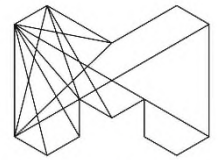


PLANNING PERMIT OBJECTION FORM

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 Your name will not be published in the planning report.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 Inc	Contact No.	
Postal Address	PO Box 1140, Carlton VIC	Post Code	3053
Email	planningcra@gmail.com		

What Planning Permit Application are you objecting to?

Address	623-645 Swanston Street Carlton	Application No.	TP-2017-761
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What are the reasons for your objection?

Note: Your objection should state how the proposal will affect you and should relate to matters relevant to the proposed use or development.

The Carlton Residents Association advocates on behalf of its members to

- Support the retention of the heritage assets of the Carlton community and to discourage new developments that fail 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

Preliminary Remarks

The CRA supports the establishment of a quality student housing complex on the Lincoln House site, and agrees that the proposed learning hub and retail offerings will be valued inclusions. While the partial retention of the Heritage Place at 11-13 Lincoln Square South is non-controversial, we are disappointed that no heritage fabric from the former Lincoln House will be retained.

In reviewing the documentation accompanying the plans, we conclude that much thought has been given to providing the occupants of the development with quality spaces and good solar access and sky views. We note that these positive attributes have been achieved by locating the higher elements of the complex towards the South and West of the site. In our view, this has resulted in a much reduced amenity for the residential occupants of both Lincoln Place and the Student Housing Complex facing Council Lane CL1015 [621A Swanston Street]. It also has to be acknowledged that a 14 level building with minimal setbacks on both Cumberland Place and Lincoln Place will do little to enhance the quality of these spaces.

Heritage Concerns

We are aware that the University is of the view that the two storey section of Lincoln House has little heritage merit and should not have been included as a Heritage Place within the Lincoln Square South Precinct. However, we note that the City North Heritage Consultant, the Planning Panel established to assess MPS Am C198, the City of Melbourne and the State Government all came to a different conclusion. The CRA concurs with the views expressed by the Planning Panel at p 64 of their report:

Although the Panel accepts that changes to the building designed by H W & J B Tomkins at 631-645 Swanston Street has reduced its intactness, it considers that the changes are reasonably reversible and the building retains its integrity and contributes to the significance of the precinct.

Although the Heritage Consultant [for the Applicant] argues that “the original windows and doors, and the remains of the demolished parapet centres, are no longer on the site, so cannot be reversed” this does not mean that an appropriate restoration is not possible. According to the Australia ICOMOS Burra Charter, 2013, Article 19, *Restoration* is appropriate only if there is sufficient evidence of an earlier state of the *fabric*.

In our view, sufficient evidence is available. The Public Record Office holds the Permit Drawing lodged with the City of Melbourne in 1922 and the State Library of Victoria holds early [1945] photographic evidence from the Harold Paynting collection. This evidence was presented to the Panel Hearing in the Witness Statement prepared for the University by Mr Peter Lovell.

The CRA accepts that this Heritage Place is currently graded D in a level 2 Streetscape. In the exhibited MPS Am C258 [Heritage Policies Review and West Melbourne Heritage Review], this Place is graded “Contributory”. According to the Exhibited Amendment, “Full demolition of significant or contributory buildings will not normally be permitted. Partial demolition will not normally be permitted in the case of significant buildings or the front or principal part of contributory buildings.”

In the opinion of the CRA the heritage fabric fronting Lincoln Square South constitutes a significant element in the Heritage Streetscape fronting Lincoln Square. In our view, the retention of this fabric warrants serious consideration. Also, the partial retention of this Heritage Place at this location, would result in most of the Swanston Street frontage being available to achieve the “activation” objectives of the Design and Development Overlay.



Lincoln Square South Streetscape

Design and Development Overlay Considerations

As the Applicant has observed, almost all the guidance included in DDO61 A4.1 is discretionary. Street wall heights and setbacks, preferred maximum building heights and recommended floor to floor heights [for example] are all discretionary.

In the view of the CRA, the arrangement of the studios and cluster units around a central courtyard, with the higher “elements” towards the lanes to the South and West, achieves good solar access and sky views for most of the

occupants, but reduced amenity for the occupants of buildings to the South and West of the subject site. The context must be better understood. The major use of the building at 621A [to the West of the site] is residential not commercial; it is used mainly for budget student accommodation. Also, the Tune/Ibis Hotel is NOT just for short stay visitors. Although this Hotel includes 235 hotel rooms/serviced apartments, it also includes 42 residential dwellings.

Given this context, the CRA submits that greater weight must be given to the DDO recommended setback [of 4 metres] above the street edge height on the laneway frontages. The intended built form outcome must be acknowledged: *Development that ensures laneways have appropriate access to daylight and sunlight.* On the Cumberland Place and Council Lane 1015 frontages, we submit that this 4 metres must be taken from the West wall of the Substation and not the more Westerly Title Boundary that falls within a Council Lane that has established carriage rights.

Similarly, on the Lincoln Place frontage, the CRA submits that Southern Façade of the development [above the street edge height] must be 4 metres from the Title Boundary opposite the dwellings at 17 and 19 Lincoln Place, and not 2.2 metres as indicated on the Level 1 floor plan.

In the Association’s view, the overall height of the development must also be moderated on the laneway frontages to achieve key design objectives of City North. These 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 deliver a scale of development that provides a high level of pedestrian amenity having regard to sunlight, sky views and wind conditions.

More specifically, the Association submits that the overall height of the development must not exceed the preferred maximum height of 40 metres.

Other Planning Matters

We note that the City of Melbourne has now developed helpful mapping tools to establish both the existing and potential use of roof areas for vegetation and solar systems. For the current development site, we note that solar panels are currently installed on the 2 storey Lincoln House building [see image below], but that no Green Star points are being targeted for ANY onsite energy generation for the new development. Similarly, we note [from the ESD Report] that while there is some rainwater harvesting for landscape irrigation, NO Green Star points are being targeted for Rainwater Re-use. Given that the Green credentials of this development are to be promoted, we consider that the lack of meaningful action with on-site energy generation and water harvesting to be a very disappointing outcome.



While the focus of the Association is upon public realm issues, we do note that all of the residential floors include one [or two] twin studio units with poor natural light outcomes [borrowed light] for the living spaces. For a development aspiring to provide quality accommodation, we think that this is a poor outcome.

3 October 2017

(If there is not enough room, attach a separate page)

How to Apply and Enquiries:

<p><u>Mail:</u> Planning Department - City of Melbourne GPO Box 1603 Melbourne 3001</p>	<p><u>Email:</u> planning@melbourne.vic.gov.au</p>	<p><u>Tel:</u> 03 9658 9658</p>
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