitable building scale, heights and setbacks to the existing character, context, and interfaces with established residential areas, and immediate amenity.
- To ensure that new buildings respect the rich heritage fabric of the area and that new buildings that adjoin the heritage buildings respect their height, scale, character and proportions.

It must be acknowledged that these provisions would apply even if the subject site was not covered by a Heritage Overlay. The fact that the former Allan and Co. piano factory [on the subject site] is one of three “Individually Significant” buildings in a precinct wide Heritage Overlay [HO1122] that includes two other Contributory buildings, reinforces the importance of taking these DDO Objectives seriously. It must also be emphasised that the preferred maximum building heights established by the DDO are not a given, and should certainly not be taken as a minimum. While the DDO may permit developments that exceed these preferred maximums,

An application to exceed the preferred maximum building height should demonstrate achievement of the relevant the Design objectives and Built Form Outcomes as identified in Part 1.0 and Table 1 of this Schedule.

In the view of the CRA, the Design Objectives cited above have not been satisfied; that is, there is no justification for exceeding the preferred maximum building height.

Is there a strong case for this new development to be less than the preferred maximum? **The City North area is planned to be an area where “... a mid-rise scale of buildings [6 to 15 storeys] that is distinct from the tall built form in the Hoddle Grid area to the South ...” will be established.** [Part 1.0 Design objective, 2nd dot point].

This Objective clearly demonstrates that the development expectations of the City North Urban Renewal Area, will be satisfied through the construction of mid-rise buildings of varying scales. That is, buildings as low as six storeys would still satisfy key DDO Design objectives, including the desire to establish a scale of development that is distinct from the Hoddle Grid.

The Laneway Street Edge Height setback expectations

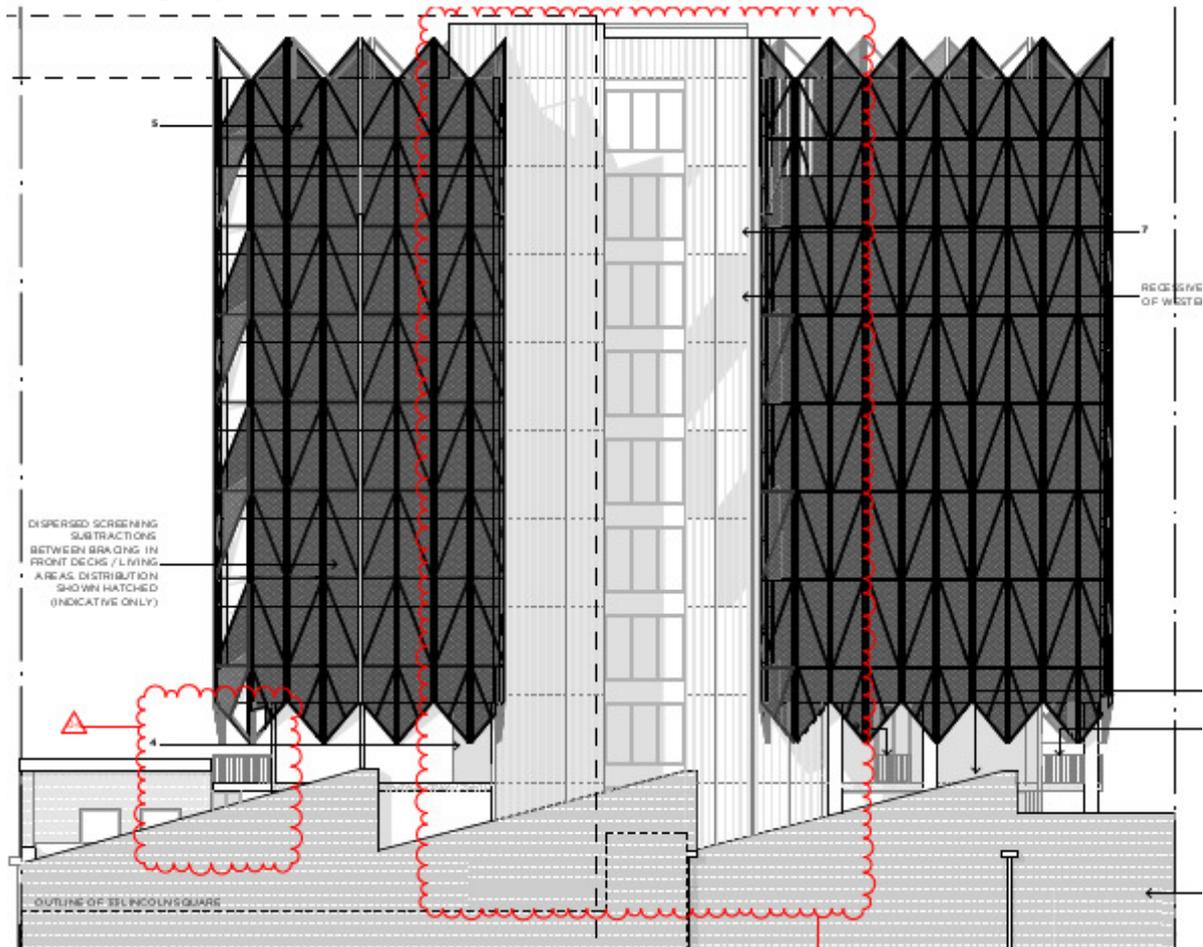
[See extract from Level 7 Plan below.]

To include NO setback above the heritage building at this location would severely impact the residential amenity of the apartment on the west side of the Council Laneway at this location. [See extract of west elevation of new development below.]

Extract from Level 7 Plan



West facing façade of New Addition [Extract]



How to Apply and Enquiries:

Mail: Planning Department - City of Melbourne
GPO Box 1603 Melbourne 3001

Email: planning@melbourne.vic.gov.au

Tel: 03 9658 9658

Carlton Residents Association Inc.
25 September 2018