



The Carlton Residents Association Inc.
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P237/2019 - 16-22 Drummond Street, Carlton - CRA VCAT Submission

The Carlton Residents Association (CRA) 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

CRA was incorporated in the 1990's and has approximately 200 members.

CRA wishes to place on record that it supports the City of Melbourne stance with respect to this application, except for it's assertion that traffic issues are not problematic.

The Association acknowledges that the amended design, incorporating the removal of one upper story and the deletion of one basement level is an improvement on the originally lodged version, however areas of serious concern to the Association still remain. They are::

1. Documentation
2. Over development resulting in excessive density for this location
3. Excessive visibility from Drummond Street.
4. Excessive demolition of existing heritage terraces
5. Traffic issues - especially ingress and egress from Victoria Street via Elliott Place.

Documentation

CRA found that both the original and the amended versions of the documentation could be confusing due to inconsistencies, omissions, errors and selective images. This made assessment of some aspects of the proposal difficult if not impossible.

Overdevelopment

The amended design still exceeds the preferred maximum heights nominated in DDO6, which when combined with the proposed bulk and mass, results in a development of inappropriate scale for this location.

Compliance with these preferred maximum heights alone does not necessarily produce an outcome of acceptable scale. In this instance the combination of the height and the sizeable footprint of the proposed development, hinders achieving the Design Objectives and Built Form outcomes of DDO6.

The relevant objectives we refer to are:

- 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.

Excessive visibility

CRA is concerned that the visibility of this proposed development has been understated in both commentary and graphical representation. The scale and the mass of the development will be out of character when viewed from some locations in Drummond Street and certainly from Elliot Place,

Bryce Rayworth acknowledges that the development will be visible. He then suggests that a future multi-storey building constructed on the adjacent car park to the south, will screen the 5 storeys proposed.

CRA asserts that the likelihood of this car park ever being developed is extremely remote due to the multiple ownership structure combined with the scarcity of car parking in the vicinity and the desire to preserve the amenity that the open space currently offers the occupants of No. 2 Drummond St. This assertion is supported by views expressed by numerous residents of No. 2 Drummond Street.

Heritage Concerns

The Association does not need to reiterate the acclaimed heritage attributes of the south end of Drummond Street, they have been clearly identified in other submissions, particularly those by CoM and Peter Sanders.

CRA strongly supports the CoM heritage assessment, which identifies an even wider range of issues than CRA has commented on herein.

The Association believes that, the extent of the demolition proposed is excessive and inconsistent with both the existing Local Heritage Policy [22.05] and current heritage thinking about the need to AVOID façadism.

While the final form of the revised Local Heritage Policy [C258] is still being considered, the City of Melbourne's consultant's report to that hearing, provided clear support for the current Heritage Policy concerning the need to AVOID façadism, which, CRA suggests strengthens the current policy rather than diminishing it.. **Refer Attachment A. for extracts**

The Association welcomes the restoration of the original façade but this would be the very least that would be expected from the redevelopment of such a sensitive heritage place, however it appears from the documentation that this reconstruction and restoration work could be corrupted by small but significant changes which will detract from the authenticity and contrary to the heritage guideline

Number 22 provides ample intact fabric to inform the complete and accurate restoration of numbers 16 to 20..

The Applicant provides no convincing evidence to justify the extent of demolition proposed. The only reason that CRA can identify, for wanting to demolish to the extent that is proposed, is that a workable basement depends on it.

It is CRA's contention that if planning controls cannot be met, then the site is inappropriate for the development, or alternatively, the development is inappropriate for the site.

In support of the preceding, it may be helpful to reflect on the recent history of this valued precinct of Carlton, if not Melbourne.

The heritage fabric of Drummond St, between Victoria and Grattan Streets, is basically unchanged since the late 1980's, except that it presents better today than it did 30 years ago. There has been no loss of heritage fabric.

In the late 80's, the predominate use of the 105 heritage dwellings, in what was and is a mixed use zone, was business at 92 and the remaining 13 were residential.

It was about this time that the City of Melbourne focused on encouraging residential uses across the municipality. This policy embraced the Victorian residences in Drummond Street, which were being used for business purposes and often in a deteriorated condition.

With this objective in place, accompanied by a greater recognition of heritage values, and the rise in popularity of inner city living, we saw a surge of new owners acquiring heritage properties in Drummond Street. Many were restored, renovated, often extended and returned to their original residential use.

The interesting thing to note, regarding this process, is that all of the properties thus treated, retained the bulk of the existing building, in most cases, in its entirety. That is to say 'facadism' was not entertained. 30 years later, the net result is 72 of the original 105 heritage dwellings are now used as residences, a 5 fold increase.

Refer to Images in **Attachment B** for examples of renovated/extended Heritage Dwellings referred to.

By virtue of the CoM and the new owners embracing the value of preserving heritage places, there is now, an increasing number of restored heritage properties, which are valued in the \$3m. to \$4m range. The Tribunal has heard that this can now be closer to \$5 or \$6 million.

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This outcome did not occur by accident. The CoM had appropriate planning controls in place and actively enforced them.

For example, the following three applications were not supported by City of Melbourne or VCAT.

- 1 66-68 Lygon Street, The Downtowner, P.843-2015**
- 2 15-31 Pelham Street, P.1375-2014**
- 3 69-71 Drummond Street, Louisa Terrace, TP 2010-319**

The strong adherence to the three dimensional philosophy of heritage preservation, retaining all or a substantial proportion of the existing dwellings, has not only maintained the high level of heritage integrity, but actually enhanced it.

Traffic Issues

CRA believes that the Elliot Place / Victoria Street traffic issue is more problematic than acknowledged by either the Applicant or CoM.

CRA believes that the focus on traffic volume, by both parties, neglects the real problem which is the conflict of vehicle movements at the Elliot Place and Victoria Street intersection.

