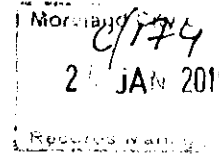


A. Schirripe

Submission #24



Moreland City Council
Strategic Planning Unit

Re: Amendment C174

Dear Sir/Madam,

Per the "Moreland Planning Scheme – Amendment C174, Explanatory Report", and as persons affected by the proposed amendment and specifically, the inclusion of the property situated at [REDACTED] we respectfully now submit our Notice Of Intention To Object To This Proposal.

We note the following points for your consideration in the assessment of this objection:

- It is hereby declared that no letter was directly received by the affected owners (herein after referred to as the "respondents") informing them of the intention to list the aforementioned property on the Heritage Overlay (HO) register;
- Per the Moreland City Council Explanatory Report, a thorough assessment of the property was not conducted for this home hence its merits for inclusion in the HO register per Amendment C174 are inconclusive at best;
- Given the lack of due notice received by the respondents, an extension of time is sought in their particular case while a Heritage Consultant is briefed and engaged, and a report tabled for consideration by the Strategic Planning Unit. The Christmas shutdown period has made it difficult to engage the services of the necessary specialist consultants to provide a considered & balanced appraisal of the situation;
- In the interests of fairness, until such time as the respondents submit this report, it is requested that the property be omitted from the Heritage Overlay listing;
- At the discretion of the respondents, the representatives for the Assessors from the Strategic Planning Unit are invited to attend & inspect the property at a pre-arranged, mutually agreeable time for the purposes of making an informed decision about the merits and significance for inclusion of this property on the proposed HO register;
- The respondents advise that the nominated property has little to nil street presence or exposure, given that it is set back so considerably from the street – it is in fact located behind another dwelling that has been constructed in front of it. The effect of listing this property on the HO register may have serious and deleterious ramifications for the respondents as the effect would be tantamount to locking up the site and inhibit the respondents use of the site or future proposed use of the site.

Your confirmation of receipt of this written objection is requested via notification to the emails listed below. We further request that a written response be provided, preferably within thirty (30) days, outlining the proposed actions in this matter by the Strategic Planning Unit.

Should you seek any further or immediate clarifications to this Notice of Objection, please make contact by registered post to the owner's principal place of residence – 34 Passfield Street, West Brunswick as well as the emails listed below.

Respectfully,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Email 1:

[REDACTED]

Email 2:

[REDACTED]

Email 3:

[REDACTED]

Email 4:

[REDACTED]

Submission #25

EQUIPE

LAWYERS

Our Ref: AN: EQ18000217

Contact: [REDACTED]

Phone: [REDACTED]

24 January 2019

Moreland City Council
Attention: Strategic Planning Unit
Locked Bag 10
Moreland VIC. 3058
By email: strategicplanning@moreland.vic.gov.au

Dear Sir/Madam

**Submission to Amendment C174 – Moreland Planning Scheme Proposed Heritage Overlay
Proposed Heritage Overlay - Schedule [REDACTED]**

We act for [REDACTED] the owner of land situated at [REDACTED] (the subject land), which contains a single storey brick dwelling (the dwelling).

Amendment C174 to the Moreland Planning Scheme (the Amendment) proposes to include the subject land within the Heritage Overlay – Schedule 466 (HO466) on the basis of a heritage citation (the citation) prepared by Context Pty Ltd (Context) forming part of the *Moreland Heritage Gap Study* (Context Pty Ltd, 2017).

Our client strongly opposes the inclusion of the subject land within the HO on the basis that the subject land and dwelling do not achieve the relevant thresholds, having regard to the *Planning Practice Note 01 – Applying the Heritage Overlay* (September 2012).

Our client has engaged Bryce Raworth and Associates to independently review and provide advice on the merits of the citation. Their preliminary assessment has concluded that the dwelling does not meet the thresholds of local significance, in particular they have found (summarised):

- The dwelling has very limited significance to the City of Moreland in terms of its historical and architectural values.

EQUIPE LAWYERS PTY LTD
8 GOLD STREET, COLLINGWOOD VIC 3066
ABN 49 141 940 703

P/03 9853 5000, E/ADMIN@EQUIPELAWYERS.COM.AU
EQUIPELAWYERS.COM.AU

- The building has been more heavily altered than described in the citation.
- The subject land is not inherently important for having a brickmaker as its first occupant as many Brunswick residents would have been employed in the brickmaking industry in the nineteenth century.
- In the local context, 1870 is not a notably early construction date and certainly not so early as to justify an individual heritage listing for what is otherwise an altered and architecturally unremarkable building.
- A representative sample of early cottages predating Melbourne's 1880s land boom are already included in Moreland's heritage overlay including [REDACTED] [REDACTED] These all exhibit a higher degree of integrity.
- The largely intact brick cottage at [REDACTED] (HO7) has a stronger and more significant association with the brickmaking industry in Brunswick than might be claimed of [REDACTED]
- That comparatively few 1860s-70s cottages survive Brunswick does not provide sufficient justification for listing an example that is inferior to those already on the overlay.
- The dwelling is not locally significant by virtue of being a rare surviving example of a specific building type.

We enclose a copy of the letter of advice received from Bryce Raworth and Associates.

On the basis of the above, our client requests that Council respond to this submission by deleting proposed H0466 from the Amendment and not apply the HO to the subject land.

Please note that, should Council determine to proceed with the Amendment without changes, our client will strongly oppose the Amendment and will seek to call Mr Bryce Raworth to give expert evidence at the Panel hearing.

We would appreciate it if you could please confirm receipt of this submission.

Please contact me on [REDACTED] if you have any queries in relation to any aspect of this submission.

Yours faithfully



[REDACTED]
Director
Equipe Lawyers

Encl.

bryce raworth

urban planning & architecture

19 victoria street
st kilda vic 3182
phone 03 9525 4299
fax 03 9525 3615
admin@bryceraworth.com.au

24 January 2019

**Strategic Planning Department
City of Moreland**

To Whom It May Concern

Re: [REDACTED]
Proposed Heritage Overlay (Amendment C174)

This letter was prepared at the request of the owner of [REDACTED] Brunswick, in relation to the proposal to apply an individual heritage overlay control to the site under Amendment C174 to the Moreland Planning Scheme. We have been asked to comment on the significance of the site, and whether the proposed heritage overlay control is appropriate and warranted.

The analysis below draws on an external and internal inspection of the house at [REDACTED] [REDACTED] and a review of the relevant documents, including the citation relating to the site, which was prepared as part of the *Moreland Heritage Gap Study* (Context Pty Ltd, 2017). Previous heritage studies of the area were also reviewed, including *Keeping Brunswick's Heritage* (Context Pty Ltd, 1990) and the *Moreland Heritage Review* (Allom Lovell & Assoc., 1999). The history of the site was researched using Sands and McDougall directories and rate books.

The subject site is presently occupied by a single-storey brick cottage. It adopts a fairly standard mid-to-late Victorian vernacular design, comprising a transverse gabled roof and symmetrical double-fronted façade with a skillion roofed front verandah. External walls are face brick with basalt window sills.

According to Context's citation, the cottage at [REDACTED] was constructed c1870. [REDACTED] a labourer and brickmaker, is recorded as the occupant and owner of a two room house on the site in the rate book for 1871/1872 (the preceding Brunswick rate books are not available, as noted in the citation). Our own research using Sands and McDougall directories indicates that the c1870 construction date is generally accurate, albeit that 1871 is the likely date. [REDACTED] (presumably a misspelling of [REDACTED] is first listed as a resident of [REDACTED] in the 1872 Sands and McDougall directory. Prior to 1872, the directories show [REDACTED] living in Weston Street, Brunswick. David Street is first listed in the 1870 directory, which is broadly consistent with information in the citation that the street was created as part of an 1868 subdivision.

The citation for the subject site completed by Context Pty Ltd includes the following statement of significance:

What is Significant?

The brick cottage at [REDACTED] Brunswick, built c.1870 is significant. The timber front fence, the timber framed carport and post 1950 additions to the cottage are not significant.

How is it significant?

The brick cottage at [REDACTED] is of local historical and architectural significance to the City of Moreland.

Why is it significant?

The brick cottage at [REDACTED] erected c.1870, is a rare surviving example of the brick cottages constructed from local hand made Brunswick brick in the early Victorian period. Built for (and probably by) brickmaker and labourer Thomas Delabunty, it is likely to have been built using bricks from one of the local brickworks. (Criterion A and B)

The Victorian brick cottage at [REDACTED] Brunswick, is architecturally significant as a rare example in Brunswick of the vernacular early to mid Victorian workers cottage. (Criterion D)

In our view, the house at [REDACTED] has only very limited interest to the City of Moreland in terms of its historical and architectural values.

Accepting that Context did not have the benefit of a close inspection of the property beyond what can be observed from the street, the house has been more heavily altered than described in their citation. The front door and window shutters are acknowledged to be non-original elements but the front window joinery also appears to be non-original. The cast iron verandah frieze is most likely a modern replica and the verandah floor (presumably originally of timber construction) has been replaced with concrete with the posts mounted on modern metal stirrups. The verandah posts themselves may also be later replacements, and the verandah detailing more generally seems incorrect for a Victorian era dwelling. The main roof and verandah roof appear to have been reclad and have been fitted with modern quad profile gutters. The chimney to the south side of the house is constructed using bricks that have a more modern machined appearance than the bricks used for the original 1870s front wall.

The citation further suggests that a rendered finish may have been removed from the walls to reveal the face brickwork. However, it is unlikely that a simple worker's cottage of the period would have originally been rendered. The physical evidence suggests that the brickwork has been repointed entirely using a modern cement rich mortar. If this is correct, then Context have mistaken the mortar residue on the face bricks as evidence of a rendered finish. It is also noted that much of the rear wing is a later addition.

In regard to issues of historical significance, the place is not inherently important for having a brickmaker as its first occupant, insofar as many nineteenth century Brunswick residences would have been occupied by persons employed in brickmaking, this having been one of the suburb's main industries. [REDACTED] occupation as a brickmaker does not necessarily mean that he built the house himself. Brickmaking and bricklaying are not mutually compatible trades requiring a similar skill set.

The citation conjectures that the house could be a much earlier building, predating the c1868 formation of [REDACTED] but this is not substantiated by the available documentary evidence. [REDACTED] first appears in Sands and McDougall directories in 1870 with a single

listing for Patrick McCormick. The next house to be built or [REDACTED] is recorded in the 1871 directory with John Ryan as the occupant. An analysis of subsequent directory listings for David Street suggests that the houses occupied by McCormick and Ryan were located to the south of present day [REDACTED]. As noted, [REDACTED] does not appear in the directory listings for [REDACTED] until 1872. He was previously listed under a Weston Street address – such that his occupancy of the [REDACTED] property could not conceivably have begun any earlier than c1871. That is to say, it is highly unlikely that the house at [REDACTED] was built before 1870. In a local context, 1870 is not a notably early construction date. It is certainly not so early as to justify an individual heritage listing for what is otherwise an altered and architecturally unremarkable building.

Moreland's heritage overlay schedule already includes a representative sample of early cottages predating Melbourne's 1880s land boom. The citation lists four examples – [REDACTED] (HO17), [REDACTED] (HO18), [REDACTED] (HO74) and [REDACTED] (HO3). [REDACTED] is thought have been built by a local quarryman in the late 1850s and hence is a much earlier and more historically significant building than [REDACTED]. The other buildings listed above are all dated to the 1860s and all exhibit a higher degree of integrity, notwithstanding that the verandah to [REDACTED] is understood to be a reconstruction.

In addition to the examples of early Brunswick cottages listed in the citation there is the highly significant c1854 pre-fabricated iron cottages at [REDACTED] (listed on the Victorian Heritage Register as H1151) and the 1860s bluestone cottage at [REDACTED] (HO195). [REDACTED] is more intact than [REDACTED] despite its front verandah also being a reconstruction. There is also a largely intact 1875-76 brick cottage at [REDACTED] (HO7), built by the Hoffman Patent Brick & Tile Company for the manager of their adjacent brickworks. The cottage at [REDACTED] has a stronger and more significant association with the brickmaking industry in Brunswick than might be claimed of [REDACTED].

That comparatively few c1860-70s cottages (of brick, stone or timber construction) survive in Brunswick does not provide sufficient justification for listing an example that is inferior to those already on the heritage overlay. The comment in the citation that early brick cottages in Brunswick are 'underrepresented' on Moreland's heritage overlay schedule presupposes that there should be a quota for specific building types to be listed on the schedule, even when extant examples of that building type are very few in number and/or of limited architectural value with poor integrity. Rather than pointing to any particular deficiencies in Moreland's existing heritage listings, the 'underrepresentation' of early brick cottages seems to be more a result of brick houses not having been built in large numbers in Brunswick during the 1860s and 70s. For example, the citation describes how [REDACTED] was one of only two brick houses in the street in [REDACTED] out of a total of fourteen (the others being of timber construction).

The citation establishes the case for rarity by categorising the house as a very specific variation of a Victorian dwelling – ie double-fronted, brick walled, cottage with a modest transverse gable form and a simple verandah. The Panel for Bayside Amendment C29 (part 2) found little justification for subdividing a general class of building to this degree. The house at [REDACTED] is not locally significant simply by virtue of being a rare surviving example of a narrowly defined building type. As stated in the Bayside C29 Panel report, rarity, in and of its self, is not a sufficient basis for heritage overlay listing:

The application guidelines for the Criteria for the Register of the National Estate note this criterion [B2 – rarity] relates to rare activities, not just the lack of example of a type due to historical attrition.

The Panel understands that in some cases a building may be a rare surviving example but unless such a building had heritage significance prior to becoming rare, rarity of itself will not necessarily translate to cultural heritage significance.

In conclusion, it is our view that the dwelling at [REDACTED] Brunswick, is neither of sufficient integrity nor sufficient historical or architectural interest to warrant an individual heritage overlay control as proposed under Amendment C174 to the Moreland Planning Scheme.

Please contact this office if there are any queries in relation to the above.

Yours sincerely

BRYCE RAWORTH AND MARTIN TURNOR

Submission #26

Holmes St objection

I own [REDACTED] Brunswick East and I am submitting an objection to applying a Heritage Overlay on this property.

Applying the Overlay on my property seems unreasonable as it falls within the area that Moreland Council is allowing the development of properties. According to my understanding it falls within one of the main criteria that Council is using to make decisions about building applications for multiple dwellings i.e., that it is on a main road. The building of apartments and townhouses has been approved by Council for the properties surrounding [REDACTED] over the years with approval being recently given to building four three storey townhouses next door at number [REDACTED]. Once built this development will overshadow [REDACTED] and take away from its appearance; especially as it is already overshadowed by the townhouses that were built at [REDACTED]. A heritage property will be out of place in an area that is consistently becoming more modern and where surrounding properties provide high density living. Both the adjoining properties will dwarf [REDACTED] taking away from its period charm just as the townhouses currently built on the fence line, leaving minimal space between the properties, and further forward than number 23 take away from its aspect. The inhabitants of [REDACTED] will feel very enclosed by the adjoining properties and will feel like they are living in a fish bowl, observed by all.

I believe applying the Heritage Overlay will negatively impact me financially on several levels. Firstly, the value of the property will be further challenged than it already is for being on a main road compared to on a secondary, quiet street. Applying the Overlay will further decrease the value of the property because of the restrictions placed on it in terms of maintaining the site and on any future development. From a re-sale perspective I will be significantly impacted by the Overlay. Secondly, the costs of complying with the regulations of maintaining the property as per the Overlay will cause me financial expense that I may not be able to sustain, dependent on what level of works needs to be done in future. If I am unable to maintain the property to the required standards it will fall into disrepair which will cause me financial hardship. The costs of maintaining the house and fence will also be an unreasonable infringement on my rights as the property owner. Thirdly, impediments the Overlay will place on the possibility to build multiple dwellings on the property will significantly affect my ability to support myself in retirement. This is the means by which I could self-fund my retirement as I am of the generation that will not be receiving a pension. Denial of the ability to develop the property will cause substantial financial loss.

[REDACTED] is classified as having a "significant" heritage value and the Council wishes to preserve it for the benefit of providing a historical 'memory' for the general public however, the general public doesn't take notice of its historical value. Heritage Overlays are better suited to properties in secondary streets where they can be noticed by the public. The majority of people who use Holmes St do so as a thoroughfare and so are not likely to notice the property let alone be interested in it.

Finally, as there are other properties in Moreland that have the features [REDACTED] is significant for it is not essential to apply the Overlay on it as the public will not be deprived from viewing those period features.

Submission #27

Giovanna Palma

From: [REDACTED]
Sent: Friday, 25 January 2019 11:56 AM
To: Strategic Planning
Cc: [REDACTED]
Subject: Amendment C174 Submission draft

I would like to make comment regarding the proposed amendment C174 Heritage overlay for the Tinning St Brunswick precinct.

While I support the concept of heritage overlay for maintaining some aspects of our history, I believe the precinct overlay is too general and includes places of questionable contributory relevance. I believe the heritage overlay should be for specific contributory houses with heritage relevance rather than a blanket precinct as proposed.

In particular, [REDACTED] has undergone significant changes over the years. Many aspects including aluminium windows and roofing and overall state of the house, I believe, make it non-contributory to such an overlay. Indeed, the house would have been demolished and site developed within the last two years had it not been for the delayed planning of the current owners.

In conclusion, I would like to see the proposal be more specific to contributory heritage buildings rather than a blanket precinct overlay.

Regards

[REDACTED]

[REDACTED]

Submission #28

Giovanna Palma

From: [REDACTED]
Sent: Friday, 25 January 2019 8:52 AM
To: Strategic Planning
Subject: Submission to Amendment C174

To whom it may concern,

I am writing to Moreland Council to lodge our objection to the inclusion of [REDACTED] in the proposed heritage overlay. We feel that the inclusion of our property is inappropriate for the following reasons.

1. While being old, the building is not of particular historic significance. There are plenty of similar structures across the inner North. This property does not merit singling out.
2. Singling out a single property within a neighborhood has no real value. One house of limited historic value within a streetscape of different housing types offers little benefit. The council should concentrate on protecting neighborhoods of value rather than single houses of questionable value.
3. The heritage overlay infringes on our rights of ownership to do with this property as we wish. We purchased this property without an existing overlay. To impose this overlay would damage us financially, and constitutes an erosion of our rights of ownership. It effectively changes the rules of the game after play has started.
4. Our inability to freely develop this property lowers its re-sale value. Anyone wishing to develop the site would no longer be a prospective buyer.
5. The overlay imposes potential long term costs associated with maintenance of the property. Works that must conform with the overlay will our reduce maintenance options (change rather than fix) and drive up costs.

Yours Sincerely,

[REDACTED]

Submission #29

Strategic Planning
Submission to Amendment C174
Moreland City Council
Locked Bag 10
MORELAND VIC 3058

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

21 January 2019

Dear Sir or Madam,

We are writing in order to make a formal objection to the proposed Amendment C174 to the Moreland Planning Scheme which will affect our property located at [REDACTED]. We purchased the property approximately eight years ago with a view to providing an accommodation option to our young children should they attend university studies in Melbourne when they complete their schooling, and the property is currently rented out until such a time occurs.

Our objection is centred around the restrictions that will apply to us, or our children when they inherit the property, and our ability to develop and renovate the home. Should either of our children decide to remain in the area and utilise the property as their family home, we are concerned that they will be unable to alter or renovate the structure in order to make it a comfortable family home with modern facilities. We object to the imposition of having an overlay to stop us from potentially doing what we would consider a tasteful development.

As noted in the property report prepared by Context Pty Ltd, there are alterations and modifications already to the property. The front door, verandah and posts are not original and we have had to replace roofing since owning the property (which was not original). Much of the overlay seems to be centered around the bricks used in the facade of the house, that "each house constructed for (and *likely* by) a local brickmaker/layer, *probably* using local bricks." The report also states that there is "*potential* to provide further information about the early bricks produced in Brunswick and the vernacular building techniques used by the original owner/builder." In the introduction to the report, both the designer and the builder of the house are clearly stated as unknown. It appears that the restrictions that would be imposed by a heritage overlay are based on possibility rather than known fact. In the section of the report titled 'Other recommendations' it is noted that we would be encouraged to replace the unsympathetic front fence with a fence appropriate to the period, however in the 'intactness and integrity' description of the house it states that the picket fence is a later addition but is sympathetic in height and material. It is also recommended that we be encouraged to accurately restore or reconstruct missing features of the house, based on physical and documentary evidence, which we fear will be costly but unnecessary to the functionality of the property.

Should we, or our children, choose to sell the property in the future, we are extremely concerned that the overlay will affect the resale value as the same restrictions will apply to prospective buyers, which has - in many cases - resulted in lower property values being realised. It would be unlikely for a modern family to live in a cottage that is described in the report as "modest in detail, small in size".

We would like to have consulted the original purchase documents from when we acquired the property for further information, however these are currently unavailable to us after a house fire that occurred at our residence (where the documents were stored) in the latter part of 2018 and recovery/restoration of our contents is still in process.

We are sympathetic to the historical foundations of the house, and will endeavour to maintain its Victorian heritage and charm, however we feel that a heritage overlay will have an adverse affect long term to the functionality and value of the property. Hence, we strongly object to the proposed Amendment C174 to the Moreland Planning Scheme which will affect our property located at [REDACTED]
[REDACTED] We request that our personal names, address and telephone numbers are removed from documents that are to be made publicly available as a part of this process.

Yours sincerely,

[REDACTED]

Submission #30

Submission to proposed Amendment C174, Moreland Planning Scheme (Heritage Overlays)

This submission is made in response to proposed Amendment C174 which is currently on exhibition for comment. I was a contributor in 2017 to Council's public invitation to suggest buildings, properties and precincts of potential heritage significance, and nominated a number of prospective sites and localities for consideration for heritage protection, along with rationale for potential application of Heritage Overlays. This drew upon my awareness of the locality in which I reside, combined with extensive professional experience in urban change management and heritage conservation.

Despite making significant input in 2017, it is noted that I was not advised of the exhibition of the proposed Amendment, and have only recently become aware of this through chance*. Consequently, some elements of this submission do not have the benefit of detailed research or full examination of the Amendment content prior to the closing date for submissions.

Should a Panel be requested to consider this Amendment, I request that this submission be provided to the Panel, and request to be heard in support of, and elaborating upon, this submission.

1. Importance of comprehensive, reliable heritage assessments during rapid urban change.

Much of Brunswick (particularly its eastern and central areas) is undergoing extraordinary levels of urban change, arguably some of the most intensive in Melbourne's history since urbanisation. This necessitates a clear understanding of heritage assets, and mechanisms to ensure that they are given full consideration as part of decision-making, ensuring protection of those elements that are important to community identity and local distinctiveness.

Unfortunately, full understanding and protection of heritage values in Brunswick is presently patchy and inconsistent. This is implicitly acknowledged by recognition of need for a 'gap study' which was partly progressed in 2017, but has not proceeded with the urgency required by the rapid pace of change that is occurring and the related pressures that place potential heritage assets at risk of loss, to the enduring detriment of place and community. Furthermore, it is understood that the City of Moreland does not have internal expertise in built heritage, despite its importance as a component element of ensuring quality outcomes from this period of transformative change. This risks degrading the urban future of Brunswick, through loss of local identity, amenity, community memory and social continuity.

In relation to Am. C174, it is disappointing that the current Amendment does not appear to respond to the review of 'gaps' that Council initiated in 2017, but has further deferred progress in addressing acknowledged weaknesses in heritage information and recognition. Extended delays in redressing this shortfall reflect poorly on Council's response to current circumstances and consistency with established standards of urban planning and change management.

Council relied heavily on public nominations to identify potential gaps in the adequacy of heritage recognition. This is commendable, but not a substitute for a comprehensive professional review of

the entire subject area to ensure that all potential heritage assets have been identified for closer consideration. A public nomination process should not be relied upon as the sole source of identifying 'gaps', or as a substitute for a full professional audit, as assets without strong aesthetic qualities or characterised by social or intangible importance can easily be overlooked by lay contributors.

Moreland City Council is strongly urged to give priority attention and resourcing to ensuring that there is a comprehensive identification of all potential heritage assets, particularly across areas undergoing or anticipating high levels of urban change, such as central and eastern Brunswick, and to establish in-house expertise to ensure more effective and responsive management of heritage assets.

2. Content of Amendment doesn't fully apply heritage evidence

A brief check of the content of the Amendment against the specialist Moreland Heritage Gap Study report to Council indicates that some places identified as of heritage significance within the Study have not been included among the proposed application of Heritage Overlay controls. Selective application of the results of an independent expert report would undermine the integrity of the basis for the amendment.

Specifically, the electricity sub-station located on the public roadway adjacent to 3 Elm Grove in East Brunswick has been found to be significant, but not proposed for a Heritage Overlay. This quirky and attractive structure is a rare remnant referencing the former importance of industry and heavy manufacturing to this locality. The entirety of the former Sidney Cooke Fasteners complex and related businesses are being removed for the so-called East Brunswick Village development. As this structure has high amenity value, is located on public land (the road reserve), and has been confirmed by the Gap Study report as being of heritage significance, its exclusion undermines the integrity of the Amendment. Council is urged to vigorously negotiate the incorporation of this delightful structure as an integral authentic element contributing to this transformed locality.

A Council planner has related the rationale that this place was removed from listing within the Amendment due to a notation on a generalised Development Plan for the locality. It is contended that this does not establish a sound basis or robust rationale for exclusion. The structure remains intact, and it does not appear that there is explicit planning consent for its demolition. Even if this had been granted it may not be acted upon, so application of an HO would be a responsible action to ensure that its heritage significance is considered in any future application.

About late 2017 I became aware of a permit application lodged with Council for construction of a building at 3 Elm Grove immediately adjacent to this structure, with proposed vehicle access at ground floor level reliant upon removal of this structure. This direct conflict with retention of the structure was brought to the attention of Council planners, and I understood that the application would be revised to avoid this presumption of demolition of an adjacent building that was not part of the subject site, and not controlled by the applicant. Due to the DPO over this locality excluding third party rights, this representation did not constitute a formal objection.

Given the imminent closure of submissions to C175, further research on this matter is unable to be concluded ahead of lodging this submission, but supplementary material may be presented to address this. Timing has also precluded checking whether other sites recommended by the Gap Study for application of a Heritage Overlay have not been included in this proposed Amendment.

It is requested that Council modify the proposed amendment to include this structure, and any other sites recommended within the Gap Study report but not proposed for a Heritage Overlay, along with any consequential notification or re-exhibition of the proposed Amendment in a revised form.

3. Exhibition and consultation

I am familiar with the statutory obligations for exhibition and notification of a proposed Amendment, along with the widely accepted principle of engagement of affected and interested parties in planning processes, both strategic and statutory.

As a contributor to material that has been utilised in the Gap Study and Amendment, I am disappointed that I was not advised as a matter of courtesy of the public exhibition of this Amendment. As a contributor, my contact details are on record with Council, presumably along with those of others who responded to the call for inputs in 2017. It seems reasonable to anticipate advice of subsequent significant steps in a process that you have contributed to. Restricting notification to the minimum statutory requirements is inconsistent with established public engagement practice – an area Council has publicly stated its commitment to improve.

Additionally, while not formalised in the Planning and Environment Act, there is a long-standing convention that notification of Planning Scheme Amendments should avoid being contained within the Christmas - New Year holiday period. Conclusion of the exhibition period immediately ahead of the January long weekend appears insensitive to this protocol and to best practice in consultation.

*I became aware of this Amendment through a notice in the current *Moreland Leader*, but note that this journal has become unreliable in its delivery and timeliness.

It is requested that Council undertake a supplementary exhibition of this Amendment, including advising all identifiable contributors who responded to Council's invitation to suggest places to the gap study. (This aligns with my request in item 2 above to include places omitted from the Amendment that were recommended for protection by the specialist report.)

████████████████████
████████████████████
████████████████████
████████████████████
████████████████████

25 January 2019

-/4

About the submitter:

██████████ is a resident of East Brunswick and a Registered Planner with extensive experience in urban change brokering. Professional experience includes 30 years with State and local governments, principal of *Good City* providing specialist strategic advice to governments and not-for-profits across Australia, New Zealand, the United Kingdom and United States, inaugural Associate Professor of Urban Planning at Deakin University, co-recipient of the Australia Award for Urban Design 2008, and currently the Victorian Committee of the Planning Institute of Australia.

Experience in heritage planning includes specialist roles with the Victorian Government overseeing heritage studies and advisory committees for numerous localities across Victoria, and authorship of conservation area policies for significant localities of south-east London.

Submission #31

Strategic Planning
Submission to Amendment C174
Moreland City Council
Locked Bag 10
Moreland VIC 3058

Via email at strategicplanning@moreland.vic.gov.au

January 25 2019

Dear Moreland City Council Planning Authority

RE: AMENDMENT C174 - Moreland Heritage Scheme proposal to apply a Heritage Overlay to [REDACTED] as part of a Serial Listing for *War Service Homes (Timber)*

We, the owners of [REDACTED] write to oppose in its entirety the inclusion of our home in the proposed heritage overlay: *Serial Listing War Service Homes (Timber)* [REDACTED]

We oppose the inclusion of [REDACTED] in this serial listing, or any other heritage overlay, and request you remove this home from the proposed listing in the amendment.

For clarity, we **oppose** the inclusion of [REDACTED] in any heritage overlay on multiple grounds:

1) Physical significance:

- The home itself has been significantly altered from its original appearance (renovation circa 2003, prior to our ownership), externally and internally, thereby diminishing the relevance of this overlay.
- To this point, the council's own surveys cast doubt on [REDACTED] inclusion for this reason. The Stage 2 Final Report (Draft) notes that Stage 1 identified nine houses (not including [REDACTED]) and Stage 2 identified two additional houses (also not including [REDACTED]). The Stage 2 Final Report (Draft) then goes on to say that *'there are also several other houses that are similar, but which have been excluded from further assessment due to lower intactness and/or integrity. One of these houses is [REDACTED]'* It is therefore unclear why [REDACTED] is the only one of these houses of "lower intactness or integrity" included in the serial listing.
- The Citation notes that [REDACTED] is a variant of the [REDACTED]. Again, a variant is not a true example and not all variants identified were included in the proposed amendment, so it is therefore unclear why [REDACTED] was.
- The Citation also notes that it is not clear that the houses in the serial listing are standard designs. This raises questions for us about the strength of the assessment informing the amendment.

2) Historical significance and materiality:

- The Stage 2 Final Report (Draft) states that the historical significance of the war service timber homes is that *'they demonstrate the important Commonwealth initiative to provide housing for returned soldiers after World War I. They are of particular significance as rare examples of timber houses built for the Commission in the period from 1919 to 1922.'*
- As per all the reasons under point 1 above, the "rare example" of [REDACTED] is dubious.
- Further, none of our close neighboring properties or [REDACTED] and including those sharing boundaries with [REDACTED] are included in any of the proposed heritage overlays. According to the detail provided in the Stage 2 Draft and Heritage Citation, these would also have been part of the land acquired by the Commonwealth. Some of these homes are in as "original" state as ours.
- This leaves the only the fact that once upon a time, our house and land, alongside others which surround us (and also of varying intactness), was owned by the Commonwealth for the purpose of

housing for returned soldiers. No evidence is provided that this intent was ever delivered. That is, no evidence that our home was owned by such a returned soldier, is provided in the Stage 2 assessment. This leads to our third reason for objecting.

3) Economic harm

- [REDACTED] would be made an orphan listing of the proposed heritage overlay, with all adjoining properties available and subject to development. This significantly affects the value of our home and asset, without proposed compensation.
- Indeed, council has just in the last six months approved the development of the adjoining [REDACTED] [REDACTED] which is a knock-down of an original circa 1920s house, and rebuild of two houses splitting the block. This approval occurred despite the heritage overlay process being well underway.
- Further, the development of [REDACTED] which will materially overlook and affect the aesthetic of [REDACTED] and further reduce any physical significance (which we argue does not apply – see point 1).
- Other properties [REDACTED] have sold recently, and developers were very interested in those sales. There is clear interest given the proximity to schools, Lygon and Nicholson street trams, and other amenities of developers, and we may have our own interests in future. The heritage overlay proposes no compensation for the diminished value such an overlay – significantly an overlay which is an anomaly relative to surrounding houses and not a precinct – and we would contest this.

Should you not meet our request to exclude [REDACTED] from the heritage overlay proposed, we request that we be given opportunity to make a submission at a future panel hearing, and ample notice and time given to enlist more detailed support from consultants regarding the proposed overlay (the notice was received by us in mid-December and this objection due by 25 January, clearly amidst the holiday season and affecting our ability to get even further evidence to support our objection.

Finally, as is our right under the notice, **we request that you delete our names, telephone, and address details from this submission prior to making it public.**

Kind regards,

[REDACTED]
[REDACTED]

[REDACTED]

Submission #32

Giovanna Palma

From: [REDACTED]
Sent: Friday, 25 January 2019 2:38 PM
To: Strategic Planning
Subject: Submission to Amendment C174
[REDACTED] [REDACTED]

[REDACTED]
[REDACTED]

As discussed with your staff at our meeting on 12th December 2018, I would like one of the recommendations of the heritage citation for this property to be removed, allowing the remnant of the front fence to be exempt from notice and review.

A northern section of this same fence was in fair condition when I began occupancy in 1974. It subsequently developed an inward lean, possibly due to tree roots and footpath replacement. In 1999 this entire section collapsed without warning.

When removing the remains, I found that the fence was constructed with no foundations at all and that the steel water pipes which provide the reinforcement for the horizontal top section were almost completely rusted through.

The existing remnant is not in great condition and has developed a perceptible outward lean. I do not consider that it would warrant the considerable expense of underpinning works. Even if the fence were to survive this work, it spans just 4.3m of the existing 16.7m of the property frontage and would be difficult to integrate into a new fence built to comply with current regulations.

I would like to be able to demolish this fence section and construct a new front fence.

Regards,
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Submission #33



Our reference: 2018.740

25 January 2019

Strategic Planning Department
Moreland City Council
90 Bell Street,
Coburg VIC 3058

Dear Sir/Madam

Re: Amendment C174, Moreland Planning Scheme Submission on behalf of the owners of [REDACTED] [REDACTED] objecting to proposed heritage controls

Hansen Partnership acts on behalf of owners of the abovementioned properties including: [REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] and in respect to Amendment C174 to the Moreland Planning Scheme (MPS). These properties comprise the former Prestige Mill Complex that Council is seeking include in a Heritage Overlay (HO511) of the Moreland Planning Scheme as per the recommendations of the Heritage Citation dated April 2017. However, we do note at page 75 of the Moreland Heritage Gap Study 2017 prepared by Context that it states this combined site (Prestige Mill Complex) along with four other buildings is exempt from a Heritage Overlay. This demonstrates some potential confusion as to what the study is seeking to achieve with conflicting viewpoints.

We note that our individual clients who are individual property owners all object to their properties being included within a Heritage Overlay of the Moreland Planning Scheme as their properties have been significantly altered over the years, do not include sufficient heritage built form characteristics and their properties do not warrant further town planning constraints that are imposed by a Heritage Overlay.

It is acknowledged that the Mills Complex formed a part of Australian textile history, however, in this instance we have three individual properties, with fragmented ownership, some small remnants of history and a great deal of inconsistency in the quality of historical characteristics present with the buildings. Any concerns of the historical reference of the building can be considered at town planning stage of redevelopment through design and detail and does not require the added controls of a Heritage Overlay to achieve a successful redevelopment of the site.

Further details of their objection to such controls are provided below in this submission to the proposed planning scheme amendment.

1 The three properties being considered

The three individual sites are outlined below followed by individual photos of the site, a detailed description of the site is provided later in this submission.

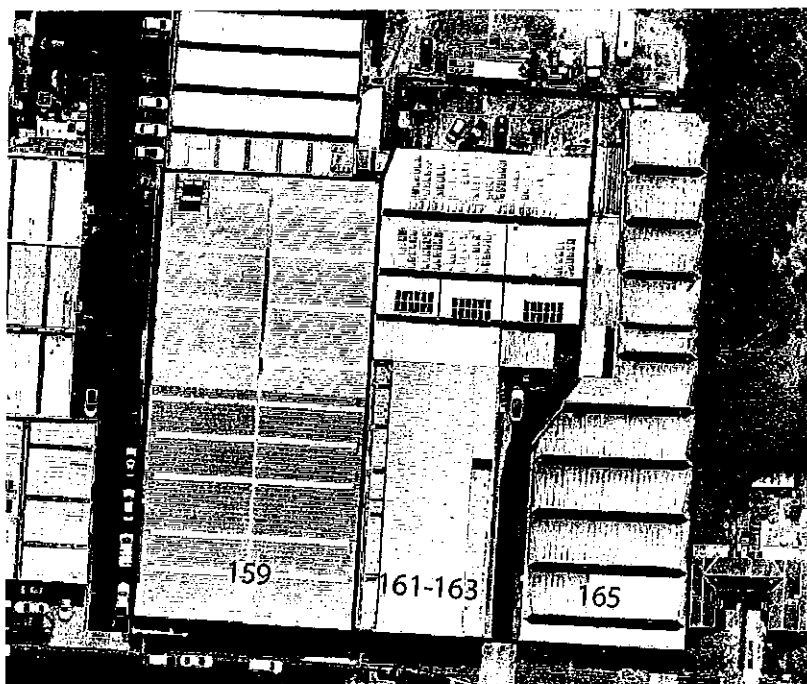


Figure 1: Aerial of the subject sites



Figure 2: [REDACTED]



[REDACTED] is the office and warehouse of [REDACTED]. The building has been converted for manufacturing use, the roof has been rebuilt as a shallow gable and the clerestory windows to the south have been removed. The side walls, which use to be red brick, have been painted. Several Planning Permits have been approved for the site including;

- Planning Permit MPS 98/0847 issued on 24 November 1998 for Building and Works to remove existing sawtooth roof to the rear section of the warehouse.
- Planning Permit MPS/2003/0725 issued on 6 May 2004 allowed for "Buildings and works to alter the existing warehouse"
- Planning permit MPS/2011/512 issued on 4 October 2011 allowed the construction of a two-storey extension to the existing warehouse.

All of these permits demonstrate the considerable changes have occurred to the property



[REDACTED] is currently being redeveloped and planning permit MPS/2018/461 issued on 25 September 2018 allows "The use of the rear of the building (basement and ground floor) for the purpose of a Place of Assembly (Function Centre), the sale and consumption of liquor with an associated reduction of the car parking requirement". The buildings will be used as an event venue such as weddings. Its façade has been altered, an additional floor has been built and changes have been made to the window opening and glazing.



██████████ is the office of ██████████ its façade has also been modified as well as its windows.

The site and surrounds:



Figure 3: Surroundings

The sites are located at the east end of ██████████ in between ██████████. Opposite to the sites is a large open space ██████████.



To the west of the sites, on the same block, are several warehouses. The next blocks to the west are residential (low scale). To the east of the sites is [REDACTED] which is developed with a group of townhouses and houses.



2 Reason for opposition to the proposed Heritage Overlay

Each of our clients' is strongly opposed to their properties being included as part of this amendment, which proposes to include their sites within a proposed Heritage Overlay. These sites, being located within an Industrial 3 Zone, are isolated and away from any main road or thoroughfare with little to no pedestrian traffic and therefore, does not warrant the sites having the necessary community exposure to be included in a Heritage Overlay, there is no benefit to the wider community for these buildings to be protected by a Heritage Overlay.

This is not to mention that Council has reviewed this industrially zoned land within the MILS Study and we understand is looking to rezone this precinct in the future to a zone that would allow redevelopment and potentially new residential development. It appears to be at odds that on one hand council is seeking to protect a redundant industrial precinct through seeking heritage protection, when past strategic studies have identified this cluster of properties in the Industrial 3 Zone, and numerous other pockets of redundant industrial zoned land throughout Moreland to be rezoned to allow for an element of residential development given the opportunities for new residents to access public transport, the Merri creek environs corridor and public open space opposite.

It is submitted that the rezoning should be given priority as the appropriate strategic direction for change to the wider site and surrounding properties within the Industrial 3 Zone (INZ3) and that protection of such properties through the application of a heritage overlay stifles the redevelopment and revitalisation of these pockets which Council is seeking to achieve. We also note there is some confusion as the citation for this site says to include in the Heritage Overlay but then p75 of the Context Heritage Gap study advises this site and 4 others are to be exempt from being in a Heritage Overlay. It can only be determined from this that these three individual sites do not warrant heritage protection given the conflicting comments.

We also note that the Statement of Significance prepared by Moreland City Council's heritage consultant Context Pty Ltd of Am C174 make no reference in terms of the internal layout of the buildings. The Council's heritage consultant is recommending the properties located at 159 to 165 Donald Street to be graded as "significant" heritage place, which is the highest/most conservative grade within the Heritage Overlay.

We note that the Statement of Significance also acknowledged in its assessment of the buildings that there were a significant amount of modifications and alterations to the façade, side walls and roof area of the buildings. This further demonstrates that the appearance and characteristics of the buildings have been considerably altered and therefore removing any valid reasoning that the buildings could be reasonably contemplated for applying a heritage overlay. It is each of our individual clients' view that buildings have been significantly altered to a point where original fabric of the buildings are difficult to distinguish and therefore does not warrant heritage protection.

It is noted that the Statement of Significance for the subject properties provides three main criteria as to why they are significant from a cultural heritage perspective. These criteria relate to historic, representative and aesthetic considerations with a reference to the properties as the 'Former Prestige Limited Textile Mill.' Specifically, the report prepared by Context Pty Ltd refers to the following criteria adopted by the Heritage Council pursuant to Sections 8(1)(c) and 8(2) of the Heritage Act 1995:

- Criterion A: Importance to the course, or pattern, of Victoria's cultural history.
- Criterion D: Importance in demonstrating the principal characteristics of a class of cultural places and objects.
- Criterion E: Importance in exhibiting particular aesthetic characteristics

It is submitted that the subject properties are not of historic, representative or aesthetic significance and a summary of the considerations on this matter are outlined below.

The reasons for opposing the proposed Heritage Overlay as per our clients' concerns are as follows:

- A. The subject properties are not of historic significance
- B. The subject properties are not of representative significance
- C. The subject properties are not of aesthetic significance
- D. A changing precinct

A. The subject properties are not of historic significance

The Statement of Significance for the subject properties refers to the importance of the textile industry in Victoria which the Council's heritage consultant claims are justification for the 'significant' grading of the properties and their inclusion in HO511.

In terms of the pattern of history, the Statement of Significance makes reference to the "former Prestige textile mills" as being historically significant for the "high quality of their products, their export trade and enterprising approach up until their takeover by Dunlop Australia in 1968 and the discontinuation of the brand in 1978. The former Prestige textile mills exist as a tangible relic of the textile industry in the City of Moreland."

It is submitted that the subject properties do not demonstrate the course and pattern of history or an important historic event, and that arguments such as being historically significant for back then "high quality products" or for being a "tangible relic of textile industry" seem unsubstantial and trivial. While our clients do not deny the importance and the value of the textile industry in Victoria, they believe that the arguments put forward by Context Pty Ltd do not justify the grading of their properties as "significant".

The third justification introduced is the fact that [REDACTED] manufacturers combined operations at the [REDACTED] between 1922 and 1925 and are historically significant as a major employer (especially of women) through the Depression years" and that "the importance of the textile industry is demonstrated by the Commonwealth decentralisation policy that saw textile and

clothing mills offered incentives to open in many regional centres and country towns during the 1930s-1950s; with Prestige opening in Shepparton, Horsham and Ararat." Again, the fact that the former owners of these buildings were a major employer back in 1922-1925 is submitted to be incidental to justify the classification of the properties as "significant"; as well as highlighting the fact that this manufacturer opened more factories in rural Victorian towns.

These facts alone in our and clients' view do not result in sufficient justification that the subject site (collection of properties) being of historic value. The subject properties are not a place of highly valued history by themselves and do not symbolise the Textile History in Victoria. It is our opinion there is no convincing documentation or sustained history expression of value for this place.

It is submitted that no passer-by or member from the wider community would have any recollection or idea of the past use of the site. Instead the buildings appear to be common industrial buildings, that include significantly altered facades that could be found in any inner and middle ring suburb and not one that would be given special heritage value. It is our view that far better examples of heritage industrial buildings of greater historical/heritage/significant appearance with lesser modifications than those of our clients' can be found within the inner suburbs of Melbourne that those considered by this collection of buildings.

We note that in the assessment (statement of significance) of the site the other examples provided that have been redeveloped are far more intact and with stronger heritage elements that these three buildings being considered. We submit comparing the subject buildings with those examples in the citation is not a fair and reasonable assessment and consideration of these three buildings.

B. The subject properties are not of representative significance

The Statement of Significance for the subject properties refers to the importance of the site in demonstrating the principal characteristics of a class of cultural places. It puts forward the fact that the subject site "is an excellent example of a large industrial complex that retains a considerable area of industrial building under saw tooth roofs with characteristic side elevations showing the roof and wall profiles to achieve clerestory glazing".

Meanwhile the report prepared by Context highlights that there have been alterations to the buildings and adaptation for new uses and concedes that

- Regarding [REDACTED] "...approximately half of the building* has been converted for an alternative manufacturing use and the roof has been rebuilt as a shallow gable, removing the south facing clerestory windows and while the sawtooth roof remains, the glazing has been removed or concealed* and some new openings have been made in the side wall; the new roof is visible above the parapet level and appears to have been extended over a laneway*; Side walls which once would have been red brick have been painted and the other side of the driveway to the west of [REDACTED] has another large factory complex at brick factory [REDACTED] that is concealed behind a newly constructed frontage*."

*Our clients disagree with the above assessment and argue that not just "half" of the building has been converted but the whole building; the statements "the sawtooth roof remains, the glazing has been removed or concealed" and "over a laneway" are not correct; and that the "large factory complex at [REDACTED]" is not just a newly constructed façade but a whole new building. Moreover, the report stipulates that [REDACTED] is the largest of the three buildings, while it is not and has a floor area of 2,340m².

- For [REDACTED] "...it would have had a similar façade to that of [REDACTED] however it has been altered by the addition of a first floor and changes to the window openings and glazing so is the least intact of the three buildings that make up the complex."

- Having regards to [REDACTED] this building "...has a similar façade treatment to the other two buildings and has window glazing changes."

Our clients appreciate the character of their properties but argues that due to the numerous changes that have already occurred, they cannot be considered as representative and "significant" anymore.

In the comparative analysis produced by Context Pty Ltd, mention is made of other similar buildings such as the

[REDACTED]
[REDACTED]
[REDACTED] All of them have been converted to other uses, while retaining some elements/patterns/features of their former uses/architectural form. As mentioned previously comparison to these sites with the subject buildings is not considered a fair and reasonable assessment. The examples cited and their corresponding photos illustrate that those buildings have a greater level of heritage intactness to their facades compared the buildings being considered by this amendment.

C. The subject properties are not of aesthetic significance

The justification regarding the aesthetic significance of the subject site also appears weak as demonstrated by the comment: "consistent rendered façade with simple detailing across the three buildings" immediately contradicted by the following element "each one has been altered through the insertion of different windows, roof form or an additional floor". As illustrated by figure 2, it is difficult to perceive that the three buildings are part of the same complex and had once the same design given the extent of alterations and modifications that has occurred to them over time as three individual buildings.

It is submitted that the buildings do not include sufficient important on historic or architectural levels and most have been modified significantly. The retention of the whole site under a Heritage Overlay is excessive and unwarranted for these sites and should only be applied to more significant sites, than these three properties and is unnecessarily protecting highly altered buildings that are of little significance to the wider Moreland community and built environment.

D. A changing precinct

From a review of the properties in and around [REDACTED] we note that there is both diversity in zoning and landuse and also the built form character of the precinct. The subject buildings are also located towards the end of [REDACTED] nearby to the [REDACTED] corridor and directly opposite a sporting oval. The streetscape is not one that warrants protection due to the diversity in built form and the infill housing that has occurred in the wider area. It is our individual clients' view it would be the last area that you would expect Council need to consider implementing heritage controls.

Issues in relation to appropriate aesthetics of any future design for the site can be undertaken at the town planning development application stage. Good architectural design does not warrant the need for protection via a Heritage Overlay to achieve such outcomes.

Some photos of the streetscape are provided below.



hansen



The precinct, in which the sites are located, is a very diverse precinct. There are warehouses, residential houses, reception venues, town houses, apartments, social housing and parkland/sports grounds with limited canopy vegetation except for around the sporting oval. It is submitted that there is no specific character or uniformity to this area that warrants heritage protects. There is no consistency or coherence to the streetscape pattern or built form, and it is quite fragmented. (Please refer to figure 3)

As mentioned previously, Council is looking at rezoning this area with some of the strategic justification already undertaken to allow for urban renewal to occur to this underperforming industrial group of properties isolated in an area that would better accommodate housing for the community in order to accommodate the considerable

growth in population and demand for housing in Moreland City Council and surrounding north and western municipalities with their close proximity to the Melbourne CBD, universities and other educational institutions and the Melbourne Airport.

Therefore, the proposal to include these three properties within a Heritage Overlay is complete conflict with the intention of the Council to allow this area to commence its evolution of urban renewal. By protecting and conserving these sites, which have been demonstrated as outdated and redundant in land use not to mention considerable modifications that have occurred to the external appearance of the buildings, it seeks to discourage renewal and stifle the renewal opportunities that have been previously identified. While it is submitted that these sites have limited to no heritage value located towards the end of a street, there is a real potential for this precinct to accommodate a modest level of infill development.

Indeed, this area has a great potential if rezoned to allow for additional housing to meet the ever increasing demand in the inner north. It is ideally located very close to public transport (Tram 1 & 6 run on Holmes Street), within walking distance to shops, café and restaurants and presents great opportunity in relation to access to outdoor recreation space (Allard Park, Northcote public golf course and Merri Creek). It is therefore our view that this precinct offers ideal amenities and presents a better utilisation of scarce inner city land for residential/mixed-use rather than overly conservative planning controls such as a heritage overlay that will discourage the renewal and regeneration of such sites.

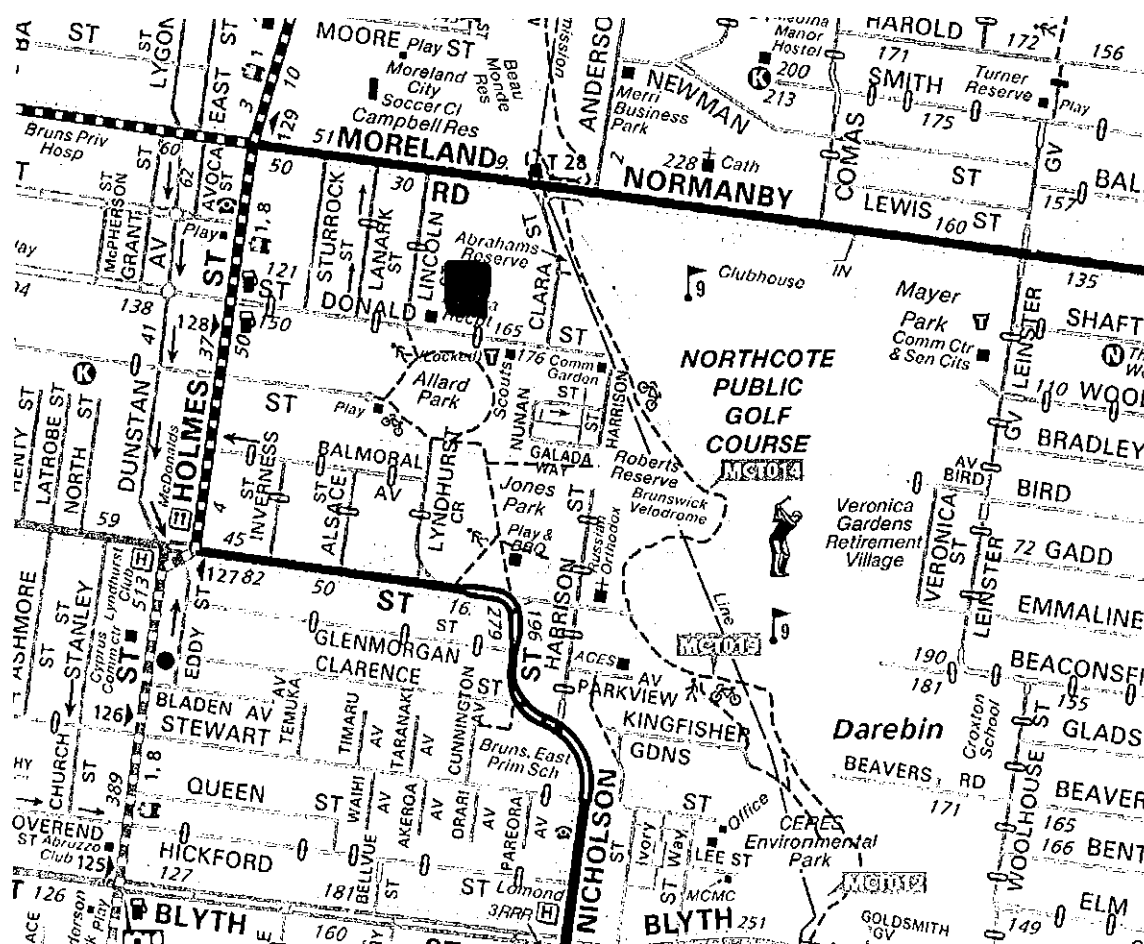


Figure 10: Map of Public transport of the area



To conclude our clients' oppose their site being included within a Heritage Overlay as sought by Amendment C174 as it relates to [REDACTED]. The properties should be removed from the amendment as not being significant enough in heritage status and being substantial altered to be included and also results in a grouping of properties that is so small it will lack any merit of the wider community seeing its importance as heritage properties. The properties should not be included in an individual heritage overlay and should not be graded as a 'significant individual places' in the context of Clause 22.04 of the Moreland Planning Scheme.

Should you any queries in relation to this matter, please contact [REDACTED] or at [REDACTED]
gwissenden@hansenpartnership.com.au

Yours faithfully,
Hansen Partnership Pty Ltd

[REDACTED]

[REDACTED]

Submission #34

Giovanna Palma

From: strategicplanning@moreland.vic.gov.au
Sent: Friday, 25 January 2019 4:49 PM
To: Strategic Planning
Subject: Amendment C174 submission

A person has submitted this form from the Council website.

Name: [REDACTED]

Address: [REDACTED]

confemail__36592: [REDACTED]

Phone: [REDACTED]

Submission: Please find below my reasons for opposing amendment C174 - I purchased the property in 1990 (29 years ago) as part of my retirement/ investment plan with the intention to eventually demolish and to build two townhouses once my family were older. One to live in and one to provide my income through rental for my retirement. This amendment will now not allow me to do this and is forcing me to have to sell and move out of the area. Keeping it under the heritage amendment will be a much more costly project, therefore as a single mother, I feel like council's decision for this amendment is forcing me to make a decision to move out of the area and that will create further financial burden for me. And I will also be forced to sell to a niche market that I consider would not be at the same value (will be less) then what the property would be worth as development. So I feel either way I'm losing out financially and have no control because this is all council's decision for my property. This is also adding unwanted stress and anxiety- all because council have decided to do this after 29 years of living here. - I find that MCC is contradictory in their decisions on our properties, in the same street we have development occurring as well at the end of Glenora, on Rennie there's a huge development occurring, yet some of us are unable to do what we planned with our houses purchased close to 30 years ago because council has no decide to heritage list my house. So many other homes that should have been saved have been allowed to be demolished yet, due to timing I am one of those unlucky residents that council is now going to impact my life financially and medically. Who will compensate for this? -This situation is making me a very unhappy Moreland resident. I've lived in Moreland city council precinct my entire life and watched all the development, some of it quite unnecessary and not thought out, which has caused a lot of of congestion in the area, and yet I'm not going to be able to develop my property with two townhouses the way I had planned. I hope the above points are taken into consideration Awaiting your response to determine my next steps Thanks in anticipation

upload: empty

Privacy: I agree

