

THE CARLTON RESIDENTS ASSOCIATION INC
6 October 2023

SUBMISSION TO VCAT
1-23 RATHDOWNE STREET, CARLTON
VCAT Ref:1498/2022
PLANNING APPLICATION: TP-2022-245

1) CRA

The purpose of the Carlton Residents Association (CRA), as a democratic, non-party political body, is to act as an advocate of the residents of Carlton (being the residents of the area defined by postcode 3053).

A key tenant of the CRA is-

The preservation of heritage values and amenity of Carlton by the preservation and maintenance of existing buildings, streetscapes and precincts and the sympathetic development of buildings consistent with the heritage nature and amenity of the area.

2) Members

The CRA has several hundred subscribers and members who are notified about local issues.

The CRA Planning Group who has prepared this submission includes architects, town planners and members with heritage and conservation expertise.

3) This submission

This submission includes a review of some important sections of the Melbourne Planning Scheme that are relevant to this application.

Section 00 Purpose and Vision

Section 10 Planning Policy Framework

Section 40 Overlays, and

The World Heritage Environs Area Strategy Plan.

4) Basic objection

We submit that this planning application is inappropriate for this site and does not comply with the intent or statutory requirements of the Melbourne Planning Scheme (MPS).

5) **A very significant site**

In assessing this application, it is important to keep in mind that this part of Carlton is an exceptional area containing the World Heritage Listed Royal Exhibition Building and Carlton Gardens and the surrounding World Heritage Environs Area.

Australia has only four listed cultural (man-made) World Heritage sites. The Opera house in NSW (c 20); Convict sites at Port Arthur, Tasmania, NSW and WA (late C18 and early c19); Aboriginal Budj Bim Cultural Area in Western Victoria (from 4,500 BC); and **the Royal Exhibition Building and Carlton Gardens in Victoria (c19)**. The REB and CG is the only Australian Victorian era site and the only extant great exhibition hall from that era, worldwide.

It is also an outstanding area for Victorian era heritage, one of Australia's finest.

6) **THE MELBOURNE PLANNING SCHEME**

The emphasis in **bold** type is ours.

Extracts from the Melbourne Planning Scheme or other noted sources are in *italics*.

7) **SECTION 00 PURPOSE AND VISION**

MUNICIPAL PLANNING STRATEGY

This section of the MPS emphasises the need to protect the heritage value of the area, that there should be a distinct change in scale from the CBD, and the importance of the WHEA buffer area.

8) *CL 02.03-4 Built environment and heritage.*

Under *Built environment* it is noted that:

*Where the built form character of an area is valued, new development **must** respect this character and add to the overall quality of the environment.*

And, *In managing the built environment the Council **will**:*

- Ensure a strong distinction between the built form scale of the Central City with that of surrounding areas.*
- The World Heritage Environs Area provides a buffer zone to protect the World Heritage listed Royal Exhibition Building and Carlton Gardens.*

9) *CI 02.04-1 The Growth area framework plan identifies that the area that we are considering, is not included as a growth area.*

10) **SECTION 10 PLANNING POLICY FRAMEWORK**

11.03 PLANNING FOR PLACES

11.03-6L-02 Carlton

The Built environment and heritage strategies include:

To maintain a strong contrast in scale between the built form of the Hoddle Grid and Carlton at the Victoria Street interface.

Maintain the predominantly low scale character of the area around Carlton Gardens.....

There is not a case for a transitional building height at the Victoria Street interface. The low scale is to be maintained down to Victoria Street.

11) **15 BUILT ENVIRONMENT AND HERITAGE**

Again the need to protect this area is emphasised:

- Planning should ensure all land use and development appropriately responds to its surrounding landscape and character, valued built form and cultural context.*
- Planning should protect places and sites with significant heritage....value.*

12) **15.01 BUILT ENVIRONMENT**

15.01-1L-05 Urban Design outside the Capital City Zone

The objectives include:

- To ensure that the scale, siting, massing and bulk of development complements the adjoining and nearby built*

form, and relates to the prevailing patterns of height and scale of existing development in the surrounding area.

- *To ensure that buildings on prominent sites are designed to achieve a high standard of design that reflects the importance of their location and extent of their visibility.*

This is a prominent site that requires not only a high standard of design but a sympathetic enhancement to this unique heritage area.

13) The *Strategies* under *Building Form* include:

Encourage development that responds to the scale of:

- *Surrounding development both in terms of its overall dimensions and the size of its individual architectural elements.*

14) **15.03 HERITAGE**

15.03-1S *Heritage conservation*

The Policy Guidelines in this clause include:

The Burra Charter: The Australian ICOMOS Charter for Places of Cultural Significance, 2013.

This Charter is adopted throughout Australia as the guide for building in a heritage place such as HO992.

It includes a Practice Note - Article 22 – *New Work in a cultural place.*

The Note includes:

All work should comply with the Charter as a whole, and this means while new work should be readily identifiable, it should also-

- *Not adversely affect the setting of the place (Article 8)*
- *Have minimal impact on the cultural significance of the place (Article 21.1)*
- *Not distort or obscure the cultural significance of the place or detract from its interpretation or appreciation (Article 21.1)*
- *Respect and have minimal impact on the cultural significance of the place.*

15) **15.03-1L-01 Heritage places within the WHEA**

The *Policy Application* notes that:

Applies to land within the Area of Greater Sensitivity to this clause, and within HO992 (WHEA Precinct) ...

The Policies and Strategies in this clause require low rise development that responds to the heritage context.

16) The Objectives include:

- *To provide a buffer zone for the World Heritage listed Royal Heritage Listed Royal Exhibition Building and Carlton Gardens.*
- *To provide a setting and context pf significant historic character for the World Heritage property.*
- *To protect significant views and vistas to the REB and CG.*
- *To maintain and conserve the significant historic character including built form and landscapes of the area.*
- *To ensure development in the area responds to the prominence and visibility of the REB and CG.*

17) The Strategies include:

- *Retain and conserve the valued heritage character of streetscapes.*
- *Retain the predominantly lower scale form of development which provides a contrast to the dominant scale and form of the REB*

18) The WHEA was set up for protection of the heritage area surrounding the REB and CG.

Surrounding buildings in Fitzroy and Carlton are predominantly low scale and mainly Victorian era. This applies particularly to Rathdowne Street, Carlton Street and Nicholson Street in Fitzroy.

19) The subject site is surrounded by significant heritage buildings and Significant Streetscapes.

In the recently gazetted MPS Am C396, the Significant Heritage status of the building at 29-31 Rathdowne Street was confirmed. This heritage place and its neighbour 25-27 Rathdowne Street (also graded Significant) are located immediately north of the subject site.

- There are few new intrusive buildings in these streets. An obvious exception is the building at the south corner of Rathdowne and Queensberry Streets, a product of a less informed era.
- The quality of the Carlton Gardens and Royal Exhibition Building is defined by the surrounding buildings. It is vital that this is maintained.
- Views both to and from the Royal Exhibition Building are addressed in the WHEA. This is especially significant given the now active Royal Exhibition Dome Promenade.

20) Heritage places in the immediate context of the proposed development:

- Rathdowne Street west side – 25-27, 29-31, 49-67 (49 only) have a Significant rating.
- The building across Elliott Lane and opposite the development site, 24-30 Victoria parade is two storeys with a pitched GI roof that is not intrusive in this heritage area.

21) The section of Drummond Street between Victoria and Queensberry Streets is designated a Significant Streetscape on both sides and includes many Significant and Contributory places (as Gazetted Am C396).

East side: 2-14, 26, 46, 48 and 58-72 are rated significant, and 16-20, 22, 24, 28-32 and 56 are rated Contributory.

West side: 1-47 are rated Significant and 49-71 Contributory.

22) There are numerous other buildings included in the *Heritage - Old Categorisation System, CI 15.03-1L-03* that were graded A to D.

23) The proposed development does not meet the requirements of the WHEA.

It must be emphasised that the World Heritage Environs Strategy Plan: Royal Exhibition building and Carlton Gardens 2009, has been a Reference document in both Local Policy and the Schedule to DDO6 for over **10 years**. More particularly, this Strategy Plan includes an important Statement of Significance for the WHEA.

This Statement was updated in the following report: Royal Exhibition Building + Carlton Gardens Draft Strategy Plan, June 2021. The updated Statement of Significance provides an important description of those heritage attributes of the Environs Area that must be respected.

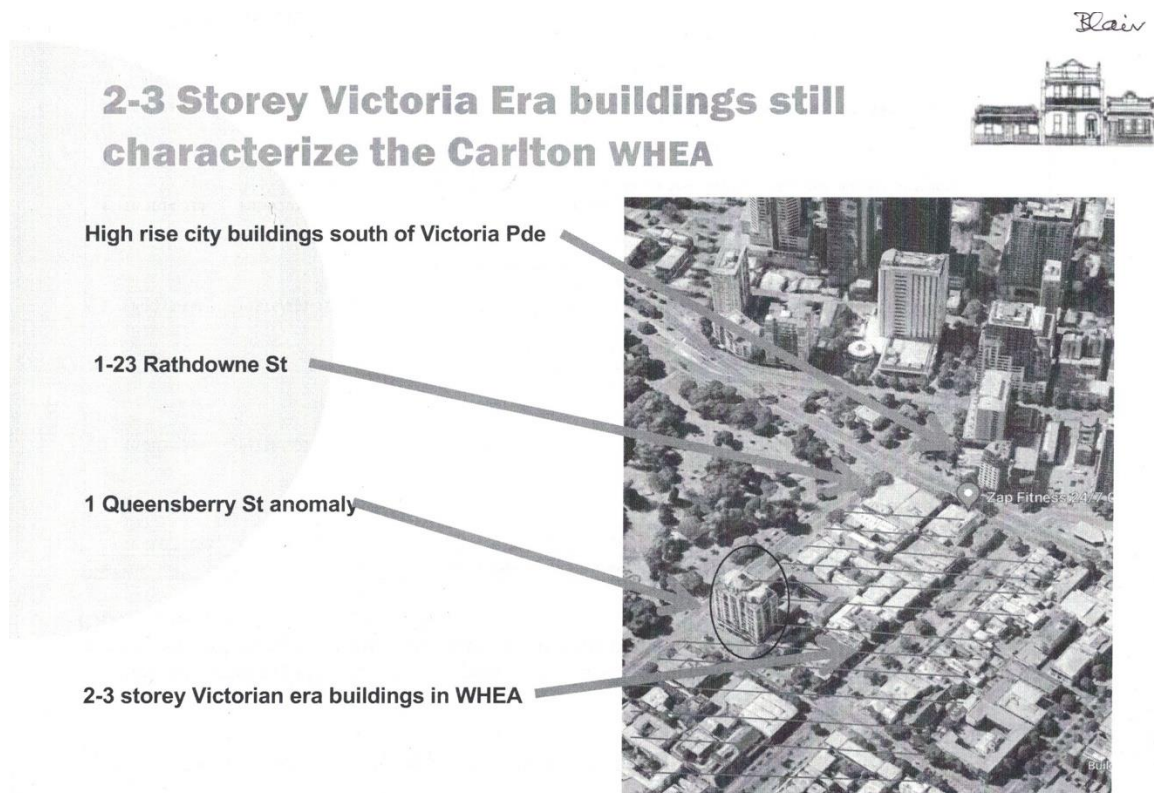
The precinct is of architectural and aesthetic significance. It retains substantially intact nineteenth century streetscape, particularly on Nicholson Street (north of Gertrude Street), the south side of Gertrude Street, Carlton Street, and Rathdowne Street north of Pelham Street. The streetscapes display a comparatively high proportion of original nineteenth century form and fabric, including substantial area of two-storey, with some three-storey residential and commercial development. The streetscapes are also interspersed with prominent institutional properties of the nineteenth and early twentieth centuries.

Materials and architectural elements include face brick, bluestone and rendered masonry construction materials; pitched and hipped roofs; chimneys; prominent parapets and pediments; post-supported verandahs, many with elaborate iron lacework or timber detailing; a proportion of palisade fences; and typically, zero or shallow front setbacks with gardens.

Public infrastructure includes some bluestone pitched road and lane surfaces, and kerbs and channels. Plane trees are common street Plantings. The precinct additionally exhibits a fine grain pattern of urban development, generally emphasised by the regularity of the terrace row subdivisions, narrow allotments and street grid, with many streets running at right angles to the REB site. (Aesthetic significance).

There are unfortunately some late 20th Century intrusions in Rathdowne Street that were approved before the current planning laws were introduced.

24)



25) **15.03-1L-02 Heritage**

Under *Policy application* it is noted that this clause-

-applies to **places with a heritage overlay**
- To encourage high quality contextual design for new development

26) **New Building strategies**

This clause contains important directions for development.

Ensure new buildings:

- Are in keeping with the key attributes of the precinct as identified in the *Statement of Significance*.
- Are in keeping with key attributes of the heritage precinct such as:
Building height, massing and form

Style and architectural expression

Details.

Materials

Front and side setbacks

Orientation

Fencing

Prevailing streetscape height and scale.

- *Do not visually dominate or visually disrupt the appreciation of a heritage place. (Note that the precinct, HO992, is the 'place')*
- *Adopt a façade height that is generally consistent with the prevailing heights in the street. This would, of course, mean the heritage precinct contributory buildings, typically 8-9 m high.*
- *Adopt a facade height that is consistent with the adjoining significant or contributory buildings, whichever is the less*
- *Where abutting a lane are respectful of the scale and form of historic fabric of heritage places abutting the lane. (Elliott Place in this case).*

27) Concealment of higher rear parts of a new building strategies

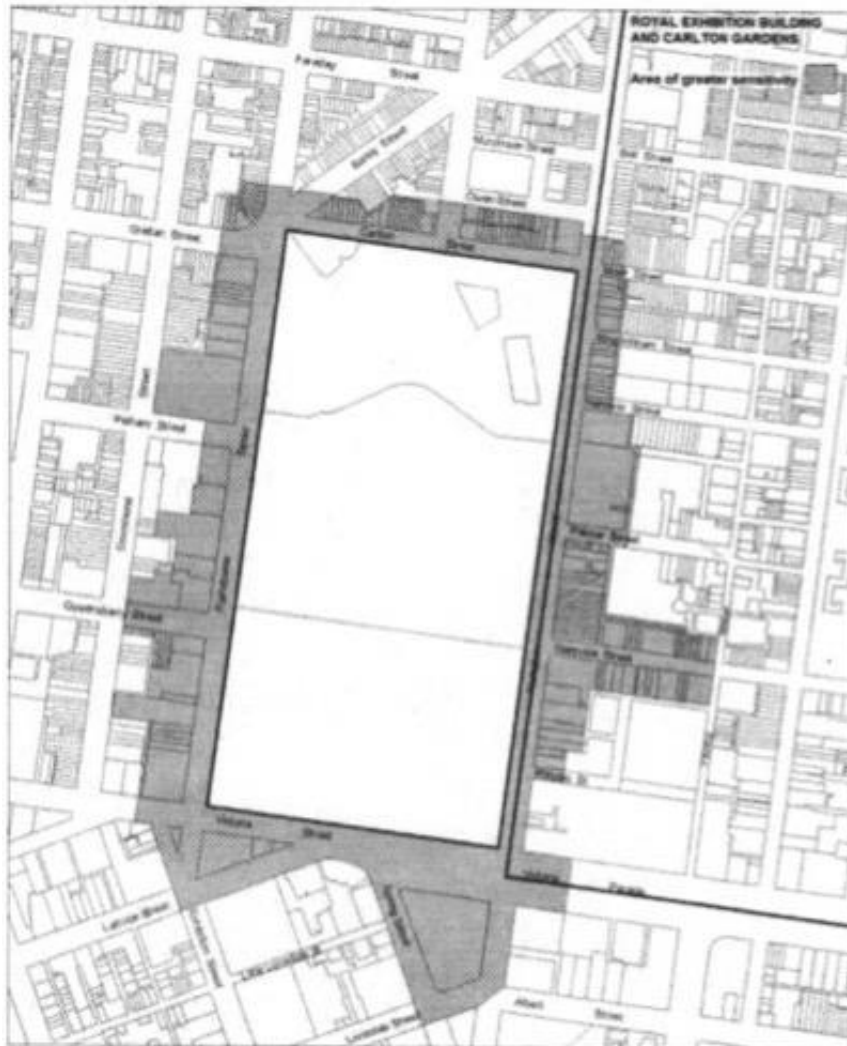
Here the MPS notes that:

In significant streetscapes, higher rear parts of a new building should be concealed. This applies to the Drummond Street Significant Streetscape across Elliott Lane from the subject land and affected by the development.

*In other streetscapes, higher rear parts of a new building should be partly concealed. **Some** of higher rear parts may be visible **provided** it does not dominate or reduce the prominence of the building(s) and the streetscape.*

This applies also when the streetscape is new and part of the overall development. The important factor is that it is a part of the 'place' or precinct, in this case HO992. See also DDO6 that reinforces this point.

Area of Greater Sensitivity Plan



28) AREA OF GREATER SENSITIVITY

29) 40 OVERLAYS

43.01 HERITAGE OVERLAY

43.01.8 'Decision Guidelines'

These note that:

...the Responsible Authority **must** consider-

- *Whether the design, form, layout, proportions and scale of any proposed building and works is **compatible** with the period, style, form, proportion, and scale of any identified heritage places surrounding the site. In this case HO992.*
- *Whether the location, bulk, form or appearance of the proposed building is in keeping with the character and appearance of adjacent buildings and the heritage place. - the precinct HO992.*
- *Whether the proposed works will adversely affect the significance of the heritage place. Again, precinct HO992.*
Note also the Burra Charter guidelines.

30) SCHEDULE 6 TO THE DESIGN AND DEVELOPMENT OVERLAY

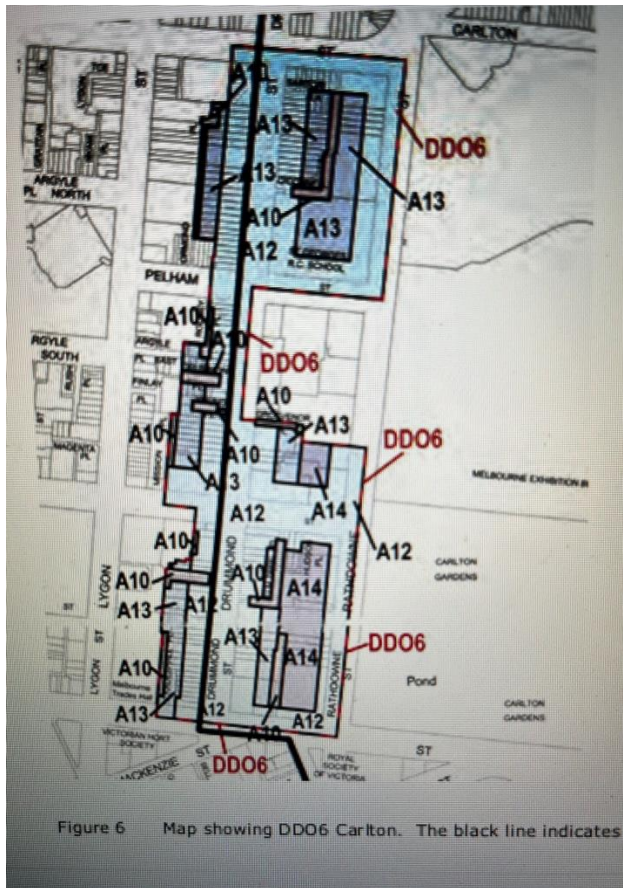
DDO6 provides an important part of our submission. As height controls are not mandatory developers assume that 'discretionary' interpretation of height limits gives them the right to bypass height limits. We argue strongly against this.

31. DDO6 is one of a hundred or so DDOs in the MPS that outlines built form for important areas in the municipality.

The schedule sets out design parameters to protect the scale and Victorian character of this important heritage area.

The DDO brings together critical parts of the MPS including the requirements of the WHEA Area of Greater Sensitivity, and heritage overlay HO992.

The WHEA SP is a referral document in this Schedule.



32) DDO6

33) In **CI 1.0** the **Design Objectives** include:

- *'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 of adjoining buildings and the area.*
- *To protect and manage the values of and views to the Royal Exhibition Building.'*

34) In **CI 2.1 Building height**, it is noted that *'Buildings or works should not exceed the Maximum Building Height specified in the table to this schedule.'*

The word **should** is not defined in the Planning Scheme. The Planning Scheme does note that where terms are not defined

common usage will prevail. If we look at common usage the Oxford Dictionary notes that **should** is used to show 'what is right or appropriate.'

The Cambridge Dictionary notes that the word is used to express 'that it is necessary, desirable or important to perform the action'. So there is a sense of duty if not obligation implied.

To reinforce this, the clause notes that '*An application to exceed the Maximum Building Height **must** demonstrate how the development will continue to achieve the Design Objectives and the Built Form Outcomes of this schedule ...*'

The word **must** is a clear direction. A mandatory requirement.

35) The Objectives of this Schedule include that the area is essentially of low-rise buildings.

36) The Outcomes are also clear.

Area A12. (Max Building Height 10m). *The low-rise built form of the area, which is predominantly 2-3 storey, is maintained to ensure that the existing Victorian character is conserved.*

Area 10. (Max Building Height 8m) *The predominantly 1-2 storey built form character of the area is maintained...*

Area 14. (Max Building Height 16m). *Development of an appropriate scale to Cardigan (sic) Street is achieved, but in doing so maintains a comfortable relationship with the surrounding low-scale area...*

The reference to Cardigan Street' is clearly an error as it is not a part of this DDO. The CoM acknowledge this. We assume that this should be Drummond Street as it is the central and main heritage street in this DDO and sets a standard for heritage conservation.

37) **The basis of the Maximum Building Heights**

We believe that the heights for the three areas on this site are based on the following:

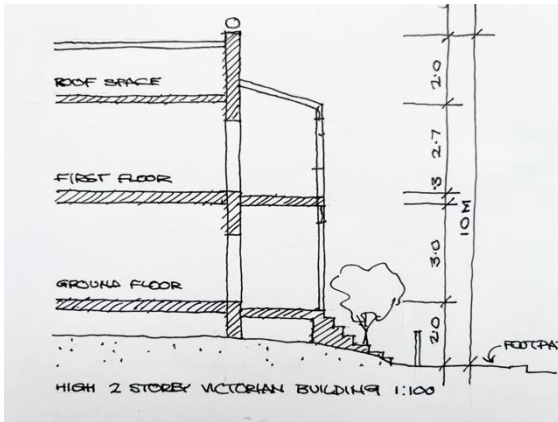
Area A10.

Based on the max building heights along the lanes such as Elliott Place. Typically one to two storeys and usually lower than 8m but potentially that height. This is the maximum height in Elliott Place.

Area A12.

The 10 m maximum appears to be based on the maximum height of two storey Victorian houses in the area such as 21-23 Drummond Street, 29-31 Drummond Street and 49 Rathdowne Street.

38) Diagram 1 and the photo of 29-31 Drummond Street (a typical higher 2 storey building), show the height of these higher buildings. Their height is approximately 10m compared with 8-9m for typical two storey Victorian buildings.

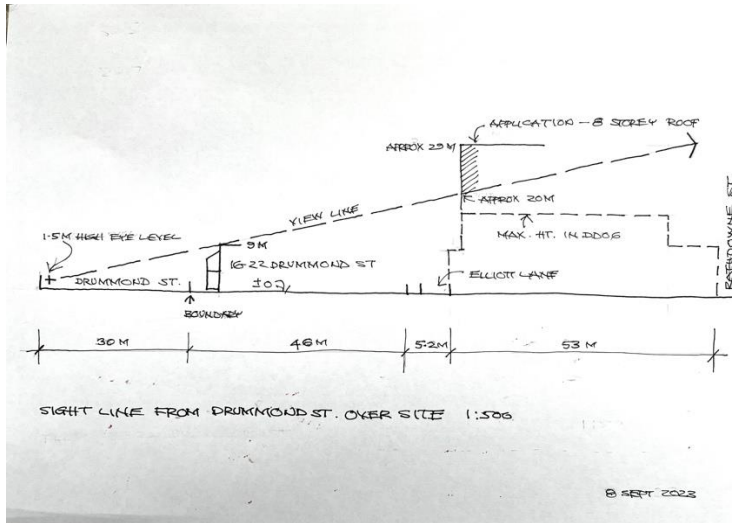


DIAG 1 SECTION, HIGHER BUILDING

29-31 DRUMMOND STREET

39) Area A14.

As noted earlier, in Significant Streetscapes, such as Drummond Street on the other side of Elliott Lane, rear development (Area A14) should not be visible. As it is a part of the heritage place this must apply to this application.



40) Site lines from Drummond Street over the subject site.

41) In other streetscapes (Rathdowne and Victoria Streets) rear development should be only partially visible, and should not dominate or reduce the prominence of the street façade.

See CI 15.03-1L-02 Concealment of higher rear parts of new buildings strategy. Note earlier.

The 16m maximum height limit is based on heights to achieve the criteria for these two streetscape conditions.

42)

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.
14	16 metres	Development of an appropriate scale to Cardigan 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.

43) Why allow developments above the Maximum Building Heights?

The requirement that the 2-3 storey built form **must** be maintained for the street frontages (Area A12) and 1-2 storeys for Elliott Place (A10) may seem a contradiction when allowing building heights above the maximums stated. **However, this is easily explained.**

This block between Victoria, Rathdowne, Queensberry and Drummond Streets contains predominantly two storey Victorian buildings but with some higher two storey examples such as Medley Hall at 48 Drummond Street, and three storey Victorian buildings such as 21-23 Queensberry Street. See photo below.



44) 21-23 QUEENSBERRY STREET, 3 STOREY VICTORIAN BUILDING

45) Buildings between these higher buildings could meet the Design Objectives and Outcomes for area A12, for example, if they were built to a similar height. Development behind these taller heritage street

front buildings may have a chance of exceeding the Area A14 Maximum Building Heights and still meet the Design Objectives and Outcomes.

46) Areas A10, A12 and A14 on the subject site.

The site frontages along Victoria Street and Rathdowne Street do not have higher Victorian buildings abutting them. 25-27 Rathdowne Street, an Edwardian era building, is marginally higher and set back by approx. 4 metres. At the other end of the street frontages in Victoria Street the existing building across Elliott Place is approximately (a Victorian building with no classification but it is a contributor to the heritage place).

There is no case to exceed the Maximum Building Heights in Schedule 6 therefore, as there are not higher heritage building at both ends of this infill development.

47) The area A10, including Elliott Place does not have any buildings above the 8 m maximum and is mainly lower than that.



48) VIEW ALONG ELLIOTT PLACE FACING NORTH

49) Area **A14** is as noted above governed by the height of street frontage buildings and does not have a case to exceed the 10 m maximum.

The subject site, unlike views from Drummond Street for example, has a high visibility as it is on the corner of Rathdowne and Victoria Street. Most importantly there is a clear view over the site from the Carlton Gardens and the Royal Exhibition Buildings and from Exhibition Street.

50) The site is important as it is large, prominent and a gateway to the Carlton Gardens and the Royal Exhibition Building.



THE SITE FROM VICTORIA STREET FACING THE REB + CG

51) The shielding effect from the street frontage buildings does not work when viewed from greater distances, so it would be hard to design a building to the Maximum Building Height in the Table to Schedule 6, for the following reasons:

- The overlooking of the site is emphasised by the existing street levels. The road at the corner of Rathdowne and Queensberry Streets is approximately 7 metres higher than the road level at the Rathdowne Victoria Streets intersection. This higher level continues across the Gardens to the Royal Exhibition Building. These higher viewing points reduce the shielding effect of the Street Frontage buildings (Area A12).
- The footpath at the midpoint of the Carlton Gardens on Victoria Street is approximately 4 metres higher than the SE corner of the subject site, also providing a view over the site.
- There are longer views from Exhibition Street south of Victoria Street and from parts of the east end of La Trobe Street.
- There is no case therefore to exceed the Maximum Building Height for Area 14. In fact it would be difficult to justify building to the maximum height except perhaps in limited areas.

52) The CRA in our submission to the review of the Royal Exhibition and Carlton Gardens Draft Strategy Plan June 2021 (REB+CGDSP) recommended that height limits should be mandatory to remove any ambiguity in this section of the MPS.

53) The CRA notes that the City of Melbourne has emphasised in its submission to the REB+CGDSP – June 2021, *that height controls in DDO6 must be strengthened in the following manner-*

- *It is important to note that that the height controls in DDO6 are all discretionary and are often challenged. In particular, large sites such as 1 Rathdowne Street (former Cancer Council site) experience continued pressure for much higher development, and stronger planning controls are needed.*
- *Rathdowne Street is the principal street in the western area of WHEA. This area directly fronts the Carlton Gardens as prime foreground so the City of Melbourne considers that mandatory controls are justified.*

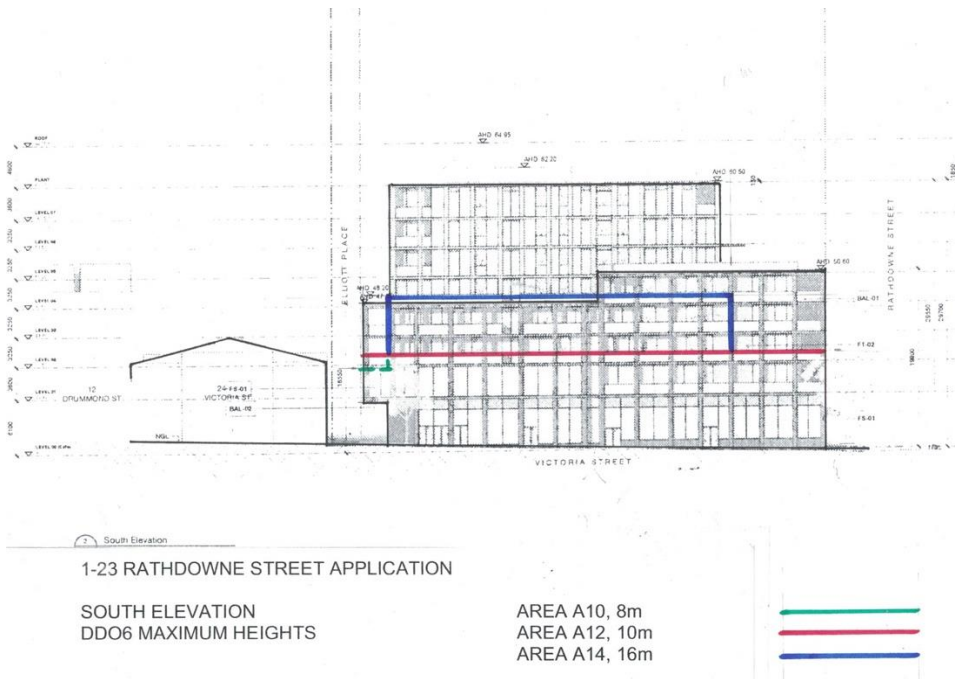
54) DOES THE APPLICATION MEET THE REQUIREMENTS OF DDO6 AND HO992?

The Application does not acknowledge the requirement of the Objectives relating to development sympathetic to this heritage area. CRA submit that there is not a case to exceed the Maximum Building Heights for Area A 10, A12 and A14.

Further CRA believe that it would be difficult, if not impossible, to achieve the Maximum heights in this sensitive heritage area, particularly in area A12 and A14, and still meet the Objectives and Outcomes of DDO6.

The following elevation/photos show the Maximum Building Heights from DDO6 superimposed on the proposed building.

55)



56)



57) **SCALE, MASSING, BULK, FORM, DETAILS, MATERIALS AND FRONT SETBACKS**

The application does not provide a satisfactory response to the MPS requirement for a sympathetic and appropriate character and heritage built form interpretation.

Scale – meaning the same or similar scale to the predominant Victorian buildings in this heritage area. There is no response to appropriate scale.

Massing and Bulk – meaning the requirement for a sympathetic relationship to the heritage area. The design is clearly far too bulky.

Details – The typical Victorian building parts such as front verandas and balconies is missing.

Materials – sympathy to the predominant brick, stone and render finishes is not addressed. The variety and richness has not been addressed.

Front setbacks – typically the Victorian buildings have a 2-4 m setback. The occasional Victorian building with a street frontage usually has colonnaded setbacks and balconies. This is not addressed.

Character – As well as the poor responses listed above the urban heritage form is not followed. Elliott Lane is overpowered and widened; the continuous street frontage typical of the area is broken twice by the application Rathdowne Street with a break on the northern end of the site and the large gap for the central courtyard.

58) **Generally there is no attempt to meet the above requirements for this heritage place.**

The three 3 storey apartments are the only section of the proposed development that, in part, meet the above requirements.

59) **RECENT VCAT RULINGS FOR THE AREA**

VCAT has consistently ruled that developments in this area of Carlton should not exceed the maximum building heights set out in the Schedule to DDO6.

Some examples of recent VCAT rulings:

TP-2007-1213	P /2009	83-95 Rathdowne St
TP-2010-319	P1738/2011	69-71 Drummond St

TP-2013-630
TP-2014-734
TP-2018-892

P1375/2014
P834/2015
P237/2019

15-31 Pelham St
66-68 Lygon St
16-22 Drummond St

See Appendix A for details.

60) **A recent development** that broadly meets the DDO6 and HO992 requirements is the Corpus Christi Seminary on the NE corner of Pelham and Drummond Streets. It is Area A12 of DDO6.

This building is approximately a maximum 10m height and responds to the neighbouring Edwardian institutional buildings (Churches and former Children's Hospital opposite 150 Drummond Street) and Victorian terrace houses.



CNR DRUMMOND AND PELHAM STREETS

61) **KEY GOVERNANCE CONSIDERATIONS**

- The Melbourne Planning Scheme (MPS) Maximum Building Heights in the Schedule to DDO6 state that the development **should not exceed** maximum heights stated. If they do they **must** meet the Objectives and Outcomes. These are not discretionary but are conditional requirements. The onus is for the applicant to demonstrate that they have been met.

-
- The Royal Exhibition and Carlton Gardens (REB + CG) Draft Strategy Plan is currently before the Minister, and may be adopted at any time soon.
 - It will likely make the maximum Height limits mandatory.
 - Since the 2004 MPS enactment, VCAT has consistently ruled against applications exceeding the DDO6 Maximum Heights for this area of Carlton. See appendix A precedents.
 - The REB + CG is a world Heritage Site and the responsibility of the Australian Government. The Victorian Minister for Planning is the responsible Authority to protect the heritage values of the place on behalf of the Australian Government.

62) **CONCLUSIONS**

We submit that the application for permit should be refused as it fails to respond to the intent and details of the Melbourne Planning Scheme, nor does it comply with the statutory requirements of the planning scheme.

Specifically-

- Lack of a response to this highly important heritage area of Carlton, including the World Heritage listed Royal Exhibition Building and Carlton Gardens.
- The requirement for a low-rise development.
- The requirement for a responsive design in this predominantly Victorian era area in relation to character, proportion, appearance, scale, massing and bulk, details, materials, and setbacks (all terms used in the MPS in relation to this area).
- Lack of response to the broad urban heritage character of the area including the protection of historic Elliott Lane.

63) APPENDIX A

RECENT VCAT RULINGS FOR THIS AREA OF CARLTON

No	CoM Ref	VCAT Ref	Address	Planning Application Summary	Final Outcome
1	TP-2007-1213	P7/2009	83-95 Rathdowne Street	Construct 6 storey building consisting of 57 dwellings, a restaurant and two retail shops	CONDITIONAL PERMIT GRANTED to meet urban design and heritage requirements - development reduced to 5 levels with no restaurant and shops.
2	TP-2010-319	P1738/201	69-71 Drummond Street	To demolish the rear of the existing Victorian era building and to construct an apartment building. The building would contain 4 levels above natural ground level, one level below natural ground containing apartments and a second level below ground for storage and bicycle parking.	NO PERMIT GRANTED. Did not meet urban design and heritage guidelines.
3	TP-2013-630	P1375/201	15-31 Pelham Street	Partial demolition of the front and rear building, conversion of existing buildings into dwellings and extend the rear building with 4 additional levels.	NO PERMIT GRANTED. Did not meet urban design and heritage guidelines. Developer amended design to meet CoM heritage and urban design requirements.
4	TP-2014-734	P834/2015	66-68 Lygon Street	Demolition of an existing four level motel building and its replacement with a 13 storey new building above 2 basements to contain retail premises, a place of assembly and residential apartments.	NO PERMIT GRANTED. Did not meet urban design and heritage guidelines.
5	TP-2018-892	P237/2019	16-22 Drummond Street	Partial demolition of 4 x Victorian terrances, construction of a 5 storey building (plus basements) accommodating dwellings and car parking.	NO PERMIT GRANTED. Did not meet urban design and heritage guidelines.