

Amendment CI43 - Recommended Officer Response to Submissions

Issue No.	Issue raised in submission	Officer comment and recommended response to the Panel
1	Support heritage controls to the Art Deco corner entry, including interiors. This is of primary significance.	<p>Officer comment:</p> <ul style="list-style-type: none"> Support is noted. <p>Recommended Position:</p> <p>No change to the amendment is recommended at this stage.</p>
2	<p>The building form outside the extent of the Entry Area are considered to be of secondary or low significance as they:</p> <ol style="list-style-type: none"> are not of aesthetic significance, have been altered such that it no longer demonstrates the occupation of the site by AFV and Rootes Ltd. 	<p>Officer comment:</p> <ul style="list-style-type: none"> The significance of this place has been established by the Biosis study in accordance with the processes and guidelines outlined in the Burra Charter and Heritage Victoria Guidelines (which include clear ‘criterion’ for determining significance – HERCON Criteria). The significance of 19 Salmon Street is supported by the separate Built Heritage report commissioned by the Port Melbourne Historical Preservation Society and National Trust. <p>a) <u>Aesthetic significance</u></p> <ul style="list-style-type: none"> It is acknowledged the aesthetic significance of the complex is limited to the Art Deco (Moderne) office building. However, this is only one of the reasons for the significance of the place and the associated office wings and sawtooth factory buildings contribute to the historic significance for the reasons described in the statement of significance and provide a related setting. <p>b) <u>Alterations to the building/ buildings</u></p> <ul style="list-style-type: none"> The statement of significance prepared by Biosis Pty Ltd assigns the level of significance as follows: <ol style="list-style-type: none"> Primary significance: Buildings constructed up to 1946 including the Salmon Street office block, and original sawtooth factory section extending 50 metres to the east of this block; foundry and 3 bays of original sawtooth factory east of Smith Street and south of Tarver Street.

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		<p>b. Secondary significance: Post 1947 additions including eastern part of Salmon Street block; factory blocks west of Smith St and extension towards Williamstown Road.</p> <p>c. No or limited significance: Post 1960's additions and internal alterations, window shades, external alterations such as recladding (but not original structural framing).</p> <ul style="list-style-type: none"> • Council's heritage consultant advised: <i>"The sections of factory identified as of Primary Significance in the citation include buildings that retain their main structural elements, with only changes to cladding and glazing. Secondary significance buildings are of similar construction form but are altered and have undergone some further levels of change."</i> • It is therefore considered that, while there are different levels of alteration to the buildings at 19 Salmon Street and 299 Williamstown Road, the buildings of primary and secondary significance nonetheless retain much of their original form, bulk and scale of the structures. Council's heritage consultant advised: <i>"...the buildings still have a high level of structural integrity in that the main elements of supporting posts, roof trusses, beams, purlins, brick dado walls and other frame work survive intact despite the external cladding having been replaced."</i> • Further, alterations to a building do not necessarily mean that heritage significance is lost. The issue of 'intactness' is often more nuanced than simply identifying whether a building has been modified. • The Panel for Latrobe Planning Scheme Amendment C14 (pp16-7) acknowledged the question of intactness (i.e. is the place 'very intact' or 'no longer intact?') often arises in heritage matters. The Panel said that the term integrity was often applied as a synonym for intactness but went on to differentiate the two terms. • In summary, considering the level of integrity of a heritage place is not, necessarily, directly linked to how intact the place is. A heritage place may demonstrate a low level of intactness but still have a high level of integrity (especially if the type of building is now rare or uncommon). Conversely, alterations to a heritage place which significantly reduce its intactness may reduce its integrity to the extent that it loses its significance.
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		<ul style="list-style-type: none"> The Biosis report, in recommending specific properties that warrant a Heritage Overlay, assessed the level of intactness and integrity and determined that where alterations have occurred that these have not compromised the heritage significance of the place or its contribution to the heritage precinct. <p>Recommended Position:</p> <p>No change to the amendment is recommended at this stage.</p>
3	<p>The Heritage Overlay should be limited to areas of 'primary significance' and only applied to the extent of the Entry Area.</p>	<p>Officer comment:</p> <ul style="list-style-type: none"> There is a clear requirement in the Planning and Environment Act 1987 to conserve heritage places, and there is a clear mandate in state policy for Council (as Planning Authority) to identify, assess and document places of heritage significance. The methodology for the assessment of this place accords with the Burra Charter and Heritage Victoria Guidelines (which include clear 'criterion' for determining significance – HERCON Criteria). Retaining the Heritage Overlay over the entire site provides a better mechanism for co-ordinated planning over the site, and greater opportunities for retaining and adapting heritage fabric. It is noted that the HLCD Pty Ltd Conservation Management Plan prepared for 19 Salmon Street and referred to in the submission also recommends application of the Heritage Overlay to the entire site. The application of the Heritage Overlay accords with the Planning Practice Note: 'Applying the Heritage Overlay' which provides that <i>'the Heritage Overlay applies to both the listed heritage item and its associated land.'</i> It is noted that the examples of situations where a reduction in the curtilage and polygon may be appropriate (homestead, significant tree, fountains/monuments) do not apply in this situation. While the application of a Heritage Overlay over the site does not prevent demolition, it ensures that heritage is considered as part of the redevelopment of the site. The citation

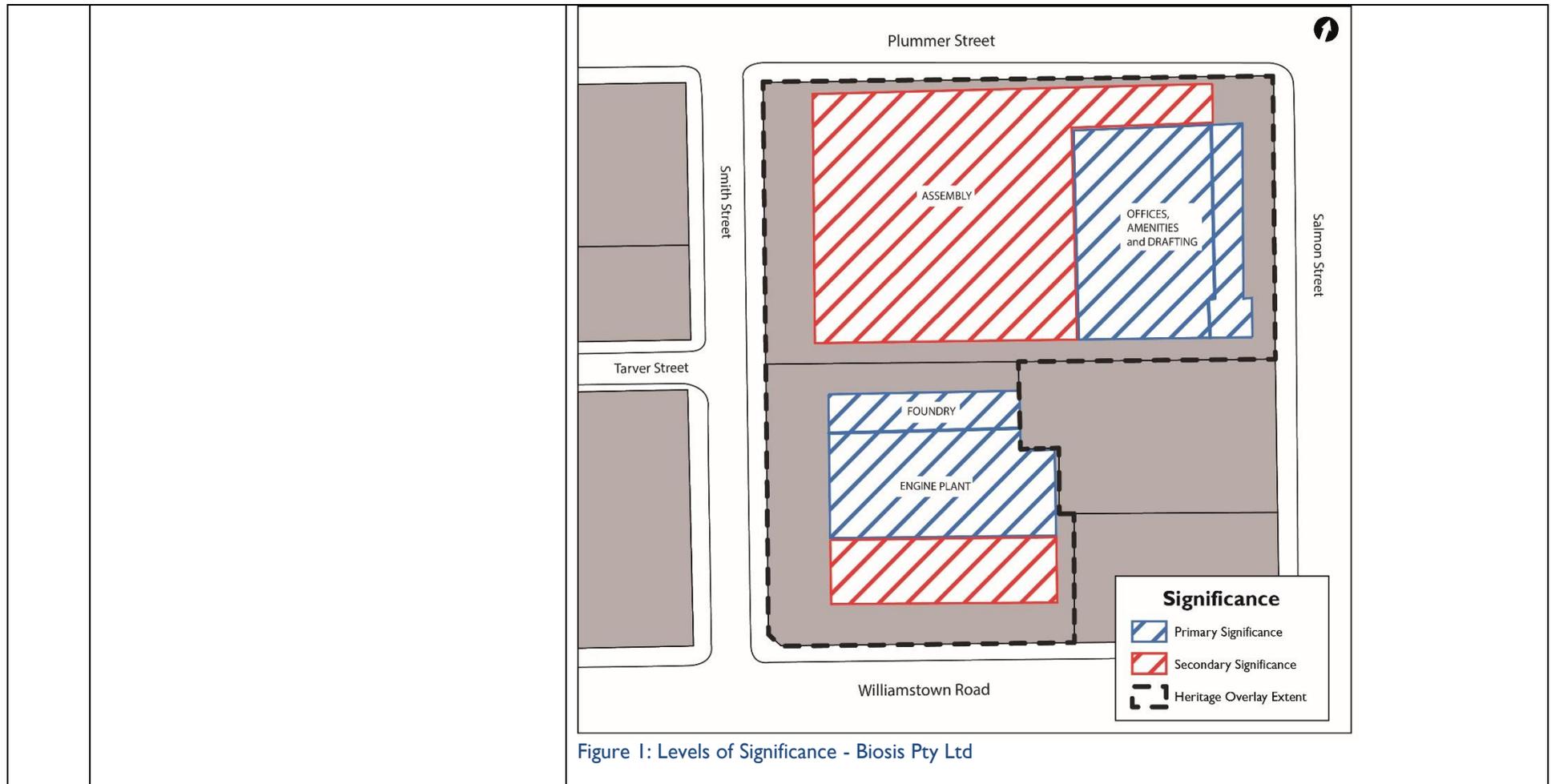
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		<p>encourages the retention and adaptation of representative elements of elements of secondary significance, while encouraging the retention of elements of primary significance.</p> <p><i>“...it allows flexibility in development with the potential to manage change over the overall site and adjoining areas. This does not mean development cannot occur, only that the heritage values of the buildings should be considered.”</i></p> <p>Recommended Position:</p> <p>No change to the amendment is recommended at this stage.</p>
4	<p>The Heritage Overlay should not unnecessarily constrain development from achieving the intent of the Fishermans Bend Strategic Framework Plan.</p>	<p>Officer comment:</p> <ul style="list-style-type: none"> • The inclusion of a site in a Heritage Overlay does not preclude redevelopment, instead it ensures that heritage is considered as part of the balanced consideration of the proposed development. • Council’s heritage consultant has advised: <ul style="list-style-type: none"> <i>While planning for the overall Fishermans Bend urban renewal area envisages high density residential and commercial development, within this there will be a demand for a variety of spaces and building forms. The historic buildings are excellent candidates for other forms of use and facilities as they provide intrinsic benefits from recognising and presenting the heritage of the area.</i> • It is a well-recognised and accepted practice that planning controls will set parameters in relation to the use and development potential of land. All properties in the municipality are subject to zoning controls and most are also subject to overlay controls. The application of the Heritage Overlay to places of heritage significance is a clear obligation on Planning Authorities under the Act. • With regard to the concern that the future development potential of properties will be restricted through the application of a Heritage Overlay, Council recognises that ‘heritage’ will become an additional matter for consideration. • The Heritage Policy at Clause 22.04 of the Port Phillip Planning Scheme sets out objectives, policy statements and performance measures to guide decision making pursuant to the Heritage Overlay. This policy enables Council to consider applications on a case by case basis. It does not prohibit opportunity for repair, extension to or redevelopment of heritage places, but rather establishes an additional layer of consideration for such places so that the existing heritage values of a place (individual property and / or precinct) are maintained.

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		<ul style="list-style-type: none"> • The policy does provide scope for partial demolition of significant and contributory buildings. Partial demolition is typically supported where it would not affect the significance of the heritage place, and the proposed addition is deemed to be sympathetic to the heritage place. Support for partial demolition to the rear of heritage buildings to allow for modern additions is common, and such alterations are seen throughout the municipality. • The citation for the Rootes / Chrysler factory site provides design guidance for the redevelopment of sites of primary and secondary significance. These would be considered as part of any development application proposed on any of the sites. <p>Recommended Position:</p> <p>No change to the amendment is recommended at this stage.</p>
5	<p>Future development of 19 Salmon Street must be undertaken in accordance with the Conservation Management Plan prepared by Helen Lardner Conservation and Design (HLCD Pty Ltd).</p>	<p>Officer comment:</p> <ul style="list-style-type: none"> • The Conservation Management Plan (CMP) was prepared on behalf of the Stamoulis Property Group for the Former Rootes Factory at 19 Salmon Street, Port Melbourne. Its purpose is to establish the site's cultural heritage significance and to guide heritage management during future development. • It is noted that the CMP has no statutory weight given it is not a reference document nor incorporated document in the Port Phillip Planning Scheme. • There are a number of differences between the CMP and the Biosis Study, in particular relating to the levels of significance within the site, which are reflected in the recommendations for future use and development (see figures 1 & 2 below showing levels of significance determined in each of the studies).

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		 <p>Figure 2: Levels of Significance - HLCD Pty Ltd</p> <ul style="list-style-type: none">• See response to issue #2 regarding assigned Levels of Significance.• The Citation prepared by Biosis Pty Ltd makes the following recommendations for any future redevelopment of the site:<ul style="list-style-type: none">○ Retain the primary significant elements which relate to the original Defence Department factory and Rootes car factory dating up to 1946 comprising:<ul style="list-style-type: none">▪ The two storey Salmon Street office block with main entrance tower,▪ The north and south elevations of the original sawtooth factory section extending for 50m to the east of this block.▪ The foundry and three original bays of original sawtooth factory east of Smith St & south of Tarver Street.○ Retain and adapt representative elements and elevations of secondary significant in any new redevelopment along the Plummer and Smith Streets elevations;○ Incorporate structural elements such as roof trusses and framing, as design and landscape features in future development.
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		<ul style="list-style-type: none">○ Design future development of the site so that it is informed by the character of the existing buildings including use of sympathetic materials, scale, roof forms and fenestration, and maintain the verticality and reference to former rooflines.○ Maintain existing setbacks from retained parts of the building.○ Prepare an archival photographic and structural drawing record for Port Phillip Council and the State Library Victoria prior to demolition of any buildings / elements. <ul style="list-style-type: none">● The above recommendations were prepared having regard to the Statement of Significance as outlined in the Biosis Study, and should be considered in any proposal for redevelopment of the site. <p>Recommended Position:</p> <p>No change to the amendment is recommended at this stage.</p>
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