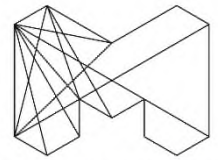


PLANNING PERMIT OBJECTION FORM

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 Your name will not be published in the planning report.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	16-22 Drummond Street, Carlton	Application No.	TP-2018-892
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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

The Carlton Residents' Association [CRA] welcomes the reinstatement of the heritage fabric of the upper level balconies [16-20 Drummond Street]. We also appreciate that, for the most part, the new construction behind the restored façade, has been concealed when viewed from the opposite side of the Drummond Street. However, we do not believe that the extent of the demolition work is consistent with either the current Local Heritage Policy or current heritage thinking.

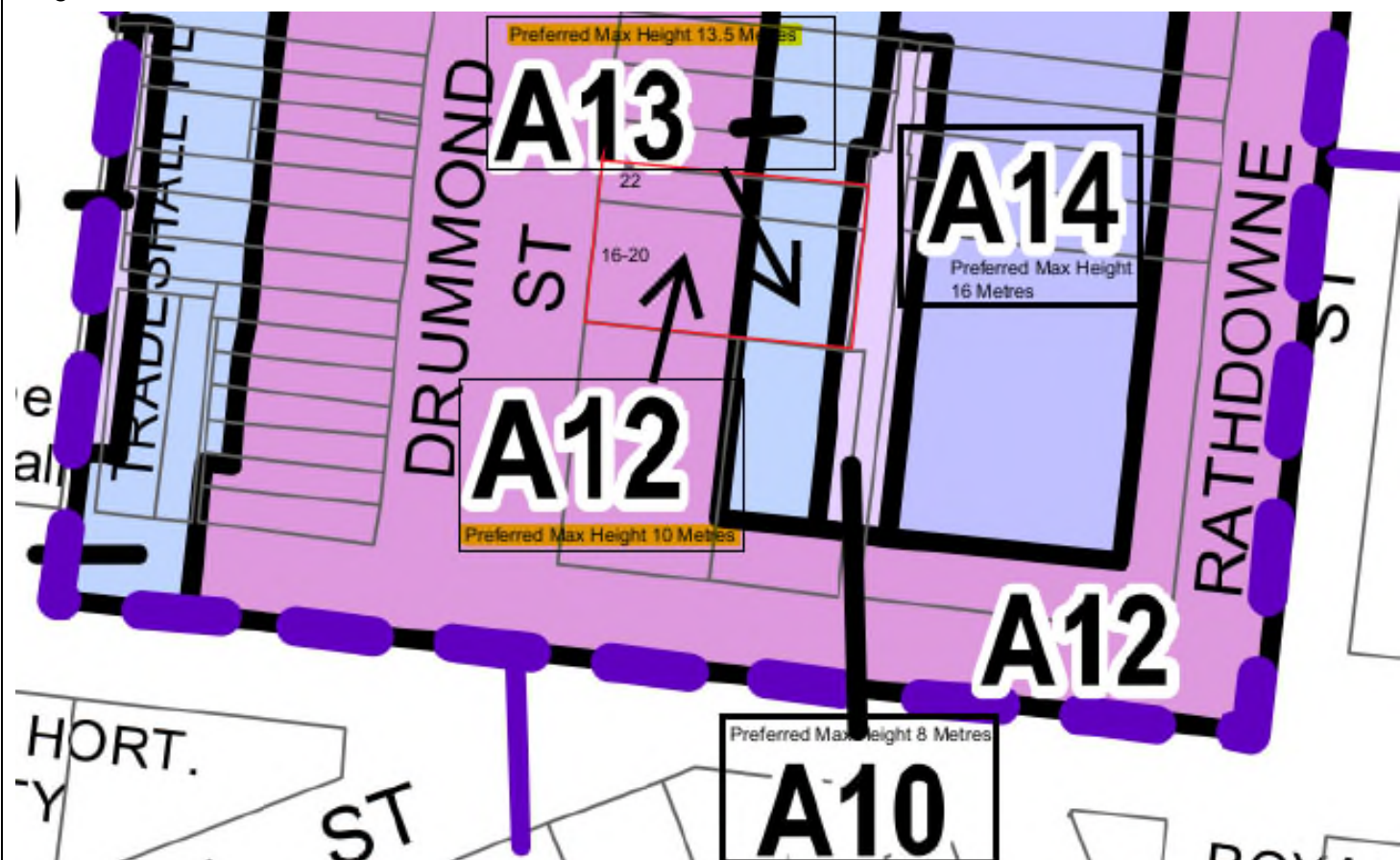
The Association is also of the view that a six level building is inconsistent with the clear low-rise design and development expectations for this area of Carlton.



16-22 Drummond Street Carlton – Existing Condition

DESIGN AND DEVELOPMENT OVERLAY CONCERNS

The annotated extract from the Melbourne Planning Scheme [DDO6] establishes the preferred MAXIMUM heights for this area of Carlton.



Clearly, the Design and Development overlay for this site includes a preferred maximum height of 10 metres [about 3 levels] for the front 25 metres or so, and 13.5 m for the rear section [about four levels]. The application includes 6 levels over the rear section [not including the plant level]. A six level building, although largely concealed from Drummond Street, would not be considered a LOW-RISE building. There is also an expectation that new work on Elliott Place will be NO higher than 8 metres; this benchmark has also been exceeded.

While the DDO6 Preferred Maximums may be exceeded, the Applicant must demonstrate how the DDO Design Objectives and Built Form outcomes will be achieved. In the Association's view, these key Objectives and Outcomes will not be satisfied.

1.0 Design objectives

18/11/2010
C174

- To protect and conserve buildings and streetscapes of significance and to reinforce the built form character of the area as being essentially of low-rise buildings.
- To maintain the human scale of the area and to ensure compatibility with the scale and character of the existing built form.
- To ensure that any redevelopment or new development is compatible with the scale and character of adjoining buildings and the area.

And again:

Table to Schedule 6

AREA	MAXIMUM BUILDING HEIGHT	OUTCOMES
10	8 metres	The predominantly 1-2 storey built form character of the area is maintained to ensure a pedestrian scale of development abutting the streets and laneways.
12	10 metres	The low-rise built form of the area, which is predominantly 2-3 storey, is maintained to ensure that the existing Victorian character of the area is conserved.
13	13.5 metres	The existing historic character of the area remains.

From the Association's perspective, the major problem with exceeding this Design and Development guidance arises from the increased impacts on both the private and PUBLIC realm. These impacts include increased shadows AND traffic movements in Elliott Place, a lane that was NEVER designed to cope with two way traffic, and where a pedestrian scale of development is clearly desired.

Although the Traffic Consultant [for the Applicant] maintains that the peak hour traffic movements from the new development will be similar to the existing situation, the Association is of the view that this position cannot be substantiated. When the servicing requirements of the complex [including at least 4 waste removal trips each week] are added to the very conservative onsite parking arrangement for the residents, there are likely to be increased traffic conflicts in Elliott Place.

Concerning the conservative onsite parking arrangements, we note that 300 sqm has been allocated to Apartment 21 [the top penthouse] for ONE car space and storage. To provide this much space for one car space is NOT a credible position. Further, the generous space allocations for other units would easily satisfy the parking needs of motor cycles in addition to cars.

HERITAGE CONCERNS

Although the Association welcomes the restoration of the original façade, we do not believe that the extent of the demolition that is proposed is consistent with either the existing Local Heritage Policy [22.05] or current heritage thinking about the need to AVOID façadism.

The buildings are currently graded C in a level 1 Streetscape. Although the total retention of the heritage fabric is not required, the current local Heritage Policy suggests that the front part [considered to be the front two rooms in depth] should be retained. The applicant is only proposing to retain the very front sections: the ground floor verandas, first floor balconies, the front wall and parts of the North and South boundary walls.

While the final form of the revised Local Heritage Policy is still being considered by the Planning Panel [C258] the following extracts from the City of Melbourne's consultant's report, provide clear support for the current Heritage Policy concerning the need to AVOID façadism.

The Policy Objectives include the following guidance:

To encourage retention of the three dimensional fabric and form of a building and to discourage façadism.

And again:

Before deciding on an application for full or partial demolition, the responsible authority will consider, as appropriate:

- The assessed significance of the heritage place or building.
- The character and appearance of the building or works and its contribution to the historic, social and architectural values, character and appearance of the heritage place, and the streetscape.
- The significance of the fabric or part of the building, and the degree to which it contributes to the three-dimensional form of the building, regardless of whether it is visible.

The following proposed definitions clarify the meaning of key terms:

Facadism	The retention of the exterior face/faces of a building without the three-dimensional built form, and, without retention of an understanding of the function of the three-dimensional building form.
Front or principal part of a building	The front or principal part of a building is generally considered to be the front two rooms in depth, with roof; or that part of the building associated with the primary roof form, whichever is the greater. For residential buildings this is generally 8 metres in depth. For most non-residential buildings, the front part is generally considered to be one full structural bay or generally 8 – 10 metres in depth, including the roof.

Council's expert witness, Ms Jordan, recommended that 'Clause 22.04 Heritage Places within the Capital City Zone' and 'Clause 22.05 Heritage Places outside the Capital City Zone' be combined into one policy, 'Clause 22.05 Heritage Policy'. [This version of 'Clause 22.05 Heritage Policy' incorporates changes recommended by Council's expert witnesses.] 8 Oct 2018 CoM download

In conclusion, the Association can find no support for a heritage outcome that results in only the SHELL of an existing Heritage Place [within a Significant Streetscape] being retained.

16 December 2018

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