



Planning Panel Hearing
Thornbury Park Estate Precinct – City of Darebin

Amendment C191dare
Expert Witness Statement - Heritage

May 2022

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EXPERIENCE, OPINION AND DECLARATION

Authorship

My full name is Anthony Scott Hemingway and I am Senior Associate and Architectural Historian of RBA Architects + Conservation Consultants, 4C/171 Fitzroy Street, St Kilda. The views outlined in this expert witness statement are my own though I have been assisted by Ashleigh Ngan, senior heritage consultant in its preparation.

Qualifications/Experience/Expertise

I have a Master of Planning & Design (Architectural History and Conservation) and Master of Arts (Fine Arts), both from the University of Melbourne. For the former I primarily studied under Professors Miles Lewis and Philip Goad. For my Master of Arts, I undertook a thesis on early Medieval (Pre-Romanesque) churches in northern Spain, in the province of Asturias.

Since 2000, I have worked at RBA and amassed extensive experience in all aspects of heritage conservation, especially in the assessment of heritage significance. I undertook much of the work for the shire-wide heritage studies for the Strathbogie and Towong municipalities (both stages 1 and 2). In addition, I completed the City North Heritage Review for the City of Melbourne, which included parts of Carlton, Melbourne, North Melbourne in the vicinity of the Queen Victoria market (Amendment C198melb); French Island Heritage Review (Amendment C004), and a peer review for Boroondara Council (Amendment C64boro). Subsequently I have led the team for the heritage review/study for the City Fringe Heritage Area for Greater Geelong (part of Amendment C359pt1), Structure Plan Areas in Bentleigh and Carnegie (Amendment C190glen), Structure Plan Area in Elsternwick (Amendment C204glen), Montague Commercial Precinct (Amendment C186port), and Melton Heritage Assessments Project 2018 (Amendment C198melt). In addition, I am currently overseeing heritage studies in the municipalities of Banyule, Greater Bendigo, Mornington, and Port Phillip. In regard to the City of Darebin, I have also undertaken a heritage assessment of the Preston Market as part of Amendment C182dare, which is ongoing.

Previously I have given evidence at several panels relating to some of the aforementioned heritage studies undertaken by RBA including C64boro, C198melb, C186port, C198melt, C190glen and C204glen. I also gave evidence on behalf of Geelong City Council in relation to the Newtown West Heritage Review (Amendment C365geel) though was not involved in the preparation of that study.

During my time at RBA, I have worked on a wide variety of sites from humble dwellings to major public buildings throughout Victoria, ranging in origin from the mid-Victorian period through to the later 20th century. As such, I have assessed many places of cultural heritage significance, and also developed expertise in managing change at historic sites, where there is a need to balance the retention of heritage values with an awareness that often-substantial change can be made, if handled in a sympathetic manner.

I have also completed many conservation management plans (CMPs), condition surveys and materials and finishes investigations, including carrying out forensic paint-scrape analyses. I have investigated the original colour scheme and prepared a specification for contemporary equivalents for the Maryborough Railway Station Conservation Works, which was recognised with shortlisting in the 2013 Dulux Colour Awards. I have also prepared schemes at Footscray, Kaniva and Wycheproof railway stations. At Footscray Railway Station, I was also involved in overseeing the Heritage Victoria permit conditions for the Regional Rail Link project.

Instructions

The preparation of this statement has been undertaken at the instruction of the Planology on behalf of the City of Darebin. Specifically, these instructions include:

- review the background material in your brief;
- undertake an inspection of the Estate (or specific properties) as necessary;
- prepare a statement of evidence, relevant to your expertise, which includes but is not limited to:
 - an explanation of your involvement in the Amendment, including the Thornbury Park Estate Precinct Study (RBA Architects and Conservation Consultants, 2021) (Study);
 - a description of the methodology adopted in undertaking the Study;
 - an assessment as to whether the proposed application of Schedule 318 to the Heritage Overlay to the Estate is appropriate from a heritage perspective;

- an assessment as to whether the proposed amendments to City of Darebin Heritage Study Incorporated Plan – Permit Exemptions (2011 – Amended 2021) are appropriate from a heritage perspective;
- review and respond to the Submissions (either individually and/or thematically).
- review and provide feedback to Planology about any other expert evidence that is circulated; and
- confer with Planology where necessary.

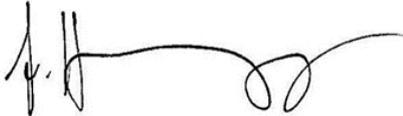
Prior Involvement

I was responsible for overseeing the preparation of the Thornbury Park Estate Precinct Review (20 July 2021) at RBA Architects and Conservation Consultants for the City Darebin. In addition, I provided responses to Council relating to the heritage issues raised in the various submissions.

Declaration

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

May 2022

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke.

INTRODUCTION

Purpose

1. This statement has been prepared for the Planning Panel appointed to consider submissions relating to Amendment C191dare to the Darebin Planning Scheme.
2. Amendment C191dare proposes to give statutory effect to the findings of the Thornbury Park Estate Precinct Review (RBA Architects and Conservation Consultants, 2021) and amend the Darebin Planning Scheme to apply the Heritage Overlay to the Thornbury Park Estate Heritage Precinct (HO318).
3. The Precinct is comprised of 1052 properties in Thornbury. The area developed mainly as part of the 1911 Thornbury Park subdivision.

Background – Pre-RBA Involvement

Northcote Urban Conservation Study – 1982-83

4. The first assessment in the area was undertaken 40 years ago by Graeme Butler as part of the Northcote Urban Conservation Study. 150 (short) citations were prepared – mostly individual and 18 small precincts. One house at 64 Keon Street in the precinct area was identified as being significant and a short citation prepared. It is likely that this house was chosen as an indicative example at the time, inferring from the ‘Study Content’ and ‘Fostering Recognition’.¹
5. This study was undertaken prior to the introduction of the existing Planning and Environment Act of 1987 and there was limited scope to protect places assessed as being of local heritage significance.
6. A citation was not prepared for 64 Keon Street, Thornbury as part of the Northcote Building Citations (then the City of Darebin), prepared by Graeme Butler and Allom Lovell & Associates in 1997. This work was essentially a review of the 1982 study.

Darebin Heritage Study – Context 2007

7. The first municipal wide study of the Darebin Council area was undertaken in 2007 to 2009. Field surveys were undertaken but it is not clear how comprehensive they were. Community consultations were held by which some places were nominated for heritage assessment. Citations were prepared for some 116 individual places and 26 precincts.

Heritage Assessment, 33 Comas Gove, Thornbury - John Briggs 2012

8. In response to community concern that two properties within this area a decade ago, the church manse at 33 Comas Gove and the former dairy at 2A Hill Street, were at risk of being demolished, Council commissioned John Briggs Architect to undertake an assessment of their heritage value in 2012.
9. Briggs determined that 2A Hill Street was not of historical significance while the house at 33 Comas Grove did not warrant the application of an individually significant heritage place.
10. While the broader locale was outside the purvey of the assessment, he advised that there was potential for a heritage precinct in the vicinity (of indeterminate extent):

...that the subject house [33 Comas Grove] and the surrounding area would generally be perceived by the public to be a heritage place and that in compliance with Clause 15.03 of the Darebin Planning Scheme the area should be comparatively assessed against other heritage precincts and considered for inclusion in the Heritage Overlay as an heritage area.²
11. Furthermore, it was also clear that:

...from this initial investigation that there are number of places within: Comas Grove; Hutton; Fyffe and Harold Streets that have cultural significance and that there is sufficient historic fabric to form a precinct.

Thornbury Park Estate Precinct Preliminary Heritage Assessment – Context, 2018-2019

12. Context were engaged six years later in 2018 to provide a review of the findings of the earlier 2012 assessment regarding the heritage potential of 33 Comas Grove and the area immediately surrounding (an area encompassing parts of Comas Grove and Harold, Hutton, Fyffe and Keon Streets).

¹ G Butler, Northcote Urban Conservation Study, vol. 1, 1982, pp2-3

² John Briggs Architect and Conservation Consultant, Heritage Assessment, 2012, pp2-5

13. Context concurred with the recommendations of the 2012 assessment that 33 Comas Grove was not likely to meet the threshold for individual heritage significance.
14. Context also recommended that a wider area could meet the threshold:

...with more comprehensive comparative analysis and broader field survey of Thornbury, warrant inclusion in the Heritage Overlay as a heritage precinct.³
15. Context were again engaged in mid- 2019 to progress this preliminary review.
16. In their July 2019 report, it was concluded that a large area – broadly between Keon Street (north) and Smith Street (south) and St Georges Road (east) and Strettle Street (west) was likely to meet the threshold for inclusion in the Heritage Overlay. A map of the proposed study area, essentially relating to the Thornbury Park Estate subdivision, derived from the 2019 report, is provided below.



'Preliminary precinct map denoting approximate boundaries for further assessment' (yellow outline), 30 Comas Grove highlighted in red

(Source: Context P/L, Preliminary Heritage Assessment, p14)

17. It was recommended that further detailed heritage assessments be undertaken, and that Council seek interim heritage controls for the potential precinct so that further assessment could be undertaken.
18. Soon after Council sought an interim heritage overlay (Amendment C188dare) for the study area outlined above on the basis of this report. The request was however refused by DELWP in March 2020 on the basis that insufficient evidence was proposed to support the claim the area was experiencing development pressure resulting in the loss of buildings and the process was not yet underway to expedite equivalent permanent heritage controls by Council.

Background – RBA Phase

19. In August 2019 RBA were engaged by Council to undertake a detailed assessment for a potential Thornbury Park Estate Precinct.
20. The study area proposed for assessment derived from the 2019 Context report. The study area largely corresponds to the c.1911 second Thornbury Park Estate subdivision.

³ Context P/L, Thornbury Park Estate Precinct Preliminary Heritage Assessment, p1

21. Assessment of the Thornbury Park Estate Precinct was undertaken in two stages as follows:
 - Stage 1: Review of all sites in the study area to confirm the potential significance and gradings of each site.
 - Stage 2: Preparation of the final report and citation.
22. RBA Architects and Conservation Consultants issued the Heritage Review in July 2021.
23. RBA generally concurred with the boundaries of the proposed precinct map proposed by Context, albeit with some minor differences to boundaries along Miller Street to the north of the precinct and Smith Street to the south.
24. While Miller Street was outside of the study area, research indicated that the south side was included in the relevant Thornbury Park Estate subdivisions. Inspections revealed that this street was highly intact with a development pattern consistent with the rest of the study area. Many of the buildings are constructed of brick and most of the semi-detached pairs in the precinct (dating to the late Interwar period) are located on Miller Street.
25. Consideration was given to the northern side of this street, which although fairly intact and consistent with the period of development in the rest of the precinct, was determined to be disconnected from the side south by being separated by a wide road with tram tracks and was also located in a different suburb (Preston). Furthermore, it was not included in the second Thornbury Park Estate subdivision. As such, it was excluded from the proposed precinct though may be worthy of inclusion in another precinct in this part of the municipality.
26. Both sides of Smith Street were contained in the study area and reviewed with the site inspections. The northern side of this street was found to contain more intact historic building stock than the south side.
27. Although the building stock on the south side was largely consistent with the rest of the precinct, research identified that it was part of an earlier, 1880s subdivision. Development in the latter subdivision began during the late 19th century (Victorian period) rather than from the late 1910s (late Federation period) as with the relevant Thornbury Park Estate subdivision. Although all the building stock from the early phase seems to have been replaced, its history/development nonetheless differs from that of the rest of study area, and so it was not included in the extent of the proposed precinct.
28. With regards to St Georges Road, the street probably has the most diverse building stock in the study area, with a concentration of commercial buildings to the southern part and a residential development section to the north, which includes a high percentage of places developed during the Post-WWII period.
29. The southern end has undergone considerable change, including some recently multi-level residential development, and it was largely removed from the extent of the proposed precinct except for a group of three largely intact, late Federation/early Interwar period shops (nos 455A to 459), of which there are few remaining examples in the precinct.
30. The northern end is mainly residential and generally masonry construction. This section was mixed with some late 20th or early 21st century developments and some historic places which had undergone some the degree of change. There were two good and prominent Post-WWII examples – no. 499 and no. 537. They are both located to corners and are the only two storey examples in the precinct – the house at no. 499 and the flats at no. 531, however the flats had been already earmarked for change.

METHODOLOGY

31. The key tasks of the project included:
 - An inspection of all sites within the potential precinct from the street (a map was provided by Council), and others adjacent,
 - Historical research and comparative analysis in the City of Darebin,
 - Preparation of a physical description,
 - Assessment of the significance of the precinct based on the research and the extant fabric,
 - Preparation of a citation (statement of significance, history and description), with reference to the relevant HERCON criteria.
32. I led the team of up to three members working on the project. I took part in the survey work, provided direction on the research and content of the citation, prepared part of the citation, and reviewed all of it.

Inspections

33. The entire study area was inspected from the footpath/perimeter during the surveying undertaken in December 2019.
34. All places were photographed, and the likely period of construction was recorded as was any major alterations and additions and the type of place. Distinctive and indicative examples were recorded.
35. As such a cultural map of the study area resulted that broadly indicated where phases of development occurred. Groups or pairs of similar buildings were identified on the map as well.
36. Further reviews of many sites were undertaken as necessary during early 2020.

Research

37. A number of primary and secondary sources were consulted, including the following:
 - Photographs, including aerial photographs, held by the State Library of Victoria, Trove, and Landata,
 - Certificates of title,
 - MMBW plans,
 - Sands & McDougall's street directories,
 - Various newspapers included on Trove (e.g., the Age, Argus, and Herald).
 - *The History of Northcote* (William George Swift, 1927),
 - *The Northcote Side of the River* (Andrew Lemon, 1983).

Assessment

38. The approach to the assessment of significance was in keeping with good heritage practice as outlined in The Burra Charter (The Australia ICOMOS Charter for Places of Cultural Significance, 2013), which is the guiding document for professionals dealing with post-contact cultural heritage in Australia, and the Planning Practice Note 1 'Applying the Heritage Overlay' (August 2018) - PPN1.
39. A key aspect of the assessment is to determine the level of intactness of the remaining building fabric. Typically, individual places within a significant precinct vary in their degree of intactness – many will be largely intact including their form, original material palette, and detailing - such as chimneys, verandah/porch, openings (windows + doors), and any decorative elements, whereas others will inevitably be partly altered. In addition, some will likely be replacement buildings dating to a period later than those identified as significant to the precinct.
40. An understanding of the thresholds for local significance was based on reviewing the statements of significance for existing heritage overlays in the City of Darebin, as well as my experience of similar examples more broadly across Melbourne and Victoria.

Citation

41. A citation for the precinct was prepared which included:
- A statement of significance,
 - A physical description, outlining the types and architectural styles and typical details and distinguishing features associated with each,
 - Historical information, including relevant maps or images,
 - A comparative analysis to substantiate the significance of the precinct, generally included in the local Schedule to the Heritage Overlay,
 - Recommendations relating to the application of controls in the Schedule to the Heritage Overlay,
 - Recommended extent of the Heritage Overlay.
 - A schedule for every site in the precinct including address, period, type, level of intactness, grading and a photograph.
42. In keeping with the PPN1, the HERCON criteria were employed in assessing heritage significance. These widely used criteria were adopted at the 1998 Conference on Heritage (HERCON) and are based on the earlier and much used, Australian Heritage Commission (now Australian Heritage Council, AHC) criteria for the Register of the National Estate (RNE).
- Criterion A: Importance to the course, or pattern, of our cultural or natural history (historical significance).
 - Criterion B: Possession of uncommon, rare or endangered aspects of our cultural or natural history (rarity).
 - Criterion C: Potential to yield information that will contribute to an understanding of our cultural or natural history (research potential).
 - Criterion D: Importance in demonstrating the principal characteristics of a class of cultural or natural places or environments (representativeness).
 - Criterion E: Importance in exhibiting particular aesthetic characteristics (aesthetic significance).
 - Criterion F: Importance in demonstrating a high degree of creative or technical achievement at a particular period (technical significance).
 - Criterion G: Strong or special association with a particular community or cultural group for social, cultural or spiritual reasons. This includes the significance of a place to Indigenous peoples as part of their continuing and developing cultural traditions (social significance)
 - Criterion H: Special association with the life or works of a person, or group of persons, of importance in our history (associative significance).
43. Each building within the precincts were graded either 'Significant,' 'Contributory' or 'Non-Contributory' / 'Not Significant' in accordance with the gradings defined in the *City of Darebin Heritage Study Incorporated Plan – Permit Exemptions* (2011, amended 2021), as follows:
- *Significant*: a single heritage place that has cultural heritage significance which may be independent of its context. These places also contribute to the significance of a heritage precinct. *Significant* places within a heritage precinct will not usually have a separate Statement of Significance.
 - *Contributory*: a place that contributes to the significance of a heritage precinct, but would not be significant on their own.
 - *Non-Contributory / Not Significant*: are places which do not contribute to the significance of a heritage precinct. In some instances, a *Significant* place may be considered *non-contributory* or *not significant* within a precinct. For example, an important Modernist house within a Victorian precinct.⁴
44. As is typical of large precincts, most places are graded contributory with only a few, if any, identified as significant. In addition, there is a proportion of non-contributory places.

⁴ City of Darebin Heritage Study Incorporated Plan – Permit Exemptions (2011, amended 2018), pp1-2

45. Within the Thornbury Park Estate precinct, five places were identified as sufficiently individually distinguished to warrant a significant grading as follows:

Address	Details
33 Comas Grove	A sprawling Californian Bungalow style house
115 Harold Street	The most elaborate/picturesque Queen Anne style house in the precinct
111 Hutton Street	The only Federation bungalow style example in the precinct
145-147 Miller Street	A commercial building with an array of retained classicising elements and an unusually intact canopy with decorative metal sheeting
499 St Georges Road	A substantial early 1940s largely cream-brick Moderne style house, originally with a surgery

46. In regard to the assessing the contribution, or not, of an individual building to the significance of the precinct, an approach was adopted in keeping with good heritage practice (as outlined in *The Burra Charter* which is the guiding document for professionals dealing with post-contact cultural heritage in Australia). A place has been attributed with a contributory grading if the following apply:

- It contributes to the character of the streetscape/precinct, and
- It was constructed during the periods of significance identified in the statement of significance, and
- It is an intact example or a place which though altered, remains largely identifiable as an example of its type/period, and
- It typically retains its form, most original materials, and at least some original detailing (which might include openings [windows + doors], chimneys, verandah or porch, decorative elements, etc.),
- Generally any changes that have occurred are reversible, allowing for accurate reconstruction in accordance with the *Burra Charter*,⁵
- If it forms part of a similar group, then it could be more altered if other examples in the group are intact,
- If there are visible additions, they are sufficiently set back such that the original section is not overwhelmed and the original roof form remains legible.

47. Typically for non-contributory/not significant places, one of the following would apply:

- Did not relate to the period of significance of the precinct,
- Related to the period of significance but were compromised either by:
 - being heavily altered such that their original design/appearance was not able to be ascertained
 - or additions dominated the remaining original portion of the building.

Recommendations

48. The key recommendations were to:

- Apply the heritage overlay to the area defined as the Thornbury Park Estate Precinct (1052 properties).
- The proposed precinct should be added to the 'City of Darebin Heritage Study Incorporated Plan – permit exemptions (2011, amended 2018)'. The existing permit exemptions for heritage overlay precincts contained in the Incorporated Plan are considered to be sound and should apply to the proposed Thornbury Park Estate Precinct.

⁵ In the *Burra Charter* 'reconstruction means returning a place to a known earlier state and is distinguished from restoration by the introduction of new material'.

AMENDMENT C191

49. On 26 April 2021, Council resolved to request authorisation from the Minister for Planning to prepare and exhibit Amendment C191, to introduce a heritage overlay (HO318) into the Darebin Planning Scheme. Council received authorisation with conditions on 11 June 2021.
50. The Amendment was exhibited between 5 August 2021 and 15 October 2021 for a period of ten weeks.
51. Of the initial 166 total submissions received in 2021, 64 were supportive of the proposed heritage overlay and 102 submissions were not supportive.
52. I attended two online information sessions along with Council Officers held on 28 August and 2 September 2021 providing an overview of the significance of the Thornbury Park Estate as well as examples of the types of alterations and additions that would generally be approved by Council. I also responded to some of the questions raised. These sessions were part of a broader community engagement process that was undertaken by Ethos Urban (and documented in a report 'Thornbury Park Heritage Estate Project - Engagement Summary Report', prepared by Ethos Urban in October 2021).
53. An interim Heritage Overlay (HO318) was approved by the Minister for Planning on 17 September 2021 (Amendment C197). The interim heritage overlay was only placed over the significant and contributory places. Five properties with approved demolition permits were excluded.
54. Applications for full demolition of six sites within the precinct were received prior to or during the Exhibition Phase. As a result, these six contributory places were regraded to non-contributory.

Address	Granted Permits
70 Hutton Street	Current Planning Permit
135 Hutton Street	Building Consent and S29A issued
98 Rennie Street	Current Planning Permit
63 Keon Street	Current Planning Permit
39 Keon Street	Building Consent and S29A issued
152 Smith Street	Current Planning Permit, Building Consent and S29A issued

55. Whilst the loss of these six contributory buildings is unfortunate, it will not have a demonstrably negative impact on the overall significance of this large precinct such that it would no longer be viable in terms of its heritage values.
56. Applications for change to eleven other sites within the precinct were also received prior to or during the Exhibition Phase. These applications were generally for partial demolition and an addition to the rear. These proposed works were reviewed and it was determined that they would not negatively impact on the significance of the relevant site, hence the grading remained as 'contributory.'

Address	Comment
59A Fyffe Street	Partial demolition to rear and single storey addition with limited/little visibility
157A Hutton Street	Partial demolition to rear and single storey addition with limited/little visibility
57 Rennie Street	Partial demolition and second storey addition. Mostly recessed but original roof form would remain interpretable
44 Rennie Street	Limited demolition of original fabric and mostly internal works
14 Rennie Street	Partial demolition and second storey addition. Mostly recessed and original roof form would remain interpretable
73 Rennie Street	Single storey addition to side setback, but low impact with limited visibility. Form of original house remains interpretable.
6 Rennie Street	Single storey addition well recessed and obscured by original section
87 Harold Street	Partial demolition to rear and single storey addition

Address	Comment
16 Keon Street	Partial demolition to rear but single storey addition will be largely not visible and form of the original front part will be retained and remain interpretable.
39 Keon Street	Rear single storey addition
63 Keon Street	Rear and minor alterations

57. On 13 December 2021, Council resolved to defer consideration of submissions received, to allow for further engagement with cultural and linguistically diverse communities in the local area.
58. In February 2022, 92 participants (including 45 from CALD communities) were involved in further consultation with Council. This resulted in seven new submissions (four submissions in support of the heritage overlay and three submissions not in support).
59. Of the 173 total submissions received, 68 are supportive of the proposed heritage overlay and 105 are not supportive (of which 24 are proforma objections).
60. Council considered the submissions at an ordinary meeting on 28 March 2022. Council recommended that all submissions be referred to an independent Planning Panel for further consideration.
61. Additional late submissions (nos 174, 175, 176, 177, 178 and 179) were received by Council (*Appendix H*). Additional information was provided by the submitter in relation to submissions 98 + 100.
62. Requests for two late submissions (nos 40 + 103) to be heard at the Hearing were received by Council. The Panel has agreed to accept both late requests.
63. Council has recently sought an extension on this interim Heritage Overlay which expires on 29 April 2023 (Amendment C207).

CITY OF DAREBIN HERITAGE STUDY INCORPORATED PLAN – PERMIT EXEMPTIONS (2011, AMENDED 2021)

64. The Incorporated Document sets out permit exemptions from the provisions of the Heritage Overlay in accordance with Clause 43.01-2 that apply to specific heritage places and precincts.
65. The document identifies specific types of development associated with demolition, routine maintenance, construction works etc, within the Thornbury Park Estate (HO318) which do not require a planning permit.
66. The document also includes a gradings map plan for the Thornbury Park Estate Precinct.

RESPONSE TO SUBMISSIONS

67. This section responds to the 178 total submissions received by Council in response to Amendment C191, some of which are doubled up. The schedules are organised according to those 'in support' or 'not in support' of Amendment C191 and those 'parties attending' or 'not attending' the Hearing.
68. A summary of each submission is provided. This includes the submission number, an overview of each submission (reproduced from document *Appendix A: Summary of Submissions* associated with the Council Meeting held on 28 and 29 March 2022), and RBA's response during the Exhibition Phase, and usually some additional comment.
69. Common issues were raised across many of the submissions. A full description of common issues, a mixture heritage and non-heritage related, identified by Council is provided in *Appendix A: Summary of Submissions*.
70. I provided comment on specific as well as common heritage issues raised by submitters for the Council Meeting held on 28 and 29 March 2022, which were outlined in *Appendix F - Response to Exhibition Submissions*. The responses to the common heritage issues (nos 1 to 16) provided in Appendix F are reproduced in the following table. These detailed responses outline my key position on these issues.

No.	Issue	RBA Response
1	Concerns regarding the financial impact on homeowners to renovate	<p>A heritage overlay does not preclude alterations and addition being approved nor that it will be necessarily more expensive to undertake them. The Heritage Overlay requires a planning permit in order to assess the potential heritage impacts and so there may be some additional time associated with that process.</p> <p>For graded properties - significant and contributory - proposed demolition and larger building works will require a planning permit. The Council will assess whether the proposed development could affect the heritage significance of the individual place and precinct more broadly. Typically, alterations to the front/ façade of a contributory or significant place would generally not be supported.</p> <p>Sympathetic alterations and additions to graded places would be approved under the heritage overlay, as well as the demolition and sympathetic redevelopment of non-contributory properties in the area. Alterations to contributory places would generally be permitted if they are located to the rear and not visible, or have limited visibility, from the public realm. Alterations to significant places will be more scrutinized but generally supported if the significance of the place is not compromised.</p>
2	Concerns regarding the perceived additional burden/difficulty in upgrading homes to environmental standard	<p>There is a substantial environmental benefit to retaining and adapting existing historic building stock. Maintaining existing buildings retains the energy embodied in the existing structure and materials, reduces the resource consumption and construction waste involved in building new homes.</p> <p>Although modest, many heritage places in the precinct were designed to be energy efficient in their own way – for example, through passive heating and cooling, sunshading, natural ventilation. Renovating creates the opportunity to ensure that these systems are working as intended and to optimise performance through new knowledge and technologies.</p> <p>Many of the changes required to improve or ensure the places in the Thornbury Park Estate (TPE) meet contemporary environmental standards would likely be permissible under the heritage overlay. Heritage Victoria provides the example of the recent renovation of the Jewel House, a significant graded building in South Yarra that was renovated with 'environmental sustainability objectives were achieved using the Passive House approach. This included adding insulation on the interior against the brick walls to maintain the external presentation and installing high-performance windows throughout, detailed to relate to the originals.' This example demonstrates that respecting heritage value and meeting environmental standards through renovations are not mutually exclusive.</p> <p>'New elements must be integrated carefully and it would be important to work with skilled heritage practitioners, architects or consultants to devise an approach that will ensure excellent performance from environmental, heritage and design perspectives.'</p>

		There are many publicly available guides and other tools that could be assist, including the Heritage Victoria publication 'At Home With Heritage Design Process And Considerations'.
3	Concerns regarding the perceived low quality of historic building fabric	Most of the contributory graded buildings in the TPE are modest timber examples, representing a low-cost type of workers housing during the late Federation and Interwar periods which relates to key themes in the development of the municipality. Timber buildings are not necessarily inferior to masonry examples. The perceived low quality of the building fabric does not affect the ability of a place to meet the thresholds for significance at the local level.
4	Concerns regarding the perceived low integrity of streetscapes and high number of non-contributory places overall	The TPE is an unusually large precinct and I acknowledge that some areas have a relatively high concentration of non-contributory places. Viewed on a precinct-wide level however, the overall integrity of the precinct is considered to sufficient to be considered intact, with approximately 73% of the total places graded contributory or significant. Although here has been change throughout the precinct, on the whole it remains legible as a Federation period subdivision developed largely over the late Federation, Interwar and Post-WWII periods. It meets the threshold for local heritage significance as a result and relates to key themes outlined in the Thematic History.
5	Concerns regarding the perceived low intactness of Fyffe Street	Fyffe Street is mostly intact with approximately 68% of the places graded contributory. It is acknowledged this is less than the average across the total precinct (which is approximately 73%) and the southern side is generally more intact than the north. As with Keon and Rennie streets, the area of Fyffe between Strettle Street and Comas Grove contains a concentration of Post-WWII period places with much of the south side consisting of flat development from the later 20th century. There are concentrations of non-contributory places on the north side between Comas Grove and Taylor Street such as from no. 98 to no. 104. That being said, when taken as a whole, Fyffe Street continues to contribute to the heritage value of the TPE. It is acknowledged that some of the individual streets have a lower level of intactness than the precinct as a whole, but this is not a reason to exclude them from the precinct if the precinct as a whole has the requisite level of intactness, which is this case it does.
6	Concerns regarding the perceived low intactness of Rennie Street	Like most of the east-west streets in the precinct the historic building stock largely consists of detached timber clad Interwar period buildings to the part east of Comas Grove while the area west of Comas Grove contains a concentration of Post-WWII period places. Rennie Street is considerably intact with approximately 76% of places graded contributory – this is higher than the total percentage of contributory places in the TPE (approximately 73%). The part west of Comas Grove is even more intact and it contains a high number of intact Post-WWII period places. As a street containing intact places from the period of significance it readily contributes to the significance of the TPE.
7	Concerns that contributory places display low integrity to original condition	Places do not have to be completely intact to be graded contributory in the precinct. In addition, the condition of the place is separate to its potential heritage value and fabric that is in poor condition can usually be repaired with matching detailing. For the purposes of assessing the contribution, or not, of an individual item (usually a building) to the significance of the precinct, an approach has been adopted in keeping with good heritage practice (as outlined in The Burra Charter which is the guiding document for professionals dealing with post-contact cultural heritage in Australia).

		<p>As noted in the TPE report, a place has been attributed a contributory grading if the following apply:</p> <ul style="list-style-type: none"> • It contributes to the character of the streetscape/precinct, and • It was constructed during the period of significance (identified as the main or secondary phases of development in the statement of significance), and • It is an intact example or a place which though altered, remains largely identifiable as an example of its type/period, and • It typically retains its form, most original materials, and at least some original detailing (which might include openings [windows + doors], chimneys, verandah or porch, decorative elements, etc.), • Generally any changes that have occurred are reversible, allowing for accurate reconstruction in accordance with the Burra Charter, • If it forms part of a similar group, then it could be more altered if other examples in the group are intact, • If there are visible additions, they are sufficiently set back such that the original section is not overwhelmed and the original roof form remains legible. For instance, the addition is set behind the main ridge (when it is parallel to the street).
8	Concerns that the whole area is being protected just to protect 33 Comas Grove	<p>While the study had its origins in a review of the potential heritage value of the property at 33 Comas Grove, it was the conclusion of that initial assessment there was a larger area of consistent housing from the Interwar period in the surrounding area which was worthy of further investigation.</p> <p>Upon review of the wider area, it was identified by Context Pty Ltd. that this area formed part of a Federation period subdivision and there was much intact historic building fabric from the Federation, Interwar and Post-WWII periods in that area that was worthy of further detailed assessment as a potential heritage precinct. RBA Architects were then engaged to undertake that detailed assessment.</p> <p>This is not an uncommon circumstance in the heritage assessment process, where the scope of a study increases as more research and analysis is undertaken.</p>
9	Claims each of the criterion haven't been met or proven	<p>The Statement of Significance identifies the TPE as meeting the thresholds for significance at the local level for historical, representative and aesthetic significance. This was the conclusions of a rigorous assessment undertaken by RBA Architects utilising a methodology in accordance with the processes and criteria outlined in the Burra Charter or Australia ICOMOS Charter for the Conservation of Places of Cultural Significance (Australia ICOMOS, 2013) and the State Government Planning Practice Note 1 note Applying the Heritage Overlay.</p> <p>The study assessment included site inspections, historical research and analysis of the extant fabric in relation to documentary evidence, preparation of a physical description, assessment of the significance of the places based on the research and the extant fabric, comparative analysis with relevant existing heritage overlay precincts in Darebin and preparation of a citation (statement of significance, history and description), with reference to the relevant HERCON criteria.</p> <p>The rigorous study found the TPE to be of historical significance as a large subdivision that illustrates the emergence and rapid consolidation of Thornbury as a residential suburb during the early to mid-20th century. The TPE precinct was mostly being offered for sale from late 1911, though not officially subdivided until 1914. Although sales were strong during the 1910s, substantial development did not occur in earnest until the early 1920s, after the opening of the St Georges Road electric tram (1920) and the electrification of the rail line (1921). Much of the ensuing construction was likely</p>

		<p>undertaken by builders such as Dunlop & Hunt and the prolific, local firm of Stewart & Davies. This pattern demonstrates the broader speculative dynamics in the district around this time and the integral part played by these types of builders in providing the suburban dream to a wide demographic.</p> <p>The TPE was also found to be representative significance for containing manifold good and generally intact examples of modest late Federation, Interwar and Post WWII period house designs, many of the type practiced by suburban builders, as well as examples of State Savings Bank homes. The economical yet presentable housing stock, which is almost entirely detached, is indicative of standard types of residences constructed during the main development phase of the 1910s and 1920s. The humbleness of the construction is evidenced however by the lack of 'extraneous' detailing such as decorative glasswork, which is common in more middle-class examples. The latter houses – dating to the 1930s (or late Interwar period) and late 1940s through the 1950s (or post-WWII period) - tend to be brick with tiled roofs and a uniformly larger (though some are paired/semi-detached).</p> <p>In addition, the TPE was also found to be of aesthetic significance for including a few individually notable buildings, being relatively substantial, have a greater level of detailing, and higher quality palette of materials than the majority of the otherwise modest building stock.</p>
10	Claims that the HO should be restricted to only the significant graded properties	<p>Under the Darebin Planning Scheme, significant places are defined as 'a place that has cultural heritage significance which may be independent of its context. These places may also contribute to the significance of a heritage precinct'.</p> <p>There are very few places in the precinct that would have heritage significance independent of their context, except for the five individually notable places graded significant. These places are 'are relatively substantial, have a greater level of detailing, and higher quality palette of materials' than the contributory graded places, which are more modest and similar in appearance.</p> <p>The gradings in the TPE reflect the heritage value of the precinct, that is a relatively large area with many similarly intact and modest places that together contribute to provide the heritage value of the place – the value of the precinct is cumulative and synergistic, in that the sum of the parts is greater than the individual value of each of the parts.</p> <p>As much of the significance of the TPE is derived from it being a large group of generally intact examples of modest housing, the values of the place would not be conserved by just applying the heritage overlay to the significant graded places, even if they are generally more elaborate and/or substantial.</p>
11	Question regarding the motivation of not including most of the west of St Georges Road	<p>As noted in the TPE report, St Georges Road probably has the most diverse building stock in the study area, with a concentration of commercial buildings to the southern part and a residential development section to the north, which includes a high percentage of places developed during the Post-WWII period.</p> <p>The southern end has undergone considerable change, including some recently multi-level residential development, and it was largely removed from the extent of the proposed precinct except for a group of three largely intact, late Federation/early Interwar period shops (nos 455A to 459), of which there are few remaining examples in the precinct.</p>

		<p>The northern end is mainly residential and generally masonry construction. This section was mixed with some late 20th or early 21st century developments and some historic places which had undergone some the degree of change. There were two good and prominent Post-WWII examples – no. 499 and no. 537. They are both located to corners and are the only two storey examples in the precinct – the house at no. 499 and the flats at no. 531, however the flats had been already earmarked for change.</p>
12	<p>Concerns regarding the impact of some of the original 66ft allotments having been further subdivided in the 1920s, on the significance of the original subdivision</p>	<p>It is acknowledged that many of the original 66ft allotments from the initial subdivision were further subdivided during the 1920s to create 33ft wide lots, due to increasing demand for housing.</p> <p>This is representative of a distinct phase in the development of the estate when, driven by improvements in transport systems, the Northcote area (including Thornbury) grew swiftly – between the wars the population in Northcote rose from 26,000 to well over 42,000. House construction accordingly ballooned, from around 6,500 houses at the end of WWI to more than 11,000 by the start of WWII. The large majority of this growth occurred in the 1920s, spurred on by the electrification of the Heidelberg railway line between Clifton Hill and Reservoir in 1921 that facilitated quicker travel to Melbourne.</p>
13	<p>Specific issues regarding the inclusion of Strettle Street</p>	<p>This issue was considered when the assessment of the precinct was undertaken. The parts of Strettle Street that are included in the precinct is the east side between Miller and Hill streets (incl. south side). The north part of this area formed part of the original c1911 TPE estate subdivision, while the south part formed part of a commensurate unnamed subdivision. It contains a high number of intact places, mostly Post-WWII period but some Interwar – approximately 70%. It readily contributes to the significance of the TPE for that reason.</p> <p>To the west side, the area between Miller and Fyffe streets is a later development from at least post-1956, with building stock from the 1960s onwards, including original two storey houses, a type not evident in the TPE. As such, it is not considered to warrant inclusion in the heritage overlay as part of the TPE as the housing stock is not from the period of significance for the TPE.</p> <p>The south end of the west side, between Fyffe and Hill streets, had been developed by 1956, but has undergone considerable change since that time. As such, it is not considered to warrant inclusion in the heritage overlay as part of the TPE because it is of low intactness to the period of significance.</p>
14	<p>Question as to why only the north side of Smith Street is included</p>	<p>Both sides of Smith Street were assessed as part of the study area and reviewed with the site inspections. The northern side of this street was found to contain more intact historic building stock than the south side.</p> <p>Although the building stock on the south side was largely consistent with the rest of the precinct, research identified that it was part of an earlier, 1880s subdivision. Development in this subdivision began during the late 19th century (Victorian period) rather than from the late 1910s (late Federation period) as with the Thornbury Park Estate subdivision.</p> <p>Although all the building stock from the early phase seems to have been replaced, its history/development nonetheless differs from that of the rest of study area, and so it was not included in the extent of the proposed precinct.</p>
15	<p>Question as to why the area between Smith Street</p>	<p>The area between Lewis Street and Normanby Ave was outside the study area and was therefore not inspected (although the south side of Smith Street was – see above).</p>

	<p>and Normanby Ave was not included</p>	<p>Research however identified this area was part of an earlier, 1880s subdivision. Development in this subdivision began during the late 19th century (Victorian period) rather than from the late 1910s (late Federation period) as with the Thornbury Park Estate subdivision. As such, its history/development differs from that of the rest of the TPE, and so it would not readily form part the TPE.</p> <p>Preliminary review of this area however including Ballantyne Street shows that there are a few Victorian period houses surviving and the character is varied with a relatively high proportion of buildings from the late 20th century and early 21st century. This area, or part of it, might potentially be worth further investigation as a separate heritage precinct.</p>
<p>16</p>	<p>Question as to why the places on Newman Street between Strettle and Comas Grove are not included</p>	<p>It is acknowledged that this area was included in the unnamed subdivision that occurred around the same time as the c1911 TPE. This area also contains some Interwar period places (mostly to the south side) and some Post-WWII period places (mostly to the north side).</p> <p>This area has a curved road layout and slopes away sharply to the west with steep terraced front setbacks to the north side of the street. This creates a different character than the rest of the residential parts of the TPE, which is mostly flat with a grid street pattern. The Post-WWII places are typically more substantial than the examples in the TPE. In addition, there is a disconnection between this part of Newman Street and the TPE proper created by the wide, curving intersection with Strettle Street.</p> <p>As such, this area does not readily relate to the character and typical circumstance of the TPE.</p>

71. Some additional discussion regarding a few of these points is outlined in further responses outlined in a following table.

Submissions in Support of Amendment C191 – Parties Attending the Hearing

72. The schedule outlines submissions in support of Amendment C191 (parties attending the Hearing).

No.	Details
<p>32</p>	<p>Submitter no. 32 supports Amendment C191.</p> <p>Response</p> <ul style="list-style-type: none"> The house at 66 Hutton Street is an intact house retaining many original features including gable roof, chimney, gable end with battens and roughcast finish, casement windows with highlights, entry porch and front door. It is indicative of detailing popular during the late Federation period, though some examples in the precinct are known to have been constructed during the early Interwar period (not an unusual occurrence). Submissions of support indicate that some members of the community believe that identified places of heritage significance should be appropriately protected.

No.	Details
	 <p data-bbox="341 1048 488 1070">66 Hutton Street</p>
40	<p data-bbox="277 1084 721 1115">Submitter no. 40 supports Amendment C191.</p> <p data-bbox="277 1133 386 1164">Response</p> <ul data-bbox="277 1182 1430 1357" style="list-style-type: none"> <li data-bbox="277 1182 1430 1281">• This is a good intact example of an Interwar period bungalow. Its multi-gabled roof form includes one to the porch and the gable ends feature shingled skirts. The boxed framed windows have lozenge leadlighting to the upper sash and the porch is mostly rendered with tapestry brick detailing. <li data-bbox="277 1294 1430 1357">• Submissions of support indicate that some members of the community believe that identified places of heritage significance should be appropriately protected.

No.	Details
	 <p data-bbox="304 1043 408 1066">2 Hill Street</p>

Submissions Not in Support of Amendment C191 – Parties Attending the Hearing

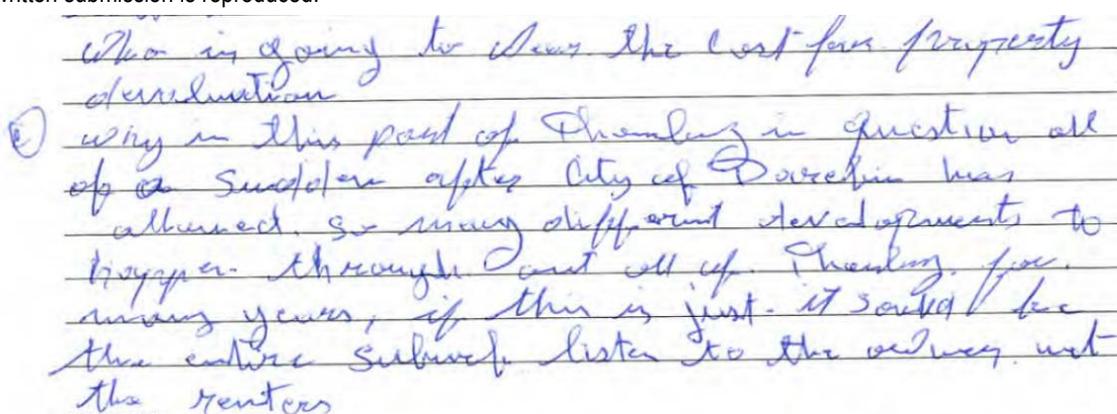
73. The schedule outlines submissions not in support of Amendment C191 (parties attending the Hearing).

No.	Details
98	<p data-bbox="233 1279 1350 1312">Submitter no. 98 objects to Amendment C191 and proposed inclusion of 111 Hutton Street in the Heritage Overlay.</p> <p data-bbox="233 1323 663 1357">A summary of the submission is reproduced:</p> <ol data-bbox="328 1361 1302 1581" style="list-style-type: none"> 1. Our Significant Home, is structurally unsound, plagued with moisture issues and not as intact as assumed 2. Contradiction between the declaration of a climate emergency and the application of a heritage overlay 3. Embodied energy is a flawed argument 4. The Heritage overlay fails to address contemporary building science 5. Contradiction between the report and proposed Heritage overlay 6. The unintended consequences of the Heritage overlay <p data-bbox="233 1597 743 1630">Review for Council Meeting dated 28 March 2022</p> <ul data-bbox="233 1641 1262 1794" style="list-style-type: none"> • Poor condition is a separate issue to assessment of intactness and potential contribution to a proposed precinct. • It is generally possible to repair deteriorated fabric whilst not diminishing significance. • A sympathetic approach to remediation can be resolved through the planning permit process. • With the current level of intactness, it passes the threshold for a contributory place. <p data-bbox="233 1809 456 1843">Additional Response</p> <ul data-bbox="233 1854 1382 2007" style="list-style-type: none"> • Within the Statement of Significance, 111 Hutton Street is listed under Criterion E as follows: <ul data-bbox="328 1906 1382 1962" style="list-style-type: none"> the only example of the Federation bungalow style in the precinct. Unusually it has a symmetrical façade in red brick with diamond quarrels to both sashes. • The following description was provided on page 7 of the citation:

No.	Details
	<p>111 Hutton Street – a Federation Bungalow style dwelling distinguished by its red-brick (with remnant tuck-pointing) and symmetrical composition. The latter formed by a central gabled porch supported by a pair of rendered square columns on brick pedestals that are flanked by two faceted bay windows (double-hung sashes/quarrel leadlighting). Restrained use of timber shingling and the original door and sidelights.</p> <p>The dwelling, constructed circa 1920, is a good example of how elements of the Queen Anne and Californian Bungalow styles were interwoven. It is however affected by structural issues with evident cracking.</p> <ul style="list-style-type: none"> ● Further details/other original elements include: <ul style="list-style-type: none"> ▪ Gambrel roof with central gable, clad in terracotta tiles with finials, exposed rafter ends, ▪ Rendered chimneys with projecting brick in a cross motif, ▪ Timber boards to soffits of gable ends and porch, ▪ Distinctive flared ends to the porch bargeboard and profile of front fascia of porch, ▪ Notched/shingled boards to gable ends and skirts above bay windows, ▪ Concrete/rendered lintel over door, ▪ The entry unit with stained glass to the lights (upper part of door and sidelights) high waisted panelled timber door, side panelling and lights (seem to also have diamond quarrels). ○ It was suggested by the submitter that the house originally was clad in slate. This is unlikely as from the 1945 aerial, there is no evidence of a metal (lead/galvanised) flashing indicating it had a tiled roof. ○ The assessment of intactness is undertaken from the public realm so that changes to the interior and rear are not a factor in determining heritage value in a precinct. ○ According to the directories, it was being built in 1922, and was listed in 1923 with William O Joynson as the occupant. At this time, the directories were often a year or two out of date. ○ Overall, this place is largely intact and a particularly distinctive example within the Thornbury Park Estate Precinct, hence it was graded as significant. ○ From the public realm, the structural issues (substantial cracking, etc) are not readily apparent, however are evident in the documentation provided. ○ A planning panel is typically not the appropriate forum for determining what would be the appropriate way to resolve structural and/or amenity issues. These concerns are usually addressed through the planning permit process. ○ In order to resolve a way forward whilst (largely) preserving the heritage values of this significant place within the proposed precinct, it is recommended that a structural engineer who has experience with remedying similar circumstances with historic buildings be engaged to review the condition and determine what might be possible solutions to retaining much of the existing fabric whilst resolving the various issues – inadequate footings, insulation, damp, etc.

No.	Details
	 <p data-bbox="248 1070 408 1093">111 Hutton Street</p>
103	<p data-bbox="233 1111 1002 1133">Submitter no. 103 objects to Amendment C191. The submission is reproduced:</p> <p data-bbox="325 1144 1369 1200">No actual case has been made that the additional costs are offset by the benefit of 90 year old inter war buildings being preserved in Thornbury.</p> <p data-bbox="325 1227 1406 1339">Similarly, these are local streets. Council policy is to minimise through traffic in the area (through traffic should be on arterial roads) so it is the local residents and future local residents that will somehow be the beneficiaries. This case has not been made. What has been presented is a throwaway line, not the product of an analysis in accordance with the requirements of the P&E Act.</p> <p data-bbox="325 1366 1406 1529">We are talking about a significant parcel of land and rather than a throwaway line perhaps council may turn their mind to the merit of preserving a large area 90 year old weatherboard dwellings into the future. Most of the dwellings have been remodelled often at the rear and at the side (usually ensuites to a master bedroom) because their internal spaces do conform to current living expectations. Council may also want to consider the cost of preserving 90 year old weatherboard which is about at the end of its serviceable life. Is it environmentally appropriate to update a built form with inefficient materials, would it be more environmentally sustainable to rebuild with a better orientation and materials?</p> <p data-bbox="325 1556 1406 1585">I would ask Council to consider the Special Building Overlay that covers some 25-30% of the dwellings in proposed overlay.</p> <p data-bbox="325 1612 1401 1693">Within the SBO, development proposals must be referred to the relevant floodplain management authority. In this instance, it is Melbourne Water. It is Melbourne Water practice to set the flood level and require development to sit 300 mm above the flood level.</p> <p data-bbox="325 1720 1406 1861">Setting aside the fact that many of the dwellings in the SBO need restumping because the land sits on fill dirt, this means that new development is referred to Melbourne Water which is a determining referral authority and there will be the inevitable debate between the Council Heritage Advisor and the Melbourne Water engineers that will have an impact on the built for outcome on dwelling stock that is made out of 90 year old hardwood frames and stumps and weatherboards. Such debate may well need to be resolved by VCAT.</p> <p data-bbox="325 1888 775 1917">No analysis has been provided about this interface.</p> <p data-bbox="325 1944 1385 2000">In the absence of a detailed analysis of the interplay between the SBO and the Heritage Overlay, I recommend that the Council withdraw the amendment till its planners provide a robust analysis of the implications as required by the P&E Act</p>

No.	Details
	<p>and remove properties that are within the SBO from the proposed permanent heritage overlay until Melbourne Water sorts out its drains and lifts the SBO.</p> <p>Response</p> <ul style="list-style-type: none"> • The main issue raised related the Special Building Overlay, which is said to affect about 25-30% of the precinct area, and the potential requirements of that overlay – for places to sit 300mm above the flood level. Managing these concerns is separate to those of the Heritage Overlay and are not necessarily in conflict with each other. • The submitter is not known to comment on the intactness, etc of their house (68 Keon Street). • No specific comment was provided about the heritage value or not of the submitter’s own place or the precinct as a whole was made except for ‘... merit of preserving a large area of 90 year old weatherboard dwelling into the future. Most of the buildings have been remodelled often at the rear and at the side (usually ensuites to a master bedroom).’ • With a precinct, it is widely accepted that if alterations and additions have occurred to the rear parts of the building, especially if they are not or have limited visibility from the public realm, they do not diminish the heritage significance of a precinct. The key consideration is that the overall original character, reflecting the (key) period/s of significance – as outlined in the Statement of Significance – is largely retained. Similarly many places will have been altered internally but internal controls are not being sought and they are not evident from the exterior. • A precinct of this scale is likely to have some gaps where the original character has been lost or diminished. This is the case with the Thornbury Park Estate Precinct, however overall it remains sufficiently intact to warrant the introduction of a heritage overlay. • In the Thornbury Park Estate Precinct, there are some gaps or lacunae however the progression along streets reveals continuity and a general progression of development in terms of periods from east to west.
162	<p>Submitter no. 162 objects to Amendment C191.</p> <p>The submission is reproduced:</p> <p>Let’s be honest, this whole proposal stems from the efforts of a small group of residents who are trying to block the legitimate development of the site at 31-33 Comas Grove and an adjoining allotment in Fyffe Street (see text below taken from the Council’s documents). While I sympathise with their concerns about inappropriate development, I don’t believe that we should ‘lock-up’ these sites and throw away the key forever.</p> <p>Melbourne is bursting at the seams. Housing affordability has plummeted and we continue to have high rates of homelessness. The parcels of land in question could house scores of new residents in this wonderful neighbourhood. Rather than block development, I would prefer Council to negotiate with the owners regarding its development, ensure Council’s own planning rules are rigorously followed, or potentially purchase the site and develop it and release it to first-home buyers and also include some social housing. I’ve had the pleasure of living in this area for the last 30 years, and raising my family surrounded by wonderful neighbours and great amenities and I want to share this area with others, and enable them to experience this same benefits we’ve had, rather than keeping it all to ourselves.</p> <p>I am also extremely concerned that this heritage proposal will have significant unintended negative consequences on our environment. We’re experiencing a climate emergency and every one of us has to do everything in our power to avert catastrophe. Improving the design and energy rating of our homes, installing solar panels and storage batteries, and using the latest and greatest energy efficient materials that are available are all part of the solution (and who knows what new technology is around the corner). This means changing the look and feel of our houses for the greater good of the planet. It just doesn’t make sense to place bureaucratic barriers in the way of residents’ efforts to reduce their carbon footprint. There’s no point having a quaint period home on a dead planet!</p> <p>Last, I dispute the fact that old is good or that this area is somehow ‘consistent and unique in character’. The area has already gone substantial transformation since the inter-war period when most houses were built and there is now a very eclectic mix of styles and structures in keeping with our vibrant and diverse community. There’s numerous flats, townhouses, and brick veneer villas, not just weatherboard homes. There’s also a huge number of double story premises. It is no different to dozens of neighbourhoods in Darebin, and in no way unique or worthy of special consideration and regulation.</p> <p>At any rate, Council needs to remember that residents own these properties not Council, and Submission 162 you need to respect our choices, tastes and changing needs rather than trying to lock our homes away in a time capsule for eternity. Let’s face it, the past is not always what it’s cracked-out to be and not always worth preserving. Who knows what we’ll learn about the name “Thornbury Park Estate” and it’s original developers whom we’re trying to honour. Just ask Moreland Council!</p>

No.	Details
	<p>While there is nothing wrong with remembering our past, there is equally nothing wrong with moving ahead and embracing the future. This heritage overlay is a curiously reactionary approach by a progressive council.</p> <p>Ultimately, what makes this neighbourhood special is not the style of its architecture, but the people who live here. I believe that Council's role should be to bring more people into the area rather than trying to appease a handful of residents who want to keep the area to themselves.</p> <p>Indeed, let's be honest, as Council's own documents highlight, this heritage overlay proposal is not about preserving the character of the neighbourhood, but rather a cynical misuse of the Heritage Act to block a contentious development, and approving it will have major negative repercussions for hundreds of local residents.</p> <p>Response</p> <ul style="list-style-type: none"> • No specific comment was made about the heritage value or not of the submitter's own place. • The submitter was concerned about housing affordability and opportunities and climate change, which are outside my areas of expertise. • The submitted stated that the process relates to the attempt by locals to prevent the redevelopment of 31-33 Comas Grove. Whilst the process of assessment commenced with 31-33 Comas Grove, two other heritage consultants identified that a larger potential heritage precinct was apparent. • The submitter stated that 'The area has undergone substantial transformation since the inter-war period when most houses were built and there is now an eclectic mix of styles and structures in keeping with our vibrant and diverse community. There's numerous flats, townhouses, and brick veneer villas, not just weatherboard homes. There's also a huge number of double story premises. It is no different to dozens of neighbourhoods in Darebin, in no way unique or worthy of special consideration or regulation.' • Whilst it is recognised that there has been some change as outlined, nonetheless over 70% of the building stock relates to the periods of significance (Federation, Interwar and Postwar). • The comparative analysis undertaken shows that the Thornbury Park Estate is unusual. Given its scale, it was inevitably realised over a few decades. The buildings stock mostly dates to the Interwar period, though some construction started in the final phase of the Federation period. Similarly, development at the western end was not completed until after WWII. Other comparative precincts in the municipality, which are decidedly smaller, have a different time profile with the subdivision commencing earlier or only relating to either the Interwar or Postwar period. • Not everything old is sought to be protected – only either the individually significant examples, typically distinctive and largely intact, of certain types or groups/streetscapes of similar types which evoke a key period of development in the municipality. In the immediate vicinity other areas that were part of Job Smith's holdings - to the east and south - would unlikely reach the threshold for local significance given the extent of change even though they retain examples of similar types evident in the subject precinct. Overall, probably less a quarter of the building stock in the municipality is affected by a heritage overlay even though there is far more historic building stock in the Darebin as many remaining buildings are located in more heterogeneous streetscapes.
167	<p>Submitter no. 167 objects to Amendment C191. (Late submission received during the second round of engagement). The written submission is reproduced:</p>  <p>Response</p>

No.	Details
	<ul style="list-style-type: none"> • In the schedule, the place was identified as Contributory with a medium level of intactness. • Historic aerials, from 1931 onwards, indicate that the roof cladding was corrugated sheet metal from the outset (along with its pair at no. 172 to the east). The chimney, on the west side, has been removed. The entry is from a recess on the west side. The footprint of the projecting bay corresponds with the historic aerials however some of the detailing has changed. • The house is indicative of the most common typology in the precinct – the bungalow - and as such representative of the significance of the precinct. • Development on the north side of Smith Street differs to the south side. It was part of a late 19th century subdivision however limited development occurred until the Interwar period. In 1900, there were three houses on the south side; six in 1910, and nine in 1915 (about the time of the first listings in the precinct). Whilst this early phase of development has been removed on the south side of Smith Street and the extant historic houses mainly date to the Interwar period, there are a few less of them than on the north side, that is there has been greater change than on the south side.
	 <p data-bbox="284 1547 432 1572">174 Smith Street</p>

Submissions in Support of Amendment C191 - Parties Not Attending the Hearing

74. The schedule outlines submissions in support of Amendment C191 (parties not attending the Hearing).

No.	Details
2	Submitter no. 2 supports Amendment C191.
4	Submitter no. 4 supports Amendment C191.
5	Submitter no. 5 supports Amendment C191.
6	Submitter no. 6 supports Amendment C191.
7	Submitter no. 7 supports Amendment C191.

No.	Details
9	Submitter no. 9 supports Amendment C191.
10	Submitter no. 10 supports Amendment C191.
11	Submitter no. 11 supports Amendment C191.
12	Submitter no. 12 supports Amendment C191.
13	Submitter no. 13 supports Amendment C191.
15	Submitter no. 15 supports Amendment C191.
18	Submitter no. 18 supports Amendment C191.
19	Submitter no. 19 supports Amendment C191.
21	Submitter no. 21 supports Amendment C191.
22	Submitter no. 22 supports Amendment C191, subject to changes.
24	Submitter no. 24 supports Amendment C191.
25	Submitter no. 25 supports Amendment C191.
26	<p data-bbox="229 848 676 875">Submitter no. 25 supports Amendment C191.</p> <p data-bbox="229 887 743 913">Review for Council Meeting dated 28 March 2022</p> <ul data-bbox="229 936 1385 1189" style="list-style-type: none"> <li data-bbox="229 936 1385 1003">• Both sides of Smith Street were assessed as part of the study area and reviewed with the site inspections. The northern side of this street was found to contain more intact historic building stock than the south side. <li data-bbox="229 1014 1385 1111">• Although the building stock on the south side was largely consistent with the rest of the precinct, research identified that it was part of an earlier, 1880s subdivision. Development in this subdivision began during the late 19th century (Victorian period) rather than from the late 1910s (late Federation period) as with the Thornbury Park Estate subdivision. <li data-bbox="229 1122 1385 1189">• Although all the building stock from the early phase seems to have been replaced, its history/development nonetheless differs from that of the rest of study area, and so it was not included in the extent of the proposed precinct.
27	Submitter no. 27 supports Amendment C191.
30	Submitter no. 30 supports Amendment C191, subject to changes.
34	<p data-bbox="229 1303 676 1330">Submitter no. 34 supports Amendment C191.</p> <p data-bbox="229 1364 743 1391">Review for Council Meeting dated 28 March 2022</p> <ul data-bbox="229 1413 1385 1709" style="list-style-type: none"> <li data-bbox="229 1413 1385 1480">• The area between Lewis Street and Normanby Ave was outside the study area and was therefore not inspected (although the south side of Smith Street was – see above). <li data-bbox="229 1491 1385 1610">• Research however identified this area was part of an earlier, 1880s subdivision. Development in this subdivision began during the late 19th century (Victorian period) rather than from the late 1910s (late Federation period) as with the Thornbury Park Estate subdivision. As such, its history/development differs from that of the rest of the TPE, and so it would not readily form part the TPE. <li data-bbox="229 1621 1385 1709">• Preliminary review of this area however including Ballantyne Street shows that there are a few Victorian period houses surviving and the character is varied with a relatively high proportion of buildings from the late 20th century and early 21st century. This area, or part of it, might potentially be worth further investigation as a separate heritage precinct.
35	Submitter no. 35 supports Amendment C191.
36	Submitter no. 36 supports Amendment C191, subject to changes.
37	Submitter no. 37 supports Amendment C191.
38	<p data-bbox="229 1870 676 1897">Submitter no. 38 supports Amendment C191.</p> <p data-bbox="229 1919 743 1946">Review for Council Meeting dated 28 March 2022</p>

No.	Details
	<ul style="list-style-type: none"> • The area between Lewis Street and Normanby Ave was outside the study area and was therefore not inspected (although the south side of Smith Street was – see above). • Research however identified this area was part of an earlier, 1880s subdivision. Development in this subdivision began during the late 19th century (Victorian period) rather than from the late 1910s (late Federation period) as with the Thornbury Park Estate subdivision. As such, its history/development differs from that of the rest of the TPE, and so it would not readily form part the TPE. • Preliminary review of this area however including Ballantyne Street shows that there are a few Victorian period houses surviving and the character is varied with a relatively high proportion of buildings from the late 20th century and early 21st century. This area, or part of it, might potentially be worth further investigation as a separate heritage precinct. • Also see RBA Response 16.
39	Submitter no. 39 supports Amendment C191.
41	<p>Submitter no. 41 supports Amendment C191.</p> <p>Review for Council Meeting dated 28 March 2022</p> <ul style="list-style-type: none"> • The area between Lewis Street and Normanby Ave was outside the study area and was therefore not inspected (although the south side of Smith Street was – see above). • Research however identified this area was part of an earlier, 1880s subdivision. Development in this subdivision began during the late 19th century (Victorian period) rather than from the late 1910s (late Federation period) as with the Thornbury Park Estate subdivision. As such, its history/development differs from that of the rest of the TPE, and so it would not readily form part the TPE. • Preliminary review of this area however including Ballantyne Street shows that there are a few Victorian period houses surviving and the character is varied with a relatively high proportion of buildings from the late 20th century and early 21st century. This area, or part of it, might potentially be worth further investigation as a separate heritage precinct. • Also see RBA Response 16.
42	Submitter no. 42 supports Amendment C191.
44	Submitter no. 41 supports Amendment C191.
45	Submitter no. 45 supports Amendment C191.
46	Submitter no. 46 supports Amendment C191.
47	Submitter no. 47 supports Amendment C191.
49	Submitter no. 49 supports Amendment C191.
50	Submitter no. 50 supports Amendment C191.
51	Submitter no. 51 supports Amendment C191.
52	Submitter no. 52 supports Amendment C191.
53	<p>Submitter no. 53 supports Amendment C191.</p> <p>Review for Council Meeting dated 28 March 2022</p> <ul style="list-style-type: none"> • The area between Lewis Street and Normanby Ave was outside the study area and was therefore not inspected (although the south side of Smith Street was – see above). • Research however identified this area was part of an earlier, 1880s subdivision. Development in this subdivision began during the late 19th century (Victorian period) rather than from the late 1910s (late Federation period) as with the Thornbury Park Estate subdivision. As such, its history/development differs from that of the rest of the TPE, and so it would not readily form part the TPE. • Preliminary review of this area however including Ballantyne Street shows that there are a few Victorian period houses surviving and the character is varied with a relatively high proportion of buildings from the late 20th century and early 21st century. This area, or part of it, might potentially be worth further investigation as a separate heritage precinct.
55	Submitter no. 55 supports Amendment C191.

No.	Details
60	Submitter no. 60 supports Amendment C191.
63	Submitter no. 63 supports Amendment C191.
64	Submitter no. 64 supports Amendment C191, subject to changes.
65	Submitter no. 65 supports Amendment C191.
68	Submitter no. 68 supports Amendment C191.
69	Submitter no. 69 supports Amendment C191.
70	Submitter no. 70 supports Amendment C191.
72	Submitter no. 72 supports Amendment C191, subject to changes.
77	Submitter no. 77 supports Amendment C191.
78	Submitter no. 78 supports Amendment C191.
82	Submitter no. 82 supports Amendment C191.
84	Submitter no. 84 supports Amendment C191.
85	Submitter no. 85 supports Amendment C191.
86	Submitter no. 86 supports Amendment C191.
92	Submitter no. 92 supports Amendment C191.
99	<p>Submitter no. 99 supports Amendment C191 (supporting document)</p> <p>Review for Council Meeting dated 28 March 2022</p> <ul style="list-style-type: none"> It is acknowledged that this area was included in the unnamed subdivision that occurred around the same time as the c1911 TPE. This area also contains some Interwar period places (mostly to the south side) and some Post-WWII period places (mostly to the north side). This area has a curved road layout and slopes away sharply to the west with steep front setbacks to the north side of the street. This creates a different character than the rest of the residential parts of the TPE, which is mostly flat with a grid street pattern. The Post-WWII places are typically more substantial than the examples in the TPE. In addition, there is a disconnection between this part of Newman Street and the TPE proper created by the wide, curving intersection with Strettle Street. As such, this area does not readily relate to the character and typical circumstance of the TPE.
107	Submitter no. 107 supports Amendment C191 (supporting document)
142	Submitter no. 142 supports Amendment C191, subject to changes.
152	Submitter no. 152 supports Amendment C191, subject to changes.
154	<p>Submitter no. 154 supports Amendment C191.</p> <p>Review for Council Meeting dated 28 March 2022</p> <ul style="list-style-type: none"> The area between Lewis Street and Normanby Ave was outside the study area and was therefore not inspected (although the south side of Smith Street was – see above). Research however identified this area was part of an earlier, 1880s subdivision. Development in this subdivision began during the late 19th century (Victorian period) rather than from the late 1910s (late Federation period) as with the Thornbury Park Estate subdivision. As such, its history/development differs from that of the rest of the TPE, and so it would not readily form part the TPE. Preliminary review of this area however including Ballantyne Street shows that there are a few Victorian period houses surviving and the character is varied with a relatively high proportion of buildings from the late 20th century and early 21st century. This area, or part of it, might potentially be worth further investigation as a separate heritage precinct.
156	<p>Submitter no. 156 supports Amendment C191.</p> <p>Review for Council Meeting dated 28 March 2022</p>

No.	Details
	<ul style="list-style-type: none"> See submission 154 above.
158	Submitter no. 158 supports Amendment C191.
163	Submitter no. 163 supports Amendment C191, subject to changes.
166	Submitter no. 166 supports Amendment C191.
168	Submitter no. 168 supports Amendment C191.
169	Submitter no. 169 supports Amendment C191.
170	Submitter no. 170 supports Amendment C191.
173	Submitter no. 173 supports Amendment C191.

Submissions Not in Support of Amendment C191 - Parties Not Attending the Hearing

75. The schedule outlines submissions not in support of Amendment C191 (parties not attending the Hearing).

No.	Details
1	<p>Submitter objects to Amendment C191 and proposed grading of 171A Harold Street.</p> <p>Response dated 25 January 2022</p> <ul style="list-style-type: none"> The site was reviewed and a detailed response provided on 25/1/2022. Whilst some change has occurred at this site reducing the intactness of the place, it has not been to such a degree for it to be regraded from Contributory to Non-contributory. The house dates to the period of significance and is indicative of the bungalow type. Key elements survive including its gable roof forms, red brick chimneys, and gable end detailing (a battened band surmounted by overlapping vertical boards). Some changes have occurred, though are potentially reversible, with the most pertinent ones being that the front porch has been opened up (removing part of the masonry components) and the terracotta roof tiling has been replaced with corrugated sheet metal. Overall, this house clearly presents (is readily interpreted) as an Interwar period bungalow and remains mostly intact. On further detailed review, it does not reach a level of 'high' intactness as currently listed in the Schedule but rather would be better listed as 'medium'. <p>Additional Response</p> <ul style="list-style-type: none"> In the Schedule, the site was graded 'C' and had initially been assessed as having a high level of intactness, though this has been changed to a medium level of intactness. A detailed review of the remnant fabric was undertaken in January 2022 (reproduced in the Appendix), resulting in the recommendation to retain the Contributory grading but change the level of intactness from high to medium. I confirm this position and no further comment is provided.

No.	Details
	 <p data-bbox="252 1131 422 1153">171A Harold Street</p>
3	<p data-bbox="228 1167 678 1189">Submitter no. 3 objects to Amendment C191.</p> <p data-bbox="228 1211 742 1234">Review for Council Meeting dated 28 March 2022</p> <ul data-bbox="228 1256 1380 1480" style="list-style-type: none"> <li data-bbox="228 1256 1380 1312">• Both sides of Smith Street were assessed as part of the study area and reviewed with the site inspections. The northern side of this street was found to contain more intact historic building stock than the south side. <li data-bbox="228 1323 1380 1402">• Although the building stock on the south side was largely consistent with the rest of the precinct, research identified that it was part of an earlier, 1880s subdivision. Development in this subdivision began during the late 19th century (Victorian period) rather than from the late 1910s (late Federation period) as with the Thornbury Park Estate subdivision. <li data-bbox="228 1413 1380 1480">• Although all the building stock from the early phase seems to have been replaced, its history/development nonetheless differs from that of the rest of study area, and so it was not included in the extent of the proposed precinct. <p data-bbox="228 1491 454 1514">Additional Response</p> <ul data-bbox="228 1536 1465 1738" style="list-style-type: none"> <li data-bbox="228 1536 1465 1738">• As outlined previously, development on the north side of Smith Street differs to the south side. It was part of a late 19th century subdivision however limited development occurred until the Interwar period. In 1900, there were three houses on the south side; six in 1910, and nine in 1915 (about the time of the first listings in the precinct). Whilst this early phase of development has been removed on the south side of Smith Street and the extant historic houses mainly date to the Interwar period, there are a few less of them than on the north side, that is there has been greater change than on the south side.
8	<p data-bbox="228 1762 678 1785">Submitter no. 8 objects to Amendment C191.</p> <p data-bbox="228 1807 343 1830">Response</p> <ul data-bbox="228 1852 1077 1874" style="list-style-type: none"> <li data-bbox="228 1852 1077 1874">• No specific comment was made about the heritage value of the submitter's house.
14	<p data-bbox="228 1915 1220 1937">Submitter no. 14 objects to Amendment C191 and proposed 'contributory' grading of 27 Keon Street.</p> <p data-bbox="228 1960 1013 1982">Response to Exhibition Submissions (Not included in Council Appendix A)</p>

No.	Details
	<ul style="list-style-type: none"> • Applicant has received incorrect advice from Council as it should have been recognised that this place was likely to be contributory to the proposed precinct as an interwar period bungalow. • This house is largely intact (roof form, chimney, gable end with shingles and vent, exposed rafter ends, boxed framed windows, entry with decorative glass). Whilst the verandah has been infilled the changes are largely reversible as the piers and timber posts survive and the bay window is likely original and could be reinstated in its original location. The verandah whilst infilled, nonetheless remains interpretable. The changes to the deck are of minimal impact. The addition is small-scale and recessed so that the footprint of the main section remains evident. <p>Additional Response</p> <ul style="list-style-type: none"> • In the Schedule, the site was graded 'C' and has been assessed as having a high level of intactness. • With the advantage of some photographs of October 2019 (https://www.realestate.com.au/property/27-keon-st-thornbury-vic-3071, accessed 23.05.2022), it is clear the bay is not original but the original façade windows (double hung sash with multi-paned upper sash, similar to those on the east side) remain in situ in the original façade wall behind the current façade wall. As such, the non-original outer wall can be easily removed and the original façade represented. • Other original elements not listed above are the wide soffits lined with timber boards and the frieze (upper band) of roughcast sheeting/finish to the façade walls. • As such, I reconfirm the Contributory grading. Whilst some limited change has occurred to the verandah (primarily the deck materials), it is largely intact and clearly identified as indicative of the bungalow type consistent with a high percentage of the building stock in the precinct.  <p>27 Keon Street</p>
16	<p>Submitter no. 16 objects to Amendment C191.</p> <p>Response to Exhibition Submissions</p> <ul style="list-style-type: none"> • Site has demolition permit, to be regraded from Contributory to Non-contributory. • The place has been re-graded to non-contributory. <p>Additional Response</p>

No.	Details
	<ul style="list-style-type: none"> Procedural issues, no heritage response required. In light of the pre-existing demolition permit for 135 Hutton Street (outlined at point 54), the site was re-graded from Contributory to non-contributory.
17	<p>Submitter no. 17 objects to Amendment C191.</p> <p>Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house to respond to.
20	<p>Submitter no. 20 objects to Amendment C191.</p> <p>Response</p> <ul style="list-style-type: none"> No specific comment about the heritage value or level of intactness of the house was provided.
23	<p>Submitter no. 23 objects to Amendment C191.</p> <p>Review for Council Meeting dated 28 March 2022</p> <ul style="list-style-type: none"> Altering houses to incorporate better insulation are likely to be achieved under the provisions of the heritage overlay. It is acknowledged that total demolition of this contributory graded place would not be in line with the planning scheme provisions. There would be opportunities for change at the site to achieve substantial greater yield (second storey addition) to meet requirements for more space. It would however be subject to a planning permit. Also see RBA responses 1 and 3. <p>Additional Response</p> <ul style="list-style-type: none"> No specific comment about the heritage value or level of intactness of the house was provided.
28	<p>Submitter no. 28 objects to Amendment C191 and proposed grading of 31 Strettle Street.</p> <p>Response</p> <ul style="list-style-type: none"> In the Schedule, the site was graded 'C' and has been assessed as having a high level of intactness. This Postwar house is partly obscured from the street. It appears to be intact with tile clad hip roof, red brick chimney and front fence, original porch with brick pier extending to a patio/terrace. The main change is the aluminium framed windows, likely replacing either original timber or steel type. It is appropriately graded contributory. 33 Strettle Street has been appropriately graded 'NC' as the walls have been rendered, which is typically a non-reversible. The single storey entry section is also an addition. Elsewhere in this block – between Keon (north) and Rennie (south) streets: No. 29 is an intact brick Postwar house (C); No. 35 is another intact brick Postwar house (C); and No. 37 is a late 20th century block of flats (NC).

No.	Details
	 <p data-bbox="288 815 440 842">31 Strettle Street</p>  <p data-bbox="288 1426 967 1453">33 Strettle Street (adjacent house) – proposed to be graded non-contributory</p>
29	<p data-bbox="268 1462 1406 1525">Submitter no. 29 objects to Amendment C191, proposed 'contributory' grading and inclusion of 62 Keon Street in the proposed Heritage Overlay.</p> <p data-bbox="268 1541 783 1570">Review for Council Meeting dated 28 March 2022</p> <ul data-bbox="268 1585 948 1659" style="list-style-type: none"> <li data-bbox="268 1585 948 1615">• Roof could easily be repaired within the bounds of the heritage controls. <li data-bbox="268 1630 644 1659">• Also see RBA responses 1, 2 and 13 <p data-bbox="268 1675 491 1704">Additional Response</p> <ul data-bbox="268 1720 1458 1973" style="list-style-type: none"> <li data-bbox="268 1720 1305 1749">• In the Schedule, the site was graded 'C' and has been assessed as having a high level of intactness. <li data-bbox="268 1765 1458 1899">• It has broad gable roof, clad in terracotta tiles, which is pierced by a red brick chimney, the soffit is lined with timber boards, and two timber struts support the roof overhang. The sheeting to the gable end is likely not original. A pair of box-framed windows with multi-paned upper sashes define the main part of the façade. The porch with brick piers surmounted by timber posts and timber deck is partly obscured on the east side. <li data-bbox="268 1915 1422 1973">• The house is indicative of massing and detailing typical of the Interwar period and has been appropriately graded contributory.

No.	Details
	 <p data-bbox="252 1016 384 1043">62 Keon Street</p>
31	<p data-bbox="233 1084 1437 1144">Submitter no. 31 objects to Amendment C191, proposed grading of 144 Keon Street and inclusion of 144 Keon Street in the proposed Heritage Overlay.</p> <p data-bbox="233 1167 620 1193">Response to Exhibition Submissions</p> <ul data-bbox="233 1211 1374 1402" style="list-style-type: none"> <li data-bbox="233 1211 1374 1294">• This place was not built in the 1970s – it is an intact cream brick Post-WWII building. It contains many original features including roof form, walls of cream brick, chimney, wide ventilating eaves, steel-framed windows, metal balustrades, porthole windows and front brick fence. <li data-bbox="233 1305 1374 1361">• Although there may have been some minor alterations over the years, they have not affected the integrity of the place and hence contribution to the TPE. <li data-bbox="233 1373 464 1402">• Also see response 1. <p data-bbox="233 1420 453 1447">Additional Response</p> <ul data-bbox="233 1464 1457 1574" style="list-style-type: none"> <li data-bbox="233 1464 1262 1494">• In the Schedule, the site was graded 'C' and has been assessed as having a high level of intactness. <li data-bbox="233 1514 1457 1574">• This house is not evident on the 1946, or any others nearby. It is clearly evident on the 1956 aerial and its holdings likely included 39A Strettle Street to the north.

No.	Details
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1956 aerial, 144 Keon Street highlighted. Note farming allotments/lack of development on west side of Strettle Street (north end) adjacent

(Source: Landata, Melbourne Outer Suburbs Project, Run 11, Frame 102)

- This house has a stepped footprint, tile clad hipped roof, prominent chimney, variegated cream brick walls, steel-framed windows, porthole windows, cantilevered concrete deck/terrace, original brick fence and retaining walls, original decorative steel gate and balustrading. These elements are typical of 1950s housing.
- The house is good and intact example of a Postwar house and has been appropriately graded contributory.

No.	Details
	 <p data-bbox="252 967 399 996">144 Keon Street</p>
33	<p data-bbox="236 1041 686 1070">Submitter no. 33 objects to Amendment C191.</p> <p data-bbox="236 1086 742 1115">Review for Council Meeting dated 28 March 2022</p> <ul data-bbox="236 1131 526 1160" style="list-style-type: none"> • See responses 1, 2 and 14. <p data-bbox="236 1176 454 1205">Additional Response</p> <ul data-bbox="236 1220 1436 1500" style="list-style-type: none"> • In the Schedule, the site was graded 'C' and has been assessed as having a high level of intactness. • It has a gable roof, clad in metal sheeting, red brick chimney, timber lined soffit. The gable ends have notched/shingled boards and the roof of the bay has notched brackets. The porch detailing may have been partly altered. It is one of mirrored pair with no. 140 to the west. • The house is indicative of massing and detailing typical of the early Interwar period and has been appropriately graded contributory. • The intactness of Smith Street and approach to only including the north side has been previously discussed.  <p data-bbox="284 1960 438 1989">138A Smith Street</p>

No.	Details
43	<p>Submitter no. 43 objects to Amendment C191 and proposed 'contributory' grading.</p> <p>Review for Council Meeting dated 28 March 2022</p> <ul style="list-style-type: none"> The place is otherwise largely intact and the changes are potentially reversible – heritage practice would allow change to non-original fabric (i.e. infilled porch). On basis of the similar house next door, the original porch could be reliably reinstated. It readily passes the thresholds for a contributory graded place. Also see RBA response 1. <p>Additional Response</p> <ul style="list-style-type: none"> In the Schedule, the site was graded 'C' and has been assessed as having a medium level of intactness. The house has partly obscured. It has a double gabled roof form, clad in sheet metal with a red brick chimney, a bay window with hood, shingles to the gable end and dado and weatherboards above. The original porch has been replaced/infilled and a canopy introduced in front. Whilst partly altered to the façade, the house retains many original features and remains readily recognisable as a bungalow and representative of Interwar period housing in the precinct. It has been appropriately graded contributory.  <p>47 Fyffe Street</p>
54	<p>Submitter no. 54 objects to Amendment C191.</p> <p>Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house to respond to.
56	<p>Submitter no. 56 objects to Amendment C191.</p> <p>Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house to respond to.
57	<p>Submitter no. 57 objects to Amendment C191.</p> <p>Review for Council Meeting dated 28 March 2022</p>

No.	Details
	<ul style="list-style-type: none"> No 455A forms a group with nos 457 and 459. They are a mostly intact commercial buildings, two with mostly intact shopfronts – the most intact of the remaining commercial places in the TPE subdivision on St Georges Road. As such, they warrant inclusion in the TPE. Nos 475, 477, 469 and 439 are also commercial buildings but are less intact with altered shopfronts so do not pass thresholds for significance at the local level. <p>Additional Response</p> <ul style="list-style-type: none"> In the Schedule, nos 455A + 459 site were graded 'C' and have been assessed as having a medium level of intactness, no. 457 was graded 'C' a high level of intactness. The group of three early shops at 455A, 457 and 459 St Georges Road form the most representative group of shops along the eastern boundary of the Thornbury Park Estate commensurate with the periods of residential development in the adjacent streets. Other examples were either single isolated examples (nos 439 or 441 and 469) or two similar adjoining at nos 475-477. The context of the other examples had changed substantially, limiting the opportunity to include larger groupings of buildings. None of the other examples retained partly/original shopfronts. Given the others were more isolated examples – either single or paired - the intactness of the shopfront came into play. By comparison, the issue of shopfront intactness was less of a consideration in determining the boundaries along Miller Street as it was much larger and in a consistent streetscape otherwise. <div style="display: flex; justify-content: space-around;"> <div data-bbox="252 920 815 1285"> </div> <div data-bbox="842 920 1337 1285"> </div> </div> <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div data-bbox="252 1294 576 1323"> <p>455a, 457 and 459 St Georges Road</p> </div> <div data-bbox="842 1294 1075 1323"> <p>475-477 St Georges Road</p> </div> </div> <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div data-bbox="252 1332 783 1727"> </div> <div data-bbox="842 1332 1377 1727"> </div> </div> <div data-bbox="252 1736 443 1765"> <p>469 St Georges Road</p> </div> <div data-bbox="842 1736 1241 1765"> <p>439 St Georges Road (left) and no. 441 right)</p> </div>
<p>58</p>	<p>Submitter no. 58 objects to Amendment C191.</p> <p>Response</p> <ul style="list-style-type: none"> In the Schedule, the site was graded 'C' and has been assessed as having a high level of intactness. The house has a double gable roof form, clad in sheet metal (original material type) with a red brick chimney (intact with additional raised cover), and gable ends with lattice to the apex, the front one with a skirt. The front gable has a central

No.	Details
	<p>bay window with similar windows evident in many houses in the precinct. The entry has been modified and the porch likely widened. It is one of a pair with no. 64 to the east, whose double doors and porch detailing is likely original, which could be reinstated at no. 66.</p> <ul style="list-style-type: none"> The house is indicative of massing and detailing typical of the early Interwar period and has been appropriately graded contributory.  <p>66 Fyffe Street</p>  <ul style="list-style-type: none"> Image provided by submitter no. 58.
59	<p>Submitter no. 59 objects to Amendment C191.</p> <p>Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house to respond to.
61	<p>Submitter no. 61 objects to Amendment C191.</p> <p>Response</p>

No.	Details
	<ul style="list-style-type: none"> The exact address in Miller Street of submitter no. 61 is not known so it is not possible to make specific comment about the heritage value of their house.
62	<p>Submitter no. 62 objects to Amendment C191.</p> <p>Response</p> <ul style="list-style-type: none"> In the Schedule, the site was graded 'NC' and has been assessed as having a low level of intactness. Comparison with historic aerials indicate that the front bay is an addition. The opening has also been changed below the carport such that the original façade treatment has mostly been removed. The owners did not seek a change to their grading and NC is the appropriate grading in this instance.  <p>88 Hutton Street</p>
66	<p>Submitter no. 66 objects to Amendment C191.</p> <p>Response</p> <ul style="list-style-type: none"> The address of the submitter was not provided. No further response.
67	<p>Submitter no. 67 objects to Amendment C191.</p> <p>Response</p> <ul style="list-style-type: none"> The address of the submitter was not provided. No further response.
71	<p>Submitter no. 71 objects to Amendment C191 and proposed 'contributory' grading of 123 Harold Street.</p> <p>Review for Council Meeting dated 28 March 2022</p> <ul style="list-style-type: none"> Although this place is in cluster of non-contributory places, the wider streetscape and TPE as a whole has a high degree of intactness. The place itself has a high level of intactness and is clearly indicative as an Interwar period building. Many original features remain such as main gabled roof, rendered chimney, timber lattice to gabled ends, tiled verandah roof, timber cladding to the walls and timber framed window. It is acknowledged that some elements have been altered including door and some verandah detailing. There is a tall rear addition, but it is well recessed. Overall, it reaches the threshold for a contributory place. Also see RBA responses 1, 2, 4, 7 and 10. <p>Additional Response</p> <ul style="list-style-type: none"> In the Schedule, the site was graded 'C' and has been assessed as having a high level of intactness.

No.	Details
	<ul style="list-style-type: none"> As previously detailed, most elements are intact, and whilst the doors might have been changed, the format is likely original (there are many paired examples with some glazing to the upper part in the precinct). The house is indicative of massing and detailing typical of the early Interwar period and has been appropriately graded contributory.  <p data-bbox="288 1205 448 1234">123 Harold Street</p>
73	<p data-bbox="268 1245 724 1274">Submitter no. 73 objects to Amendment C191.</p> <p data-bbox="268 1292 783 1321">Review for Council Meeting dated 28 March 2022</p> <ul style="list-style-type: none"> This issue was considered when the assessment of the precinct was undertaken. The parts of Strettle Street that are included in the precinct is the east side between Miller and Hill streets (incl. south side). The north part of this area formed part of the original c1911 TPE estate subdivision, while the south part formed part of a commensurate unnamed subdivision. It contains a high number of intact places, mostly Post-WWII period but some Interwar – approximately 70%. It readily contributes to the significance of the TPE for that reason. To the west side, the area between Miller and Fyffe streets is a later development from at least post-1956, with building stock from the 1960s onwards, including original two storey houses, a type not evident in the TPE. As such, it is not considered to warrant inclusion in the heritage overlay as part of the TPE as the housing stock is not from the period of significance for the TPE. The south end of the west side, between Fyffe and Hill streets, had been developed by 1956, but has undergone considerable change since that time. As such, it is not considered to warrant inclusion in the heritage overlay as part of the TPE because it is of low intactness to the period of significance. <p data-bbox="268 1713 491 1742">Additional Response</p> <ul style="list-style-type: none"> In the Schedule, the site was graded 'C' and has been assessed as having a high level of intactness. The subject house is evident on the 1931 aerial and so was one of the earliest houses constructed in the street. It is considerably obscured from the street but photographs from 2010 are available online (https://www.realestate.com.au/property/11-strettle-st-thornbury-vic-3071, accessed 24.05.2022). It is a bungalow with walls clad in weatherboards with shingles to the gable end, windows with geometric leadlighting, and original porch with brick balustrade (overpainted) with Tuscan order columns and original doors. It warrants a contributory grading.

No.	Details
	<ul style="list-style-type: none"> The east side of Strettle Street has a good percentage of places which are commensurate with the identified character and periods of significance of the precinct. More than half of the west side of Strettle Street (north and central parts), as previously outlined, has a different development pattern as it remained used for farming allotments until after 1956 (Refer to previous aerial, submitter no. 31), that is it was subdivided for suburban development much later (after the original housing stock in the precinct was constructed).  <p data-bbox="296 1227 448 1261">11 Strettle Street</p>
74	<p data-bbox="228 1272 687 1305">Submitter no. 74 objects to Amendment C191.</p> <p data-bbox="228 1323 341 1357">Response</p> <ul style="list-style-type: none"> <li data-bbox="228 1373 948 1406">The address of the submitter was not provided. No further response.
75	<p data-bbox="228 1417 687 1451">Submitter no. 75 objects to Amendment C191.</p> <p data-bbox="228 1469 341 1503">Response</p> <ul style="list-style-type: none"> <li data-bbox="228 1518 948 1552">The address of the submitter was not provided. No further response.
76	<p data-bbox="228 1574 1345 1608">Submitter no. 76 objects to Amendment C191 and inclusion of 26 Rennie Street in the proposed Heritage Overlay.</p> <p data-bbox="228 1626 743 1659">Review for Council Meeting dated 28 March 2022</p> <ul style="list-style-type: none"> <li data-bbox="228 1675 1437 1765">Although the condition of the building may be poor, this issue is separate to assessment of intactness and potential contribution to a proposed precinct – the place is highly intact with many original features and readily identifiable as an interwar period bungalow. It meets the threshold for inclusion in the TPE. <li data-bbox="228 1783 619 1816">Also see RBA responses 1, 2, 3 and 9 <p data-bbox="228 1834 453 1868">Additional Response</p> <ul style="list-style-type: none"> <li data-bbox="228 1883 1262 1917">In the Schedule, the site was graded 'C' and has been assessed as having a high level of intactness.

No.	Details
	<ul style="list-style-type: none"> • This house has classic bungalow format with broad, transverse gable roof. It retains original brick chimney, exposed rafter ends, weatherboard cladding, lattice to the apex of the gable end, original porch detailing (brick and rendered elements), windows with leadlight and stained glass, and original paired doors. • Whilst it is understood that there are some issues regarding its condition, it more than adequately meets the threshold for a contributory grading.  <p data-bbox="288 1218 440 1245">26 Rennie Street</p>
79	<p data-bbox="268 1290 1278 1317">Submitter no. 79 objects to Amendment C191 and proposed 'contributory' grading of 212 Harold Street.</p> <p data-bbox="268 1339 379 1366">Response</p> <ul style="list-style-type: none"> • In the Schedule, the site was graded 'C' and has been assessed as having a high level of intactness. • It is not evident on the 1931 aerial and some of its detailing indicates a later Interwar period date such as the tapestry bricks to the base of the pier, which is rendered above with a geometric capital-like element. It has a double gable roof, clad in tiles, red brick chimneys, windows with geometric leadlighting, and shingles to the gable end. • It has been appropriately graded contributory.

No.	Details
	 <p data-bbox="252 1115 411 1144">212 Harold Street</p>
80	<p data-bbox="228 1180 687 1216">Submitter no. 80 objects to Amendment C191.</p> <p data-bbox="228 1229 341 1261">Response</p> <ul data-bbox="228 1279 1286 1314" style="list-style-type: none"> <li data-bbox="228 1279 1286 1314">• No specific comment was made about the heritage value of the submitter's house. No further response.
81	<p data-bbox="228 1328 1394 1395">Submitter no. 81 objects to Amendment C191 and the proposed 'contributory' grading of 118 Smith Street (also refer to submission 93).</p> <p data-bbox="228 1408 743 1444">Review for Council Meeting dated 28 March 2022</p> <ul data-bbox="228 1458 1382 1583" style="list-style-type: none"> <li data-bbox="228 1458 1382 1543">• Although some fabric has been replaced, the form and sufficient original fabric survives to understand the building as interwar bungalow. Front doors are often changed and assessment of heritage value does not hinge on them being intact, whilst optimal. <li data-bbox="228 1556 703 1583">• It passes the thresholds for a contributory place. <p data-bbox="228 1597 453 1632">Additional Response</p> <ul data-bbox="228 1646 1458 1933" style="list-style-type: none"> <li data-bbox="228 1646 1262 1682">• In the Schedule, the site was graded 'C' and has been assessed as having a high level of intactness. <li data-bbox="228 1695 1458 1856">• It has a gable roof clad in terracotta tiles, said to be replaced but it is not clear from the historic aerials if that was the original material. One chimney survives, another has been removed. The gable end has a skirt with weatherboards and shingles. The walls have an upper band of notched/shingled boards. The dado boards to the front have been replaced. The bay window has an upper band of multi-paned windows. It retains a porch with masonry pier and wall with a timber deck. It is not possible to see the door behind the screen but is said to have been replaced. <li data-bbox="228 1870 1458 1933">• Whilst some change has occurred, the house remains representative of the most common building type in the precinct. It warrants a contributory grading.

No.	Details
	 <p data-bbox="268 1102 421 1128">118 Smith Street</p>
83	<p data-bbox="268 1146 724 1173">Submitter no. 83 objects to Amendment C191.</p> <p data-bbox="268 1191 782 1218">Review for Council Meeting dated 28 March 2022</p> <ul data-bbox="268 1236 1410 1361" style="list-style-type: none"> <li data-bbox="268 1236 1410 1326">• Although the east side of Strettle Street between contains some non-contributory places, including the St Pauls Hostel which is admittedly a large lot, it has a high level of integrity regardless. Many of these places date to the Post-WWII period, which relates to the later phase of development of the precinct, which generally moved from east to west over time. <li data-bbox="268 1335 718 1361">• Also see RBA responses 1, 2, 3, 4, 7 and 10. <p data-bbox="268 1379 491 1406">Additional Response</p> <ul data-bbox="268 1424 1474 1648" style="list-style-type: none"> <li data-bbox="268 1424 1337 1451">• In the Schedule, the site was graded 'C' and has been assessed as having a medium level of intactness. <li data-bbox="268 1469 1474 1568">• The house has hipped roof, clad in tiles, with a chimney. The walls are brick (overpainted) and the timber-framed windows are not original. The entry porch has a concrete canopy (originally cantilevered with two columns introduced) and decorative metal balustrade. <li data-bbox="268 1585 1474 1648">• This house is representative of the Postwar phase, which are mostly brick houses, as compared to timber of the earlier Federation and Interwar periods. It warrants a contributory grading.

No.	Details
	 <p data-bbox="271 1008 430 1041">25 Streetle Street</p>
87	<p data-bbox="231 1041 686 1086">Submitter no. 87 objects to Amendment C191.</p> <p data-bbox="231 1097 742 1131">Review for Council Meeting dated 28 March 2022</p> <ul data-bbox="231 1142 1380 1467" style="list-style-type: none"> • This place is highly intact otherwise with original chimney, roof form, bay window, and porch. • Most elements remain other than the original cladding (which could survive under the existing). Could reinstate (likely) original or sympathetic alternative. Although we note the structural report from Shane Ford Contracting assesses the condition of the porch balustrade, pier and roof as poor, they could be repaired. It passes the threshold for a contributory graded place. • Otherwise, the area around Miller Street forms part of the original TPE subdivision period and contains a sufficient amount of intact building stock from the periods of significance. As such, it warrants inclusion in the proposed precinct. • More broadly, the large area of Post-WWII period housing to the west of Comas Grove reflects a distinct phase of development in the TPE. The TPE subdivision was generally developed from east to west, with the WWII phase consequently to the west. As such, it readily forms part of the significance of the place. • Also see RBA response 4. <p data-bbox="231 1489 454 1523">Additional Response</p> <ul data-bbox="231 1534 1452 1803" style="list-style-type: none"> • In the Schedule, the site was graded 'C' and has been assessed as having a medium level of intactness. • It is evident on the 1931 aerial and remained the edge of the Interwar phase on Miller Street on the 1946 aerial. • The bungalow has hipped and gable roof, clad in sheet metal (the original material type) with exposed rafter ends and red brick chimney with clinker brick soldier coursing to the cap. The soffit is lined with timber boards and the gable end is shingled. The bay window features leadlight to the upper panes. The porch has a masonry wall and tapered pier. • Whilst it presents poorly with the faux brick cladding, most original elements survive and it has been appropriately graded contributory.

No.	Details
	 <p data-bbox="290 992 437 1019">199 Miller Street</p>
	 <ul style="list-style-type: none"> <li data-bbox="272 1626 719 1653">● (Source: Trethowan Report provided by submitter)
88	<p data-bbox="272 1664 724 1691">Submitter no. 88 objects to Amendment C191.</p> <p data-bbox="272 1711 376 1738">Response</p> <ul style="list-style-type: none"> <li data-bbox="272 1760 1117 1787">● No specific comment was made about the heritage value of the submitter's house.
89	<p data-bbox="272 1816 724 1843">Submitter no. 89 objects to Amendment C191.</p> <p data-bbox="272 1863 376 1890">Response</p> <ul style="list-style-type: none"> <li data-bbox="272 1912 1117 1939">● No specific comment was made about the heritage value of the submitter's house.
90	<p data-bbox="272 1968 724 1995">Submitter no. 90 objects to Amendment C191.</p>

No.	Details
	<p>Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house.
91	<p>Submitter no. 91 objects to Amendment C191.</p> <p>Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house.
93	<p>Submitter no. 93 objects to Amendment C191 and proposed 'contributory' grading of 118 Smith Street (also refer to submission 81).</p> <p>Review for Council Meeting dated 28 March 2022</p> <ul style="list-style-type: none"> Although some fabric has been replaced, the form and sufficient original fabric survives to understand the building as interwar bungalow. Front doors are often changed and assessment of heritage value does not hinge on them being intact, whilst optimal. It passes the thresholds for a contributory place. <p>Additional Response</p> <ul style="list-style-type: none"> Refer to comments for submission 81.
94	<p>Submitter no. 94 objects to Amendment C191.</p> <p>Review for Council Meeting dated 28 March 2022</p> <ul style="list-style-type: none"> See RBA responses 1, 4 and 10. <p>Additional Response</p> <ul style="list-style-type: none"> In the Schedule, the site was graded 'C' and has been assessed as having a medium level of intactness. It is one of a pair with 115 Keon Street to the east and between the two houses, most of the original detailing survives. No. 117 has a single gable roof with a wide shingled skirt and lattice to the apex and a timber lined soffit. The front bank of windows has a pylon-like architrave with diamond quarrels. The original porch detailing was presumably as survives at no. 115 (brick base surmounted by a tapered column). The entry is recessed and has been modified. Whilst it has been partly modified, it is one of a pair and has been appropriately graded contributory.

No. Details



117 Keon Street

95 Submitter no. 95 objects to Amendment C191. Submitter added new dotpoints 7, 8, 9 and 10 on 16/2/2022.

Review for Council Meeting dated 28 March 2022

- See RBA response 1.

Additional Response

- In the Schedule, the site was graded 'C' and has been assessed as having a high level of intactness.
- The late Interwar period house has a hipped roof clad in terracotta tiles and a tall brick chimney. The gable roof, masonry porch with a keystone to its depressed arch in tapestry brick is suggestive of a Tudor Revival influence. The walls of the main part are clad in weatherboards with a boxed framed window to the façade.
- This is a good intact example of the 1930s bungalow and it has been appropriately graded contributory.

No.	Details
	 <p data-bbox="233 1111 400 1133">● 154 Smith Street</p>
P96	<p data-bbox="233 1151 1238 1173">Submitter no. 96 objects to Amendment C191 and proposed 'contributory' grading of 113 Hutton Street.</p> <p data-bbox="233 1196 743 1218">Review for Council Meeting dated 28 March 2022</p> <ul data-bbox="233 1240 1378 1429" style="list-style-type: none"> <li data-bbox="233 1240 1299 1294">• Poor condition is a separate issue to assessment of intactness and potential contribution to a proposed precinct. It is generally possible to repair deteriorated fabric whilst not diminishing significance. <li data-bbox="233 1308 1098 1330">• A sympathetic approach to remediation can be resolved through the planning permit process. <li data-bbox="233 1352 1378 1429">• This place is mostly intact with many original elements evident (replacement of posts to porch and windows are the major changes). It remains readily identifiable as an Interwar period bungalow in keeping with the most common building type in the precinct and so contributes to the significance of the TPE. <p data-bbox="233 1451 453 1473">Additional Response</p> <ul data-bbox="233 1496 1458 1720" style="list-style-type: none"> <li data-bbox="233 1496 1299 1518">• In the Schedule, the site was graded 'C' and has been assessed as having a medium level of intactness. <li data-bbox="233 1541 1401 1639">• The gable roof is clad in terracotta tiles. There is no chimney. The façade is clad in weatherboards with battened sheeting to the upper part of the gable. The roof of the central porch is intact but is now supported with non-original metal poles. The front windows have been replaced with aluminium types. <li data-bbox="233 1662 1458 1720">• Whilst it has been partly modified, the house remains indicative of the Interwar phase of development in the precinct and has been appropriately graded contributory.

No.	Details
	 <p data-bbox="288 1115 448 1137">113 Hutton Street</p>
97	<p data-bbox="268 1178 724 1205">Submitter no. 97 objects to Amendment C191.</p> <p data-bbox="268 1227 783 1254">Review for Council Meeting dated 28 March 2022</p> <ul data-bbox="268 1272 1337 1451" style="list-style-type: none"> <li data-bbox="268 1272 938 1299">• The place is largely intact with the principal original elements surviving. <li data-bbox="268 1312 1219 1339">• It readily meets the threshold as a contributory building by relating to one of the periods of significance. <li data-bbox="268 1352 1337 1411">• Poor condition is a separate issue to assessment of intactness and potential contribution to a proposed precinct. It is generally possible to repair deteriorated fabric whilst not diminishing significance. <li data-bbox="268 1424 1134 1451">• A sympathetic approach to remediation can be resolved through the planning permit process. <p data-bbox="268 1464 491 1491">Additional Response</p> <ul data-bbox="268 1514 1485 1733" style="list-style-type: none"> <li data-bbox="268 1514 1299 1541">• In the Schedule, the site was graded 'C' and has been assessed as having a high level of intactness. <li data-bbox="268 1563 1485 1657">• This bungalow has a transverse gable roof clad in terracotta tiles. The central porch has shingled boards to the gable end, timber lined soffit, brick piers surmounted by two timber posts. The flanking windows – casements with small upper panes have a shingled hood. The entry format – door and sidelight - is likely original. <li data-bbox="268 1675 1394 1733">• Whilst it is understood there are condition issues, it has been appropriately graded contributory from a heritage perspective.

No.	Details
	 <p data-bbox="252 1115 411 1144">115 Hutton Street</p>
100	<p data-bbox="228 1178 1114 1211">Submitter no. 100 objects to Amendment C191 and proposed grading of 39 Rennie Street.</p> <p data-bbox="228 1223 746 1256">Review for Council Meeting dated 28 March 2022</p> <ul data-bbox="228 1267 1366 1518" style="list-style-type: none"> <li data-bbox="228 1267 1366 1328">• This place is an example of a design developed of low-cost housing by the State Savings Bank, under the Housing and Reclamation Act (1920). <li data-bbox="228 1339 1366 1480">• It is acknowledged that the place has been altered including the removal of the brick base of the verandah piers, the replacement of the tiled roof with metal cladding and some original timber window frames have been replaced with metal types. However, the principal elements of the place remain intact, including the form of the building with gabled roof, gable end detailing with ventilation panel, verandah incorporated into the main roof form, and two timber-framed windows to the façade with hoods. It remains identifiable as an Interwar period bungalow and meets the thresholds for contributory grading. <li data-bbox="228 1491 624 1518">• Also see RBA responses 1, 2, 6 and 7. <p data-bbox="228 1529 456 1563">Additional Response</p> <ul data-bbox="228 1574 1463 1908" style="list-style-type: none"> <li data-bbox="228 1574 1262 1608">• In the Schedule, the site was graded 'C' and has been assessed as having a high level of intactness. <li data-bbox="228 1619 1463 1821">• This house has a broad gable roof, now clad in corrugated sheet metal but originally terracotta tiles. There is no chimney. The wide front gable end has a wide band is battened with a roughcast finish and is supported by two struts. The soffit is timber lined and there are exposed rafter ends to the transverse gable. The two sets of paired windows have small upper panes commensurate with many houses of the period in the precinct, though with non-original hoods (which can be readily removed). The main roof extends over the porch in a catslide like manner, reflecting Arts and Crafts influences. The piers to the porch have been removed and replaced with timber posts. <li data-bbox="228 1832 1414 1908">• Whilst some changes have occurred (some immaterial), this house remains indicative of the Interwar period housing stock in the precinct and is appropriately graded contributory.

No.	Details
	 <p data-bbox="288 1021 440 1048">39 Rennie Street</p>
101	<p data-bbox="260 1059 735 1086">Submitter no. 101 objects to Amendment C191.</p> <p data-bbox="260 1108 379 1135">Response</p> <ul data-bbox="260 1158 1118 1184" style="list-style-type: none"> <li data-bbox="260 1158 1118 1184">• No specific comment was made about the heritage value of the submitter's house.
102	<p data-bbox="260 1216 735 1243">Submitter no. 102 objects to Amendment C191.</p> <p data-bbox="363 1249 1452 1361">We do NOT support Darebin Council's Planning Scheme Amendment C191, which promotes a precinct wide overlay. We submit our property should be removed from the Heritage Overlay altogether. The proposed Amendment (C191) appears to be somewhat of an overreaction by Darebin Council as a result of the refused application for heritage recognition for 31-33 Comas Grove...</p> <p data-bbox="363 1391 1485 1554">...It is overkill for Council to propose to apply significance to an entire precinct, primarily on the basis of their shared background of being in the original parcel of land that was subdivided and that some of them share some common features. The existing street scape is largely unremarkable, with a whopping 247 properties (28.16%) deemed 'non-contributory', and only 6 properties (less than 1%) deemed 'significant'. The existence of so few 'significant' properties and so many 'noncontributory' properties doesn't warrant heritage overlay preservation at the whole-of-precinct level. In addition, most properties have been modified and very few are completely intact...</p> <p data-bbox="260 1574 379 1601">Response</p> <ul data-bbox="260 1624 1118 1650" style="list-style-type: none"> <li data-bbox="260 1624 1118 1650">• No specific comment was made about the heritage value of the submitter's house.
104	<p data-bbox="260 1675 735 1702">Submitter no. 104 objects to Amendment C191.</p> <p data-bbox="260 1724 379 1751">Response</p> <ul data-bbox="260 1774 1114 1800" style="list-style-type: none"> <li data-bbox="260 1774 1114 1800">• No specific comment was made about the heritage value of the submitter's house
105	<p data-bbox="260 1832 735 1859">Submitter no. 105 objects to Amendment C191.</p> <p data-bbox="260 1881 379 1908">Response</p> <ul data-bbox="260 1930 1300 1957" style="list-style-type: none"> <li data-bbox="260 1930 1300 1957">• In the Schedule, the site was graded 'C' and has been assessed as having a high level of intactness.

No.	Details
	<ul style="list-style-type: none"> This house is one of a pair with no. 52 to the west. It has a gable roof clad in metal sheeting. The walls are clad in weatherboards with shingles to the upper part of the gable end and above the recessed porch. A bay window with leadlight and separate hood defines the façade. It is representative of the Interwar period housing stock in the precinct and is appropriately graded contributory.  <p data-bbox="247 1111 411 1137">50A Rennie Street</p>
106	<p data-bbox="228 1155 699 1189">Submitter no. 106 objects to Amendment C191.</p> <p data-bbox="228 1200 341 1234">Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house.
108	<p data-bbox="228 1301 699 1335">Submitter no. 108 objects to Amendment C191.</p> <p data-bbox="228 1346 341 1379">Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house.
109	<p data-bbox="228 1447 699 1480">Submitter no. 109 objects to Amendment C191.</p> <p data-bbox="228 1491 341 1525">Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house.
110	<p data-bbox="228 1592 699 1626">Submitter no. 110 objects to Amendment C191.</p> <p data-bbox="228 1637 341 1671">Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house.
111	<p data-bbox="228 1738 699 1771">Submitter no. 111 objects to Amendment C191.</p> <p data-bbox="228 1783 743 1816">Review for Council Meeting dated 28 March 2022</p> <ul style="list-style-type: none"> See responses 3 and 9.
112	<p data-bbox="228 1895 699 1928">Submitter no. 112 objects to Amendment C191.</p> <p data-bbox="228 1939 341 1973">Response</p>

No.	Details
	<ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house.
113	<p>Submitter no. 113 objects to Amendment C191.</p> <p>Review for Council Meeting dated 28 March 2022</p> <ul style="list-style-type: none"> It is acknowledged that the verandah to 132 Harold Street may have been altered from the original, however this place is largely intact otherwise including gable end with rough cast sheeting and timber battens, shingled boards, and timber-framed casement windows and stained glass highlights. It readily contributes to the significance of the TPE. Also see RBA responses 1, 2, 4 and 10. <p>Additional Response</p> <ul style="list-style-type: none"> In the Schedule, the site was graded 'C' and has been assessed as having a high level of intactness.  <p>132 Harold Street</p>
114	<p>Submitter no. 114 objects to Amendment C191.</p> <p>Review for Council Meeting dated 28 March 2022</p> <ul style="list-style-type: none"> It is acknowledged that due to the specific site it may be difficult to develop due to the deep front setback. However, the heritage overlay controls do allow for change and there may be opportunities to make sympathetic additions to the rear. Also see RBA responses 1, 4 and 8. <p>Additional Response</p> <ul style="list-style-type: none"> In the Schedule, the site was graded 'C' and has been assessed as having a high level of intactness. The house is considerably concealed from the public realm, though images are available online (https://www.realestate.com.au/sold/property-house-vic-thornbury-129082030, accessed 24.05.2022), This house replaced an earlier house post-1956 and may have been constructed in two phases (not uncommon at the time) – the main brick section (eastern part) and timber (western) part.

No.	Details
	<ul style="list-style-type: none"> The hip roof is clad in tiles with a prominent chimney and wide soffit lined with sheeting. The brick section is overpainted and the timber section is clad in weatherboards, both with steel-framed windows. The low brick fence is also original and has a cap of brown glazed bricks, similar to the window sills. This house is indicative of the Postwar phase and is appropriately graded contributory.  <p data-bbox="252 1111 405 1133">1/51 Miller Street</p>
115	<p data-bbox="228 1144 699 1178">Submitter no. 115 objects to Amendment C191.</p> <p data-bbox="228 1193 341 1227">Response</p> <ul style="list-style-type: none"> <li data-bbox="228 1243 1082 1276">No specific comment was made about the heritage value of the submitter's house.
116	<p data-bbox="228 1301 699 1335">Submitter no. 116 objects to Amendment C191.</p> <p data-bbox="228 1350 341 1384">Response</p> <ul style="list-style-type: none"> <li data-bbox="228 1400 1299 1433">In the Schedule, the site was graded 'C' and has been assessed as having a medium level of intactness. <li data-bbox="228 1449 1449 1505">Suggests applying heritage overlay on smaller scale – segments of streets. The subject place forms part of a consistent streetscape section on both sides of Harold Street between Turner Reserve and Taylor Street.

No.	Details
	 <p data-bbox="284 913 443 943">166 Harold Street</p>
117	<p data-bbox="260 954 735 987">Submitter no. 117 objects to Amendment C191.</p> <p data-bbox="260 999 379 1032">Response</p> <ul data-bbox="260 1043 1417 1111" style="list-style-type: none"> <li data-bbox="260 1043 1417 1111">• No specific comment was made about the heritage value of the submitter's house, though the condition was said to be poor.
118	<p data-bbox="260 1133 735 1167">Submitter no. 118 objects to Amendment C191.</p> <p data-bbox="260 1178 379 1211">Response</p> <ul data-bbox="260 1223 1118 1256" style="list-style-type: none"> <li data-bbox="260 1223 1118 1256">• No specific comment was made about the heritage value of the submitter's house.
119	<p data-bbox="260 1290 735 1323">Submitter no. 119 objects to Amendment C191.</p> <ul data-bbox="260 1335 523 1368" style="list-style-type: none"> <li data-bbox="260 1335 523 1368">• See submission 118.
120	<p data-bbox="260 1379 735 1413">Submitter no. 120 objects to Amendment C191.</p> <ul data-bbox="260 1424 523 1458" style="list-style-type: none"> <li data-bbox="260 1424 523 1458">• See submission 118.
121	<p data-bbox="260 1469 735 1503">Submitter no. 121 objects to Amendment C191.</p> <ul data-bbox="260 1514 523 1547" style="list-style-type: none"> <li data-bbox="260 1514 523 1547">• See submission 118.
122	<p data-bbox="260 1559 735 1592">Submitter no. 122 objects to Amendment C191.</p> <ul data-bbox="260 1603 523 1637" style="list-style-type: none"> <li data-bbox="260 1603 523 1637">• See submission 118.
123	<p data-bbox="260 1648 735 1682">Submitter no. 123 objects to Amendment C191.</p> <ul data-bbox="260 1693 523 1727" style="list-style-type: none"> <li data-bbox="260 1693 523 1727">• See submission 118.
124	<p data-bbox="260 1738 735 1771">Submitter no. 124 objects to Amendment C191.</p> <ul data-bbox="260 1783 523 1816" style="list-style-type: none"> <li data-bbox="260 1783 523 1816">• See submission 118.
125	<p data-bbox="260 1827 735 1861">Submitter no. 125 objects to Amendment C191.</p> <ul data-bbox="260 1872 523 1906" style="list-style-type: none"> <li data-bbox="260 1872 523 1906">• See submission 118.
126	<p data-bbox="260 1917 735 1951">Submitter no. 126 objects to Amendment C191.</p> <ul data-bbox="260 1962 523 1995" style="list-style-type: none"> <li data-bbox="260 1962 523 1995">• See submission 118.

No.	Details
127	Submitter no. 127 objects to Amendment C191. <ul style="list-style-type: none"> • See submission 118.
128	Submitter no. 128 objects to Amendment C191. <ul style="list-style-type: none"> • See submission 118.
129	Submitter no. 129 objects to Amendment C191. <ul style="list-style-type: none"> • See submission 118.
130	Submitter no. 130 objects to Amendment C191. <ul style="list-style-type: none"> • See submission 118.
131	Submitter no. 131 objects to Amendment C191. <ul style="list-style-type: none"> • See submission 118.
132	Submitter no. 132 objects to Amendment C191. <ul style="list-style-type: none"> • See submission 118.
133	Submitter no. 133 objects to Amendment C191. <ul style="list-style-type: none"> • See submission 118.
134	Submitter no. 134 objects to Amendment C191. <ul style="list-style-type: none"> • See submission 118.
135	Submitter no. 135 objects to Amendment C191. <ul style="list-style-type: none"> • See submission 118.
136	Submitter no. 136 objects to Amendment C191. <ul style="list-style-type: none"> • See submission 118.
137	Submitter no. 137 objects to Amendment C191. <ul style="list-style-type: none"> • See submission 118.
138	Submitter no. 138 objects to Amendment C191. <ul style="list-style-type: none"> • See submission 118.
139	Submitter no. 139 objects to Amendment C191. Response <ul style="list-style-type: none"> • No specific comment was made about the heritage value of the submitter's house.
140	Submitter no. 140 objects to Amendment C191. <ul style="list-style-type: none"> • See submission 118.
141	Submitter no. 141 objects to Amendment C191. Review for Council Meeting dated 28 March 2022 <ul style="list-style-type: none"> • See responses 4, 11, 13.
143	Submitter no. 143 objects to Amendment C191. Response <ul style="list-style-type: none"> • The submitter states a building inspection report of the property is attached however not provided. • No specific comment was made about the heritage value of the submitter's house, the address of which was not provided.
144	Submitter no. 144 objects to Amendment C191. Response

No.	Details
	<ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house , the address of which was not provided..
145	<p>Submitter no. 145 objects to Amendment C191.</p> <p>Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house, the address of which was not provided.
146	<p>Submitter no. 146 objects to Amendment C191.</p> <p>Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house, the address of which was not provided.
147	<p>Submitter no. 147 objects to Amendment C191.</p> <p>Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house, the address of which was not provided.
148	<p>Submitter no. 148 objects to Amendment C191.</p> <p>Review for Council Meeting dated 28 March 2022</p> <ul style="list-style-type: none"> See responses 1, 4, 5, 7 and 8.
149	<p>Submitter no. 149 objects to Amendment C191.</p> <p>Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house, the address of which was not provided.
150	<p>Submitter no. 150 objects to Amendment C191.</p> <ul style="list-style-type: none"> See submission 118.
151	<p>Submitter no. 151 objects to Amendment C191.</p> <ul style="list-style-type: none"> See submission 118.
153	<p>Submitter no. 153 objects to Amendment C191.</p> <p>Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house, the address of which was not provided.
155	<p>Submitter no. 155 objects to Amendment C191.</p> <p>Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house.
157	<p>Submitter no. 157 objects to Amendment C191.</p> <p>Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house.
159	<p>Submitter no. 159 objects to Amendment C191.</p> <p>Review for Council Meeting dated 28 March 2022</p> <ul style="list-style-type: none"> Poor condition is a separate issue to assessment of intactness and potential contribution to a proposed precinct. It is generally possible to repair deteriorated fabric whilst not diminishing significance.

No.	Details
	<ul style="list-style-type: none"> A sympathetic approach to remediation can be resolved through the planning permit process. This place is mostly intact with many original elements evident (replacement of posts to porch and windows are the major changes). It remains readily identifiable as an Interwar period bungalow in keeping with the most common building type in the precinct and so contributes to the significance of the TPE. <p>Additional Response</p> <ul style="list-style-type: none"> Refer to submission 96 above.
160	<p>Submitter no. 160 objects to Amendment C191.</p> <ul style="list-style-type: none"> Same as submission 159 above.
161	<p>Submitter no. 161 objects to Amendment C191.</p> <ul style="list-style-type: none"> Same as submission 159 above.
164	<p>Submitter no. 164 objects to Amendment C191.</p> <p>Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house, the address of which was not provided.
165	<p>Submitter no. 165 objects to Amendment C191.</p> <p>Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house.
171	<p>Submitter no. 170 objects to Amendment C191.</p> <p>Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house, the address of which was not provided.
172	<p>Submitter no. 172 objects to Amendment C191.</p> <p>Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house.
174	<p>Submitter no. 174 objects to Amendment C191. (Additional late submission – 49 Keon Street). The submission is reproduced.</p> <p>Over the last few years, I have been working through plans to re-develop this site by building a new home for me and my family.</p> <p>As I'm sure you can appreciate, it's a long and expensive process at the best of times, let alone while trying to navigate business and personal disruptions due to COVID which significantly slowed down the design and application process.</p> <p>Unfortunately, with the changes to the heritage overlay, the plans are no longer valid.</p> <p>It has been incredibly disheartening for this to occur, as I had everything in place and ready to submit to council before the heritage overlay changes were enforced. I was delayed at the 11th hour due to a change in Melbourne Water boundary regulations that forced me to completely redesign the entire project with new designs, drawings and plans.</p> <p>Frustratingly, my draftsman had failed to keep abreast of the Melbourne Water boundary regulations updates and further compounded by not issuing plans early to the council.</p> <p>This means that the council does not have a copy of our permit application prior to the heritage overlay changes being implemented (of which we were unaware of the new overlay as we had not received any letter or other direct communication on this matter) and thus I am not automatically eligible for an exemption.</p> <p>As I'm sure you can appreciate, my family and I have worked on this planning application for several years. We have invested significant cost, time and effort in creating not one, but two significantly different designs to accommodate changing government regulations, whilst navigating businesses and suppliers impacted by COVID. While I appreciate the need to enforce specific deadlines for planning and zoning changes, I hope that the council is willing to work with family homeowners to look at applications on an individual basis and make accommodations in the interest of a fair and balanced approach to enforcing changes.</p> <p>In order to support the conversation, I have attached evidence of our journey, and multiple designs and engineering drawings as a result of the Melbourne Water boundary, which you can see transpired in the first half of 2021.</p> <p>To that end, my family and I would greatly appreciate if the council could consider our unique journey and</p>

No.	Details
	<p>circumstances and be willing to provide an exemption to the heritage overlay requirement in our application. Thank you for your consideration and hope we can discuss this matter further.</p> <p>Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house.
175	<p>Submitter no. 175 objects to Amendment C191. (Additional late submission)</p> <p>Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house.
176	<p>Submitter no. 176 objects to Amendment C191. (Additional late submission)</p> <p>Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house.
177	<p>Submitter no. 177 objects to Amendment C191. (Additional late submission)</p> <p>Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house.
178	<p>Submitter no. 178 objects to Amendment C191. (Additional late submission – 19 Rennie Street)</p> <p>Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of the submitter's house.
179	<p>Submitter no. 179 objects to Amendment C191. (Additional late submission). Proforma/Petition (20 signatories) – some previous submitters.</p> <p>Response</p> <ul style="list-style-type: none"> No specific comment was made about the heritage value of any of the submitters' houses.

Withdrawn Submissions

76. Submission no. 48 was withdrawn on 7 December 2021.

CONCLUSION

77. I support the proposed Amendment C191dare to apply to the Thornbury Park Estate Precinct as outlined in the citation and associated documents on a permanent basis.
78. I recommend the changes to the gradings of six Contributory properties which had been approved for full demolition during the Exhibition Phase to be regraded to non-contributory.
- 70 Hutton Street
 - 135 Hutton Street
 - 98 Rennie Street
 - 63 Keon Street
 - 39 Keon Street
 - 152 Smith Street
79. Of the eleven places for which a permit for changes to the rear, etc., I recommend that the original Contributory grading be retained.
- 59A Fyffe Street
 - 157A Hutton Street
 - 57 Rennie Street
 - 44 Rennie Street
 - 14 Rennie Street
 - 73 Rennie Street
 - 6 Rennie Street
 - 87 Harold Street
 - 16 Keon Street
 - 39 Keon Street
 - 63 Keon Street
80. Having reviewed the house at 111 Hutton Street, I recommend that the significant grading is retained within the Thornbury Park Estate Precinct as a largely intact and a particularly distinctive Federation bungalow. Whilst there are clearly structural and other issues affecting the house, there is likely to be a way of resolving their remediation, accepting some renewal may be required, whilst retaining its significance.
81. Having further reviewed the comments of the submitters who objected to their Contributory grading, I recommended that the grading and level of intactness as outlined in the Exhibition Phase version be retained,
- 174 Smith Street
 - 171A Harold Street
 - 27 Keon Street
 - 31 Strettle Street
 - 62 Keon Street
 - 144 Keon Street
 - 138A Smith Street
 - 47 Fyffe Street
 - 455A, 457 + 459 St Georges Road
 - 66 Fyffe Street

- 123 Harold Street
- 11 Strettle Street
- 26 Rennie Street
- 212 Harold Street
- 118 Smith Street
- 25 Strettle Street
- 199 Miller Street
- 117 Keon Street
- 154 Smith Street
- 113 Hutton Street
- 115 Hutton Street
- 39 Rennie Street
- 50A Rennie Street
- 132 Harold Street
- 1/51 Miller Street
- 166 Harold Street

82. I have no further changes to recommend to the amendment in response to the submissions.

APPENDICES

1. Response regarding 171A Harold Street – 25.01.22

Response regarding 171A Harold Street – 25.01.2022

Whilst some change has occurred at this site reducing the intactness of the place, it has not been to such a degree for it to be regraded from Contributory to Non-contributory.

The house dates to the period of significance and is indicative of the bungalow type. Key elements survive including its gable roof forms, red brick chimneys, and gable end detailing (a battened band surmounted by overlapping vertical boards). Some changes have occurred, though are potentially reversible, with the most pertinent ones being that the front porch has been opened up (removing part of the masonry components) and the terracotta roof tiling has been replaced with corrugated sheet metal. Overall, this house clearly presents (is readily interpreted) as an Interwar period bungalow and remains mostly intact. On further detailed review, it does not reach a level of 'high' intactness as currently listed in the Schedule but rather would be better listed as 'medium'.

The objector identified several changes to the building which are discussed in the following table.

Issue	Response
Front fence is not original, was replaced by previous owners in the 1990's with new materials	<p>There are very few original fences in the precinct, mainly low masonry types. It is assumed most of the timber-framed fences in the precinct are not original, but generally they are sympathetic. This is a common occurrence in other heritage precincts with early 20th century houses.</p> <p>The current fence – timber-framed with wire mesh - is sympathetic as it is indicative of a common Interwar period type (possibly replacing the original type). Retention of original fences is a bonus and not a prerequisite for assessment of significance, especially in a precinct.</p>
Roof is not original, redone in early 2010's and is Zincume Metal, including new downpipe and guttering style (round not square), not matching original red tiled roof or style. This also has a large solar panel system on roof which is visible from the street	<p>The original roof cladding of terracotta tiles was replaced, however whilst this is not optimal, it is known to have occurred widely across the precinct (by comparison with historic aerial photographs). This type of change is a common occurrence in heritage precincts. It however is reversible in that when the roof cladding begins to fail, there is no hindrance on reinstating terracotta tiles.</p> <p>Guttering has been changed on many houses in the precinct and this is common in most heritage precincts. It is possible to reinstate original profiles.</p>
Rendering of front porch and posts is not original, was completed by previous owners. We also have an electric car charger here.	<p>There was likely a low balustrade wall and another short pier near the door. Whilst this removal is unfortunate as was the rendering, and has partly reduced the intactness of the place, it has not negated it.</p> <p>The introduction of a car charger is a modest change and is removable.</p>

Issue	Response
Side gates are not original, were replaced by previous owners in the 1990's.	The side gate type is irrelevant from a heritage perspective.
Front door is not original, was replaced by previous owners in 2000's	Due to the presence of the grille, it is not clear what the extant door type is. Whilst retention of original doors is optimal, assessment of heritage significance does not depend upon it.
Security door is not original, was installed in mid-2010's	Introduction of security doors is commonplace and does not impact on heritage significance, as it is a modest and readily reversible change.
Driveway is not original, was redone by previous owners in 2000's	Whilst red brick paving was not typical of the Interwar period (concrete was), its does not obscure original fabric. The paving treatment of the driveway is generally not integral to heritage significance for an individual site in a precinct.
Front Window has non-original external blind attached to it and covering it.	The introduction of an awning blind does not impact on heritage significance, as it is a modest and readily reversible change.

In addition, some other elements have been replaced such as timber deck, weatherboards, and bargeboards, however it is necessary to replace some original fabric in all buildings as some fabric inevitably deteriorates over time – especially timber-framed examples, if the paintwork is neglected. This does not generally reduce heritage significance if like-for-like or sympathetic replacement has occurred.

Explanation of why the following places identified in Harold Street were graded as Non-Contributory is provided in the following table.

Non-contributory places:

- do not date to the period,
- date to the period of significance but are either:
 - heavily modified such that their intactness has been compromised to the extent that that they are not readily understood (interpreted) as being indicative of the types identified as contributing to the significance of the precinct,
 - or have dominating additions, i.e., which overwhelm the original section.

No.	Response
114	The exterior of this house recently underwent considerable change. The walls had been face brick (likely red) but in earlier GSV images, the bricks had been painted. With the works during early 2015 (Nearmap), the terracotta roof tiles were replaced with corrugated sheet metal (potentially reversible), the bay window was changed from being timber-framed with highlights to aluminium framed without a