



The Carlton Residents Association Inc.

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ROYAL EXHIBITION BUILDINGS AND CARLTON GARDENS- THE WORLD HERITAGE STRATEGY PLAN

SUBMISSION FROM THE CARLTON RESIDENTS ASSOCIATION INC

GENERAL

We support the broad objectives for changes to the WHEA-

That the WHEA be extended to include properties on the west side of Drummond Street (1-205 Drummond Street).

The inclusion of important areas not currently included in the WHEA

Removing the distinction between Areas of Greater and Lesser Sensitivity and placing a heritage control over the whole WHEA.

The importance of views to and from the REB

However, there are some serious limitations in the draft in order to achieve the above changes.

OUR CONCERNS

According to the explanatory material accompanying this Plan The Strategy Plan sets out strategies for the appropriate use of the World Heritage Environs Area, which acts as a 'buffer zone' to protect the World Heritage values of the REB&CG. The World Heritage Environs Area also protects views and vistas to the site.

Draft Planning Scheme amendments for the City of Melbourne and City of Yarra area also open to view and respond to.

These draft Planning Scheme amendments give effect to the recommendations in the draft Strategy Plan.

This response includes comments upon the following documents apart from the Draft World Heritage Strategy Plan itself:

_Melbourne Planning Scheme Draft Clause 22.21 Development Guidelines for the World Heritage Environs Area

_Melbourne Planning Scheme Draft Schedule 6 to Clause 43.02 Design and Development Overlay, and the

_Melbourne Planning Scheme Draft Schedule [NEW] to Clause 43.02 Design and Development Overlay

Summary of our Concerns

- Why aren't the boundaries of the Heritage Overlay areas extended to coincide with the extended WHEA?
- Heritage Overlay HO992 boundaries are confused.
- Confused boundaries of the areas HO809, HO109 and HO81
- The Draft Statement of Significance is not included in the Draft Strategy Plan.
- The Draft Development Guidelines for the WHEA creates confusion over the extent of the expanded WHEA and the Statement of Significance.
- The importance of the proposed Built Form Guidelines.

The Draft Strategy Plan

On page 46 of the Draft Strategy Plan, there is a brief discussion concerning the use of a Heritage Overlay to protect the WHEA. The following extract is relevant.

Currently part of the WHEA is included in two HO Precincts, H0992 in the City of Melbourne and H0361 in the City of Yarra planning schemes which both resulted from the 2009 Strategy Plan. The boundaries of H0992 and H0361 followed the 2009 WHEA area of greater sensitivity. This 2021 draft Strategy Plan has recommended against continuing the distinction between the Areas of Greater and Lesser Sensitivity. Hence it is a recommendation of this Strategy Plan that the boundaries of these HO areas be reconsidered in the future. The key question here is why these Heritage Overlay boundaries have not been extended to coincide with the recommended boundaries of the WHEA [when the distinction between the area of greater sensitivity and the WHEA has been scrapped]. Retention of

the existing boundaries of these Heritage Overlays creates further complications.

Heritage Overlay HO992

In the case of HO992 in the City of Melbourne, the boundaries of this Overlay remain quite problematic. This arises because the currently gazetted Heritage Overlay map for this area is almost impossible to read;

and, also because the area is defined by including those Individual Heritage Overlays within HO992 that are not on the Victorian Heritage Database.

Heritage Overlay area HO809, HO103 and HO81

A further complication arises because the two Individual Heritage Overlays at the southern end of Rathdowne Street [HO809 and HO103] have been incorrectly mapped. Also, to add to this “boundary confusion” it was never clear whether all [or just part of] HO81 [the site of the former Children’s Hospital] should be included within HO992.

It should also be noted that the Heritage Overlay map, included at p47 of the Draft Strategy Plan, adds to this confusion over the boundaries of HO992. HO81 is omitted altogether, and the boundaries of HO809 and HO103 remain incorrect.

Statement of Significance for the WHEA

Another problem arises as the Draft Statement of Significance for the two HO Precincts [H0992 in the City of Melbourne and H0361 in the City of Yarra planning schemes] is nowhere to be found in the Draft Strategy Plan. In contrast, the 2009 version of the World Heritage Environs Area Strategy Plan included a detailed Statement of Significance for the two HO Precincts [pp 34 and following]. Although this citation addressed both Overlays in the one Statement; in other respects it followed accepted practice by separately addressing the key issues

_What is Significant

_How is it Significant and

_Why is it Significant

According to the current Draft Strategy Plan [p 46]
In future the SoS for each of these HO areas should be updated to address their heritage values at the same time that their boundaries are reassessed. Keeping these values contributes to the retention of the setting of the REB & Carlton Gardens.

Given the expectation that all Heritage Overlays should be accompanied by a current Statement of Significance, it is not clear why this important update work has not been undertaken.

Draft Development Guidelines for the WHEA

Draft Development Guidelines for the World Heritage Environs Area [Clause 22.21 of MPS]

The principal difference between this Draft Policy and the earlier Policy relates to the expanded area to which it applies. The existing Policy only provided guidance for the area of greater sensitivity whereas the proposed Policy is intended to provide guidance for the whole [expanded] World Heritage Environs Area.

However, given that the Government has not updated the boundaries of the existing Heritage Overlay 992 and that the Statement of Significance for this Heritage Overlay has not been updated, the community has been left with ongoing confusion over both the extent of HO992 and the status of the existing Statement of Significance for this Overlay [as outlined in the discussion above].

Policy Guidelines and Signage

In other respects, the Policy guidance of the two WHEA Policies [existing and proposed] remains essentially the same. The one notable addition to CI 22.21-3 addresses the issue of signage. It is policy to “Discourage high wall signs, major promotion signs, panel signs, pole signs, internally illuminated/animated signs, and sky signs within the WHEA.”

Built Form Guidelines

Draft Schedule 6 to Clause 43.02 Design and Development Overlay
The major change proposed in this draft Schedule addresses a significant gap in the built form guidance that has existed for decades. This change involves the inclusion of Design and Development Guidance over all those properties included within Heritage Overlay 81 and those properties located at 107-123 Rathdowne Street. More specifically, it is proposed to extend the

existing controls that apply to sub-areas A12, 13 and 14 to those properties within HO81 and 107-123 Rathdowne. [See extract from the proposed Melbourne DDO6 Expansion Map for details of this extension].

In other respects, the height guidance included within Table 1 has remained unchanged [See extract from Schedule 6 below].

In contrast to the revised height guidance for those properties north of Grattan and Carlton Streets, this height guidance is discretionary; applications to exceed the Maximum Building heights specified in Table 1 may be exceeded.

Views to and from the REB

Views from the REB and particularly the REB dome promenade are important and should be referred to in the Statement of Significance for the revised WHEA including controlled building heights and retention of heritage properties.

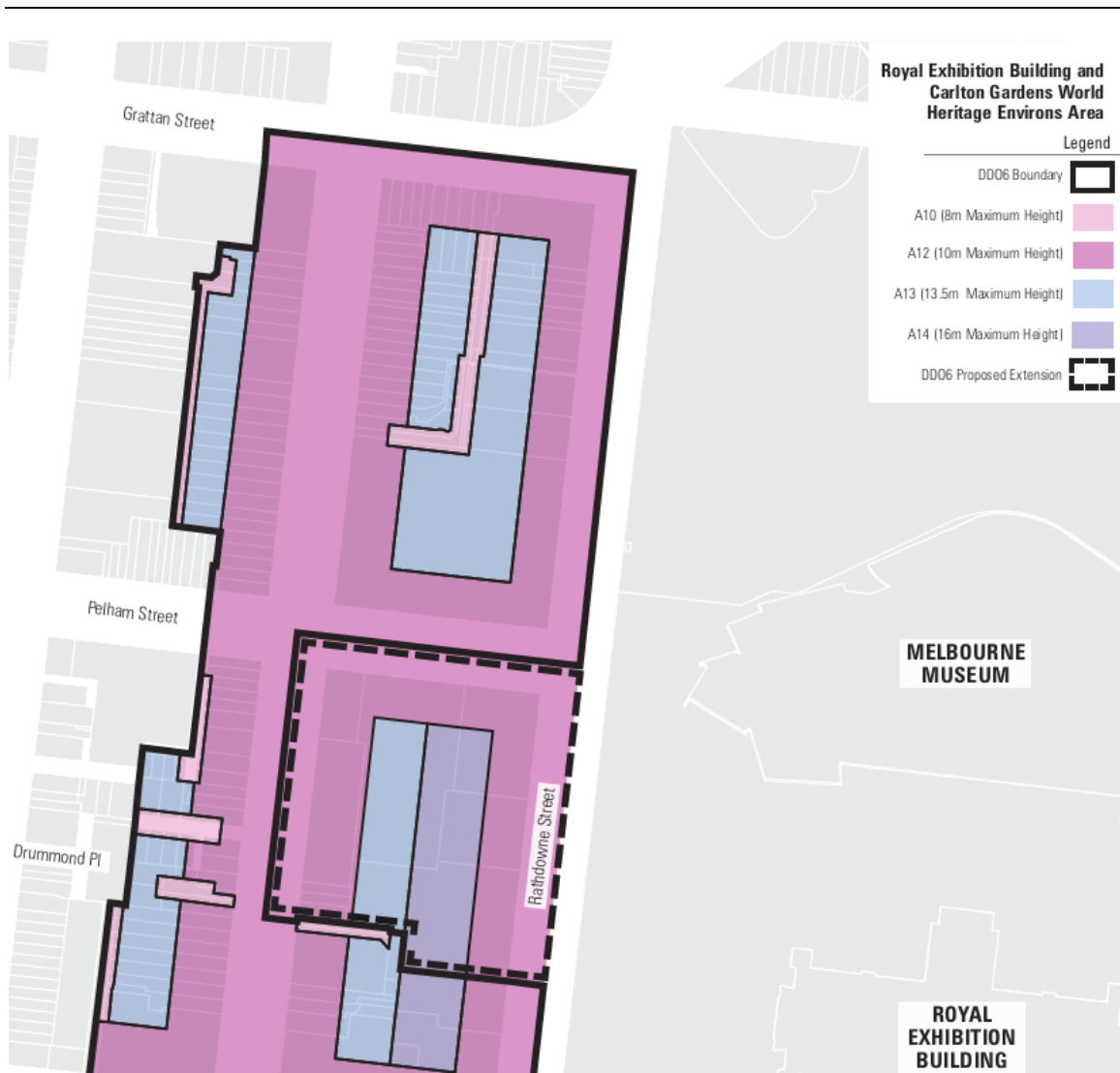


Table 1

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.
14	16 metres	Development of an appropriate scale to Lygon Street is achieved, but in doing so maintains a comfortable relationship with the surrounding low-scale area. Views to the drum, dome, lantern and flagpole of the Royal Exhibition Building from the footpath on the south side of Queensberry Street between Lygon Street (west side) and Rathdowne Street are protected.

The major problem addressed in this proposed new Clause [from Carlton's perspective] includes the introduction of mandatory building heights over ALL those properties within the World Heritage Environs Area north of Grattan and Carlton Streets; properties that are currently zoned Neighbourhood Residential Zone and General Residential Zone. Currently, the maximum building height requirements that exist within these zones [North of Carlton Street] ONLY apply to dwellings and residential buildings. The proposed new Clause would address this serious anomaly. [See extracts from proposed Clause below]

Map 1 to Schedule [NUMBER] to Clause 43.02



Table 1: Preferred and Mandatory Maximum Building Heights

Area	Preferred Maximum Building Height	Mandatory Maximum Building Height	Design Outcomes
1 NRZ Area	9m	9m	Retain the predominantly lower scale form of development which provides a contrast to the dominant scale and form of the Royal Exhibition Building. Retain and conserve the valued heritage character of streetscapes to assist with maintaining the heritage character of the setting and context of the Royal Exhibition Building and Carlton Gardens.
2 GRZ Area	11m	11m	Retain the predominantly lower scale form of development which provides a contrast to the dominant scale and form of the Royal Exhibition Building. Retain and conserve the valued heritage character of streetscapes to assist with maintaining the heritage character of the setting and context of the Royal Exhibition Building and Carlton Gardens.