

18 October 2018

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City Strategy
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Re: Heritage Strategy and Action Plan 2018-2029

Dear Ms Blacket,

Thank you for providing an opportunity to provide comment on the City of Stonnington Heritage Strategy and Action Plan 2018-2029 draft document.

The National Trust of Australia (Victoria) [National Trust] is the state's largest community-based heritage advocacy organisation actively working towards conserving and protecting our heritage for future generations to enjoy, representing 28,000 members across Victoria. The National Trust maintains a Heritage Register of Significant Places, including buildings, landscapes, gardens and trees. Within the City of Stonnington there are currently 118 built heritage places, 19 trees and 6 gardens included on the Register.

As Victoria's premier heritage and conservation organisation, the National Trust has an interest in ensuring that the wide range of natural, cultural, social and Indigenous heritage values of the municipality are protected and respected, contributing to strong, vibrant and prosperous communities.

We commend the City of Stonnington for progressing this important strategy, with a view to ensuring the continued protection, enhancement and enjoyment of the municipality's heritage. We note the purpose of the Heritage Strategy and Action Plan is to guide council in the identification and management of heritage places into the future; the review and development of new strategies for protecting heritage; and the celebration of local heritage with the community and other stakeholders.

We congratulate council on its achievements since the 2006 Heritage Review Strategy, including more than 2,000 heritage places added to the Heritage Overlay, an update of Clause 22.04 Heritage Policy, the development of the Stonnington Heritage Design Guidelines (July 2017), and the expansion of Council-funded heritage advisory service.

While we strongly support the Draft Heritage Strategy and Action Plan, this submission provides some comments for consideration as the document is finalised. We welcome further discussion and consultation with council regarding our points outlined within this submission.

1. Grading Conversion

Point 1.1.2 included in *Table 6: Heritage Strategy Action Plan* [‘the Action Plan’], proposes the development of a model for translating the gradings of heritage places to conform with the *Practice Note 1: Applying the Heritage Overlay*. The National Trust strongly supports this action, and encourages council to follow the preferred ‘significant’, ‘contributory’ and ‘non-contributory’ gradings system. We further suggest including a more prescriptive timeline/deadline for when this translation will be undertaken, as a matter of priority, and before any further places are proposed for inclusion within the Heritage Overlay.

2. Post-War Architecture

Point 1.2 included in the Action Plan proposes to prioritise future protection for places that fall within heritage themes that are currently underrepresented, including in particular the theme ‘creating a modern city’. The National Trust strongly supports this action, in line with the strategic work our organisation is currently undertaking as part of our ‘Suburban Modern Campaign’ (link: <https://www.nationaltrust.org.au/campaigns-vic/suburban-modern-campaign/>).

For many people, ‘heritage’ evokes grand and ornate architecture of the ‘Marvellous Melbourne’ period, which is well represented in the City of Stonnington. Despite the historic importance of the post-war period in Melbourne, a period of transformation on a scale not seen since the gold rush, much of our post-war heritage remains vulnerable and without statutory protection. With accumulative densification transforming our suburbs, it is becoming increasingly important to document, celebrate, and protect significant post-war heritage, including houses, churches, factories, service stations, hospitals, etc.

We are pleased that council has identified this theme in particular as a gap priority in progressing heritage protection into the future. We encourage council to monitor developmental impacts relating to significant places that fall within this theme but are yet to receive statutory protection, and to undertake community education regarding the significance of this heritage theme.

3. Online Access to Heritage Studies

Point 2.1.1 included in the Action Plan proposes that all heritage studies will be available online through Heritage Victoria and the City of Stonnington. The National Trust strongly supports this action, and acknowledges that free and easy access to heritage studies is beneficial to local residents, developers and heritage consultants to ensure a clear understanding of the heritage overlay and orderly planning. We suggest including a more prescriptive timeline for when this process will be undertaken.

4. Aboriginal Cultural Heritage

We note that Table 2 includes the key historical themes that have shaped the City of Stonnington, as described in the *Stonnington Thematic Environmental History 2009*. While we

acknowledge and support the inclusion and reference to *Theme 1 Creation: Aboriginal Landscapes*, and the specific places that represent this theme including the Yarra River and its banks, we do express some concern that post-contact Aboriginal cultural heritage and historic values, including contemporary connection to Country and connection to place, are not thematically referenced or outlined in the Heritage Strategy or Action Plan. We question whether this is a limitation of the *Stonnington Thematic Environmental History 2009*, or whether further thematic reference from this study could be included in the Heritage Strategy and Action Plan.

We reference in particular places of cultural heritage significance that have significance to both historic and contemporary Aboriginal communities, from the post-contact period until the present day. As an example, we reference a place in the City of Yarra, a Morten Bay Fig tree in the Carlton Gardens, which was a significant meeting and gathering place for Aboriginal communities before and during the Second World War. We encourage council to undertake further strategic work in consultation with Traditional Owner Groups to identify places of similar historic and contemporary Aboriginal cultural heritage significance within the City of Stonnington from the post-contact period, and to ensure they are identified, protected and celebrated alongside places of non-Aboriginal cultural heritage significance.

Further, we note that no Traditional Owner Groups are referenced under point 4 Partnerships. While there is currently no Registered Aboriginal Party for the City of Stonnington, we acknowledge that the Boon Wurrung Foundation, the Wurundjeri Land Council and the Bunurong Land Council are all relevant groups for this area of Melbourne, and should be identified as key stakeholders.

We note a recent review of the *Southern Grampians Shire Heritage Strategy* outlined a commitment to ongoing engagement with Gunditj Mirring Registered Aboriginal Party and other relevant Traditional Owners in early planning for Council led projects; in raising community awareness about Aboriginal Cultural heritage and history; and in facilitating cultural heritage activities for the Southern Grampians Shire Reconciliation Festival, National Heritage Week and NAIDOC Week. We suggest that similar actions/targets could be developed and incorporated into the City of Stonnington Heritage Strategy and Action Plan. We also point towards the City of Melbourne's ambitious Aboriginal Heritage Action Plan and Reconciliation Action Plan as key examples of best practice in the identification, protection and celebration of Aboriginal cultural heritage at the local level and for local communities.

5. Social Significance

We query whether places of social and cultural significance are effectively addressed in the key heritage themes. This typology can include pubs, hotels, theatres and other places of community meeting and congregation. In our role as community advocates for significant heritage places, we note the importance of 'social significance', which in many cases, particularly through the re-development/VCAT process, is generally cast as being of 'lesser' or 'secondary' importance than architectural or aesthetic significance. This consideration should be cast against our evolving understanding of tangible versus intangible cultural heritage, and how this relates to built fabric. Members of the community do not necessarily have

an understanding of 'architectural' or 'aesthetic' purity or intactness, but care more about the history, character and identity of where they live, the places that are important to them, and how to preserve this. As such, we believe the identification, protection and celebration of places of social and cultural heritage significance, including intangible values and places that have a lower level of architectural purity and intactness, should be referenced and included in the Heritage Strategy and Action Plan. For example, a gap heritage study based on this theme would be a beneficial action to ensure that no places of significance to the community come under threat.

6. Significant Tree Register

While we support the Council implementing statutory protection for trees based on the National Trust Register of Significant Trees, we submit that our register is not representative nor a thorough assessment of significant trees across the Stonnington municipality. We strongly recommend that council investigate the implementation of statutory protection of trees in both the public and private realms via a local Significant Tree Register in the planning scheme. We note that the council has already successfully implemented a permit system through the City of Stonnington Local Law, which requires a permit for the pruning or removal of all trees that reach a particular threshold. While this is to be commended, we note that not all significant trees meet the threshold for size articulated by the current local law, and that this may lead to tree losses, particularly in the private realm.

We recommend that the council undertake an arborist review of the entire municipality to identify all trees of potential significance on public and private land. Such a study has recently been undertaken by the City of Moonee Valley, with resulting tree controls currently going through the Amendment process (City of Moonee Valley Planning Scheme Amendment C179). Community nomination and engagement should also be prioritised as a means of identifying trees to be assessed for a tree register. This is important in gaining public support for the register, and in raising awareness of the benefits of significant trees in the community and more broadly. Both these approaches are outlined in the VPP Practice Note *Vegetation Protection in Urban Areas*. We also note that consultation should also be undertaken with Traditional Owner groups and Aboriginal Victoria to identify trees with potential Aboriginal cultural heritage significance.

As part of any statutory Significant Tree Register, the National Trust encourages the Council to consider making use of Tree Bonds on development sites and reviewing fines for illegal removal of trees. This is particularly important given that such fines are often accounted into development budgets, often leading to significant vegetation loss.

The National Trust would welcome opportunities to provide comment and feedback on any proposed Significant Tree Register for the City of Stonnington. We would be pleased to offer use of the National Trust's own nationally approved criteria for identifying significance.

7. Australian Heritage Festival

Point 5.3.1 in the Action Plan proposes to work with key stakeholders to promote heritage in the municipality through key events such as the National Trust Australian Heritage Festival. We are pleased to see reference to the Australia Heritage Festival in the Action Plan, and would like to take this opportunity to invite the Shire to contact our Australian Heritage Festival coordinator, Freya Keam, to discuss how the Shire can become more involved with the program, including as part of our 'Friend of the Festival' program. Freya can be contacted on (03) 9656 9818 or at freya.keam@nattrust.com.au.

8. Municipal Heritage Strategies: A guide for Councils

As recommended in the *Municipal Heritage Strategies: A guide for Councils*, we suggest a column for 'Resourcing' and 'Progress/Outcomes' be added to *Table 6: Heritage Strategy Action Plan*, and 'Timeframe' be amended to 'Target Date for Completion'. Consideration should be given to where resources will come from to fund the important work of the Action Plan. Providing an indication of how actions will be funded will assist in the ongoing implementation of these actions. It is noted that the Heritage Strategy is a document to be used by Council staff, Councillors and the community, therefore the addition of the heading 'Progress/Outcome' will provide different stakeholders a brief understanding of any progress to date and desired outcomes.

Further, as per the *Municipal Heritage Strategies* document, we submit that the Heritage strategy and associated Action plan should be reviewed every 4 years. We strongly recommend that council continue with transparent, ongoing and meaningful consultation with stakeholders and the community with regard to the actions documented in the plan.

9. Conclusion

Overall we support the adoption of the City of Stonnington Heritage Strategy and Action Plan, noting some suggested amendments put forward in our submission. We welcome future opportunities to provide comment and feedback on the various actions outlined in this draft Heritage Strategy and Action Plan.

For any enquiries regarding this submission, please get in touch with this office on 9656 9837 or with me directly at caitlin.mitropoulos@nattrust.com.au.

Kind Regards,



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