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Response to Draft Heritage Strategy 2019

First of all, congratulations on the work done on the Heritage Strategy to date. The clearer focus on the role and backdrop of Indigenous heritage, together with the sense that heritage is more than just "old buildings" are both welcome.

Certainly the former has strong strategic backing in Plan Melbourne 2017-2050 Policy 4.4.2 - "Respect and protect Melbourne's Aboriginal cultural heritage".

I note that the overarching Direction 4.4. in Plan Melbourne - "Respect Melbourne's heritage as we build for the future" - also goes on:

"Heritage will continue to be one of Melbourne's competitive strengths, contributing to its distinctiveness and liveability and attracting visitors, new residents and investors. Heritage is an important component of Victoria's tourism industry and benefits the economy."

...

"In time, new development will add to Melbourne's rich legacy of heritage places. The process of building a new legacy is important, just as it is vital that current assets are protected.

Innovative approaches to the creative re-use of heritage places need to be adopted, ensuring good urban design both preserves and renews historic buildings and places."

Plan Melbourne then goes on to expand on these respective themes of "Stimulate economic growth through heritage conservation" and "Protect Melbourne's heritage through telling its stories" in Policies 4.4.3 and 4.4.4 respectively.

Certainly the Draft Heritage Strategy document does a good job of picking up those themes of heritage conservation and the "telling stories" in the sense of social and cultural heritage.

However, I have a couple of suggestions - one is that the linkage back to the overarching state strategic documents could perhaps be made a little clearer in the document. Currently it looks like Plan Melbourne 2017-2050 is mentioned in passing but exactly how this Draft Heritage Strategy relates to it and its policies and objectives is unclear.

When arguing a matter before VCAT it's certainly helpful to have clearer links to state policy of this kind, as it gives more weight to council's own policies.

The second suggestion offered is that there is another important aspect of how heritage tells its stories - and that *is* through place and built form¹ - specifically in how heritage is layered.

Plan Melbourne makes a point that heritage isn't just a fixed point in time - it's the ongoing "rich legacy" of heritage places - the most recent to be recognised being Federation Square(!).

This concept of layering is far more clear in the Port Phillip Planning Scheme's Clause 22.04:

22.04-3 Objectives

To encourage the conservation of all significant and contributory heritage places in the Heritage Overlay.

To discourage the demolition of significant and contributory heritage places in the Heritage Overlay.

To encourage all new development and redevelopment of significant and contributory places to be respectfully and harmoniously integrated with the surrounding character.

To encourage the retention, reuse and recycling of significant and contributory heritage places in the Heritage Overlay in a manner which conserves and does not detract from the surrounding character.

To promote design excellence which clearly and positively supports the ongoing heritage significance of the Heritage Overlay.

¹ Yes, I know I said heritage isn't just about "old buildings" - but the way buildings of different ages relate to each other is an important part of how the built environment *can* "tell a story" and speak to future generations.

To ensure new buildings and additions complement existing heritage characteristics.

To ensure that new development and any publicly visible additions and/or alterations in or to a heritage place maintain the significance of the heritage place and employ a contextual design approach.

The Port Phillip Clause 22.04 talks about layering in connection with a "contextual design approach":

22.04-4 Policy

General

It is policy to:

- Encourage the restoration and reconstruction of heritage places in all parts of the Heritage Overlay where appropriate and in particular in intact or substantially consistent streetscapes
- Encourage new development to be respectful of the scale, form, siting and setbacks of nearby significant and contributory buildings.
- Disregard the impact of buildings that are obviously atypical to the character of the streetscape when determining the appropriate mass and scale for new buildings or extensions or upper storey additions in a Heritage Overlay.
- Encourage a contextual design approach for additions and/or alterations to a heritage place or for new development. A contextual approach is where the alteration, addition or new development incorporates an interpretive design approach (derived through comprehensive research and analysis). New development should sit comfortably and harmoniously integrate with the site and within the streetscape and not diminish, detract from or compete with the significance of the heritage place, or streetscape character of adjoining or nearby buildings.
- This approach can include:
 - Contemporary architecture and innovative design which is an important part of the contextual approach because it adds to the existing diversity and layering of styles through time. This layering is a defining feature in a number of areas and is therefore an important component of Port Phillip's heritage.
 - Accurate reproduction architecture may be employed in limited instances where detailed evidence, such as photographic evidence, exists for that alteration, addition or new development.

I'll spare everyone further quoting of the Port Phillip scheme - suffice to say strong guidance from a cohesive Heritage Strategy can be powerful once embodied in the Planning Scheme.

The idea seen in Plan Melbourne and the PP scheme above, that heritage is about change rather than the lack of it is important. Important so as to justify the adaptation of heritage places to new uses, and also important in terms of justifying the preservation of heritage buildings from different periods which may co-exist in the same precinct - because, and when, they tell a story.

All too often heritage consultants working for developers will justify the demolition of a couple of heritage buildings because they're from a slightly different era to the bulk of the stock in that streetscape - e.g. a couple of Edwardian buildings in a largely Victorian shopping strip, or a single Art Deco or Moderne commercial building nestled in largely Federation surrounds.

It's the very presence of "out of place" buildings that often *tells* the story - those buildings were put there for a reason, to address changing needs, just as we may seek to renew buildings today. That someone knocked down a dairy to build a motor garage is telling us something important about the evolution of Melbourne. That they didn't feel the need to do the same with the Victorian houses around it is telling us something else.

As the example of Federation Square shows, it's not age alone that makes a building valued as heritage, but other qualities - social, cultural - basically that it has a place in telling our stories.

Yours sincerely,



President - Protect Fitzroy North

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