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1. INTRODUCTION

1.1 Purpose

I, David Helms, have prepared this statement of evidence for the City of Port Phillip in relation to Amendment C142 to the Port Phillip Planning Scheme. Amendment C142 proposes to implement recommendations of the HO6 St Kilda East Heritage Precinct Review 2018 (hereafter referred to as the HO6 Precinct Review).

1.2 Instructions

This statement of evidence was prepared in accordance with the following written instructions to prepare an expert report, which:

- Provides an overview of the methodology used in the preparation of the HO6 Precinct Review;
- Provides an explanation of the comparative analysis undertaken for proposed heritage places;
- Responds to issues raised by submissions as relevant to my expertise, placing the greatest emphasis on the Gresham Laundry site at 322-332 St Kilda Road, St Kilda; and
- Outlines any recommended changes to C142 in response to submissions.

1.3 Preparation of this report

This statement has been prepared by David Helms, heritage consultant, of David Helms Heritage Planning (11 Elm Place, Windsor, 3181).

I have prepared this report with no assistance from others. The views expressed in this statement are my own.

1.4 Relevant expertise

My specific area of expertise is in the assessment of the (post contact) cultural heritage significance of places and, in particular, the application of statutory planning controls and policy in planning schemes. I have particular experience in the drafting of local heritage policies suitable for inclusion in clauses 21 and 22 of planning schemes.

I have been retained by various councils to provide expert witness evidence on heritage matters at Independent Panel Hearings, most recently for Amendment C231 to the Yarra Planning Scheme.

Please refer to section 1.6 for further details.

I have a good understanding of the historic development and heritage of the City of Port Phillip through my role as Heritage Advisor since 2015. Apart from the HO6 Precinct Review I have also prepared the *Port Phillip Heritage Review Update*, which was completed in 2017. The tasks included in that review included reviewing and updating the gradings of around 200 heritage places in heritage precincts across Port Phillip, reviewing and updating the citations for over 50 heritage places, and assessing four new individual heritage places. The findings of that review will be implemented by forthcoming amendments to the Port Phillip Planning Scheme.

1.5 Reports relied on

In preparing this report, I have relied upon the HO6 Precinct Review, which I adopt as the strategic basis for Amendment C142.

I was the sole author of the HO6 Precinct Review. My roles in this project included:

- Undertaking fieldwork inspections and research;
- Comparative analysis and assessment applying the Hercon criteria for the above precincts and places;
- Preparation of new and revised citations and statements of significance;
- Preparation of the final report setting out methodology, findings and statutory recommendations arising from the study.

1.6 Qualifications and experience

B App Sci (Urban & Regional Planning), Grad Dip (Heritage Planning & Management) I am a strategic planner with over twenty years experience, and now specialise in cultural heritage planning and management. I have worked in a variety of local and state government and private organisations in Melbourne, Sydney and regional Victoria and I am now an independent heritage consultant.

As a strategic and statutory planner who has also undertaken numerous cultural heritage studies, I combine my knowledge of cultural significance with a clear understanding of how heritage studies may be most effectively translated into practical planning controls, policies and guidelines that are easy to understand and use.

From 2002-2012, I was a Senior Heritage Consultant at Context Pty Ltd. My projects with Context included numerous municipal heritage studies and reviews such as the Baw Baw Shire Heritage Study, Casey Heritage Study, Darebin Heritage Study, Manningham Heritage Study Review, Moreland Local Heritage Places Review, Moreland North of Bell Street Heritage Study, Murrindindi Shire Heritage Study, Mitchell Shire Heritage Review and the Yarriambiack Shire Heritage Study.

My other Context projects included heritage assessments and heritage impact analysis for the Regional Fast Rail project (Latrobe and Bendigo lines), the *Royal Exhibition Buildings & Carlton Gardens Conservation Management Plan* (in association with Lovell Chen), and the *Yan Yean Water Supply System Conservation Management Plan* and the *Regional Water Supply Heritage Study*, both for Melbourne Water and Heritage Victoria. I was also involved in the preparation of a number of thematic histories for local and State government agencies – the most recent being a thematic history of public housing in Victoria for the Office of Housing.

Upon completion of a study I am usually engaged by the Council to implement the study via a planning scheme amendment including preparation of documentation, consultation and preparation and appearance at independent panel hearings. This has been done for the City of Casey, Shire of Wellington, City of Darebin, Latrobe City, Shire of Baw Baw, Mitchell Shire, City of Moreland, City of Moonee Valley, City of Stonnington, and the City of Yarra.

I have appeared as expert witness (or Council advocate) at a number of Independent Panel hearings in relation to heritage amendments. Most recently, this has included appearances as expert witness for the City of Yarra for Amendment C231 to the Yarra Planning Scheme, for the City of Moreland for Amendment C174 (*Moreland Heritage Gaps Study*), and for the City of Melbourne for Amendment C258.

Others include Amendment C77 to the Banyule Planning Scheme, Amendments C86 & C90 to the Baw Baw Planning Scheme, Amendment C80 (Part 2) to the Casey Planning Scheme, Amendments C68 and C108 (Part A) to the Darebin Planning Scheme, Amendment C50 to the Greater Shepparton Planning Scheme, Amendments C17 and C34 (Part 2) to the Hobsons Bay Planning Scheme, Amendment C14 to the Latrobe Planning Scheme, Amendment C56 to the Mitchell Planning Scheme, Amendments C109, C124, C143 & C144 to the Moonee Valley Planning Scheme, Amendments C129 & C134 to the Moreland Planning Scheme, Amendments C117 and C163 to the Stonnington Planning Scheme, and Amendments C149, C173 & C183 to the Yarra Planning Scheme.

1.7 Summary of my opinions

1.7.1 HO6 Precinct Review Methodology

The heritage precincts and places in the HO6 Precinct Review and included in Amendment C142 have been reviewed, identified and assessed as part of a rigorous two-stage heritage assessment process, which included:

- Preliminary identification and analysis in Stage 1; and
- Detailed assessment and comparative analysis in Stage 2.

Please see section 2 of this statement of evidence for details. On this basis it is my opinion that, in accordance with the Planning Practice Note 1: *Applying the Heritage Overlay* (PPN1) and other relevant guidelines:

- The HO6 Precinct Review was undertaken with rigour and the citations contained in the study clearly establish the significance of each heritage precinct extension and individual place proposed for inclusion in the HO by Amendment C142;
- The revised HO6 and HO391 precinct boundaries have been carefully and appropriately defined and extended having regard to the significance of the precincts and the historic and physical evidence;
- The Significant, Contributory and Non-contributory heritage gradings have been reviewed and applied correctly having regard to the historic and physical evidence associated with the properties;
- The comparative analysis was appropriate to the level of significance of the place, and sufficient to provide a sound and justified basis for the assesment of significance; and
- The proposed application of the HO to precincts, and individual places is in accordance with PPN1.

1.7.2 Response to submissions

In response to the submissions that object or seek changes to Amendment C142, the following changes are recommended:

- To remove 23 Lambeth Place, St Kilda (in response to Submission 1, see Appendix A) and 11 Hotham Street, St Kilda East (Submission 13, see Appendix A) from the proposed HO6 precinct extensions.
- To make changes to the following citations:
 - Citation 2388 and 78 in accordance with the changes proposed by Submission 6, see Appendix A.

- Citation 2015 to change the place name to 'House' (Submission 8, see section 3.3.5).
- To change the HO6 precinct citation in response to Submission 9, as detailed in section 3.2.7.

1.8 Declaration

I have made all the inquiries that I believe are desirable and appropriate and no matters of significance that I regard as relevant have to my knowledge been withheld from the Panel.

David Helms

18 October 2019

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2. METHODOLOGY

2.1 Introduction

This chapter provides:

- An overview of the methodology used in the preparation of the HO6 Precinct Review;
- An explanation of the comparative analysis undertaken for proposed heritage places.

2.2 HO6 Precinct Review methodology

2.2.1 Purpose

The City of Port Philip commissioned the HO6 Precinct Review to:

- Ensure the citation and statement of significance in the *Port Phillip Heritage Review* (PPHR) adequately describes the significance of the precinct;
- Provide appropriate strategic justification for any changes to the HO6 boundaries;
 and
- Support the conservation and management of the precinct in the future.

The review of the HO6 precinct followed the reviews in 2008 of HO3 (a precinct that formerly covered most of South Melbourne, Albert Park and Middle Park) and in 2011 of HO1 (Port Melbourne). The outcomes of those reviews included new statements of significance and the identification of smaller, more consistent precincts or subprecincts. Consistent with these previous reviews the key tasks were to:

- Prepare a new citation and statement of significance for the HO6 precinct;
- Review and make recommendations in relation to the HO6 precinct boundaries;
- Review and (where required) update the heritage grading (Significant, Contributory, Non-contributory) of places within the HO6 precinct;
- Review and update the citations for individually significant places within the HO6 precinct; and
- Identify and assess new places of potential individual significance.

While the focus of the HO6 Precinct Review was the HO6 precinct, the investigation and analysis also identified the need for consequent changes to the HO391 Murchison Street/Alma Road precinct (the HO391 precinct).

2.2.2 Overview

The HO6 Precinct Review was prepared in accordance with the Australia ICOMOS Charter for Place of Cultural Significance, 2013 (the Burra Charter) and its practice notes using the Hercon criteria. All terminology is consistent with the Burra Charter.

The methodology and approach to this review and its recommendations was also guided by:

• PPN1. PPN1 instructs that places to be included in the Heritage Overlay (HO) can include (among other things) 'Places identified in a local heritage study, provided the significance of the place can be shown to justify the application of the overlay'. It goes on to explain:

The heritage process leading to the identification of the place needs to clearly justify the significance of the place as a basis for its inclusion in the Heritage Overlay. The documentation for each place shall include a statement of significance that clearly establishes the importance of the place and addresses the heritage criteria.

- 'Heritage issues; summaries from recent Panel reports' (June 2015), prepared by Planning Panels Victoria;
- Comments made by relevant Independent Panel reports and, in particular, the Advisory Committee report for the Review of Heritage Provisions in Planning Schemes (the Advisory Committee Report), which was completed in August 2007; and
- Guidelines for using the Hercon criteria and significance thresholds prepared by Heritage Victoria and the Queensland Heritage Council.

The HO6 Precinct Review was carried out in two stages. Stage 1, completed in June 2016, identified key issues that provided the basis for detailed investigation in Stage 2.

The key tasks associated with Stage 1 were:

- A review of relevant background documents including previous heritage studies to gain an understanding of how the HO6 precinct was first identified and assessed and how it has evolved over time.
- Fieldwork. During Stage 1 the entire HO6 and HO391 precincts, as well as all streets in the immediate vicinity (this included all streets in the block bounded by St Kilda Road, Wellington Street/Dandenong Road, Orrong Road and Alma Road, and between Alma Road and Argyle Street between St Kilda Road and Chapel Street) were inspected. The purpose of the Stage 1 fieldwork was to:
 - Gain a preliminary understanding of the visual and spatial characteristics of the HO6 and HO391 precincts (and nearby precincts such as HO389 that form comparisons);
 - o Identify a preliminary list of potential changes to precinct boundaries;
 - Identify heritage gradings (Significant, Contributory or Non-contributory) that may be incorrect;
 - Identify where changes have occurred to places with an individual PPHR citation; and
 - o Identify new places that may be of individual significance.

Follow up fieldwork was carried out in Stage 2, as required, following detailed research.

Stage 2 involved the detailed review and assessments of the precincts and the proposed extensions, review of existing individually significant places, and assessment of new individually significant places. The key tasks were:

- Fieldwork. To confirm or review potential changes to precinct boundaries identified during Stage 1, undertake further comparative visual analysis of places, and confirm details of integrity and intactness of buildings and areas;
- · Historic research;
- Assessment including comparative analysis and application of the Hercon criteria; and
- Statutory recommendations.

2.2.3 Comparative analysis

PPN1 advises:

The thresholds to be applied in the assessment of significance shall be 'State Significance' and 'Local Significance'. 'Local Significance' includes those places that are important to a particular community or locality.

. . .

To apply a threshold, some comparative analysis will be required to substantiate the significance of each place. The comparative analysis should draw on other similar places within the study area, including those that have previously been included in a heritage register or overlay.

Section 1.5 Approach and methodology of the HO6 Precinct Review describes the assessment including comparative analysis that was carried out. The comparative analysis in the HO6 Precinct Review also drew on the information gathered during the concurrent preparation of the *Port Phillip Heritage Review Update*.

For the purposes of this study, similar types of places already included within the HO in St Kilda were used as 'benchmarks' to provide a basis for comparison. Where sufficient comparative examples did not exist within St Kilda examples were sought from other parts of the City of Port Phillip (p.9 of the HO6 Precinct Review).

This approach recognises that due to the historic patterns of settlement of Port Phillip, places that are significant in one suburb may not be within another. For example, a defining characteristic of St Kilda and Elwood, when compared to other parts of Port Phillip, is how the popularity of apartment living, which began in the early twentieth century and continues to the present day, has influenced the built form character of the area. The result is a range of distinctive flat types including conversions of existing buildings (usually houses or mansions), and purpose-built flats from all eras that demonstrate the development and evolution of styles and planning.

To assist with the comparative analysis, places were assessed as parts of typological and thematic groups, including:

- Residential
- Commercial/retail
- Community (churches, schools etc.)

For new places of individual significance, the citation contains a comparative analysis that identifies comparable places and discusses how it compares in terms of its history, style, integrity and intactness. For some, this includes additional contextual information (see, for example, Citation 2387 for the concrete house at 226 Alma Road).

Properties within precincts that are not of individual significance were identified as Significant, Contributory or Non-contributory having regard to the definitions in the Port Phillip Planning Scheme Local Policy Clause 22.04-5 and the statement of significance for precinct, the date of construction and the intactness and integrity of the place based on assessment of fabric visible from the street (p.8 of the HO6 Precinct Review).

Significant heritage places include buildings and surrounds that are individually important places of either State, regional or local heritage significance and are places that together within an identified area, are part of the significance of a Heritage Overlay. These places are included in a Heritage Overlay either as an

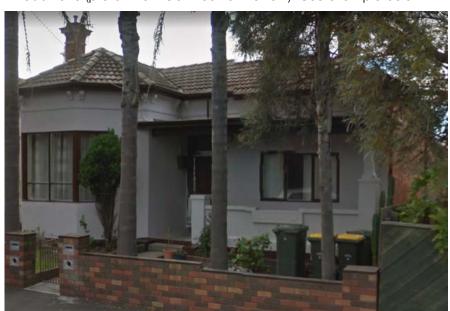
area or as an individually listed heritage place and are coloured "red" on the City of Port Phillip Heritage Policy Map in the Port Phillip Heritage Review, Volume 1-6.

Contributory heritage places include buildings and surrounds that are representative heritage places of local significance which contribute to the significance of the Heritage Overlay area. They may have been considerably altered but have the potential to be conserved. They are included in a Heritage Overlay and are coloured "green" on the City of Port Phillip Heritage Policy Map, in the Port Phillip Heritage Review, Volume 1-6.

Non-contributory properties¹ are buildings that are neither significant nor contributory. They are included in a Heritage Overlay and have no colour on the City of Port Phillip Heritage Policy Map in the Port Phillip Heritage Review, Volume 1-6. However any new development on these sites may impact on the significance of the Heritage Overlay, and should therefore consider the heritage characteristics of any adjoining heritage place and the streetscape as covered in this policy.

In accordance with the above definitions:

- Significant places include both places of local or State significance that have an
 individual citation in the PPHR, as well as places that are not of local significance
 but contribute to the significance of a precinct.
- The key difference between Significant and Contributory places is the latter 'may have been considerably altered, but have the potential to be conserved'. A review of a selection of 'Contributory' places shows that typically they have been stripped of much of their historic detail (e.g. chimneys removed, windows replaced and/or enlarged, verandahs removed or modified, cladding and roof materials replaced) and in some cases, only the overall form remains. Some also have unsympathetic additions (p.8 of the HO6 Precinct Review). See example below.



Alterations to this Contributory house at 4 Crimea Street include replacement of the verandah, rendering of the walls, replacement of original windows and changes to the proportions of the openings and modifications to chimneys (Note: this house has since been restored closer to the original Victorian appearance). (Source: Google streetview)

¹ Non-contributory properties are also known as 'Nil'

On the other hand, places may have some alterations and still be considered Significant, particularly where such changes are readily reversible (e.g. over-painting of brickwork), or where the alterations themselves are of heritage significance (e.g., a Victorian house converted to flats in the interwar period). This is particularly relevant in St Kilda East where the 'architectural layering' contributes to the historic and aesthetic significance of the precinct (p.8 of the HO6 Precinct Review). See example below.



The modifications to this Victorian era house (rendering of walls, new windows, modifications to chimneys, new front and side fences) at the corner of Charnwood Crescent and Charnwood Grove were carried out as part of a comprehensive architect-designed makeover in the 1920s that converted several buildings to flats. This forms part of an individually significant place within HO6 (Citation 867 & 869).

I discuss this issue further in relation to commercial and retail buildings in my response to Submission 9 (see section 3.2).

2.4 Summary of my opinions

The heritage precincts and places in the HO6 Precinct Review and included in Amendment C142 have been reviewed, identified and assessed as part of a rigorous two-stage heritage assessment process, which included:

- · Preliminary identification and analysis in Stage 1; and
- Detailed assessment and comparative analysis in Stage 2.

On this basis, it is my opinion that, in accordance with PPN1 and other relevant guidelines:

- The HO6 Precinct Review was undertaken with rigour and the citations contained in the study clearly establish the significance of each heritage precinct extension and individual place proposed for inclusion in the HO by Amendment C142;
- The revised HO6 and HO391 precinct boundaries have been carefully and appropriately defined and extended having regard to the significance of the precincts and the historic and physical evidence;

- The Significant, Contributory and Non-contributory heritage gradings have been reviewed and applied correctly having regard to the historic and physical evidence associated with the properties;
- The comparative analysis was appropriate to the level of significance of the place, and sufficient to provide a sound and justified basis for the assesment of significance; and
- The proposed application of the HO to precincts, and individual places is in accordance with PPN1.

3 RESPONSE TO SUBMISSIONS

3.1 Introduction

This chapter provides my responses to the three submitters (nos. 8, 9 & 10) who are appearing before Panel.

My response to other submissions is set out in Appendix A.

Approach

In accordance with my written instructions this statement of evidence responds to the heritage issues raised by the submissions. It does not comment on any non-heritage issues raised by the submissions such as impact on property values, development potential and cost of on-going maintenance and the like.

3.2 Submission 9: 322-332 St Kilda Road, St Kilda



The Gresham 322-332 St Kilda Road, St Kilda

3.2.1 Summary of submission

The submission opposes the proposed change from Non-contributory to Significant grading for this property for the following reasons:

- The land does not include buildings that are individually important places of either State, regional or local heritage significance.
- The proposed citation for HO6 and the HO6 Report does not provide a thorough analysis of the Land such that the Owners Corporation has any certainty regarding the extent of facade that would need to be retained and the specific 'internal fabric of interest'.
- The works undertaken along the facade and at the rear of the land have no heritage value.

- The HO6 Report does not provide details of the comparative analysis undertaken to other significant places within HO6.
- If the grading is upgraded to a 'Significant' grading, a Citation and Statement of Significance should be included to ensure that it is clear that only the facade incorporating the central panel of "The Gresham" sign should be retained. Any supporting Citation for the grading should make it clear that the extent of the facade that has been substantially modified and the rear office suites do not warrant inclusion as a 'Significant' grading.

3.2.2 Amendment C142

Part of 322-332 St Kilda Road, St Kilda is currently included in the HO6 precinct. It is graded Non-contributory.

Amendment C142 proposes to change the grading from Non-contributory to Significant, and to apply the HO to the whole of the property.

3.2.3 HO6 Precinct Review

322-332 St Kilda Road, also known as 'The Gresham', was one of the places identified during Stage 1 as having an incorrect grading, based on its architectural style, which suggested that it was constructed in the early twentieth century.

Research carried out for the HO6 precinct review indicated a build date of c.1920 for 'The Gresham'. That is, it was constructed between 1915 and 1925. This estimate was based on examination of Melbourne & Metropolitan Board of Works (MMBW) Plans and Sands & McDougall Directories.

The review of significance is summarised in Table 2 on p.59 of the HO6 Precinct Review:

Edwardian commercial complex. Altered, but retains original parapet with notable Art Nouveau detailing, and some internal fabric of interest. Altered and extended at the rear. Comparable integrity to Significant places within HO6.

The 'internal fabric of interest' is the arcade through the centre of the building, which retains some original bracketed timber trusses. An original or early hipped-roof lantern lights this from above. See image below.



Historic research during Stage 2 of the HO6 Precinct Review identified 'The Gresham' to be one of several buildings associated with the consolidation and development of St Kilda Road during the early twentieth century when it was St Kilda's premier commercial centre. On this basis, a Significant grading was considered appropriate.

In the revised HO6 precinct citation history, it is now mentioned specifically on p.13 in the context of the expansion of the centre in the early twentieth century:

In the High Street shopping centre new buildings included 'The Gresham' laundry opened c.1920 to the south of the Post Office, while next door the Queens Arms Hotel was rebuilt in 1923-24 to designs prepared by architects Sydney Smith & Ogg. The Post Office Hotel further to north was remodelled in 1931. The construction of several motor garages including the one designed by Oakley & Parkes and erected in 1925 for the Canada Cycle & Motor Co. at the south corner of Charnwood Crescent demonstrated the growth of car ownership.

The revised description for the HO6 precinct includes the following on p.32:

To the south of Pakington Street is 'The Gresham' at nos. 322-332, which retains an intact Edwardian style parapet divided into four bays with arched panels separated by engaged piers. The central panel with 'The Gresham' in relief framed by sinuous Art Nouveau floral decorations and flanked by hexagonal piers is of note.

Following this is a general comment about the integrity of shops within the precinct, which is also relevant:

The most common alterations to all shops have been the removal or replacement of original verandahs or awnings and shopfronts. While no original verandahs survive, several shopfronts do. In addition to the ones cited above the others include nos. 106 & 108.

3.2.4 Further research in response to submission

The MMBW Detail Plan No. 1371, dated 1897, shows that this property was occupied by two shops at nos. 322 & 324, and another pair at nos. 338 & 340 (see Figure 1), which were separated by vacant land. In 1910 W.J. Purves, a seedsman, occupied No.322.

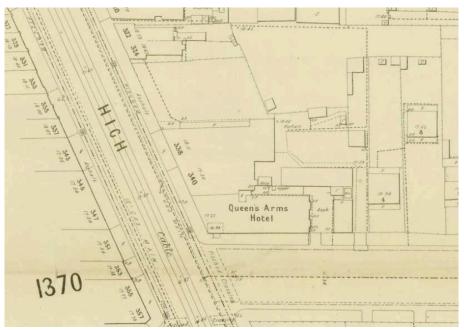


Figure 1. Section of MMBW Detail Plan No. 1371 showing the site in 1897

Title records show Purves had purchased the property containing the two shops in 1910 and an early plan of subdivision shows that the shops were weatherboard. The then vacant lot immediately to the south was sold to Marian Allen in 1914, while the well-known grocery firm, Moran & Cato, became the owner of the site containing the building shown as no.338 in the same year (Certificate of Title Vol. 2743, Fol. 485).

Council building records show the buildings at 322-332 St Kilda Road were built in stages:

- In April 1914 Building Permit no. 2248 was issued to Moran & Cato for a brick shop at 330 High Street (St Kilda Road).
- In October 1915 Building Permit no. 2746 was issued to W.J. Purves for the construction of two brick shops at 322 & 324 High Street.
- In August 1918 Building Permit No. 3681 was issued to Mr T.G. Allen for 'brick additions' at 326-328 High Street. T. Cockram was the builder.
- In September 1920, Building Permit no. 4303 was issued to J. Shimmin for a brick shop at 332 High Street.

These permits are reflected in the Sands & McDougall Directory:

- In 1915 Moran & Cato were listed in their new shop at no.330.
- In 1920 the shops at nos. 326-328 were occupied by F.J. Marks, Draper; however, by 1925 Marks had been replaced by the Gresham Laundry Pty Ltd.
- In 1925, W.J. Field 'sdlr' occupied the shop at 332 High Street.

The buildings are shown in a c.1965 image, held in the collection of the St Kilda Historical Society (see Figure 2). This shows the series of buildings constructed between 1914 and 1920. At that time the Gresham Laundry still occupied the shop at no.326 and both this shop and no.324 appeared to retain original shopfronts with ingos and tiled stallboards. There was a suspended awning over the entrance to the central arcade. The image also shows how nos. 330 and 332 had different parapets to those that exist today.



Figure 2: c.1965 image of High Street showing nos. 322 & 324 (black arrow), 326-328 (red arrow), 330 (white arrow), 332 (green arrow) (Source: St Kilda Historical Society Flickr website)

In 1984 and 1985 approval was given for the adaptive re-use of the building as a showroom and offices (Planning Permit no. D2576, 20 August 1984). This involved the renovation of the existing shop buildings and the construction of new buildings on the land behind. Building plans submitted at that time (prepared by Dykes, Interlandi and Associates) demonstrate how the building achieved its current appearance (See Figures 3, 4 & 5):

- One plan (Figure 3) shows the buildings retaining their original parapet profiles, however, a later plan (Figure 4) shows the parapet of no.332 being modified 'to match existing façade parapet'.
- The plans also show the original central arcade with the roof lantern and internal features and materials including the timber trusses, chamfered support posts and T & G lining boards that were retained and adapted (Figure 5).
- The plan shown in Figure 4 also includes a note that the 'bottle green' ceramic tiles were to 'match existing', suggesting they were based on the original shopfronts.

No plans have been found that show the modification of the parapets to nos. 330 and 332 to match nos. 322 and 324, but this was evidently done at the time that the building works were carried out.



Figure 3. Plans showing retention of original parapet profiles

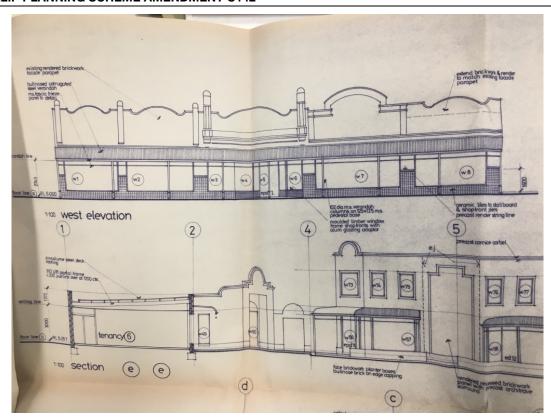


Figure 4. Plans showing modification to parapet of no.332

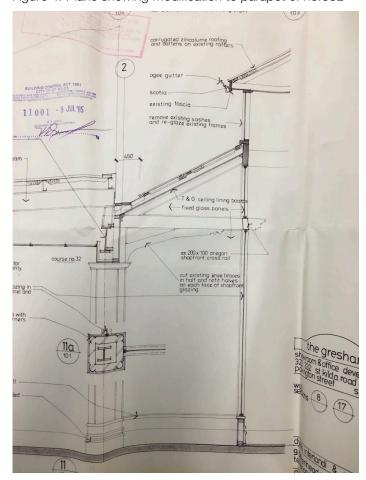


Figure 5: detail of internal alterations

3.2.5 Review of significance

On the basis of the further analysis this section provides a review of the significance of 322-332 St Kilda Road.

Comparative analysis

The most common alterations to historic shop buildings within heritage precincts are the removal or modification of original shopfronts and verandahs and awnings.

In Port Phillip double storey shops are usually graded Significant within precincts, even if the shopfront or awning/verandah is not original. A Contributory grading is applied when the upper façade has been modified.

Single storey shops within heritage precincts are graded either Significant or Contributory depending upon the level of integrity. A Significant grade is usually applied when they retain original shopfronts or awning/verandahs and/or when the form, detailing or materiality distinguishes them in some way (for example, an ornate or well-detailed parapet), and/or if they form part of a row.

Within the HO6 precinct in St Kilda Road the other single storey shops are at:

- No.118 single Victorian shop with original or early shopfront and intact parapet Significant.
- Nos. 122-124 pair of Edwardian shops with original shopfronts and intact parapet (concealed by advertising hoarding) – Significant. This features shaped parapets separated by piers surmounted by balls, like 'The Gresham'.

Other comparable examples of single storey shops graded Significant are found within Carlisle Street shopping strip, which forms part of the HO7 precinct:



184 Carlisle Street, St Kilda Significant within HO7 precinct

Typically, the shopfront is not original. This shop is distinguished by the form and detailing to the parapet. It is simpler and less ornate than the central section of the parapet to 'The Gresham'. Another example is 149 & 149a Carlisle Street (Carlisle Hall).



156, 156A & 156B Carlisle Street, St Kilda. Significant within HO7 precinct.

These retain original shopfronts in addition to an intact parapet. The parapet form here with arched or stepped panels separated by piers is like 'The Gresham', Other examples with intact shopfronts and parapets include 120-124 and 238 & 240 Carlisle Street.

(Note: There are exceptions or anomalies – for example, 177-179 Carlisle Street is currently graded 'Non-contributory' even though it has an almost identical parapet to no.184, and 162 & 162A Carlisle Street are graded Contributory even though they retain original shopfronts and an intact parapet. These are to be reviewed, as part of a forthcoming review of the HO7 precinct in 2020).

Discussion

The comparative analysis demonstrates that the buildings with non-original shopfronts and awnings can still justify a Significant grading when the form, detailing or materiality distinguishes them in some way (for example, an ornate or well-detailed parapet).

While the alterations to the southern section of the parapet have impacted upon the integrity of the building, in my opinion the Significant grading is still appropriate for the following reasons:

- The form and detailing of the original section of the parapet is comparable to the Significant examples cited above such as 156, 156A & 156B Carlisle Street.
 Compared to the other examples it is distinguished by the fine Art Nouveau detailing to the central parapet. No comparable examples of this type of decoration are known in Port Phillip.
- Also of note is the original central arcade, which externally is demonstrated by the hipped-roof lantern. This is a distinctive feature and the only known surviving example of an early arcade in Port Phillip.

3.2.6 Response to the submission

In relation to the specific issues raised by the submission, my opinions may be summarised as follows:

• The land does not include buildings that are individually important places of either State, regional or local heritage significance.

Response: I agree this building does not meet the threshold of individual significance at the local or State level. However, in my opinion the building contributes to the significance of the HO6 precinct and justifies a Significant grading for the reasons already discussed.

 The proposed citation for HO6 and the HO6 Report does not provide a thorough analysis of the land such that the Owners Corporation has any certainty regarding the extent of facade that would need to be retained and the specific 'internal fabric of interest'.

Response: On the basis of the further analysis I propose changes to both the history and description of the HO6 precinct to better explain the historic development of this site and describe the features that contribute to the significance of the precinct. See section 3.2.7. Also, no internal controls apply.

 The works undertaken along the facade and at the rear of the land have no heritage value.

Response: I agree that the verandah and the façade below, the reconstructed parapets to the south of the central arcade, and the additions and buildings constructed at the rear as part of the 1985 works are not significant. This is clarified in the revised description (see section 3.2.7).

• The HO6 Report does not provide details of the comparative analysis undertaken to other significant places within HO6.

Response: The HO6 Precinct Review does provide an explanation of the comparative analysis undertaken - please refer to section 2.2 of this statement of evidence.

 If the grading is upgraded to a 'Significant' grading, a Citation and Statement of Significance should be included to ensure that it is clear that only the facade incorporating the central panel of "The Gresham" sign should be retained. Any supporting Citation for the grading should make it clear that the extent of the facade that has been substantially modified and the rear office suites do not warrant inclusion as a 'Significant' grading.

Response: The preparation of a citation is not warranted, as this place is not of local significance. In my opinion the recommended changes to the HO6 precinct citation in section 3.2.7 will provide sufficient guidance in relation to the significant features of the place.

3.2.7 Recommendations

In response to the submission and having regard to the further analysis I recommend the following changes to the HO6 precinct citation:

1. On p.13 of the HO6 precinct history, make the following changes (*italics* = existing, <u>underlined</u> = new or amended text):

In the High Street shopping centre <u>new buildings were constructed on the remaining vacant sites</u> included 'The Gresham' laundry opened c.1920 <u>In the block</u> to the south of the Post Office, <u>for example</u>, the prominent grocery firm Moran & Cato erected a <u>new shop at no.330 in 1914</u>. The following year two new brick shops replaced old <u>timber shops at nos. 322 & 324</u>. Between these buildings was built 'The Gresham', which incorporated an arcade. The remaining vacant site immediately to the south of <u>Moran & Cato was built on by 1920</u> while next doer and the rebuilding of this block was completed when the Queens Arms Hotel was rebuilt in 1923-24 to designs prepared by architects Sydney Smith & Ogg. The Post Office Hotel further to north was remodelled in 1931. The construction of several motor garages including the one

designed by Oakley & Parkes and erected in 1925 for the Canada Cycle & Motor Co. at the south corner of Charnwood Crescent demonstrated the growth of car ownership.

2. On pages 14 & 15, add the following text:

The other significant change during the late 1960s and early 1970s was the rebuilding of St Kilda Junction and widening of High Street/St Kilda Road, which resulted in the destruction of all of the buildings along the west side between the Junction and Carlisle Street. This hastened the decline of High Street/St Kilda Road as a commercial centre. Many shops were closed or changed to other uses. For example, in 1985 the shops at 322-332 St Kilda Road were adaptively re-used as an office and showroom complex. The original parapets to nos. 322-328 and the arcade structure were retained, while the parapets to nos. 330 and 332 were modified to match and a 'heritage' style verandah was added. New buildings were constructed at the rear.

3. On p.32 of the HO6 precinct description make the following changes:

To the south north of Pakington Street is 'The Gresham' at nos. 322-332. As part of the 1985 renovation described in the history the which retains an intact original northern and central sections of the Edwardian style parapet divided into four bays with arched panels separated by pilasters engaged piers and the central arcade with its hipped roof lantern was retained. The central panel with 'The Gresham' in relief framed by sinuous Art Nouveau floral decorations and flanked by hexagonal piers is of note. Alterations and additions including the modified parapets to the south of the arcade, the verandah and the façade below, and the additions and new buildings at the rear of the site are not significant.

3.3 Submission 8: 42 Hotham Street, St Kilda East



42 Hotham Street, St Kilda East

3.3.1 Summary of submission

The submission does not accept the heritage significance of 42 Hotham Street for reasons that include the HO6 precinct review and the previous East St Kilda Heritage

Study (2004) 'fail to demonstrate in any meaningful or quantifiable way' that the property:

- has ever been considered or acknowledged as being of historic, architectural, social or cultural interest or value prior to the 2004 Heritage Alliance report, on which the current one is almost entirely based;
- is an historic building of cultural or social significance;
- is remarkable or substantially unique or distinctive in terms of its design or architecture;
- was designed by a leading architect or important building firm;
- was built for, or owned, by a prominent person in the public life of the municipality or state;
- is in a demonstrably and quantifiably 'pristine' or 'authentic' state, without significant alterations to its character, features, or outlook both externally and internally;
- is associated with any significant, meaningful or important events in the history or culture of the City of Port Phillip area necessitating preservation;
- would be recognised as important or significant in any way by the wider community, or lay-persons, in the City of Port Phillip.

The submission also objects to the use of 'Summers House' (which refers to the original owner/builder) as the place name for the property.

3.3.2 Amendment C142

42 Hotham Street, St Kilda East is currently included in the HO as an individual place (HO397). It is graded Significant.

Amendment C142 proposes to delete the individual HO397 and include the property within the extension to the HO391 precinct as a Significant place.

3.3.3 HO6 Precinct Review

The East St Kilda Heritage Study (Heritage Alliance, 2004) assessed 42 Hotham Street to be of local heritage significance and it was subsequently included in the heritage overlay as an individual place (HO397).

The HO6 precinct review found there have been no substantive changes to 42 Hotham Street and the assessment of local significance made by the 2004 study is still relevant.

The HO6 precinct review has updated the existing Citation 2015 to the present format. The information contained in the history, description, comparative analysis and statement of significance remains the same. The key changes are:

- Under 'What is significant?', the description of the place has been added to clearly identify the significant and non-significant features of the building in accordance with PPN1.
- Under 'Why is significant?' identify the relevant Hercon criteria in accordance with PPN1.
- Addition of the 'Thematic context' and 'Assessment' sections.
- Inclusion of recommendation to retain the place in the HO as a Significant place, but to transfer to the HO391 precinct, consistent with PPN1 (see 'How are

individual trees or properties of significance located within significant areas treated?' on p.5).

3.3.4 Response to the submission

The changes proposed by Amendment C142 do not change the heritage controls and policy that currently apply to this site and have done since it was first included in the HO.

I understand that Council's Planning Committee has resolved to change the name of the place in Citation 2015 to 'House'. I have no objection to this change.

3.3.5 Recommendations

In Citation 2015 change the place name to 'House'. No other change to Amendment C142 in response to this submission.

3.4 Submission 10: 44 Hotham Street, St Kilda East



44 Hotham Street, St Kilda East

3.4.1 Summary of submission

The submission opposes the inclusion of 44 Hotham Street in the HO for the following reasons:

- The limitations placed on the property by a heritage listing will lower the land value and make it harder to sell.
- A heritage listing will prevent building units on the land
- Fixing up the house would be more expensive than to build from scratch.

3.4.2 Amendment C142

44 Hotham Street, St Kilda East is not currently included in the HO.

Amendment C142 proposes to include the property within the extension to the HO391 precinct as a Significant place.

3.4.3 HO6 Precinct Review

The East St Kilda Heritage Study 2004 found the HO391 precinct to be representative of a typical pattern of settlement in St Kilda where large Victorian properties were sold off and subdivided during the interwar period. Consequently, it has a very consistent inter-war character, comprising mostly detached bungalows, with a smaller number of flats and Edwardian houses.

The HO391 precinct effectively forms a sub-precinct of the HO6 precinct, as it has a shared history. However, in contrast to the diverse character of much of HO6, HO391 has a very cohesive and consistent interwar character.

The section of HO6 south of Alma Road between Hotham Street and Alexandra Street has a very similar history and built form character to HO391. It comprises mostly detached interwar houses in Alexandra Street, Hotham Street and Wavenhoe Avenue that were built on subdivisions created within the grounds of two mansions 'Yanakie', later 'Wavenhoe' (161 Alma Road) and 'Holmwood', later 'Fairholm' (61 Alexandra Street), both of which survive today.

The HO6 precinct review therefore recommends the transfer of this section of the HO6 precinct to the HO391 precinct. In addition, the following interwar houses are also recommended for inclusion in HO391:

- 38, 40 & 44 Hotham Street; and
- 2 & 4 Mooltan Avenue (duplex at corner of Hotham Street only).

The above houses were all built on the same subdivision that created Wavenhoe and Mooltan avenues, are comparable to the housing within HO6 and HO391, and they fill in the missing gaps in an intact streetscape of interwar houses and flats along the east side of Hotham Street between Alma Road and Mooltan Street. All the houses are Significant.

In addition, the following three places that historically form part of the precinct, but are currently included within individual HOs, are recommended for transfer into HO391 as the HO schedule controls are the same and there no statutory reason for applying an individual HO:

- House, 42 Hotham Street (HO397).
- 'Tecoma', 18 Lansdowne Road (HO179); and
- Flats, 26A Lansdowne Road (HO180).

3.4.4 Response to the submission

44 Hotham Street is an interwar bungalow constructed of brick with a transverse gable roof that extends to form a porch at one side of a projecting gable. There is also a gablet in the roof. The house has good integrity and intactness that justifies a Significant grading and inclusion in the HO as part of the HO391 precinct extension.

3.4.5 Recommendations

No change to Amendment C142 in response to this submission.

APPENDIX A - RESPONSE TO OTHER SUBMISSIONS

This section provides my responses to the other submissions, where the submitter is not appearing at the Panel Hearing.

No.	Property address	Proposed Amendment C142 changes	Summary of key issues	Response to submission
1.	23 Lambeth Place, St Kilda	Proposed inclusion in the HO6 precinct extension in Lambeth Place as a Significant place.	23 Lambeth Place has been demolished and should not be included as a 'significant' property in the Heritage Overlay.	The house formerly at 23 Lambeth Place was a single storey interwar bungalow and graded Significant (it is shown at extreme right in the above photo). It has been demolished and replaced with two townhouses. As it has been demolished this property now has no heritage value. As it is at the edge of the precinct (and is unlikely to be redeveloped) it can be excluded from the proposed HO6 precinct extension. Recommendation: Remove 23 Lambeth Place from Amendment C142 (Do not include in proposed HO6 precinct extension)

No.	Property address	Proposed Amendment C142 changes	Summary of key issues	Response to submission
2.	9 Johnston Street, St Kilda East	Proposed inclusion in the HO6 precinct extension in Johnston Street as a Noncontributory property.	The submission objects to the inclusion of 9 Johnston Street in the HO, as future changes to the building would be subject to approval and may have an effect on property value.	The HO6 precinct extension in Johnson Street contains houses predominantly from the Victorian, Federation and interwar periods, with a small number of post-war houses. It clearly demonstrates the historic development of this area and the integrity and visual cohesion is comparable to the broader HO6 precinct. On this basis, it justifies inclusion in the HO. Please refer to p.19 of the HO6 Precinct Review for further information. Non-contributory places are excluded from HO precincts wherever possible. However, when they are situated among Significant or Contributory places within a streetscape they must be included in order to manage future development. The application of the HO will not prevent redevelopment of the site and inclusion in the HO will ensure that new development respects and responds to the heritage characteristics of adjoining heritage places

No.	Property address	Proposed Amendment C142 changes	Summary of key issues	Response to submission
				and the streetscape to protect the heritage significance of the area.
				Recommendation:
				No change to Amendment C142.
3.	35 Crimea Street, St Kilda	Proposed inclusion in the HO6 precinct extension in Crimea Street as a Significant place.	35 Crimea Street should be re-graded to Non-contributory, as there is 'nothing of any heritage value to be preserved'.	The Heritage Review. Wellington, Crimea and Redan streets, St Kilda (Lovell Chen, 2015) recommended the review of the section of Crimea Street generally south of Charnwood Road that is currently not in HO6. This area was further investigated in the HO6 Review and it was found to contain a collection of late Victorian, Federation and interwar houses and flats. Although there are some Non-contributory properties, including 1960s flats, the currently excluded section has comparable integrity and visual cohesion to the broader precinct and justifies inclusion in the HO. Please refer to p.18 of the HO6 Precinct Review for more information.
				35 Crimea Street is a Victorian era house, which

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No.	Property address	Proposed Amendment C142 changes	Summary of key issues	Response to submission
				appears to have been altered in the Federation/Edwardian period (c.1900s) when the half-timbering to the gable end was added. The only other changes to the visible sections of the house are overpainting of the brickwork, and alterations to the verandah. Otherwise the form and detailing are largely intact. The proposed Significant grading is therefore appropriate. Recommendation: No change to Amendment C142.
4.	21 Lambeth Place, St Kilda	Proposed inclusion in the HO6 precinct extension in Lambeth Place as a Contributory place.	The submission claims there is 'nothing heritage about the property', as the windows are aluminium and house needs to be re-stumped. Also notes the house at 23 Lambeth Place has been demolished.	HO6 currently applies to Lambeth Place except for nos. 19-23. Lambeth Street was partially formed in the nineteenth century and one house (no.2) dates from the 1850s. However, most development occurred during the Edwardian and interwar periods when the street was extended southward to Argyle Street. The street contains a mix of Edwardian and interwar houses and interwar flats.

No.	Property address	Proposed Amendment C142 changes	Summary of key issues	Response to submission
				21 Lambeth Place is an altered Edwardian house. Although the windows have been replaced, and other changes made the house retains the typical asymmetrical plan, gable-fronted form, a tiled roof and one chimney consistent with other houses in the street, and therefore contributes to the historic streetscape character.
				Given the alterations that have been made, a Contributory grading is appropriate for this house.
				Refer to Submission 1 for my response to 23 Lambeth Place.
				Recommendation:
				No change to Amendment C142 in relation to 21 Lambeth Place.

No.	Property address	Proposed Amendment C142 changes	Summary of key issues	Response to submission
5.	31 Crimea Street, St Kilda	Proposed inclusion in the HO6 precinct extension in Crimea Street as a Significant place.	 The submission opposes the proposed extension of HO6 as: There are significantly devalued buildings that are out of character that were built in the 1950s and 1960s. These have undermined the value of the street The northern end of Crimea Street is already protected with a HO. It may impact future plans to renovate the house. The overlay will be too restrictive of future plans. Most of the houses in the immediate vicinity, which are included in the overlay, have already been significantly altered since they were originally constructed, and have lost some of their original heritage value as a consequence. 	The Heritage Review. Wellington, Crimea and Redan streets, St Kilda (Lovell Chen, 2015) recommends the review of the section of Crimea Street generally south of Charnwood Road that is currently not in HO6. This area was further investigated in the HO6 precinct review and it was found to contain a collection of late Victorian, Federation and interwar houses and flats. Although there are some Non-contributory properties, including 1960s flats, the currently excluded section has comparable integrity and visual cohesion to the broader precinct and justifies inclusion in the HO. Please refer to p.18 of the HO6 Precinct Review for more information. 31 Crimea Street is a Victorian era Italianate villa. Although there have been some changes (the removal of the verandah and rendering of the walls being the most significant), otherwise the form and detailing are largely intact and overall the integrity is comparable to other Significant buildings within the HO6 precinct. The

No.	Property address	Proposed Amendment C142 changes	Summary of key issues	Response to submission
				proposed Significant grading is therefore appropriate. Recommendation No change to Amendment C142
6.	St Michael's Grammar School, 4 & 25 Chapel Street, St Kilda	Existing HO6 (part 4 and part 25-27 Chapel St), HO82 (part 4 Chapel St) and HO86 (part 25-27 Chapel St) No changes to the existing HO controls or gradings, but updates to the existing Port Phillip Heritage Review citations that apply to HO82 (Citation 78) and HO86 (Citation 81), and the introduction of a new individual citation (Citation 2388) for St Michael's Grammar School (the portion included within HO6).	The submission proposes changes to Citations 2388 and 78, as follows: Citation 2388 To note that the former Kindergarten/Bishops Hall has been altered on the west side To detail the changes to the 1925 school building and describe it as 'contributory' rather than 'significant'. Citation 78 To describe the hall as being of secondary significance and make other changes to the description.	Most of St Michael's Grammar School is included within the HO, either as part of the HO6 precinct or within the site-specific HOs that apply to the VHR places (Rondesboch Mansion and the former St George's Church). Amendment C142 does not change the extent of the HO, but proposes to introduce a new citation for St Michael's Grammar School (Citation 2388) and update the existing citations that apply to Rondebosch (Citation 81) and former St George's Church complex (Citation 78). The changes proposed by the submission to Citations 2388 and 78 are relatively minor and I agree better describe the contribution of the buildings to the heritage significance of St Michael's. Recommendation: Change Citations 2388 and 78 in accordance with the tracked changes versions provided by the submission.
7.	Various including 21 Redan Street	Various	Strongly supports the Amendment	Noted. Recommendation:
8.	42 Hotham Street, St Kilda East	Please refer to section 3.3 of this statement of evidence.	Please refer to Section 3.3 of this statement of evidence.	Please refer to Section 3.3 of this statement of evidence.
9.	322-332 St Kilda Road, St Kilda	Please refer to section 3.2 of this statement of evidence.	Please refer to Section 3.2 of this statement of evidence.	Please refer to Section 3.2 of this statement of evidence.

No.	Property address	Proposed Amendment C142 changes	Summary of key issues	Response to submission
10.	44 Hotham Street, St Kilda East	Please refer to section 3.4 of this statement of evidence.	Please refer to Section 3.4 of this statement of evidence.	Please refer to Section 3.4 of this statement of evidence.
11.	9 Shirley Grove, St Kilda East	Proposed inclusion in the HO6 precinct extension in Crimea Street as a Significant place.	The submission opposes the proposed inclusion of 9 Shirley Grove in HO6 for the following reasons: Poor condition of house, due to lack of maintenance. Changes to the original fabric including replacement of French doors with a single door, replacement of some windows with aluminium, removal of canopy over door and partial removal of window hood.	Shirley Grove was formed in the nineteenth century along the carriage drive of the eponymous mansion (this was replaced in the 1950s/60s by the 'Shirley Court' flats at no.20) and by 1900 contained several houses. Development re-commenced in the Federation/Edwardian period and the street was almost fully developed by the early interwar period. The diverse streetscape of Shirley Grove is characteristic of the broader HO6 precinct, and similarly demonstrates the distinct phases of development over time. Consistent with houses elsewhere, the interwar alterations to the Victorian houses contribute to the architectural diversity and layering that is a distinctive part of St Kilda precincts such as HO5, HO6 and HO7.

No.	Property address	Proposed Amendment C142 changes	Summary of key issues	Response to submission
				In addition, Shirley Grove is historically significant in the context of the HO6 precinct as the most remote of the nineteenth century subdivisions and demonstrates how far development progressed during the land boom.
				The whole of Shirley Grove is therefore recommended for inclusion in the HO6 precinct on this basis with the exception of the two individually listed HO places ('Shirley Court' at no.20 and 'Pine Nook' at no.22). Places are Significant, except for 2, 5 & 8, which are Non-contributory.
				9 Shirley Grove was built c.1910-15, and is one of several early 1900s houses built on vacant land between the original houses that were built during the late nineteenth century. It is a timber house and while there have been some alterations, the house retains the asymmetrical form that is typical of Edwardian houses and much of the original materials and detailing including a hipped tile roof with half-timbered and bracketted gable end, a corner entry porch with a ladder timber frieze and feature diamond window, timber casement windows, and brick and render chimney.
				No.9 is comparable to other Significant houses in Shirley Grove and the broader HO6 precinct and justifies inclusion in the proposed HO6 extension as a Significant place.
				Recommendation: No change to Amendment C142.

No.	Property address	Proposed Amendment C142 changes	Summary of key issues	Response to submission
12.	5/226 Alma Road, St Kilda East	Proposed inclusion within an individual HO as a Significant place with an new individual Citation 2387.	The submission objects to the proposed inclusion of 5/226 Alma Road in the HO as the 'Significant' grading of the property would mean significant limitations on the options of renovating and expanding the family home, and would also mean a loss in property value.	The concrete house at 5/226 Alma Road, St Kilda East is of local historic, architectural and aesthetic significance to the City of Port Phillip for the reasons set out in Citation 2387. The Significant grading and inclusion in the HO as an individual place are therefore appropriate. Recommendation: No change to Amendment C142.

No.	Property address	Proposed Amendment C142 changes	Summary of key issues	Response to submission
13.	11 Hotham Street, St Kilda East	Proposed inclusion in the HO6 precinct extension in Johnston Street &	The submission opposes the proposed inclusion of 11 Hotham Street in the HO for the following reasons:	
		Hotham Street as a Non-contributory place.	The property is a Nil-grade place comprising of a 1950s house	
			 The balance of Hotham St to the north did comprise Edwardian and interwar houses and through what we submit is an outcome consistent with Council's planning Scheme, a redevelopment has occurred hence the properties are not recommended for listing. The report did not provide context for the property immediately adjacent to the property to the south which is 1950s walkup set of flats; or provide any evidentiary basis that the villa at 24 Johnson St is legible in any way from Hotham St providing a basis for the inclusion of 11 Hotham St as a 'Nil' graded property within the HO. The era of the development of the property and those adjacent is firmly 1960s and holds no historic value. It is unlikely that the style of housing or its presentation to the street is in anyway representative of the type of properties incorporated in to the HO of the planning scheme. 	The house at 11 Hotham Street was built on what was once part of the front garden of the c.1870s house now at 24 Johnson Street. This HO6 precinct review proposes the inclusion of this house, and no.9 on the corner of Johnson Street, within the HO6 precinct as Non-contributory properties in order to manage future development that could impact of the setting of and views to 24 Johnson Street, and the Johnson Street streetscape. In response to this submission further analysis was carried out in relation to the potential impacts of a development at 11 Hotham Street upon 24 Johnson St and the broader Johnson Street HO6 precinct extension. My conclusion is while the redevelopment of 9 Hotham Street could have direct impacts upon 24 Johnson Street and Johnson Street, the potential impacts of the redevelopment of no.11 are much less. Also, it is on the edge of the proposed HO6 precinct

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No.	Property address	Proposed Amendment C142 changes	Summary of key issues	Response to submission
				extension. Because of this, I agree that 11 Hotham Street may be excluded from the proposed HO6 precinct extension.
				Recommendation:
				Remove 11 Hotham Street, St Kilda East from Amendment C142.