



Moreland City Council
90 Bell Street
Coburg Victoria 3058
Telephone 61 3 9240 1111
Facsimile 61 3 9240 1212
info@moreland.vic.gov.au
www.moreland.vic.gov.au

Part A - Submission by the Planning Authority Moreland City Council

Planning Scheme Amendment C208more
Implementation of the Moreland Heritage Nominations Study

22 February 2022

TRIM: D22/19503

Table of Contents

1.	Introduction.....	3
2.	Overview of Amendment C208more	5
3.	Background to the Amendment	6
3.1	Moreland Heritage Gap Study (MHGS).....	6
	MHGS Stage 1 – Preliminary Assessment	6
	MHGS Stage 2 – Detailed Assessment	6
	Implementation of the MHGS & 151A Lygon Street Brunswick East	7
	Community Nominations of Potential Heritage Places	8
	Heritage Action Plan 2017-32 (HAP).....	8
3.2	Moreland Heritage Nominations Study (MHNS).....	9
	MHNS Stage 1 – Preliminary Assessment.....	9
	MHNS Stage 2 – Detailed Assessment	9
3.3	Amendment C207more – Interim heritage controls	10
4.	Amendment C208more	11
4.1	Council Adoption.....	11
4.2	Authorisation	11
4.3	Exhibition	13
4.4	Post Exhibition	15
4.5	Notifying submitters of post exhibition changes	16
4.6	Referral of late submissions.....	17
4.7	Chronology of events.....	17
5.	Strategic Assessment of the Amendment.....	18
5.1.	Why is the Amendment Required?.....	18
5.2.	How does the Amendment implement the objectives of planning in Victoria?	19
5.3.	How does the Amendment address any environmental, social and economic effects?	19
5.4.	Does the amendment comply with the requirements of any Ministers Direction applicable to the Amendment?.....	20
5.5.	How does the Amendment support or implement the Planning Policy Framework and any adopted State policy?	21
5.6.	How does the Amendment support or implement the Municipal Planning Strategy?	22
5.7.	Amendments that may impact the Amendment	22
5.8.	Current permits & applications issued to C208more properties	24
6.	Summary of Issues Raised in Submissions.....	27
7.1.	Common Issues.....	27
7.1.	Issues specific to Places and Precincts	28

7.	Post Exhibition Changes	33
7.1.	Changes in response to submissions.....	33
7.1.	Other responses and changes.....	36
7.1.	Site visit to 32 & 34 Hanover Street Brunswick & 491 Moreland Road Pascoe Vale South.....	36
7.1.	Amendment documents that incorporate post exhibition changes	37
8.	Conclusion.....	38
9.	List of Appendices & Reference Documents	39

1. Introduction

1. This document forms the 'Part A' submission to the Panel for Amendment C208more (the Amendment) to the Moreland Planning Scheme. The Moreland City Council (Council) is the Planning Authority for the Amendment.
2. The Panel has directed Council to provide its 'Part A' submission by 22 February 2022 and to address a number of matters in its submissions as listed below:
 - a) Background of Amendment & Chronology of events
 - b) Strategic Context and assessment, including:
 - i. relevant planning policies and controls
 - ii. other amendments that may be under preparation or recently approved that may impact the Amendment.
 - iii. Current permit applications that may impact on the Amendment.
 - c) Table showing places or precincts where the HO is proposed to be applied, and include HERCON criteria, HO reference number and identify any submissions with specific issues
 - d) An explanation of how Council responded to each condition of authorisation from DELWP and whether each change was made before or after the Amendment's exhibition.
 - e) Clarification and confirmation of the formal referral of late submissions to Panel
 - f) A summary of the main issues raised in submissions, presented as
 - i. common issues that apply across multiple places or precinct such as property value, development potential and building condition
 - ii. precincts and individual places
 - g) A summary of post exhibition changes Council proposes to make to the Amendment including clarification of
 - i. Reason for the proposed change (including whether the change is proposed in response to submissions or for other reasons)
 - ii. Recommendation for 32 and/or 34 Hanover Street and whether the properties have been demolished
 - h) With regard to post exhibition changes:
 - i. confirmation of whether Council notified submitters and affected property owners and tenants
 - ii. if notice was given, details including date(s) and the form of notification
 - iii. if notice was not given, clarification of Council's position about whether the changes should be made through the amendment or a separate process,
 - i) Any other strategic material Council intends to rely upon in support of the Amendment that has not yet been provided, or that might assist the Panel in its consideration of the Amendment.
3. A response to each direction is provided in Sections 3 to 7 of this submission.
4. Council's 'Part B' submission will be provided at the Panel Hearing on 1 March 2022 and will address the following matters set out in the Panels directions dated 31 January 2022. These are:

- a) its response to the issues raised in submissions
- b) its response to expert evidence
- c) any further changes Council proposes to make to the Amendment in response to expert evidence or submissions
- d) its final position on the Amendment.

2. Overview of Amendment C208more

5. The Amendment as exhibited sought to implement the findings of the Moreland Heritage Nominations Study 2020 (MHNS) and Moreland Heritage Gap Study 2019 (MHGS) by introducing a heritage overlay (HO) on a permanent basis to 45 individual places, 1 serial listing, 7 new precincts and 3 precinct extensions in Brunswick, Brunswick East, Brunswick West, Coburg, Coburg North, Fitzroy North, Glenroy, Oak Park, Pascoe Vale and Pascoe Vale South. The exhibited Amendment also sought to rectify a number of mapping anomalies of the Moreland Heritage Overlay and update the significance of 6 HO listings.
6. The Amendment was exhibited from 13 August 2021 to 1 October 2021 in accordance with Section 19 of the Act and proposed to:
 - Amend Clause 15.03-1L (Heritage in Moreland) of the Moreland Planning Scheme to make reference to the *Moreland Heritage Nominations Study, 2020*.
 - Amend the Schedule to Clause 43.01 (Heritage Overlay) to introduce the Heritage Overlay to 45 new individual places, 1 serial listing, 7 new precincts and 3 precinct extensions and include a reference to their associated Statement of Significance Incorporated Plan.
 - Amend the Schedule to Clause 43.01 (Heritage Overlay) to introduce a separate Statement of Significance Incorporated Plan to four (4) existing individual places and two (2) existing precincts.
 - Amend the Schedule to Clause 43.01 (Heritage Overlay) to delete the Heritage Overlay to 5 existing individual places.
 - Amend the Schedule to Clause 72.04 (Documents Incorporated in this Planning Scheme) to include the Statements of Significance of all heritage places, serial listing, precincts and precinct extensions listed above and reference the updated *Moreland Heritage Exemptions Incorporated Plan 2020*.
 - Amend Planning Scheme Maps 2HO, 6HO, 7HO, 8HO, 9HO, 10HO, 11HO, 12HO, 14HO and 15HO in line with the above changes and to rectify mapping anomalies.
7. A list of the properties proposed for a new HO, modified HO and those deleted from the HO formally exhibited is provided at **Appendix 1**.
8. A total of forty four (44) submissions were received to the Amendment, forty one (41) during the exhibition period and three (3) late submissions.
9. On 8 December 2021, Council resolved to request the Minister for Planning to appoint a Panel in accordance with Part 8 of the Act to consider submissions.

3. Background to the Amendment

3.1 Moreland Heritage Gap Study (MHGS)

- 14 Over the past twenty years a number of heritage studies have been undertaken in the area that is now defined as the City of Moreland. Each study made recommendations for appropriate statutory planning protection as well as other recommendations for controls, policies and guidelines to encourage the conservation of the identified heritage places and precincts.
- 15 In 2008, Moreland Local Heritage Places Review reviewed these studies and identified that there were 285 places with potential significance. At the time, a detailed heritage assessment of these places was not undertaken.
- 16 In the following years, a number of additional heritage investigations were recommended in reports by Planning Panels Victoria.
- 17 The MHGS sought to investigate these outstanding recommendations of the earlier studies and panel reports.
- 18 Council engaged heritage consultants Context Pty Ltd (Context) to prepare the MHGS, with the purpose to assess individual places and precincts and determine whether they satisfied the threshold for local significance and justify their inclusion in the HO. The MHGS 2017 was undertaken in two stages.

MHGS Stage 1 – Preliminary Assessment

- 19 Stage 1 study comprised of a preliminary assessment of over 400 individual places and 12 potential precincts (containing 365 properties), as well as potential extensions to seven current HO precincts. This list was based on recommendations from earlier strategic heritage work, Planning Panel recommendations, community nominations and Council Officer knowledge.
- 20 The preliminary assessment was completed in May 2016 by heritage consultants Context and focused on a desktop review with some limited fieldwork to produce a revised list of places that were likely to meet the threshold for local heritage significance. A comparative review of each place and precinct against those already included in the HO was also undertaken in the preparation of this list.
- 21 Stage 1 recommended the following places for detailed assessment in Stage 2:
- 148 individual places;
 - Three serial listings;
 - 10 potential precincts; and
 - 10 potential extensions to existing HO precincts.

MHGS Stage 2 – Detailed Assessment

- 22 Stage 2 involved the full research of the places recommended for further assessment during Stage 1 as well as additional places identified during fieldwork. The study was prepared in accordance with Heritage Victoria guidelines, the Australia ICOMOS Charter for Places of Cultural Heritage Significance (the Burra Charter) and its guidelines.

- 23 The Stage 2 study was also conducted by heritage consultant Context. It comprised of historical research, field work (site visits) and assessment of potential heritage places by comparing them to similar significant places in the City of Moreland. It confirmed that 82 places satisfied the threshold of local significance, and the significance at the local level of three serial listings, four new precincts and 10 precinct extensions. This included identifying 151A Lygon Street Brunswick East as an individually significant place to Moreland.
- 24 The two volumes of the MHGS relevant to the Amendment are (**Appendix 3**):
- Moreland Heritage Gap Study Vol 1 – Methodology Report
 - Moreland Heritage Gap Study Vol 3 – Residential Citations

Implementation of the MHGS & 151A Lygon Street Brunswick East

- 25 The recommendations of the MHGS were implemented via two Amendments.
- 26 Amendment C173more sought the application of a HO to properties identified as locally significant by the MHGS on an interim basis whilst permanent controls were sought through Amendment C174more.
- 27 On 13 February 2018, officers requested the Minister for Planning to exercise his powers pursuant to Section 20(4) of the Planning and Environment Act 1987 to prepare, adopt and approve interim heritage controls for properties identified in the MHGS via Amendment C173more. This request was approved and interim heritage controls with an expiry of 31 December 2019 were gazetted and formed part of the Moreland Planning Scheme on 24 January 2019.
- 28 Amendment C174more sought to apply a HO on a permanent basis to properties identified as locally significant by the MHGS. Amendment C174more was:
- Exhibited in accordance with Section 19 of the Planning and Environment Act from 22 November 2018 to 25 January 2019. A total of 35 submissions were received, of which:
 - Two submissions supported the Amendment
 - Thirty-three objected to the Amendment, or suggested changes to the Amendment
 - All submissions were referred to Planning Panels Victoria, with a Panel hearing held on 6 and 7 May 2019. The Panel report was generally supportive of Amendment C174more, stating the:
 - Amendment was well founded and strategically justified; and
 - Recommended the Amendment be adopted subject to changes, generally related to updating information in the heritage citations and to remove three properties from the HO (ie removed from the Amendment).
- 29 A late submission was received on 24 May 2019, after the C174more Pane hearing, objecting to the heritage overlay proposed for 151A Lygon Street, Brunswick East.
- 30 As the Panel hearing had already been conducted, the submitter sought an appeal on procedural grounds through the Victorian Civil and Administrative Tribunal (VCAT). Through this appeal, the landowner sought an opportunity to make a formal submission to the Amendment and for that submission to be considered by Council in accordance with s23(1) of the Act.

- 31 In order not to delay implementation of heritage controls in relation to all other matters in Amendment C174more and not compromise the VCAT hearing, the Amendment was split into two parts:
- Amendment C174more Part 1 – All properties minus 151A Lygon Street Brunswick East
 - Amendment C174more Part 2 – 151A Lygon Street Brunswick East
- 32 Amendment C174 Part 1 was submitted to the Minister of Planning for approval on 16 August 2019 and approved on 5 January 2021.
- 33 The VCAT matter was settled between Council and the land owners to include 151A Lygon Street, Brunswick East into the next planned heritage Amendment (C208more).
- 34 Amendment C174 Part 2 was abandoned by Council at 12 August 2020 Council meeting, with 151A Lygon Street Brunswick East included in C208more.
- 35 A detailed chronology of events relating to 151A Lygon Street Brunswick East and C174more is included at **Appendix 2**. This chronology includes details of the following Amendments, planning permit applications, 29A demolition consent applications and VCAT appeals relevant to the planning controls and development at 151A Lygon Street Brunswick East.

Community Nominations of Potential Heritage Places

- 36 Concurrent with the review of the outstanding recommendations, a public nomination process was conducted following the completion of Stage 1 of the MHGS in November 2016. Over 800 properties were nominated through this process.
- 37 The scope of Stage 2 of the MHGS however did not include the assessment of these nominated places due to insufficient budget and the availability of external consultant resources. As such the preliminary assessment of these additional places was deferred and documented in the heritage workplan within the Moreland Heritage Action Plan 2017-2032.
- 38 These public nominated places form the basis of places investigated in the Moreland Heritage Nominations Study 2019.

Heritage Action Plan 2017-32 (HAP)

- 39 The Moreland Heritage Action Plan 2017-32 identifies heritage actions which are already underway and sets out the parameters for further identification, conservation and management of the city's heritage. Of relevance to this Amendment are the following actions of the HAP:
- Action K5 - Commission heritage expert assistance to undertake a preliminary assessment of the potential heritage places identified as part of the public nomination process held in 2016.
 - Action K14 - Commission heritage expert assistance to undertake a heritage study of Pre-War and Post War Modern architectural style heritage places identified as part of the public nomination process held 2016 (this action is based on the outcomes of the Preliminary Assessment as per Action K5). Note two studies may be prepared i.e. Pre-War and Post War.
 - Action P3 – Prepare a planning scheme amendment to introduce the places identified and assessed as part of the Pre-War and Post War Modern architectural style Heritage Study(s)

(aligned with Actions K5 and K14) into the Moreland Planning Scheme, via application of the Heritage Overlay.

- 40 The number of Post War Modern architecture nominated was not as extensive as originally thought when the actions of the HAP was drafted. As such, the heritage study for the public nominated places was not themed by architectural style, instead named after the nomination process.

3.2 Moreland Heritage Nominations Study (MHNS)

- 41 The Moreland Heritage Nominations Study sought to investigate the heritage significance of places nominated by the public in 2016. This study was prepared in two stages.

MHNS Stage 1 – Preliminary Assessment

- 42 The Stage 1 study comprised of a preliminary assessment of 73 individual places, 14 potential precincts (containing 587 properties), as well as potential extensions to 5 current HO precincts (containing 170 properties). This list was largely based on the places nominated by the public in 2016, with a few through Council Officer knowledge.
- 43 The preliminary assessment was completed in August 2019 by heritage consultants Context Pty Ltd. This assessment focused on a desktop review with some limited fieldwork to produce a revised list of places that were likely to meet the threshold for local heritage significance and warranted further detailed assessment. A comparative review of each place and precinct against those already included in the HO was also undertaken in the preparation of this list.
- 44 Stage 1 recommended the following for detailed assessment in Stage 2:
- 69 individual places
 - One potential serial listing
 - 9 potential new precincts
 - Two potential extensions to existing HO precincts
- 45 This list included 21 individual places and 3 potential precincts identified by the consultants whilst undertaking their desktop review.

MHNS Stage 2 – Detailed Assessment

- 46 The Stage 2 study was completed in June 2020 by heritage consultants Extent Heritage Pty Ltd (Extent Heritage). This study involved the full research of:
- Places short listed in Stage 1 of the MHNS
 - Extra places found through fieldwork and desktop review by the consultants
 - An update of heritage descriptions of four places already in the Moreland Heritage Overlay
- 47 Stage 2 of the MHNS was prepared in accordance with Heritage Victoria Guidelines, the Australia ICOMOS Charter for Places of Cultural Heritage Significance (the Burra Charter) and its guidelines. The study involved historical research, site visits and research of existing heritage places and precincts in Moreland to assess the place against the National Heritage Convention (HERCON) criteria.

- 48 This study confirmed that 44 individual places, 1 serial listing, 7 new precincts and an extension to 3 existing heritage precincts satisfied the threshold for local significance and recommended they be included in the Moreland Heritage Overlay.
- 49 The MHNS 2019 was prepared in two volumes and is included at **Appendix 4**:
- Moreland Heritage Nominations Study Vol 1 – Recommendations Report 2020
 - Moreland Heritage Nominations Study Vol 2 – Citations 2020

3.3 Amendment C207more – Interim heritage controls

- 50 On 17 September 2020, Council requested the Minister for Planning to exercise his powers pursuant to 20(4) of the *Planning and Environment Act 1987* to apply interim heritage controls to properties identified as significant in the MHNS 2020.
- 51 The Minister of Planning notified Council on 5 September 2021 of the approval of C207more with changes removing the following properties that were either already protected by the HO, those that had been demolished or been issued with a planning permit for development on the site (see Reference Document 5G):
- HO207 – 491 Moreland Road Pascoe Vale
 - HO571 – 86 Gordon Street Coburg
 - HO580 – 31 The Avenue Coburg
 - HO594 – 32 & 34 Hanover Street Brunswick
 - HO596 – 27 Railway Place Coburg
 - HO597 – 112 Bell Street Coburg
 - HO600 – Multiple electricity supply properties
- 52 Amendment C207more was gazetted on 30 September 2021 applying an interim HO with an expiry of 31 May 2022.

4. Amendment C208more

4.1 Council Adoption

65 At the Council meeting on 12 August 2020 a report seeking endorsement of the MNHS, authorisation for C208more and Ministerial intervention to apply interim heritage controls thought C207more was considered (Reference Document 1A), and the following resolution was made (Reference 1B):

That Council:

- 1. Endorses the report Moreland Nominations Study 2020 at Attachments 1 and 2 to this report, as a reference document listed in Clause 22.06 – Heritage. This report outlines the rationale and evidence which underpins the proposed planning scheme changes.*
- 2. Requests that the Minister for Planning prepare, adopt and approve prescribed Moreland Planning Scheme Amendment C207 (interim heritage controls) pursuant to section 20A of the Planning and Environment Act 1987 as shown in Attachments 3 and 4 to this report.*
- 3. Using its powers as a Planning Authority under sections 8A and 8B of the Planning and Environment 1987, seeks Authorisation from the Minister for Planning to prepare Moreland Planning Scheme Amendment C208 (permanent heritage controls) as shown in Attachments 5 and 6 to this report.*
- 4. Following receipt of the Minister’s Authorisation, exhibits Amendment C208 in accordance with Section 19 of the Planning and Environment Act 1987 and as outlined in the consultation section of this report.*
- 5. Authorises the Director City Futures to make changes to Amendment C208 based on conditions imposed in any Authorisation granted by the Minister for Planning and to make minor changes.*
- 6. Using its powers as a planning authority under Sections 23 and 28 of the Planning and Environment Act 1987, abandons Moreland Planning Scheme Amendment C174 Part 2.*
- 7. Writes to the Minister for Planning advising of Council’s decision to abandon Moreland Planning Scheme Amendment C174 Part 2.*

4.2 Authorisation

66 On 17 September 2020 Council sought authorisation from the Minister for Planning to prepare and exhibit Amendment C208more (The Amendment). On 24 September 2020 Council received a letter from the Department of Environment, Land, Water and Planning (DELWP) stating the amendment required further review.

67 Authorisation of the Amendment was granted on 9 July 2021 (Reference Document 2H) and included the following conditions:

- Remove 18 Kendall Street, Coburg (HO547) from the list of properties to be included in the Heritage Overlay and make consequential changes to all amendment documentation including maps, ordinance and the Explanatory Report.*
- Review the changes proposed to Clause 22.06 which is now obsolete and instead incorporate them to Clause 15.03-1L (Heritage in Moreland) where applicable.*
- Update all precinct Statements of Significance to ensure the map in each statement clearly outlines which properties are individually significant, contributory and non-contributory to the precinct.*

- *Ensure consistency of place and precinct names and addresses through all amendment documentation.*
- *Amend the Schedule to Clause 72.04 to include all statements of significance to be incorporated as part of the amendment.*
- *Ensure all amendment documents are consistent with the Ministerial Direction -the Form and Content of Planning Schemes and Planning Practice Note 1: Applying the Heritage Overlay.*

68 Council Officers made changes to the Amendment documentation in line with the authorisation conditions and revised documentation was submitted to DELWP with the notice of preparation to exhibit the Amendment. This included:

- Removing 18 Kendall Street Coburg & HO547 from all the Amendment documentation (Explanatory report, Schedule to Clause 43.01, Schedule to Clause 72.04, Incorporated Plan, HO Map 11)
- Removing Clause 22.06 from the Amendment and add Clause 15.03-1L, amended to include the Moreland Heritage Nominations Study 2020 as a Policy Guideline.
- A review all precinct Statement of Significance to ensure there is a map and table that describes the heritage value of each place in the precinct, and ensure they are all listed in Schedule to Clause 72.04.
- A review all documentation to ensure the names and addresses of places and precincts are correctly spelled and consistent in all documents and are consistent with Ministerial Direction – the Form and Content of Planning Schemes and Planning Practice Note 1: Applying the Heritage Overlay.
- Consultation with DELWP officers seeking details on particular errors/inconsistencies in the documentation that was submitted that needed to be rectified to ensure all are captured in the above review.

69 DELWP’s letter of Authorisation also noted that the State Government had an interest in the redevelopment of 31 The Avenue Coburg. Council was encouraged to contact Development Victoria before preparing the amendment documents for exhibition.

70 Council Officers met with Development Victoria representatives in early 2021 to discuss the future development of the land, the existing heritage significance of The Grove/Sydney Road precinct and the proposed heritage overlay for the Moreland Secondary College and former Kangan TAFE Campus.

71 Discussions between Council Officers and Development Victoria continued throughout 2021 and in January 2022. Below is a table that documents key meetings and correspondence between Council and Development Victoria.

Date	Type	Purpose
9 February 2021	Meeting	Discussed various aspects of the proposed development of land at 31 The Avenue by Development Victoria. Update provided on timing and status of Amendment C208more.
11 March 2021	Meeting	Discussed various aspects of the proposed development of land at 31 The Avenue by Development Victoria. Update provided on timing and status of Amendment C208more.
13 August 2021	Email	Formal notification of exhibition of C208more sent via email to Development Victoria.
2 September 2021	Email	Council Officer sends email to Development Victoria Officer to inform them of the exhibition of C208more.
1 October 2021	Email	Submission received from Echelon Planning on behalf of Development Victoria seeking changes to the Amendment for 31 The Avenue, Coburg.
4 November 2021	Call & Email	Discussion with Development Victoria Officer about the upcoming Council meeting that will discuss the outcomes of the exhibition of C208more, where the officer discussed the recommendations relating to 31 The Avenue Coburg. This included sharing the changes Council Officers were proposing to the citation and curtilage of the proposed HO to 31 The Avenue Coburg based on the submission received. Echelon Planning as the submitter representing Development Victoria were included in the email.
8 November 2021	Meeting	Discussed various aspects of the proposed development of land at 31 The Avenue by Development Victoria. Update provided on Amendment C208more.
16 December 2021	Call & Email	Discussion about the changes to C208more that Council resolved at the 8 December 2021 meeting, specifically the reduction to the curtilage of HO580 and HO172.
14 January 2022	Meeting	Discussed various aspects of the proposed development of land at 31 The Avenue by Development Victoria. Update provided on Amendment C208more.
14 February 2022	Meeting	Discussed various aspects of the proposed development of land at 31 The Avenue by Development Victoria, including concept plans. Update provided on Amendment C208more.
22 February 2022	Briefing	Development Victoria briefed Moreland City Council on the proposed development of land at 31 The Avenue, Coburg.

4.3 Exhibition

72 The Amendment was publicly exhibited in accordance with Section 19 of the Planning and Environment Act from 13 August 2021 to 1 October 2021. The Exhibited Amendment documents included:

- Explanatory Report (Reference Document 3A)
- Instruction Sheet (Reference Document 3B)
- Notice of Preparation (Reference Document 3C)

- Exhibited Provisions (Reference Document 3D)
 - Clause 15.03-1L Heritage in Moreland
 - Schedule to Clause 43.01 Heritage Overlay
 - Schedule to Clause 72.01 Documents Incorporated in this Planning Scheme
- Exhibited Planning Scheme Maps (Reference Document 3E)
- Moreland Heritage Nominations Study – Vol 1 – Recommendations Report, 2020 (Reference Document 3F)
- Moreland Heritage Nominations Study – Vol 2 – Citations, 2020 (Reference Document 3G)
- Heritage Exemptions Incorporated Plan 2020 (Reference Document 3H)
- Statement of Significance for all new and modified Heritage Overlays (Reference Document 3I)

73 The exhibition of the amendment included direct notification to:

- Relevant state government departments and Ministers
- All abutting Municipal Councils
- Statutory referral authorities operating within Moreland
- Owners and Occupiers of affected properties
- Owners and Occupiers of properties adjoining places proposed to be in a new HO
- Community members who nominated places in 2016
- Relevant community groups

74 This notice included a C208more Fact Sheet (Reference Document 5C) to provide more details about the Amendment. This included a description of the Amendment, information about what a Heritage Overlay is and a list of properties included in the Amendment.

75 To reach the wider community and ensure the community had an opportunity to learn about the Amendment, the following notification was also undertaken:

- Public notice in the Herald Sun and The Age on 23 August 2021
- Public notice in the Government Gazette on 26 August 2021
- C208more focused Facebook post on 31 August 2021
- C208more project page on Council's website describing the Amendment and providing access to all the Amendment documentation and an online form to lodge a submission.

76 Strategic Planning Officers were available for phone calls to talk about the Amendment with any member of the community. Officers also scheduled eight meetings with heritage consultants and landowners to talk about the Amendment. These were held via video conference due to COVID-19 social distancing requirements.

77 In total, 44 submissions were received to Amendment C208more, 41 during the exhibition period and three late submissions.

78 Of the 44 submissions received:

- 13 submissions supported the Amendment
- 28 were not supportive of the Amendment

- 2 were neutral in their views of the Amendment
- 5 submissions suggested changes to the Amendment

79 A summary of key issues raised in the submissions is provided in Section 6 of this submission.

4.4 Post Exhibition

80 Council Officers considered the submissions and recommended a number of changes to the Amendment following further investigation by Extent Heritage based on information provided in the submissions, including:

- a. Removing one place (HO586, 13 Ash Grove Oak Park) from the Amendment.
- b. Removing one precinct (HO593, Duke Street Precinct) from the Amendment.
- c. Reducing the extent of the HO for three places:
 - HO559 - CERES Park, to reflect the operational and lease area of the place
 - HO580 - 31 The Avenue Coburg, to capture the most significant features of the site
 - HO585 - Bluestone Retaining walls, to only apply to walls associated with the significant heritage fabric.
- d. Changing the heritage grading of three places in the Hanover Street Precinct from contributory to non-contributory.
- e. Modifying the Statement of Significance and citation of seven places and two precincts to incorporate the changes listed above, to clarify the significance of particular features, make corrections to dates and incorporate additional information.

81 Council Officers also recommended a number of changes to the exhibited MHNS and amendment documentation to reflect the above changes as well as to correct minor errors identified during the exhibition process.

82 A summary of changes is provided at Section 7 of this submission.

83 On 10 November 21, Council considered a report summarising and responding to the submissions (Reference Document 1C), however the matter was deferred to the 8 December 2021 meeting to enable Councillors to undertake site visits and better understand some of the issues raised in questions and submissions.

84 On 8 December 2021, Council considered a report summarising and responding to the submissions, resolving (Reference Documents 1D):

That Council:

1. *Using its powers as a planning authority under s 23(1) of the Planning and Environment 1987, requests that the Minister for Planning appoint an independent Panel to consider all submissions to Moreland Planning Scheme Amendment C208more.*

2. *Endorses the response to submissions as set out in Attachment 1 to this report to form the basis of Council's submission to an Independent Planning Panel.*
3. *Notes that the recommended form of the Amendment to be presented to the Independent Planning Panel to respond to submissions is included in Attachment 1 to this report.*
4. *Refers any late submissions to the Independent Planning Panel appointed to consider the Amendment and submissions.*
5. *Authorises the Director City Futures to make minor changes to Moreland Planning Scheme Amendment C208more and to give direction on issues which arise in the course of the Panel hearing in response to expert evidence and submissions if required, so long as any further changes are generally in accordance with the Moreland Heritage Nominations Study.*
6. *Endorses the Moreland Thematic History 2020 in Attachment 2 to this report.*
7. *As part of the review of the Moreland Heritage Action Plan 2017-2032 provide Council with information about the scope and cost of a review of early, mid and late Victorian era cottages in Moreland to determine if there are any additional individual buildings or group/serial precincts worthy for inclusion in a heritage overlay, noting that the Heritage Action Plan review will be reported to Council in 2022.*

85 On 13 December 2021, Council formally requested the Minister for Planning appoint a Panel for the Amendment.

4.5 Notifying submitters of post exhibition changes

86 Council Officers directly notified all submitters of both the 10 November 2021 and 8 December 2021 meetings via email and letters on the 3 November 2021 and 2 December 2021 respectively. This notice included a link to the C208more Council Report that contained the post exhibition changes Officers were proposing and which Council adopted. This Council report described the proposed changes in text form and also as modified Amendment documents for both Council and the submitters to review (**Appendix 5 & 6**).

87 Further to this notice, modified citations and statements of significance were shared with submitters prior to Council's decision on the 8 December 2021 as follows:

Submitter	Method	Post Exhibition changes shared	Date
Submitter 8	Email	Modified Coonans Hill Precinct citation and Statement of Significance.	6 October 2021 11, 12 & 15 November 2021
Submitter 18	Email	Modified 28 McMahons Road Coburg North citation and Statement of Significance and Schedule Clause 43.01	28 September 2021
Submitter 22	Meeting	Modified Coburg Market citation and statement of significant (verbally shared)	6 December 2021
Submitter 29	Email	Modified CERES Park and Joe's Market Garden citation and Statement of Significance.	21 October 2021
Submitter 30	Email	Modified 31 The Avenue Coburg citation and statement of significance	4 November 2021

Submitter 38	Email	Modified 198 Edward Street Brunswick East citation and statement of significance	20 October 2021
Submitter 40	Email	Heritage Permit Exemptions Incorporated Document – corrected Hanover Street Precinct Map	10 November 2021

88 Further conversations at various times were also had to discuss other post exhibition changes with a number of submitters:

- Submitter 6 – Approach to changing the grading of 32 Hanover Street Brunswick in the Hanover Street Precinct following demolition.
- Submitter 10 – Reduction to the curtilage of HO585 – Bluestone Retaining Walls to exclude land adjacent to 64 Vincent Street.
- Submitter 35 & 39 – Removing Duke Street Precinct from the Amendment.

4.6 Referral of late submissions

89 Amendment C208more received three late submissions following the close of the formal exhibition period from Submitters 42, 43 & 44.

90 As detailed above, after considering submissions to the Amendment, Council resolved at its meeting on 8 December 2021 to progress Amendment C208more and refer the submissions to a Panel. This included a specific resolution (resolution 4) to manage late submissions, stating that Council:

Refers any late submissions to the Independent Planning Panel appointed to consider the Amendment and submissions.

91 A response to submission 42 was included in the 8 December Council Report, with council supporting the Council Officer response and recommendation to form the basis for this Panel Hearing.

92 Whilst Submission 43 was received prior to the Council decision on 8 December 2021, due to reporting timeframes, Officers were unable to include a response to that submission for Council to consider at that meeting. This submission was thus included within the Amendment documentation provided to Panel in January 2022 in accordance with the above resolution.

93 On 26 January 2022, Council received Submission 44. Strategic Planning Officers only became aware of this submission late on 27 January 2022, following the Directions Hearing.

94 In a letter dated 1 February 2021, Council formally referred Submission 43 and Submission 44 to Panel for consideration.

4.7 Chronology of events

95 A chronology of events is set out in [Appendix 2](#).

5. Strategic Assessment of the Amendment

5.1. Why is the Amendment Required?

- 96 The Amendment is required to implement the *Moreland Heritage Nominations Study 2020* and complete the implementation of the *Moreland Heritage Gap Study 2019*.
- 97 These Studies identify heritage precincts and individual properties as being locally significant to Moreland and recommend their inclusion in the Heritage Overlay to the Moreland Planning Scheme. These places have been predominantly nominated by the public in 2016 through a public nomination process. These studies confirm the heritage status and significance of the identified places.
- 98 The significance of the precincts and individual properties were assessed against the standard criteria contained in Practice Note 01 Applying the Heritage Overlay (September 2012) and were considered to meet the requirements and threshold for local protection through the Heritage Overlay.
- 99 The Heritage Overlay is the appropriate planning mechanism to protect the heritage values of these properties as the Heritage Overlay requires a permit to be granted for building and works, including demolition that could affect the significance of these precincts and individual properties.
- 100 The Amendment will also ensure Council meets its deliverables under the Council Action Plan 2021-2025 (Council Action Plan) and the Moreland Heritage Action Plan 2017-2050 (HAP).
- 101 The Council Action Plan implements the Council Plan 2021-2025 and identifies the following deliverables under Theme 4: Vibrant Spaces and place in Moreland, 4.4 Create a sense of place while retaining what is valued about heritage including First Nations.
- 102 The Heritage Action Plan was endorsed by Council on 14 June 2017. The purpose of the Heritage Action Plan is to assist Council to meet its heritage obligations as set out in various legislation and provides several principles, objectives and strategies to achieve this purpose in an integrated way. It specifically sets out the following actions to be delivered:
- *Action K5 - Commission heritage expert assistance to undertake a preliminary assessment of the potential heritage places identified as part of the public nomination process held in 2016.*
 - *Action K14 - Commission heritage expert assistance to undertake a heritage study of Pre-War and Post War Modern architectural style heritage places identified as part of the public nomination process held 2016 (this action is based on the outcomes of the Preliminary Assessment as per Action K5). Note two studies may be prepared i.e. Pre-War and Post War.*
 - *Action P3 – Prepare a planning scheme amendment to introduce the places identified and assessed as part of the Pre-War and Post War Modern architectural style Heritage Study(s) (aligned with Actions K5 and K14) into the Moreland Planning Scheme, via application of the Heritage Overlay.*

5.2. How does the Amendment implement the objectives of planning in Victoria?

103 The Amendment seeks to implement the following objectives listed under Section 4(1) of the Planning Environment Act:

1d) - to conserve and enhance those buildings, areas or other places which are of scientific, aesthetic, architectural or historical interest, or otherwise of special cultural value;” and

1g) - to balance the present and future interests of all Victorians

104 The Study has identified properties which hold local heritage significance to the City of Moreland. The heritage value of each property and precinct has been documented in their respective heritage citations.

105 The amended Moreland Heritage Permit Exemptions Incorporated Document 2020 will refine the HO permit requirements to the new places and precincts based on a set criterion, to assist in streamlining heritage applications. This will aid in the efficient processing of planning applications so that those which meet the criteria, do not require assessment. It will also contribute to greater effectiveness of the HO control, by providing increased certainty for a range of minor proposals within areas of significance.

5.3. How does the Amendment address any environmental, social and economic effects?

Environmental Effects

106 The amendment is not considered to generate any detrimental impact on the environment. The environmental sustainability benefits afforded by the retention of heritage places through maintenance, restoration and re-use are considered environmentally responsible and can have significant resources in the longer term.

107 Furthermore, buildings can continue to be modified to achieve net zero emissions and very good ratings (7+ NatHers) by integrating design features to improve a building’s efficiency, including but not limited to, tree canopy for passive cooling and heating outcomes, installing glazing and insulation, use of efficient appliances, disconnection from gas and using renewable energy sources.

108 All these changes are not prevented by the Heritage Overlay.

Economic Effects

109 The amendment is expected to have no adverse economic impacts. The protection of architectural and historically significant buildings can have economic benefits, especially in residential areas where period homes and former industrial and commercial buildings are sought for restoration and investment.

110 An economically sustainable outcome may be achieved through the retention, conservation and adaptation of heritage places where it contributes to local and regional economic benefits.

111 Heritage controls do not prohibit development, subdivision or demolition but require that a planning permit be obtained to ensure that heritage values of a place are not jeopardised. A planning permit is not required under the Heritage Overlay to carry out routine maintenance and repairs that do not change the appearance of the heritage place.

Social Effects

- 112 The amendment will make a positive contribution to the City of Moreland and greater community. Buildings, landscapes and other places of heritage value provide a link to our past. Heritage places also add character, appeal and interest to our city while contributing to the quality of life and cultural identity of the local community.
- 113 Respect for our cultural heritage involves retaining and managing places that have importance to us as community. The inclusion of new places in the heritage overlay will ensure the preservation of Moreland's history for present and future generations.

5.4. Does the amendment comply with the requirements of any Ministers Direction applicable to the Amendment?

- 114 The Amendment complies with the requirements of the following Ministerial Directions:
- Ministerial Direction – The Form and Content of Planning Schemes
 - Ministerial Direction 9 – Metropolitan Planning Strategy
 - Ministerial Direction 11 – Strategic Assessment of Amendments
 - Ministerial Direction 15 – The Planning Scheme Amendment Process

Direction – The Form and Content of Planning Schemes

- 115 This amendment complies with Ministerial Direction – The Form and Content of Planning Schemes. The amendment documentation conforms with the Form and Content of Planning schemes as set out in the direction.

Direction 9 – Metropolitan Planning Strategy

- 116 This Amendment complies with Ministerial Direction 9 – Metropolitan Planning Strategy which applies to Plan Melbourne 2017-2050 (Plan Melbourne). The Amendment supports Direction 4.4 - Respect Melbourne's heritage as we build for the future.
- 117 Direction 4.4 specifically identifies the importance of continuous identification and review of currently unprotected sites; the contribution heritage makes to Melbourne's distinctiveness and liveability; and advocates for the protection of Melbourne's heritage places.
- 118 The Amendment supports Policy 4.4.1 by seeking to apply the HO on sites which have been identified to hold local cultural significance following a comprehensive review that has been based on accepted heritage conservation principles and practices.
- 119 Similarly, the Incorporated Plan will provide a means to better encourage appropriate development in the context of ongoing and increased development in Heritage areas. Developments can therefore be better facilitated. This is particularly with respect to minor types of applications where, minimum requirements can determine acceptable outcomes that will not need to be assessed.

Direction 11 – Strategic Assessment of Amendments

120 The Amendment complies with Ministerial Direction No 11 – Strategic Assessment of Amendments. A detailed strategic assessment of the Amendment is included in the Explanatory Report (Reference Document 3A). Generally, Amendment C208more:

- Supports the Planning Policy Framework and Municipal Planning Strategy by applying the HO to identified places of local cultural significance.
- Makes proper use of the Victorian Planning Provisions (VPP) through the use of the HO. The HO is the appropriate tool to protect the heritage values of individual places and precincts with heritage significance.

Direction 15 – The Planning Scheme Amendment Process

121 The Amendment complies with Ministerial Direction No 15 – The Planning Scheme Amendment Process. The amendment has been processed in accordance with the relevant time frames and requirements.

5.5. How does the Amendment support or implement the Planning Policy Framework and any adopted State policy?

122 A key theme of the PPF is to recognise the role of urban design, building design, heritage and energy and resource efficiency in delivering liveable and sustainable cities, towns and neighbourhoods.

123 More specifically, Clause 15.01-S seeks to recognise, support and protect neighbourhood character, cultural identity, and sense of place. This is achieved through ensuring development responds to its context and the valued features and characteristics of the local environment and place by emphasising heritage values and built form that reflect community identity.

124 15.03-1S (Heritage Conservation) of the PPF also seeks to ensure the conservation of heritage significance through the implementation of the following objective and strategies.

Objective:

- *To ensure the conservation of places of heritage significance.*

Strategies:

- *Identify, assess and document places of natural or cultural heritage significance as a basis for their inclusion in the planning scheme.*
- *Provide for the protection of natural heritage sites and man-made resources.*
- *Provide for the conservation and enhancement of those places which are of, aesthetic, archaeological, architectural, cultural, scientific, or social significance.*
- *Encourage appropriate development that respects places with identified heritage values.*
- *Retain those elements that contribute to the importance of the heritage place.*
- *Encourage the conservation and restoration of contributory elements of a heritage place.*
- *Ensure an appropriate setting and context for heritage places is maintained or enhanced.*

- *Support adaptive reuse of heritage buildings where their use has become redundant.*

125 The Amendment is consistent with and supports the PPF by applying the HO to identified places of local cultural significance

126 The amendment ensures that the policy directions for heritage conservation can be met through the identification, assessment and protection of heritage places within Moreland. The protection of the heritage places will encourage appropriate development and the conservation and restoration of the contributory elements of the heritage places

5.6. How does the Amendment support or implement the Municipal Planning Strategy?

127 The Amendment supports the strategic directions of the Municipal Planning Strategy (MPS) of the Moreland Planning Scheme through the application of a heritage overlay that will serve to protect identified heritage assets to help our understanding of the past, enrich the present and be of value to future generations.

128 The amendment is further supported by built form guidance outlined in the objectives and strategies of Clause 15.03-1L – Heritage in Moreland. This policy applies to all land affected by a heritage overlay and outlines the following strategies:

- *Encourage the retention of contributory or significant heritage fabric required to maintain the original streetscape appearance.*
- *Encourage new buildings and alterations and additions that respect the existing scale, massing, form and siting of contributory or significance elements and do not dominate the heritage place or precinct.*
- *Discourage total reconstruction of a heritage place as an alternative to retention.*
- *Retain significant elements of the heritage landscape.*

129 Individual places, precincts and a serial listing have been assessed by Extent Heritage Pty Ltd and found to be of local heritage significance.

130 The amendment will also support the MPS and reinforce local policy by introducing the Moreland Heritage Nominations Study 2020 as a reference document and include the Statement of Significance of the heritage places in the Heritage Incorporated Document to the Scheme (at Clause 72.04).

5.7. Amendments that may impact the Amendment

131 The table below is a list of Amendments that have made changes recently or are proposing to make changes to heritage policy and provisions in the Moreland Planning Scheme.

Amendment	Description	Relevance to C208more	Status
C174more Part 1	The amendment implemented the recommendations of the Moreland Heritage Gap Study by applying a Heritage Overlay on a permanent basis to 80 individual sites, 4 heritage precincts, 3	C208more documentation submitted for Authorisation in 2020 was modified for exhibition to incorporate the changes approved by C174more Part 1. These	Gazetted on 5 January 2021

Amendment	Description	Relevance to C208more	Status
	<p>serial listings and 10 precincts and introduced the Moreland Heritage Exemptions Incorporated Plan 2019 into the Moreland Planning Scheme.</p>	<p>changes were made through DELWP’s Amendment Tacking System (ATS) ‘Objective Keystone Authoring’.</p> <p>Due to the nature of ATS authoring portal, at least one administrative error has been identified in merging content approved by C174more Part 1 into the C208more exhibition material (see post exhibition changes).</p> <p>This amendment also introduced the Moreland Heritage Exemptions Incorporated Plan 2019, in which C208more is seeking to modify.</p> <p>151A Lygon Street Brunswick East was assessed as part of the Moreland Heritage Gap Study, with the C174more Panel Report stating that the study <i>‘has applied appropriate methodology for initially identifying candidate sites and assessing whether they have sufficient local significance to justify the Heritage Overlay’</i>, concluding that the Amendment <i>‘is was well founded and strategically justified’</i>.</p>	
C200more	<p>The Amendment translated the Local Planning Policy Framework of the Moreland Planning Scheme to a new Municipal Planning Strategy, Planning Policy Framework and amended a number of schedules to overlays and operational provisions consistent with the reforms to the Victoria Planning Provisions introduced by Amendment VC148.</p>	<p>Local heritage policy at Clause 22.08 was translated to 15.03-1L (Heritage in Moreland) to align with new planning scheme structure introduced by VC148.</p> <p>This occurred whilst the Minister was considering Authorisation of C208more, which included a modified Clause 22.08. Thus Authorisation and Exhibition documentation of C208more reference differing local policy in the Scheme.</p>	Gazetted on 4 August 2021
C210more	<p>The Amendment applies a Specific Controls Overlay (SCO) to the land at 10 Dawson Street, Brunswick to facilitate the development of an eight-storey mixed-use building comprising retail, office and residential with affordable housing and to make associated changes to the Moreland Planning Scheme.</p>	<p>The ‘10 Dawson Street Brunswick Incorporated Document allows the demolition of all buildings at this site, including a substation included in the proposed HO600 - Brunswick Substation Serial Listing.</p> <p>This incorporated document directs that <i>‘Prior to the commencement of any</i></p>	Gazetted on 4 August 2021

Amendment	Description	Relevance to C208more	Status
	This amendment was prepared by the Minister for Planning, who was the planning authority for this amendment. The amendment was also made at the request of the Minister for Planning.	<i>demolition, a professionally prepared archival record of the substation on the land must be carried out and submitted to the satisfaction of the Responsible Authority. This record must be carried out in accordance with Heritage Victoria's technical note 'Specification for the submission of Archival'.</i>	
C212more	The Amendment seeks to improve the operation of the Moreland Planning Scheme and planning permit decision making by introducing new policy content, new planning permit application requirements, and correcting a number of anomalies and errors/ inconsistencies identified in the Moreland Planning Scheme.	This amendment also seeks to modify Clause 15.03-1L, Schedule to Clause 43.01 Heritage Overlay, Schedule to Clause 72.04 Documents Incorporated in this Scheme and HO Map 14 to: <ul style="list-style-type: none"> – Insert new policy guideline and policy documents 'Guidelines for Fences in Heritage Areas, Moreland City Council 2021 and 'Guidelines for Assessing Planning Permit Applications, Heritage Victoria, 2007' – Extends the curtilage of HO246 to 20 Dawson Street Brunswick and incorporate the place in the statement of significance in the scheme 	Exhibition complete, referred to Panel. Panel hearing set for the 17 March 2022.

5.8. Current permits & applications issued to C208more properties

132 As part of preparing Amendment C208more documentation, Council reviewed all properties to understand whether there were any planning/building approvals or applications to build or demolish on any sites in C208more. This analysis was undertaken in August 2020, just prior to submitting the Amendment for Authorisation and Amendment C207more interim HO request. A more recent review has been undertaken in February 2022.

133 The following are a list of relevant planning permit, building permit and 29A demolition consent applications or permits that may impact the amendment.

Application Number	Description	Relevant C208more property	Status
MPS/2018/202	Planning Permit Application <ul style="list-style-type: none"> – Use and development of the land by the construction of a nine (9) storey building over two (2) levels of basement car parking, including a partially enclosed roof terrace above, containing 4 shops and 78 dwellings, and a reduction in the standard car parking requirement for the retail component' 	151A Lygon Street Brunswick East (HO505 – 151A Lygon Street Brunswick East)	Notice of Refusal issued, currently being reviewed through VCAT

MPS/2019/711	<p>Planning Permit issued on 8 October 2019 for:</p> <ul style="list-style-type: none"> Buildings and works to extend the existing place of assembly including an increase in patrons, use and development of a child care centre, and a reduction of the standard car parking requirements. 	<p>148-150 Nicholson Street Brunswick East</p> <p>(HO564 - Church School (former) and Cretan Brotherhood, 148–150 Nicholson Street Brunswick East)</p>	<p>Current, yet to be acted upon.</p>
MPS/2017/942 & CR/2021/577	<p>Planning Permit issued on 4 February 2018 for:</p> <ul style="list-style-type: none"> Construction of a double storey dwelling <p>S29A Building approval issued on 7 September 2021 for:</p> <ul style="list-style-type: none"> Full demolition of dwelling and outbuildings 	<p>32 Hanover Street Brunswick</p> <p>(HO594 – Hanover Street Precinct)</p>	<p>Current.</p> <p>A site visit confirms the original dwelling has been demolished</p>
MPS/2018/727	<p>Planning Permit issued on 18 July 2019 for:</p> <ul style="list-style-type: none"> Construction of a double storey dwelling 	<p>34 Hanover Street Brunswick</p> <p>(HO594 – Hanover Street Precinct)</p>	<p>Current.</p> <p>A site visit confirms the original dwelling is still on the site</p>
MPS/2020/458	<p>Planning Permit issued on 26 March 2021 for:</p> <ul style="list-style-type: none"> Two storey extension to the rear of the existing on a lot less than 300sqm <p>(*design retains front part of the dwelling, with a new second floor positioned 4m from front parapet)</p>	<p>27 Railway Place Coburg</p> <p>(HO596 – Railway Place Precinct)</p>	<p>Current, yet to be acted upon.</p>
MPS/2011/732	<p>Planning Permit issued on 13 August 2020 for:</p> <ul style="list-style-type: none"> Development of 6 storey building, use of dwellings and reduction in car parking <p>(*design retains half of existing building, with a new 6 storey building set back 10.5m from front boundary)</p>	<p>112 Bell Street Coburg</p> <p>(HO597 – Bell Street & Sydney Road Shops Precinct)</p>	<p>Current, yet to be acted upon.</p>
MPS/2009/156	<p>Planning permit issued on 24 November 2010 for:</p> <ul style="list-style-type: none"> Development of the land to construct a five storey building comprising five (5) dwellings, reduction in standard car parking requirement and alteration to the existing crossover in a Road Zone Category 1. 	<p>491 Moreland Road Pascoe Vale South</p> <p>(HO207 – Coonans Hill Precinct extension)</p>	<p>Current.</p> <p>6 requests to extend the permit expiry have been approved since issuing of the permit in 2010.</p> <p>(recent site visits confirms the dwelling has been demolished)</p>

MPS/2021/401	<p>Planning permit application</p> <ul style="list-style-type: none"> – Use of the land for food and drink premises, partial demolition and buildings and works in a Heritage Overlay, and waiver of the car parking requirement. <p>(the heritage of the site of HO301 & HO311, including the heritage substation, is being considered in this application)</p>	<p>14 Frith Street Brunswick (HO600 – Brunswick Substation Serial Listing)</p>	<p>Current, decision is yet to be made</p>
PBS/2020/734	<p>Building surveyor has been appointed for:</p> <ul style="list-style-type: none"> – Alterations and additions to an existing dwelling 	<p>76 Albion Street Brunswick East (HO85 – Glenmorgan, Clarence and Albion Street Precinct)</p>	<p>Details of the works have not been provided to Council.</p>

134 There are a number of other planning and building applications and permits associated with C208more properties. However, these were not considered to pose a conflict with this Amendment, a key reason being that the key heritage fabric is retained and limited visibility of new additions.

135 A full list of these planning and building permits and applications have been included at **Appendix 7.**

6. Summary of Issues Raised in Submissions

- 136 A total of 44 submissions have been received regarding the Amendment.
- 137 Of the 44 submissions received:
- 13 were supportive of the Amendment
 - 29 were not supportive of the Amendment
 - 2 were neutral in their views of the Amendment
 - 5 of the submitters suggested changes to the Amendment
- 138 Council considered the submissions at its meeting on 8 December 2021. The Council report contains a summary of submissions and Officer responses, endorsed by Council (see **Appendix 5**)
- 139 Expert heritage consultants Extent Heritage Pty Ltd reviewed all of the submissions received to support the Officers responses.
- 140 Below is an identification of what Council considers to be the main issues raised by submitters in their submissions.
- 141 The issues raised in submissions and Council's response will be elaborated further in Council's Part B Submission to Panel.

7.1. Common Issues

- 142 The issues and grounds of objection raised by submitters vary and in many instances are site specific. There were however consistent themes which emerged across submissions including:

Questioning the Heritage Value of a Particular Site or Precinct

- 143 Twenty five (25) submissions raised concerns about the heritage value of a particular site or precinct. Most of these submissions considered that the site/precinct had undergone change that it no longer warranted heritage protection.
- 144 These submissions can be further summarised as follows:
- Building intactness, level of significance & threshold issues (20 submissions)¹
 - Issues with the content in the Heritage Citation (15 submissions)²
 - Building sits in isolation from existing heritage areas (3 submissions)³

Development Restrictions & Property Rights

- 145 Sixteen submissions⁴ raised concerns that the heritage overlay will conflict with existing zoning and overlays that direct growth or will prevent them from developing and modernising their property, many citing they were being denied the same rights as other property owners.

¹ Submission Numbers - 8, 10, 16, 21, 22, 24, 25, 27, 28, 30, 31, 33, 34, 35, 36, 37, 39, 40, 42 & 43

² Submission Numbers - 8, 9, 16, 18, 27, 29, 30, 32, 33, 35, 36, 38, 39, 42 & 43

³ Submission Numbers - 13, 17 & 21

⁴ Submission Numbers – 8, 9, 13, 17, 19, 21, 22, 23, 24, 27, 31, 33, 35, 36, 39 & 43

Consultation

146 Seven submissions⁵ raised concerns with the consultation of the heritage study and exhibition of the amendment.

Property values

147 Five submissions⁶ raised issues that a heritage overlay will devalue their property, with one submitter⁷ outlining that no financial modelling had been offered to outline the impact on property values and extra maintenance.

Maintenance & financial implications

148 The added burden on property owners when wanting to fix up their property was raised in seven submissions⁸, including concerns with:

- Costs to replace and maintain heritage features and modernise buildings
- Issues with availability of original materials
- Additional regulatory and compliance costs

Heritage grants and support

149 Three submissions⁹ asked what kind of compensation and support Council is offering landowners to help preserve the heritage and history for the community.

Planning Scheme Policy and requirements of the Heritage Overlay

150 Two submissions¹⁰ sought information on what it means to have a property in a heritage overlay, including asking about particular types of works.

151 A further four submissions¹¹ questioned heritage policy in the scheme and the use of the heritage overlay as an appropriate tool to manage the identified heritage and character of an area.

Heritage nominations

152 Two submissions¹² requested the inclusion of additional properties in the heritage overlay.

7.1. Issues specific to Places and Precincts

153 Many submissions raised issues specific to a place or precinct beyond the common issues described above. These are summarised in the table below, with all the issues raised by submissions contained in the Council Officer response to submissions provided at **Appendix 5**.

⁵ Submission Numbers – 32, 33, 35, 36, 39, 42 & 43

⁶ Submission Numbers – 3, 5, 12, 41 & 42

⁷ Submission Number – 2, 29, 31, 33, 36, 39, 42

⁸ Submission Numbers - 9, 23, 25, 31, 34, 41 & 43

⁹ Submission Numbers – 12, 41 & 42

¹⁰ Submission Numbers – 5 & 31

¹¹ Submission Numbers – 18, 29, 33 & 37

¹² Submission Numbers – 26 & 38

Place or Precinct	HO No.	Issues raised specific to the place or precinct	Sub. No.
383 Brunswick Road Brunswick	HO550	<p>The heritage assessment was limited to a visual inspection.</p> <p>The building is in significant and life -threatening state of disrepair.</p> <p>Does not agree with the heritage assessment against the HERCON criterion.</p> <p>The property provides no contribution to the area as it is largely concealed from views from the street and is overshadowed by a development at the rear.</p>	33
Loretto, 198 Edward Street Brunswick	HO552	<p>The assessment is based on an incorrect built date, era of the dwelling and historical information relating to the neighbouring dwellings.</p>	38
CERES Park - 7 Lee Street Brunswick East	HO559	<p>Outlined inaccuracies within the citation.</p> <p>Supports the recognition of the social significance of the place.</p> <p>Heritage Overlay is not the right tool for managing the intangible character of the place.</p> <p>Suggests alternative approaches: site specific permit exemptions incorporated plan or conservation management plan.</p>	29
151A Lygon Street Brunswick East	HO505	<p>Does not agree that the place meets the threshold for local heritage significance.</p> <p>Place sits in isolation from any heritage context.</p> <p>Proposes to retain the façade within the redevelopment of a significantly larger parcel of land to address the heritage significance of the building.</p>	21
113 Nicholson Street Brunswick East	HO563	<p>Does not agree with the significance of the place:</p> <ul style="list-style-type: none"> • Aesthetic appeal is overstated • Place does not meet HERCON Criteria D and E 	27
Joe's Market Garden – 131 Harding Street Coburg	HO572	<p>Outlined inaccuracies within the citation.</p> <p>Supports the recognition of the social significance of the place.</p> <p>Heritage Overlay is not the right tool for managing the intangible character of the place.</p> <p>Suggests alternative approaches: site specific permit exemptions incorporated plan or conservation management plan.</p>	29
Coburg Market, 415-423 Sydney Road Coburg	HO577	<p>Disagrees with the citation's classification that the place has high integrity, noting modifications that have been made to the building over time.</p> <p>Any social history can be recorded and documented in written and photographic form and/or information plaques.</p>	22
Moreland Secondary College and Kangan Tafe Campus, 31 The Avenue Coburg	HO580	<p>Does not agree with the heritage merits of the place:</p> <ul style="list-style-type: none"> • The building does not demonstrate the aesthetic characteristics detailed in the citation, is weak in its rationale and covers part of the building that is a later addition. • The citation is not clear on its construction dates, stating it is likely constructed in 1980's, which is late for Brutalist architecture and thus, questions 	30

Place or Precinct	HO No.	Issues raised specific to the place or precinct	Sub. No.
		<p>how the building can demonstrate innovative construction.</p> <ul style="list-style-type: none"> Comparative analysis only includes State significant places, the place is not as impressive, different in character and/or significance. The statement of significance describes internal elements as significant features, but the citation does not propose internal controls. 	
Coburg Velodrome, 30-34 Charles Street Coburg North	HO582	Concerns the HO will prevent the re-purposing of the underutilised velodrome and Richards Reserve more broadly.	44
28 McMahons Road Coburg North	HO583	<p>Supports the Amendment but identified some inaccuracies in the citation relating to the materials described in the citation and statement of significance.</p> <p>Does not believe external paint controls are necessary to protect the unpainted brickwork for this heritage place.</p>	18
Bluestone Retailing Walls, Oak Park	HO585	The walls adjacent to 64 Vincent Street Oak Park do not meet the criteria of the proposed heritage overlay HO585.	10
13 Ash Grove Oak Park	HO586	Changes have been made to the façade since the heritage assessment of 13 Ash Grove Oak Park (rendering of façade and painting of timber panelling). Questions the heritage integrity of the dwelling in light of these changes.	16
413 Gaffney Street Pasco Vale South	HO590	The residence at 413 Gaffney Street Pascoe Vale is not unique and only met two of the eight HERCON criterion.	42
Hanover Street Precinct	HO590	<p>The mapping of HO594 in the Moreland Heritage Exemptions Incorporated Plan incorrectly shows 29 Hanover Street as having contributory heritage value.</p> <p>A quarter of Hanover Street is not included in the precinct and the rationale for their exclusion has not been documented. With a second submission stating that all properties within Hanover Street should be included in the precinct.</p> <p>Many properties have been modified. Do not agree with the 'high' integrity rating for the precinct. One submission highlighting that 50 Hanover Street should have non-contributory heritage value due to the extensive modifications.</p> <p>Inaccurate description of property age(s) in the citation, many much younger than what is described.</p> <p>Council has completed prior heritage studies for the area, of which the most recent study (Heritage Gap Study) did not consider Hanover Street worthy of heritage protection.</p> <p>Highlighted that a planning permit had been issued for 32 Hanover Street Brunswick that permitted a new dwelling to replace the existing dwelling on a site, and requested the HO not be applied to the property or downgraded to non-contributory heritage value.</p>	6, 40 & 43

Place or Precinct	HO No.	Issues raised specific to the place or precinct	Sub. No.
Duke Street Precinct	HO593	<p>Describes errors in the citation's description of the façade of 5 Duke Street.</p> <p>There is little consistency in the architectural period and style within the street.</p> <p>Disagrees with the heritage assessment of meeting HERCON criterion D & E, including:</p> <ul style="list-style-type: none"> The physical analysis should be revised to be 'fair' condition 'moderate' integrity. The citation describes the dwellings as 'not unique' and has and has significantly less heritage value than nearby Sumner Street. All dwellings have been modified in some form over the years. Description of a bungalow is insufficient evidence to meet Criterion D and E and fails to mention pre-1920's cottages. Dwellings 9, 11 and 13 are not interwar cottages. Scale, setback and design of the dwellings is not consistent. 	32, 34, 35, 36 & 39
Irvine Estate Precinct	HO595	No issues raised beyond common issues (financial, maintenance, value, development disadvantage)	31
Railway Place Precinct	HO596	<p>Does not agree with the heritage assessment:</p> <ul style="list-style-type: none"> Previous heritage studies found the row of houses did not meet the criteria for inclusion Queries the emphasis on 'Italian boom era style terraces' for this precinct based on the era, style and modifications of many dwellings. Visual cohesiveness of the Railway Place houses is interrupted by the dwelling at 9-11 Railway Place. The individual nature of fences, verandahs and exterior finishes including paintwork. <p>Concerns with mandating a white picket fence approach to creating a heritage precinct.</p> <p>Questions the non-contributory value to 13, 15 and 17 Railway Place.</p> <p>Neighbourhood Character policy is adequate to protect the character of the Railway Place houses.</p>	37
Glenmorgan, Albion and Clarence Streets Precinct	HO85	<p>Albion Street displays a mixed character.</p> <p>A new modern dwelling along Albion Street will not affect the protection of Glenmorgan Street.</p>	13, 17, 19 & 25
Coonans Hill Precinct	HO207	<p>487 Moreland Road PVS does not contribute to the HO:</p> <ul style="list-style-type: none"> The dwelling is a poor example of Mid-20th Century Austerity design The dwelling does not fit with the overall style of most houses in the precinct. 475 Moreland Road is in poor state and work to restore the house to as-new is not feasible. 	8, 9, 23, 24, 28 & 41

Place or Precinct	HO No.	Issues raised specific to the place or precinct	Sub. No.
		<p>485 Moreland Road PVS should not be included in the HO:</p> <ul style="list-style-type: none"> • Poor condition of house and retaining wall • Has a significant extension making it not in its original form • Interwar and postwar housing are too recent a form of housing to be considered heritage. • Key characteristics of the dwelling in the study are typical features of all houses in 40's to 60's and not unique to heritage • materiality of the retaining walls as a significant feature has implications to their ongoing repair and maintenance. <p>487 Moreland Road PVS has had substantial modifications.</p> <p>Concerns unable to install a lift on these properties for accessibility needs within a HO.</p> <p>Should not be included in the Coonans Hill Precinct:</p> <ul style="list-style-type: none"> • Limited sight lines of the dwellings due to significant slope of the blocks • It was the last part of Coonans Hill to be developed and is not in the same era as the other parts of the precinct. 	

154 **Appendix 1** has been provided as a useful summary of this information, containing a table of all places and precincts in Amendment C208more and includes against each place and precinct the key themes raised in submissions and the associated submission numbers.

7. Post Exhibition Changes

7.1. Changes in response to submissions

155 In response to submissions, the following changes are proposed to the Amendment and were endorsed by Council at their meeting on 8 December 2021. These changes include:

Submission No.	Heritage Place	Recommendation	Change to Document
6	32 Hanover Street Brunswick - within Hanover Street Precinct	Modify the heritage value of the 32 Hanover Street to non-contributory following demolition of the property	MHNS HO594 Statement of Significance Incorporated document Heritage Exemptions Incorporated Plan
8	485 Moreland Road Pascoe Vale South - within Coonans Hill Precinct	Modify the statement of significance to provide more clarity on the significance of the materials of the terrace walls.	MHNS HO207 Statement of Significance Incorporated document
9	481 Moreland Road Pascoe Vale South - within Coonans Hill Precinct	Modify the statement of significance to provide more clarity on the significance of the materials of the terrace walls.	MHNS HO207 Statement of Significance Incorporated document
10	Bluestone Retaining Walls Serial Listing	Reduce the curtilage of HO585 to only apply to walls associated with the original bluestone walls. The landscaping/ stonework adjacent to 64 Vincent Street Oak Park is not associated with the original bluestone walls	MHNS HO585 Statement of Significance Incorporated document Map No 6HO
12	113 Nicholson Street Brunswick East	Update the citation to capture new information about the heritage place.	MHNS HO563 Statement of Significance Incorporated document
16	13 Ash Grove Oak Park	Remove 13 Ash Grove Oak Park (HO586) from the Amendment. Recent modifications to the front of the dwelling changes the heritage significance of this place.	Schedule to Clause 43.01 Schedule to Clause 72.04 Map 6HO
18	28 McMahons Road Coburg North	Modify citation and statement of significance to show inaccuracies of the	MHNS Schedule to Clause 43.01

Submission No.	Heritage Place	Recommendation	Change to Document
		<p>materials and clarify garden edging.</p> <p>Apply external paint controls to protect the significant facebrick of the dwelling.</p> <p>Reinstate the original recommendation relating to external paint controls, its omission from the proposed HO583 listing in the Schedule to Clause 43.01 was a clerical error.</p>	HO583 Statement of Significance Incorporated document
22	Coburg Market – 415-423 Sydney Road Coburg	Update the citation and statement of significance to describe timber and steel trusses.	MHNS HO577 Statement of Significance Incorporated document
23	483 Moreland Road Pascoe Vale -within Coonans Hill Precinct	Modify the statement of significance to improve the clarity of the significance of the terrace walls.	MHNS HO207 Statement of Significance Incorporated document
24	487 Moreland Road Pascoe Vale -within Coonans Hill Precinct	Modify the statement of significance to improve the clarity of the significance of the terrace walls.	MHNS HO207 Statement of Significance Incorporated document
28	475 Moreland Road Pascoe Vale -within Coonans Hill Precinct	Modify the statement of significance to improve the clarity of the significance of the terrace walls.	MHNS HO207 Statement of Significance Incorporated document
29	CERES Park & Joe's Market Garden	<p>Reduce the HO curtilage and update the name and address of HO559 (CERES Park) to reflect the operational name and area as defined by their Lease.</p> <p>(CERES Community Environment Park, 6-8 & 7 Lee Street Brunswick East)</p> <p>Update the citations of both places to capture new information for both heritage places.</p> <p>Investigate permit exemptions for CERES Park and Joe's Market Garden</p> <p>Investigate an option to a prepare conservation plan</p>	MHNS HO559 Statement of Significance Incorporated document Map 15HO

Submission No.	Heritage Place	Recommendation	Change to Document
		(subject to funding and resources)	
30	31 The Avenue Coburg	Update citation to correctly describe the construction date of 31 The Avenue Coburg in the physical description. Reduce the curtilage of HO580 (31 The Avenue Coburg) to cover only the original Brutalist building.	MHNS HO580 Statement of Significance Incorporated document Map 11HO
32	5 Duke Street Brunswick East - within Duke Street Precinct	Remove HO593 – Duke Street Precinct from the Amendment New information provided during exhibition changes the heritage significance of this precinct.	N/A MHNS Schedule to Clause 43.01 Schedule to Clause 72.04 Map 15HO
34	3 Duke Street Brunswick East - within Duke Street Precinct	Remove HO593 – Duke Street Precinct from the Amendment New information provided during exhibition changes the heritage significance of this precinct.	Schedule to Clause 43.01 Schedule to Clause 72.04 Map 15HO
35	13 Duke Street Brunswick East - within Duke Street Precinct	Remove HO593 – Duke Street Precinct from the Amendment New information provided during exhibition changes the heritage significance of this precinct.	Schedule to Clause 43.01 Schedule to Clause 72.04 Map 15HO
36	7 & 9 Duke Street Brunswick East - within Duke Street Precinct	Remove HO593 – Duke Street Precinct from the Amendment New information provided during exhibition changes the heritage significance of this precinct.	Schedule to Clause 43.01 Schedule to Clause 72.04 Map 15HO
38	198 Edward Street Brunswick East	Update citation to correctly describe the places history, reflect the era of construction and why it is significant to Moreland.	MHNS HO552 Statement of Significance Incorporated document
39	Duke Street Precinct	Remove HO593 – Duke Street Precinct from the Amendment New information provided during exhibition changes	Schedule to Clause 43.01 Schedule to Clause 72.04 Map 15HO

Submission No.	Heritage Place	Recommendation	Change to Document
		the heritage significance of this precinct.	
40	50 & 52 Hanover Street Brunswick - within Hanover Street Precinct	Correct the error in the heritage gradings of the HO594 Hanover Street Precinct map in the Moreland Permit Exemptions Incorporated Plan	Heritage Exemptions Incorporated Plan

7.1. Other responses and changes

156 During the exhibition of the Amendment the following new information emerged relating to the attributes of two properties in the Hanover Street Precinct:

- 54 Hanover Street Brunswick is a new dwelling constructed in 2009 but is described as an original Victorian dwelling.
- 34 Hanover Street Brunswick has a planning permit approved to construct a new dwelling.

157 Both these properties were described in the Statement of Significance as having features that 'contribute' to the significance of the precinct.

158 Further analysis determined that the heritage value 'non-contributory' was more appropriate for 54 Hanover Street Brunswick as it did not have any heritage features that contribute to the heritage significance of that precinct. Non-contributory was also considered an appropriate heritage value to apply to 34 Hanover Street Brunswick following demolition of the property to facilitate the new permitted dwelling.

159 In response, the following changes to HO594 – Hanover Street Precinct seek to correct their heritage value, post exhibition changes that have been endorsed by Council at their meeting on 8 December 2021:

- Change the heritage value of 54 Hanover Street to non-contributory to the Hanover Street Precinct
- Modify the heritage value of the 34 Hanover Street to non-contributory following demolition of the property.

7.1. Site visit to 32 & 34 Hanover Street Brunswick & 491 Moreland Road Pascoe Vale South

160 Council undertook a site visit on 4 February 2022 and 12 February 2022 and confirmed that:

- The original dwelling at 32 Hanover Street Brunswick has been demolished (site vacant).
- The original dwelling at 34 Hanover Street Brunswick remains on the site.
- The original dwelling at 491 Moreland Road Pascoe Vale South has been demolished (site vacant).

161 This site visit confirms the non-contributory value of 32 Hanover Street Brunswick is relevant today.

162 With the demolition of 491 Moreland Road Pascoe Vale South, the heritage value of this property will be discussed in Council's Part B submission.

7.1. Amendment documents that incorporate post exhibition changes

163 Amendment documentation that has been changed to incorporate all the changes listed above and endorsed by Council are provided at **Appendix 6**. This includes changes to the following documents:

- Citations included in Vol 2 of the Moreland Heritage Nominations Study 2020
- Schedule to Clause 43.01 Heritage Overlay
- Schedule to Clause 72.04 Documents Incorporated in this Planning Scheme
- Statement of Significance Incorporated Documents
- Planning Scheme Maps 6HO 11HO & 15HO
- Moreland Heritage Exemptions Incorporated Plan precinct map

8. Conclusion

- 164 Council and its expert heritage consultants have undertaken a thorough and robust process to prepare the Moreland Heritage Nominations Study and Amendment C208more to the Moreland Planning Scheme.
- 165 Council's position to the Panel will rely on expert evidence provided by Extent Heritage Pty Ltd, as well as the Council Officer response to submissions included in the 8 December 2021 Council report.
- 166 Council's 'Part B' submission will be presented at the Panel Hearing on 1 March 2022.
- 167 This concludes Council's Part A submission.

9. List of Appendices & Reference Documents

List of Appendices	
Appendix No	Document Title
Appendix 1	List of Exhibited Properties
Appendix 2	Chronology of Events
Appendix 3	Moreland Heritage Gap Study 2019 – Vol 1 & 151A Lygon Street Brunswick East Citation
Appendix 4	Moreland Heritage Nominations Study 2020 – Vol 1 & Vol 2
Appendix 5	Council Report with Response to Submissions
Appendix 6	Revised Amendment Documents
Appendix 7	Planning & Building Permit and Applications affecting C208more properties

C208more Panel Document Folder – List of Reference Documents	
Document No.	Section 1 – Council Reports
1A	<p>Council Report DCF35/20 – Amendment C208more – Decision Gateway 1 - Adoption and Exhibition – 12 August 2020 (with 6 Attachments)</p> <ul style="list-style-type: none"> Attachment 1 – <u>See 3F</u> – Moreland Heritage Nominations Study Vol 1 – Recommendations Report 2019 Attachment 2 – <u>See 3G</u> – Moreland Heritage Nominations Study Vol 2 – Citation Appendices 2019 Attachment 3 – C207 – Interim HO – Draft Clause 4301 Heritage Overlay Schedule Attachment 4 – C207 – Interim HO Maps Attachment 5 – C208 – Permanent HO – Gateway 1 – Draft Clause 43.01 Heritage Overlay Schedule Attachment 6 – C208 - Permanent HO – Gateway 1 – New HO and Modify & Delete existing HO Maps
1B	Council Action Memo DCF35/20 – 12 August 2020
1C	<p>Council Report 7.6 Amendment C208more – Moreland Heritage Nominations Study – Decision Gateway 2 - Consideration of Submissions – 8 December 2021 (with 2 attachments)</p> <ul style="list-style-type: none"> Attachment 1 - Summary of submissions, Officers Responses & Recommendation Attachment 2 – <u>See 5D</u> - Moreland Thematic History 2020
1D	Council Action Memo 7.6 – 8 December 2021
	Section 2 - Authorisation
2A	Explanatory Report - Authorisation
2B	Instruction Sheet - Authorisation

2C	Strategic Assessment Guidelines
2D	Application Form – first submission
2E	Proposed Provisions submitted for Authorisation <ul style="list-style-type: none"> • Clause 22.06 Heritage (prior to PPF translation) • Schedule to Clause 43.01 Heritage Overlay • Schedule to Clause 72.04 Documents Incorporated in this Planning Scheme
2F	Planning Scheme Maps – Heritage Overlay Maps
2G	Letter from DELWP – Amendment requires further review
2H	Letter of Authorisation
	Section 3 - Exhibition
3A	Explanatory Report - Exhibition
3B	Instruction Sheet - Exhibition
3C	Notice of Preparation - Exhibition
3D	Exhibited Provisions <ul style="list-style-type: none"> • Clause 15.03-1L Heritage in Moreland • Schedule to Clause 43.01 Heritage Overlay • Schedule to Clause 72.04 Documents Incorporated in this Planning Scheme
3E	Exhibited Planning Scheme Maps
3F	Moreland Heritage Nominations Study Vol 1 - Recommendations Report, 2020
3G	Moreland Heritage Nominations Study Vol 2 – Citation Appendices 2020
3H	Heritage Exemptions Incorporated Plan 2020
3I	Statement of Significance for all new and modified Heritage Overlays (zip file)
	Section 4 - Submissions
4A	Submitter Register
	Submissions 1-43
	Section 5 – Supporting Documents
5A	Moreland Heritage Gap Study Vol 1 – Methodology Report
5B	Moreland Heritage Gap Study Vol 3 – Non-Residential Citations
5C	C208more Fact Sheet
5D	Moreland Thematic History 2020
5E	Moreland Heritage Nominations Study – recommended Schedule to Clause 43.01 prepared by Extent Heritage
5F	C174more Council Report – Adoption – 11 September 2019
5G	C207more approval letter from Minister of Planning