

Attachment 3B - Summary of late submission to the review of HO3 / list of additional changes to be made to citations in Attachment 1.

Submission:	Officer Response
General (all precincts):	
Submissions requesting corrections of fact or expression:	
Text reads 'information shown on these maps, such as the extents of residential development at any given time, boundaries of residential' should it not read the 'extent and boundaries of residential areas?'	Request not supported. Maps show the extents of residential development (plural). Text currently refers to 'boundaries of residential development'.
There is reference to a Sands & McDougall Directory; as more than one directory was cited it should be in plural, and even more correctly the individual years consulted should be stated, which is standard academic practice.	Request not supported. The Sands & McDougall Directory is the title of this serial publication, which is used as a collective term of reference for a standard source. Studies of this type, which are not intended as academic publications, do not cite exact dates, page numbers and so on for standard reference sources such as directories or rate books.
The clause in order to confirm the current grading of any specific places that might be disputed is perhaps a little bit ambiguous in its expression and needs redrafting.	Request not supported.
Page 14: Footnote 3 has an inconsistency in the spelling of the submitter's surname.	Request supported, to be incorporated into final draft.
Cast iron cottage at 391 Coventry street, Sth Melb. Should be mentioned in text, required greater level of protection in the planning scheme.	Request not supported. Additional mention of specific places in the heritage precinct datasheet does not actually provide a greater level of protection. Preparation of a citation would provide increased level of protection and is supported by the heritage consultant.

Page 15: First sentence of the page uses the phrase 'by which time' and repeats 'by that time' later. One should be removed.	Request supported, to be incorporated into final draft.
Page 15: In the last sentence of the first paragraph reference is made to the new courthouse being opened in 1858, but there is no reference to the location of this building.	Request supported, to be incorporated into final draft as a footnote.
Requests further reference to regrading of the broader precinct.	Request not supported. It is not considered to be crucial to the overall significance of the precinct to provide further detail in relation to this matter.
Page 16: Requests further reference to public buildings.	Request not supported. This matter has been addressed previously.
Page 17: Requests the deletion of the word 'certainly' and a redrafting of the sentence.	Request not supported. Heritage consultant disagrees with submission.
Page 18: The Protestant Orphanage on Emerald Hill is incorrectly referred to as the Roman Catholic Orphanage. Correction required.	Request supported, to be incorporated into final draft.
Requests that reference be made to the alignment of the Emerald Hill street grid with that of the City of Melbourne's grid.	Request supported, to be incorporated into final as a footnote.
Page 21: Suggests that clarification is needed in regards to the location of buildings in Moray or Clarendon Streets.	Request not supported. The opening sentence states clearly that the discussion is centred on commercial properties in Moray Street.
Councils heritage advisory committee is of the view that painted signage on shop fronts should be documented.	Request supported, to be incorporated into final draft.
Page 28: Minor typographical error, 'Belladonia' should be spelt 'Balladonia'.	Request supported, to be incorporated into final draft.
Submissions requesting substantive Changes to citations – Not supported by Heritage Advisers	
Page 18: Requests that further information related to the Nelson Road Housing Commission Area and the history thereof is included.	Request not supported. The additional information is beyond the scope of the study and does not need to be incorporated.
Requests photographs of specific properties are included in the final draft.	Request not supported. Heritage consultant disagrees with submission and does not see the need to illustrate every building referred to in the text.
Requests that further information regarding 'the 'miraculous'	Request not supported. Heritage consultant disagrees with

Singapore cottage be included on the updated list for inclusion of the register.	submission. Heritage advisor agrees that the preparation of a citation would be appropriate.
Requests further retention and protection of original bluestone elements.	Request not supported. Outside scope of project. Significant bluestone elements have been noted in the draft.
Albert Park Residential Precinct	
Submissions requesting corrections of fact or expression:	
Requests that figure 21 show site historical battery emplacement.	Request not supported. It is not crucial to the overall significance of the precinct for the battery emplacement (which no longer exists) to be shown.
Observation on 'sinuous' shape of Nelson Street.	No Change requested.
Page 37: Requests a minor correction of expression.	Request supported, to be incorporated into final draft.
Page 37: Requests a minor correction of expression, text reads 'that permeate certain parts of the precinct' The word 'certain' begs the question which parts?	Request not supported. Heritage consultant notes that the citation already identified which parts of the precinct contain these very narrow streets and it is not necessary to reiterate this every time the phenomenon is subsequently referenced.
Submissions requesting substantive Changes to citations – Supported by Heritage Advisers	
Request clarification of details on the Kearney map relating to settlement patterns.	Request supported, to be incorporated into final draft as a footnote.
Submissions requesting substantive Changes to citations – Not supported by Heritage Advisers	
Page 35: Second last line, second paragraph. Request seeks clarification on the area of a particular subdivision.	Request not supported. The existing description of development is not considered to be unclear. It is also not considered necessary to

	discuss the distinction between precise cardinal points and simplified local usage.
Submission expresses concern that the choice of images does not display good examples of buildings with a grading of significant.	Request not supported. Both images are considered to adequately illustrate their respective housing types.
Page 38: Submissions states that the use of the photograph of Layfield Court Housing Commissions flats is misleading in that such constructions are atypical rather than being typical of the area. Images in a document such as this, which relate to celebrating the heritage of the areas, should be carefully selected so that they reflect the heritage qualities rather than atypical features such as this.	Request not supported. Issue previously raised. The image was deliberately chosen to illustrate the contrast in this part of the precinct between the grand townhouses of the nineteenth century and the high density apartments of the later twentieth century. The image was indeed carefully selected and was not a random choice.
Bridport Street Commercial Precinct	
Submissions requesting substantive Changes to citations – Not supported by Heritage Advisers	
Submission asks why there is no reference to Albert Park Railway Station, formerly the 'Butts' railway station. Submission states that there is an incorrect reference to the 'Butt's railway station in the context of the Middle Park business precinct.	Request not supported. Railway station was not included as it 'has little, if indeed any impact on the subsequent residential and commercial development along the western portion of Bridport Street'. Heritage consultant did not address the question of the 'Butt's railway station in the context of the Middle Park business precinct; requires confirmation.
Middle Park Residential Precinct	
Submissions requesting corrections of fact or expression:	
Incorrect reference to the location of a row of single storey boom style cottages. Requests that photography with a better example of polychrome brick I used instead of the current images.	Request supported, to be incorporated into final draft. Error arose in compilation of the document.

Request that reference be made to the 'Edwardian Streetscape in the southern part of Page Street.	Request supported, to be incorporated into final draft.
Submission asks why the Danish Club is mentioned.	Heritage consultant notes that the building is clearly a key element, both historically and architecturally. The citation refers to the former Danish Club which is now referred to as Hughenden.
Page 55. Submission is concerned with the inclusion of figures 45 & 46, which the submitter considers to be of only average quality and which could be replaced by better examples.	Request not supported. Heritage consultant does not consider these images unsatisfactory.
Page 55. First paragraph, second sentence. Submission is concerned with grammar.	Request not supported. Heritage consultant does not agree that the sentence is ambiguous or unclear.
Submissions requesting substantive Changes to citations – Not supported by Heritage Advisers	
Submission asks 'why the trees of Mary Street are mentioned, while similarly magnificent stands along Richardson Street are not?' Submission questions the omission by mistake/deletion of the original listing of Heritage Trees in South Melbourne from the 1998 review.	Request not supported. Heritage consultant notes that the intent of the citation was not to provide an exhaustive list of notable avenue trees across the entire precinct.
Submission states that 'if this list is to form part of the planning scheme then it must incorporate that missing page'.	Under investigation by council officers separately. Not related to HO3 Review.
Submission requests inclusion of more photographs to illustrate the points being made.	Request not supported. Heritage consultant notes that it is neither necessary nor indeed desirable to illustrate every desirable architectural type that is referred to in the text.
Appendix 3 – Submissions question the reference to historical patterns of settlement and asks why parts of West St Kilda are included in the same precinct as Middle Parks Edwardian area.	Request not supported. The heritage consultant notes that the citation acknowledges the distinction between the patterns of settlements within the east and west parts of this precinct. The heritage consultant gave consideration to splitting the precinct

	<p>into two smaller areas. This was based solely on the fact that the old municipal boundary (along Fraser Street) seemed like a sensible division. Upon further investigation the arbitrary nature of the municipal boundary was revealed and thus influenced the decision to maintain the area as one precinct.</p> <p>Further research revealed that the historical and architectural development was fairly consistent across the entire precinct.</p> <p>The heritage consultant observed that Victorian development in St Kilda West is comparable to that in the northwest of the precinct - i.e. along Canterbury Road, Kerferd Road and the smaller streets nearby. The precinct is heterogeneous in its mixture of Victorian, Edwardian, inter-war and post-war development – the consultant found that it is these successive layers of development, and the reasons behind them, that define its overall significance.</p> <p>The heritage consultant does not recommend splitting the precinct into two. He is doubtful that it will produce a better statement as it will not provide any greater level of protection for the significant buildings therein. Separating the precinct would lose sight of the overall picture of development and in doing so diminish the significance of this area.</p>
Armstrong Street Commercial Precinct	
Submissions requesting corrections of fact or expression:	
Submission notes that there is confusion between Albert Park/Butts railway station and the Middle Park railway station.	Request supported, to be incorporated into final draft.
Submission suggests a change to the reference to re-numbering of	Request supported, to be incorporated into final draft.

property addresses.	
Submission notes incorrect reference to the rebuilding of Albert Park railway station. Requires clarity on dates.	Request supported, to be incorporated into final draft.
Overview	
Submission in 'perturbed' by the relative weight within the report given to the history of the settlement and space given to the analysis of the heritage qualities of the properties in each precinct.	Request not supported. The methodology used for the projects is supported and accepted practice, and is consistent with the Burra Charter.
Submitter notes that the review is clearly intended to be an additional source to support council's heritage position at VCAT. Submission queries the qualification of the authors of the report in that they 'seem to be limited to the fact that they are a principal and employee to a firm called Heritage Alliance'	Council officers note that Heritage Alliance is respected within the industry and have considerable experience. Council officers are confident that the content of the statement reflects best practice.
Submission states that the 'comparative analysis for each precinct is also very confusing' and questions the grammatical structure of the document.	Heritage consultant disagrees that the section is confusing and notes that the in relation to grammatical structure it 'appears to relate to the submitter's preference of literary style'.
Submission notes that if this is a study of urban character then there are at least two serious omissions. 133 & 183 Beaconsfield Parade.	Request not supported. Heritage consultant disagrees that failure to mention these two blocks of high rise apartments constitutes a serious omission. The heritage advisor notes that the citation already includes an adequate discussion of post war high rise flats along Beaconsfield Parade.
Submission asks that as a matter of urgency that all properties dating from the 1850's should be specifically identified as soon as possible to provide the utmost protection for them.	Request not supported. The heritage consultant notes that inserting references to individual properties within a precinct does not provide them with a greater level of protection. Site specific heritage citation would be appropriate if more detailed information on individual properties is required.

List of Recommended Changes to the Citations in Attachment 1 (HO3 Review):

- Page 8: Remove semi-colon between the words residential and subdivision.
- Page 14: Correct spelling of Bunnett in footnote 3.
- Page 15: Remove the tautological 'by this time' in opening sentence of page 15.
- Page 15: Insert street location of courthouse into final sentence of first paragraph.
- Page 18: Replace Roman Catholic with Protestant in opening paragraph of description.
- Page 18: Insert footnote to first sentence of second paragraph, noting that this angled street layout was parallel to original City of Melbourne 'Golden Mile' grid.
- Page 19: Insert footnote to second sentence of first paragraph, noting that the double-fronted cottage at 18 Coventry Place was originally built as an attached pair of single-fronted dwellings that were later consolidated.
- Page 28: Correct spelling of Belladonia to Balladonia.
- Page 34: Insert footnote stating that that the Kearney map is coded to indicate both existing and proposed development in the South Melbourne area.
- Page 37: Amend the third last sentence in the last paragraph so that it reads 'minor streets such as Little Page Street'.
- Page 54: Amend penultimate sentence of final paragraph so that it reads '...and the grander Hughenden (formerly premises of the Danish Club) at No 177'.
- Page 55: Amend final sentence of first paragraph, so that it reads 'these proliferate in the larger streets (e.g. southern part of Page Street) as well as smaller streets (e.g. Erskine Street)'.
- Page 60: Delete erroneous reference (in parenthesis) to the Butts railway station.
- Page 61: Delete first sentence of the first paragraph, and amend second sentence to read 'when the street addresses of properties across South Melbourne were renumbered in 1900, the shops in Armstrong Street at Nos 1 to 15 were redesignated'.
- Page 65: Amend sentence in first paragraph under the heading 'Why is it significant', to read 'the opening of the railway station (1880)'.