

## Urban form and design outcomes of heritage planning policies in inner Melbourne

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**Abstract:** This paper addresses the theme of 'City Structure' by describing the visible changes in streetscapes that have directly resulted from the implementation of heritage planning policies in inner Melbourne. The argument is that the heritage studies of Victoria greatly influence the urban form and streetscape outcomes of development applications processed in inner Melbourne. The development of the heritage studies in Victoria is discussed with the statutory outcomes and policies that are generally applicable statewide. The methodological and analytical framework used for the work that led to this paper is similar to that used in the heritage studies: a desktop survey, a field photographic survey, a comparative analysis of previous work and historical research to inform the assessment. The material used includes publicly available local council planning data, historical mapping material, historical land data and a comparative historical streetscape survey to assist in analysing the changes in built form that have resulted from the progression of heritage planning policies from the 1970s to today. As a result, lessons can be learned about the effectiveness of heritage planning policies and how particular changes have improved the intended outcomes of these policies in their actual implementation through development applications. Observations for the improvement of future policy making are made with reference to a cooperative approach between local planning authorities, the public and consultancies. The contribution this paper makes to an understanding of Australian cities is in how policy making influences the development of urban form and urban design at the 'grass roots' level.

**Disclaimer:** The opinions and observations made in this paper are those solely of the author and do not represent any policy, unless specifically stated, of the local councils or government bodies from which publicly available material has been taken.

### Introduction

The heritage studies of Victoria form the basis for statutory controls of identified heritage places. The development of these studies has followed a life cycle, somewhat similar to that of the Product Life Cycle (Kotler, 1997), with variations akin to the Demand and Technology Model (Kotler & Keller, 2000). The resultant model is known as the Heritage Studies Framework (Clinch, 2012). There is evidence to suggest that experience and testing of the resultant policies once implemented as statutory controls has had a significant effect on the built form in heritage overlays. Comparison of photographs from 1975 informs how streetscapes have changed as a result of heritage policies. In this paper examples are cited from streetscapes in the inner city area around St Kilda, Albert Park, Elwood and Port Melbourne.

### Heritage planning in Victoria

It is not the purpose of this paper to review the history of planning or heritage planning in particular in Victoria; there are excellent texts available that undertake this task comprehensively (Freestone, 2010) and (Eccles, 2004). However, key dates, events and relevant influences will be presented to assist in underpinning the discussion that follows in relation to the progress of the development of heritage policy and the resultant outcomes to streetscapes. This will underpin the philosophy used in the model of the development of the heritage studies discussed throughout this paper.

In inner Melbourne from 1954, when the Melbourne Metropolitan Planning Scheme (MMPS) came into effect (MMBW, 1954) planning applications were managed by local councils with overall responsibility by the Melbourne Metropolitan Board of Works (MMBW). In the 1970s there were 210 local instrumentalities that had responsibility for the development of their jurisdictions and implemented their planning policy (Freestone, 2010). The statutory environment for heritage places emerged with the inclusion of specific clauses in the Town and Country Planning (TCP) Act of 1961 (TCPB, 1961). These clauses gave some reference for planners to implement control, albeit with some confusion relating to financial compensation for owners that was not cleared up until the 1980s (Gobbo, 1978). The demise of the MMBW in 1985 resulted in councils managing their planning schemes. The statutory environment changed, however, with the implementation of the *Planning and Environment Act (1987)* (Victorian Government, 1987). Another key milestone in the development of heritage policy was the reduction in the number of local councils to 83 with the implementation of the rationalisation of

council and shire boundaries known colloquially as Amalgamation from 1993 (Eccles, 2004). This rationalisation, brought on by the Kennett government, resulted in a concerted effort by the councils, encouraged by Heritage Victoria (the state run heritage body), to align heritage studies with the new boundaries and undertake work in areas previously untouched. Another spurt of activity began with the introduction of the New Format Planning Schemes (NFPS) in 1999 (Gibson, 1999). Some of the areas in inner Melbourne that responded quickly to these changes were in Port Melbourne, South Melbourne and St Kilda; the new City of Port Phillip (CoPP). This council was one of the first to adopt the NFPS in 1999 (Gibson, 1982) and with it the standardised heritage overlay provisions encapsulated in Clause 43.01 of the new Victorian Planning Provisions (Department of Planning and Community Development, 2013). Since the implementation of the Victorian Planning Provisions (VPPs) only three minor adjustments have been made to this clause (Moles, 2007, p 20). Funding from the National Estate Grants Program (NEPG) set up with the National Estate in 1976 assisted; however, by 2000, this money had been expended and new federal funding allocations were overseen by Heritage Victoria (HV).

In 2004 a review of heritage planning was undertaken in Victoria that indicated there were a number of areas requiring improvement in the implementation of the heritage overlays. One of these related to the fact that the underpinning clause of heritage (Clause 43.01) was written such that it was 'one size fits all' in relation to built form with no guidance for places with significance other than those assessed for their external structure (Moles, 2007, p 26). This had further implications for assessment with openings for interpretation as to how extensions and infill resulted in a heritage streetscape with the resultant tension arising from pushing additions to the rear of the site to avoid intrusion on the public realm (Moles, 2007, p 77).

### **The development of heritage studies of Victoria**

The heritage studies of Victoria aim to provide the basis for policy making and statutory controls through local planning schemes via amendments for locally identified heritage places. The first documents intended to provide potential material for this purpose have been identified as emerging in the early 1970s. Recent work has suggested that there are approximately 420 of these documents that were produced between 1970 and 2012 (Clinch, 2012, Appendix 1).

The Heritage Studies Framework model can be used to explain how the heritage studies developed in Victoria. This uses the number of studies produced per year and organises these into phases that correspond to key phases of development in terms of their output and style and aligns these with important statutory milestones. The result is an interpretation of their development through a series of phases known as the Emergence Phase (1970-1979), the Development Phase (1980- 1986), the Growth Phase (1987-1993), the Maturity-Post Amalgamation Phase (1994-1999), the Maturity-Post NFPS Phase (2000-2004) and the Decline and Rejuvenation Phase (2005-2012) (Clinch, 2012). Key attributes of the studies that result in particular outcomes influencing streetscape and design within streetscapes can be identified from these phases.

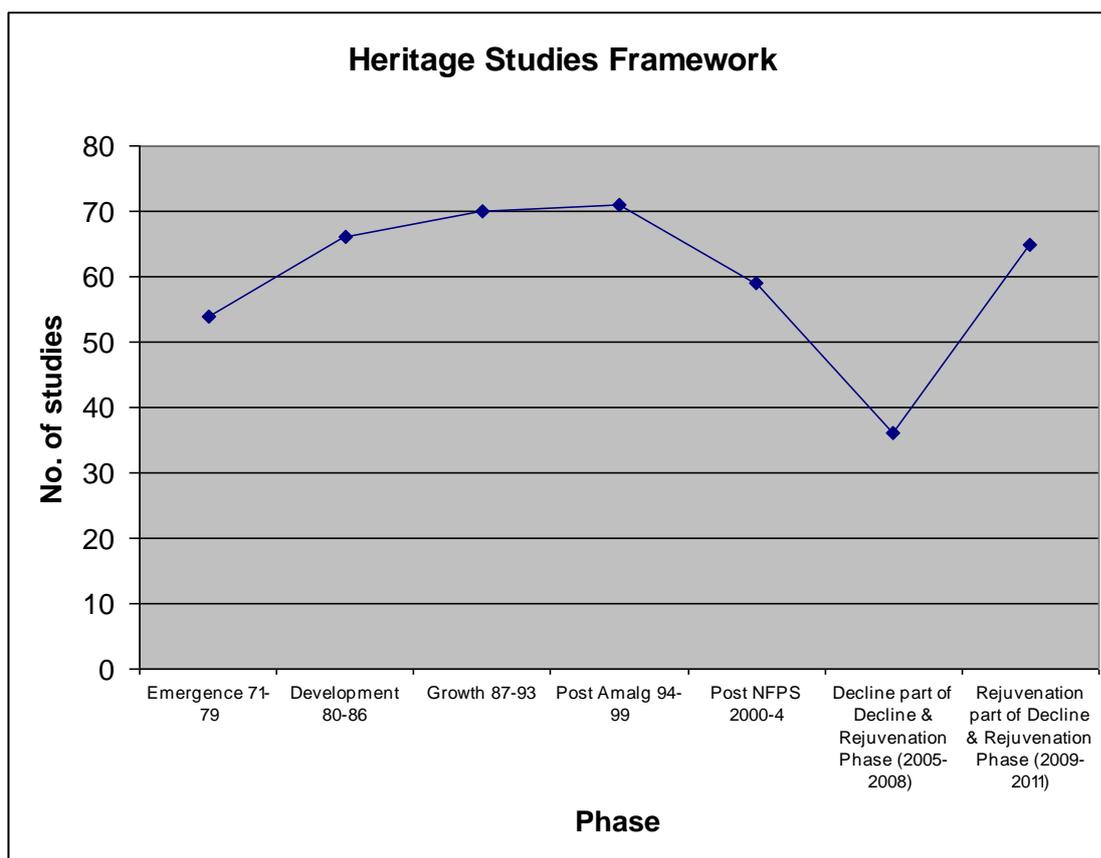


Figure 1 – Heritage Studies Framework (Clinch, 2012, Chapter 2)

**Key factors in the development of the heritage studies**

The Emergence Phase (1970-1979) was characterised by a variety of documents supported by different movements, consultants and instrumentalities such as the National Trust, the Land Conservation Council (LCC), citizens’ action groups such as the North Melbourne Association, the Parkville Association, the Committee for Urban Action (CUA) and consultancies such as Loder & Bayly. However, when the Historic Buildings Council decided to support a review of its inner city buildings with eight inner city building reviews, it had difficulty sourcing appropriately experienced authors. A variety of authors were co-opted with works displaying vastly different outputs. These eight studies provided a baseline for much of the work that has since been undertaken on heritage places. Other studies undertaken during this phase demonstrated the variety of approaches of the authors. These included works that focused on streetscapes such as in Beechworth (Tibbits, 1976) and St Arnaud (Staughton, 1978), architectural studies such as a Castlemaine (Perrott, 1979), historic sites including archaeological sites such as at Yarra Valley (Tansley, 1978) and a set of guidelines for development for Parkville produced by Jacobs Lewis Vines known as JLV (JLV, 1979) These works were the beginnings of proposed outcomes for streetscapes and included drawings, perspectives and interpretations that have underpinned today’s policies.

The Development Phase was one where the inner city areas of perceived interest and/or threat to heritage places yielded studies. This included industrial areas such as Docklands; places of prime real estate potential and areas where vast demolition had occurred such as South Melbourne. At this stage, HV, (then known as the Heritage Branch) began its scrutiny of the process of heritage studies and produced its first brief for consultants. The *Historic Buildings Act (1981)* was one of the key initiatives during this phase. Statutory controls were being developed during this time. Key people such as Evan Walker (Planning Minister) and David Yencken (Secretary of the Department of Planning) were instrumental in a key amendment in 1983 to the MMPS, Amendment 224, that brought in manageable heritage controls (MMBW, 1983) Tools for planners such as the ‘Scott Matrix’ (Scott, 2009) and ‘The Purple Book’ (City of Melbourne, 1985) that came from the Melbourne City Council were evidence of concern for the outcomes to streetscapes in areas identified as of heritage importance.

The Growth Phase was typified by the increasing number of studies being undertaken by the consultants now becoming more confident in their fields. Authors such as Graham Butler and Andrew

Ward churned out studies on nearly an annual basis; these consultants had developed their techniques and were beginning to standardise their own approaches. The Burra Charter underwent a major update in 1988 and was often referred to in the studies as a source of key philosophy adopted by the consultants, although it has been argued that there was limited understanding of how this philosophy was to be implemented (Tonkin, 2008).

Post Amalgamation brought a further increase in the number of studies being produced. Areas formerly under smaller jurisdictions were included in wider reviews and new places added. This was the period in which funding from the NEGP ceased (1997); thus consultants were under more pressure to undertake their work for less, despite some encouragement from HV when it took over the funding distribution.

The NFPS resulted in more studies being undertaken to reflect the changes of the planning schemes and in order to produce appropriate local clauses crafted in the VPPs. Consultant teams became more multi-disciplinary with a range of experts such as horticulturalists, architects, historians, planners and landscape architects being brought in to undertake assessments.

The current phase of the development of the heritage studies, the Decline and Rejuvenation Phase, is one that has resulted from a decline in funding availability followed by a ground swell of need for continual updating of existing studies.

### ***Influences on heritage studies***

The early works that are typical of the Emergence Phase (1970-1979) were mainly undertaken with the idea that there would be some future statutory controls to enable the conservation of heritage places within local town planning jurisdiction. The earliest studies were named variously including titles such as 'Urban Conservation Study'. Many of the works included those completed by the LCC that identified heritage built form places in amongst natural environmental places. The National Trust led a number of works during this time and it was a ground swell of conservation activists that set the scene for future work. Academics, such as George Tibbits, at the University of Melbourne, produced courses in heritage conservation that enthused the early authors of the studies. Some of the early examples of this occurred in Maldon (JLV, 1977) in Hawthorn (University of Melbourne, 1978) and in Beechworth (Tibbits, 1976), areas still under local planning controls derived from the work of these studies in their appropriate planning schemes today. Of relevance to this paper, is the work that was undertaken as a result of one of the NEGP grants that produced streetscape photographs of areas in inner Melbourne including South Melbourne and Albert Park (CUA, 1975). In addition the work completed in early studies such as Parkville provided material that has filtered into some local planning schemes today. An example is the policy in the Port Phillip Planning Scheme in Clause 22.04 that uses a diagram of the sightline to be used for extensions on dwellings; this diagram is exactly the same as that shown in the original Parkville study. This policy has important outcomes in the way streetscapes have developed with the form of extensions on heritage buildings following the design outlined in this policy.

Apart from the progression of statutory control that developed and shaped the heritage studies over the past 40 years, it was the authors themselves who largely influenced how the studies developed. Early authors were often enthusiasts and came from a range of backgrounds. This included the students at the University of Melbourne, largely instructed by George Tibbits. A cohort of students from the 1970s thus arose who became the 'emerging' experts in the field, people such as Nigel Lewis, Elizabeth Vines and Wendy Jacobs of JLV and Andrew Ward and Graeme Butler. These architects were instrumental in shaping the way heritage studies in Victoria were conducted in the earlier days from the late 1970s to the mid-1980s through the Emergence and Development phases as described above.

### **Statutory outcomes of heritage studies in Victoria**

One of the objectives of planning in Victoria is '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.' (DPCD, 2013) It is for this reason that the statutory controls that result from any work done via the heritage studies is so important to the streetscapes that result.

The basic principles of conservation are evident across the state as found in Clause 43.01 in the VPPs. Although this clause does not mention the Burra Charter its philosophy clearly derives from this document as is shown in its purpose:

- To conserve and enhance heritage places of natural or cultural significance.

- To conserve and enhance those elements which contribute to the significance of heritage places.
- To ensure that development does not adversely affect the significance of heritage places.
- To conserve specifically identified heritage places by allowing a use that would otherwise be prohibited if this will demonstrably assist with the conservation of the significance of the heritage place.

The process of implementing the findings of the heritage studies in Victoria is known as a Planning Scheme Amendment that results in heritage overlays: statutory areas of control managed by heritage policy. Broadly this process involves the preparation of a formal submission to a local council of the findings of the study and potentially its further review by a Planning Panel. It is not the purpose of this paper to describe this process in detail; however, suffice it to say that the Panel is an independent state run body that provides recommendations to the council of how to progress the results of the heritage study in their planning scheme. Once the heritage study has been thoroughly scrutinised its recommendations are then developed into policies in the local planning scheme that are ratified by Amendment through gazettal by the Planning Minister (DPCD, 2013).

One of the important outcomes of heritage studies is the policies that result and that then drive the resultant built form of infill buildings and extensions to heritage buildings in heritage overlays. These policies are usually crafted for each council by their internal strategic planners and then managed via development applications through the statutory planners.

In terms of how the heritage studies are conducted, consultants are encouraged to adopt in their work the ethics of Australia ICOMOS that follows the Burra Charter in their work. Guidelines are provided by Heritage Victoria in a Standard Brief and consultants are encouraged to participate in a peer review during the stages of the study (HV, 2010). This process then filters how the places are identified, assessed and classified. The management of the places then resides with the local planners in each council and the interpretation by these planners of the resultant policy in their planning scheme.

### ***The application process for a heritage place***

An application for development in a heritage overlay undergoes a permit application process if the proposal so requires. The requirements for a permit to be lodged are outlined in Clause 43.01 and if a permit is required it is processed through the statutory planning department of the appropriate council. The process involves the applicant submitting the appropriate plans and supporting material and, in the case of a heritage place, the justification for the changes proposed. If a place is identified of significance in the heritage overlay and the proposal is for total demolition the application should include detailed justification and comprehensive plans for an appropriate replacement on the site. Once the application is received, it is then usually advertised, giving the public the opportunity to review it and make their comments. It is the public who is making the decisions about what they find acceptable in those heritage areas that often causes disputes. However, as outlined in a recent poll published in an article in *The Age*, 64% of 2383 respondents preferred the contemporary approach rather than the 'faux heritage' (Dobbin, 2013). If a member of the public has issues with the application they can object to it in writing and then have the right to appeal any decision made by the council on that application.

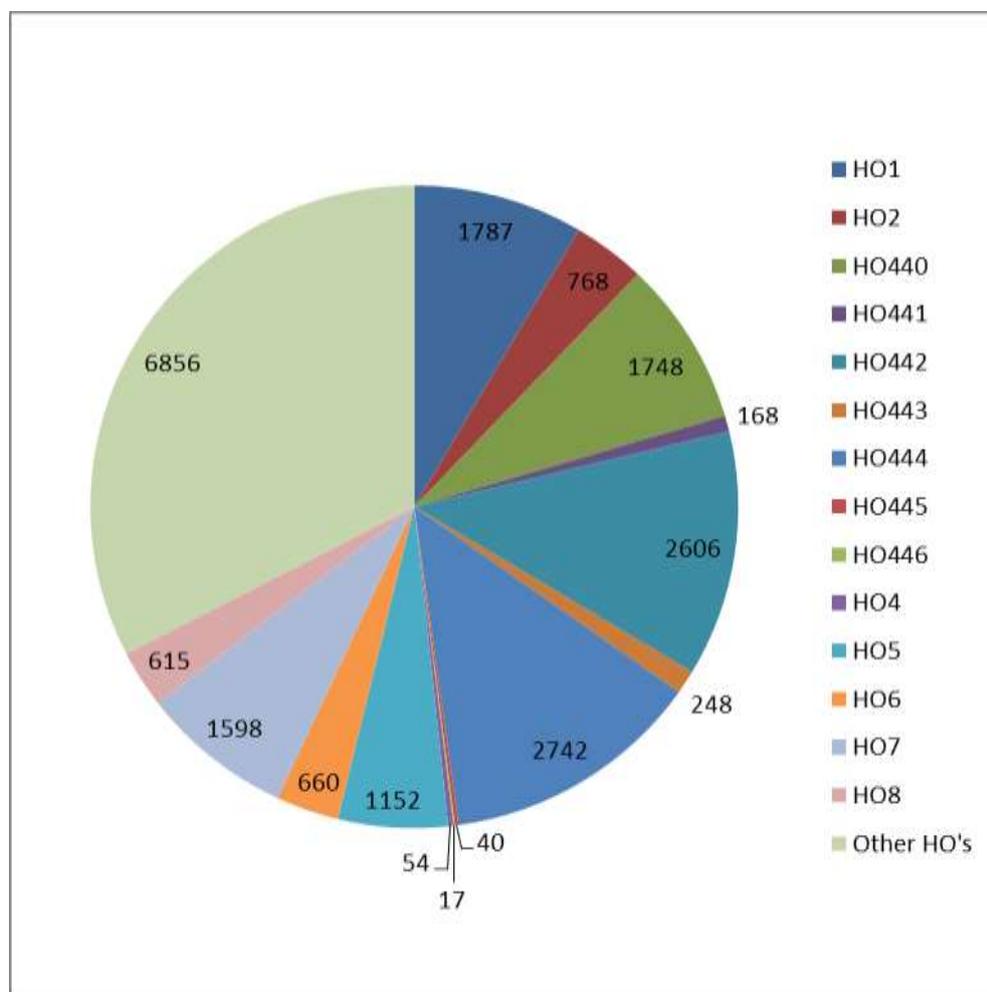
If an appeal is lodged, it is the Victorian Civil and Administrative Tribunal (VCAT) that becomes the responsible authority for the decision making. The result of this process for development is that, in any heritage overlay, there will be evidence of a mix of decisions: those made by the local council and those made by VCAT.

### **Inner Melbourne example: the City of Port Phillip (CoPP)**

The City of Port Phillip (CoPP), established on 22 June 1994 by the amalgamation of the cities of South Melbourne, Port Melbourne and St Kilda, is an inner city local council of Melbourne that covers the suburbs of St Kilda, Port Melbourne, Albert Park, Middle Park and Elwood. It spans an area of 20.62sqm with a population of approximately 91,000. Its boundaries extend from White Reserve and Todd Road to the west, the West Gate Freeway, Kings Way and Dorcas Street to the north, St Kilda Road, High Street, Punt Road, Queens Way, Dandenong Road, Orrong Road, Inkerman Street, Hotham Street, Glen Huntly Road, St Kilda Street and Head Street generally to the east and the foreshore of Port Phillip Bay to the south (CoPP, 2013)

### Heritage places in CoPP

In terms of built form, there are approximately 27,000 buildings in the city with approximately 21,000 of those identified within a heritage overlay. There are 14 major heritage precinct overlays over the city including in the suburbs of St Kilda, Albert Park/Middle Park, Elwood and Port Melbourne (Clinch, 2013)



**Figure 2 – Number of lots in each major heritage overlay in the City of Port Phillip showing the number of lots per HO. Each HO is identified by a different colour in the legend.**

CoPP is one of the oldest areas of Melbourne that has benefited from the implementation of heritage studies since the 1970s. Work was undertaken in 1975 that resulted in a comprehensive photographic streetscape survey that included areas of South Melbourne, Albert Park and Middle Park. About the same time, a study was completed of the South Melbourne area that identified key precincts of heritage importance (Yuncken Freeman, 1975). Then in 1976 a study of the Emerald Hill area was undertaken for the purpose of identifying the potential of renewal of the structures around the Town Hall for habitation (Jordan, 1976). Much of the content of this report was of importance in the identification of the heritage places in the vicinity. At about the same time a study was undertaken of South Melbourne that systematically identified and classified places for future statutory control. The next major study undertaken in the area was in Port Melbourne in 1979 (JLV, 1979). Again this work formed the basis for further study later and identified key buildings within the area for potential statutory control. The St Kilda area was studied in 1982 (Lewis, 1982) and 1985 (Bick, 1985). Garden City was reviewed by the National Trust in 1986 (Moloney, 1986) with work done on industrial sites in South Melbourne by Peter Milner of the University of Melbourne (Milner, 1986). In 1987 the consultancy Allom Lovell Sanderson conducted the first formal heritage study of South Melbourne (Allom Lovell Sanderson, 1987) This was a comprehensive document encompassing 4 volumes of work that included classifications of buildings and identification of precincts. In 1992 further work was undertaken in St Kilda on particular buildings of the twentieth century (Peck Von Hartel Trethowan, 1992). This document provided historical information on particular places that has since formed the basis for some of the citations used today in the Port Phillip Planning Scheme (PPPS). Further work

was undertaken as a review in Port Melbourne in 1995 (Allom Lovell, 1995). Although this document was not released officially due to the process of Amalgamation it later provided valuable material for a later study. The largest study aimed at bringing together all the previous work done across Port Phillip commenced in 1997 with Andrew Ward’s work for the *Port Phillip Heritage Review* (Ward, 1998). This document formed the basis for the first heritage overlays implemented in the PPPS in 2000 (DPCD, 2000). Since then several smaller reviews have been conducted including one for the Swallow Street precinct (Butler, 2001), East St Kilda (Heritage Alliance, 2004) Elwood (Heritage Alliance, 2005) a review of HO3 (Reeves, 2009 and Heritage Alliance, 2010) and a recent review of HO1 (Lovell Chen, 2012).

In the period 1990 to 2012 there were approximately 13,575 applications for extensions or infill proposals with 9,727 (or 71%) of those affecting heritage places previously identified in past heritage studies. (Clinch, 2012).

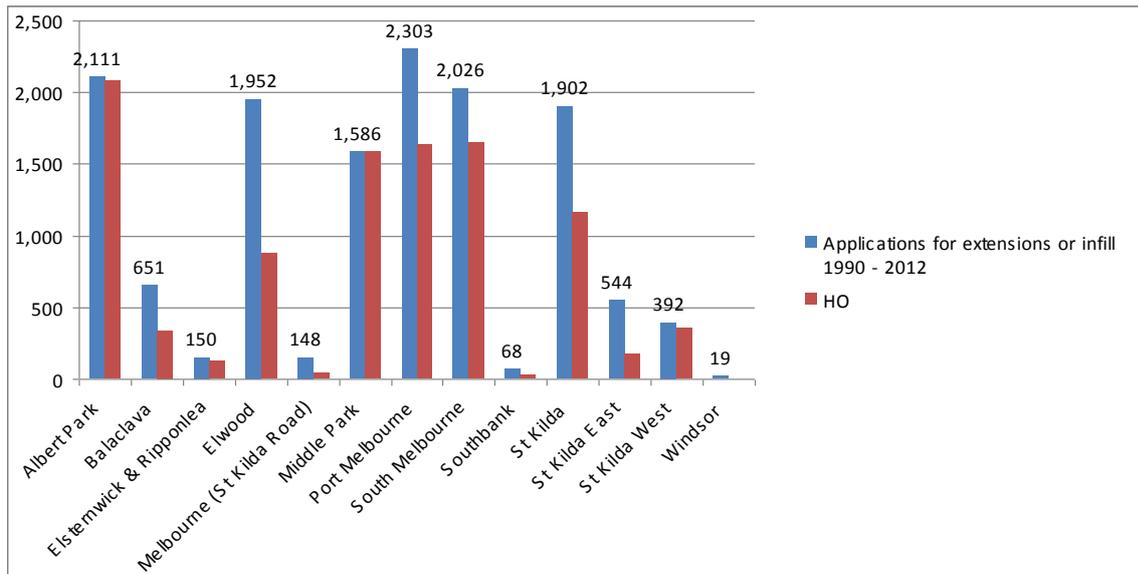
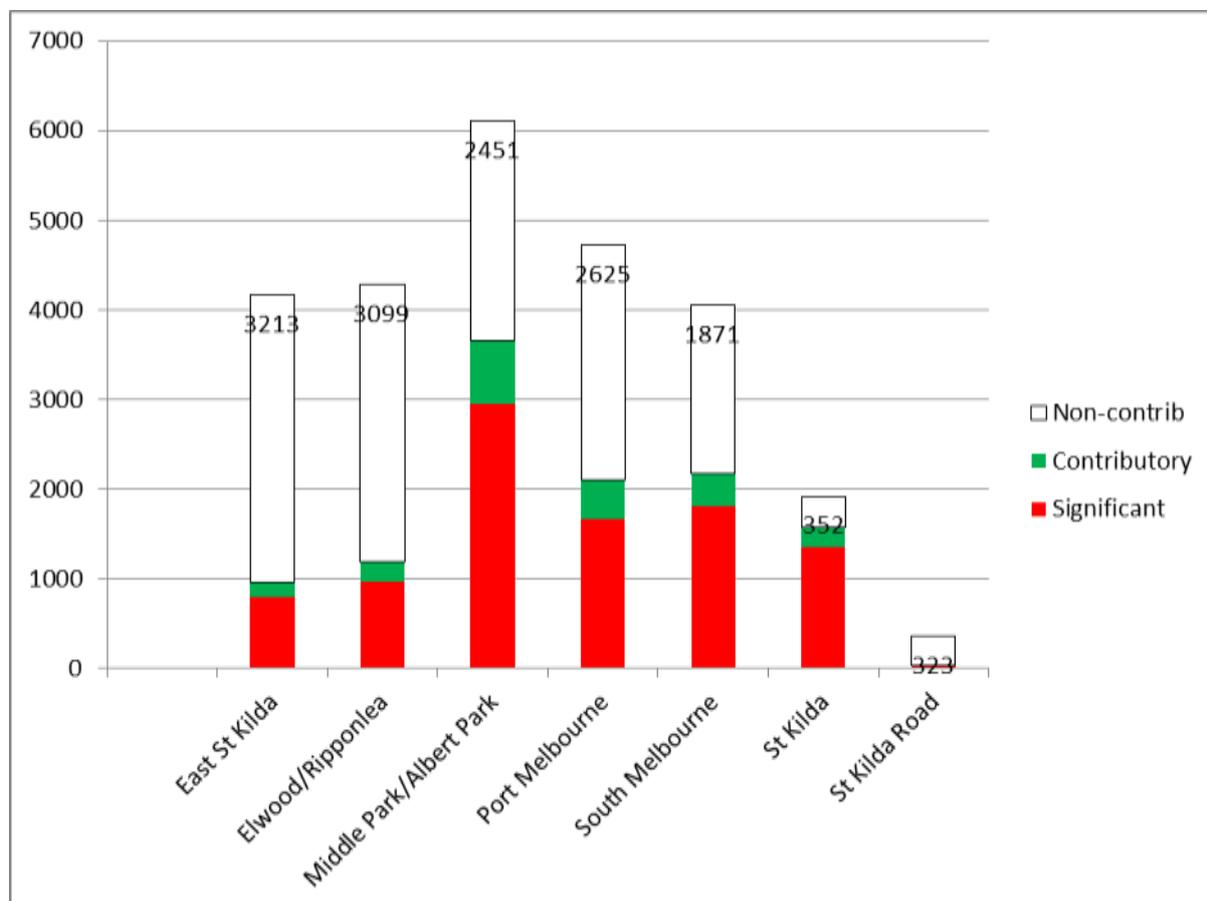


Figure 3 – Applications for infill or extensions in neighbourhood areas in CoPP from 1990 - 2012

### Urban form and design resulting from heritage policies in the CoPP

The urban form and design outcomes as seen in the streetscapes of inner areas, such as the City of Port Phillip, reflect the policies that have resulted from the heritage studies completed in the municipality. The studies have resulted in sites being graded and the result today is overlays that include places classified as either 'significant', 'contributory' or 'non-contributory'.



**Figure 4 – Number and type of grading of heritage places in CoPP neighbourhood areas**

There is a specific policy within the local planning scheme for the management of heritage places under Clause 22.04, developed in 2000. This outlines what is acceptable for demolition, extension and infill. In addition there is the unique policy that applies to rear extensions on heritage buildings, requiring that the additions be sited within a 10 degree line drawn from the bottom of the gutter line of the original façade. This policy derived from work in the early studies in Parkville (JLV, 1979) and Fitzroy (JLV, 1979).

In the South Melbourne area, subsequent to the production of the South Melbourne study (1987) reference was made to the resultant gradings of buildings and a policy that extensions should be sited within a 20 degree envelope. This work derived from a document authored within the council in response to a concern about the number of demolitions and developments resulting from gentrification in the area (City of South Melbourne, 1987) The result has been a number of isolated buildings that respond to this policy and that have been considered at VCAT appeals as setting a precedent for the built form in the streetscapes.

In some areas of CoPP the heritage policy can be seen to be rigorously applied with the result that streetscapes remain intact. Middle Park is the area with the largest number of 'significant' graded properties (see Figure 2 above) and is one area that has been carefully conserved. Despite there often being appeals over proposed developments requiring reduction in built form, generally it can be clearly shown that streetscapes have been maintained. This can be seen from comparisons of streetscape photographs from 1975 compared with those of today.



**Figure 5 – Streetscape in Middle Park, 1975 above and 2009 below, showing a policy compliant addition**

On the other hand, in other areas, such as in Port Melbourne, it has been more difficult to maintain the heritage streetscapes due to the extensive demolition that occurred during the 1960s and 1970s resulting in non-contiguous areas of heritage fabric dominating a streetscape. Even though studies were conducted in Port Melbourne relatively early (1979) the identification of buildings was on a site by site basis rather than as a streetscape with the resultant mix of streets with some sites in a heritage overlay next to others that are not. More recent studies have attempted to rectify this situation with the identification of heritage sub-precincts, however, these are yet to be tested as to their effect on the streetscapes they are trying to conserve.



**Figure 6 – addition in Port Melbourne enabled by work and demolition prior to the 10 degree policy**

Elwood is another example where heritage policy has been applied to streetscapes already chopped up by demolition and infill. The completion of the heritage study in 2004, did not provide enough evidence to retrofit the thinking of developers and a number of VCAT cases further eroded the work of the study. The result has been streetscapes with some aberrant infill that has little connection with the original heritage places (see Figure 7).

#### **Policy outcomes of heritage studies in the CoPP**

Applicants respond to policy by either ignoring it entirely, attempting to exceed it with excuses or comply literally. In relation to extensions on dwellings, for example, this can mean either intense negotiation or battles at VCAT or justification for how to avoid the policy by exception or to design exactly as described by the wording of the policy. Outcomes can result in streetscapes with exceptions to policy, with aberrations in the streetscape or with derived designs blindly following policy.

A key issue for the success of a planning scheme amendment for a heritage overlay is the 'rigour' of the study. An example is the Elwood study where the Panel Member had concerns with the lack of material to support the assessments of the buildings. As a result, a particular street has been fought over in relation to the 10 degree policy and the interpretation of 'significance' since this study was implemented in 2004. Unfortunately, due to the lack of robustness in the study as identified at the Panel (Read, 2006) the policies attempting to conserve the streetscape with minimal intrusion have failed.



**Figure 7 – infill dwelling in the shape of a dragon (with tail) approved by VCAT in Elwood**

However, on the flip side, there are examples of policy compliance to the letter found throughout the municipality. These can sometimes result in roof forms that are derived directly from the 10 degree sightline and may or may not make design sense. This can be seen in the photographs below.



**Figure 8 – Policy compliant addition compared with 1975 streetscape above**

On the positive side, improved design responses have resulted in areas where studies have been conducted more recently resulting in more meaningful Statements of Significance. An example is the recent review of HO3 (via Amendment C72) that resulted in more specific sub-precincts of HO440, HO441, HO442, HO443, HO444, HO445 and HO446. An example of one of the areas is shown in Figure 10 compared with Figure 9 that shows the original HO3 area. (Space limits the inclusion of the all the maps cited herein).

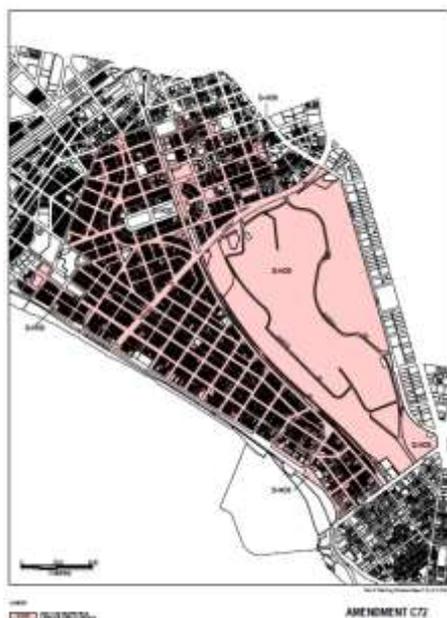


Figure 9 – map showing the original HO3 area prior to Amendment C72 (DSE, 2013)



Figure 10 – map showing the new HO441 area, a segment of the original HO3 (DSE, 2013)

## Conclusions

The outcomes of the policies and implementation of heritage overlays are derived from the interpretation of the work completed in the heritage studies. When a place becomes contested as to its significance it is often the original work of the study that becomes the key to its assessment. The original work is often of a fleeting nature that does not provide enough evidence for a planner to justify the specifics of the heritage significance that needs conservation or retention. As a result the outcome of a dispute is often one that is negotiated or won by legal argument at VCAT and not one that relates to the original intention of the heritage study in relation to that place.

The importance of the development of the policies that result from a heritage study cannot be underestimated. Planners are the custodians of the public realm and any policy that they have to implement needs to be as clear and unequivocal as possible. The ideal situation is that when policies are crafted, the planners who will be using those policies should be consulted, to ensure appropriate wording.

In terms of public consultation with the process of an amendment, it is critical that the public are kept informed of the intention of any heritage amendment so that there are no misunderstandings as to the outcomes of such an amendment. There is evidence that by inviting people to one on one meetings with planners at the early stages of an amendment process can allay any potential concerns about the effect of the overlay. (McBride, 2009)

Of key importance to the studies themselves is the material produced by the consultants in relation to any Statements of Significance (SoS). These are particularly important when it comes to assessing a heritage application and the content needs to be clear and concise (HV, 2010) If an application is in dispute, especially at VCAT, the absence of or problems with the SoS comes to light. HV has a template for these statements that should be used. It is often the lack of these statements that hinders decision making for planners.

On the other hand, the early studies are used where there is no other source material available for assessment. These documents were often rigorously completed by consultants when they were new and enthusiastic in their work, keen to establish their credentials. As a result, much of the material has been re-used in subsequent studies and not updated. Care must be taken in using this material in isolation as it may be incomplete in terms of subsequent development that has been undertaken on the property. Planners need to be able to source recent and past material where possible in order to support their views on a heritage place. This may involve the work of an expert, such as a heritage consultant, or archivist for the relevant material, if the planner does not have the required research skills or time.

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