About Australia ICOMOS
ICOMOS – the International Council for Monuments and Sites is a non-government professional organisation that promotes expertise in the conservation of cultural heritage. ICOMOS is also an Advisory Body to the World Heritage Committee under the World Heritage Convention. Australia ICOMOS formed in 1976 is one of over 100 national committees throughout the world.

Australia ICOMOS has over 600 members in a range of heritage professions. We have expert members on a large number of ICOMOS International Scientific Committees as well as on expert committees and boards in Australia. We have a particular interest in Australia’s world heritage sites.

The goals of Australia ICOMOS are to:

- Ensure that the organisation retains a leadership role in conservation philosophy and practice for culturally significant places
- Promote an understanding of the cultural significance of places and raise conservation standards through education and communications
- Inform and influence key decision makers concerning Australia ICOMOS’ aims and approaches to conservation philosophy and practice
- Participate in the international arena, both within and beyond the ICOMOS International family
- Develop, maintain and support a broad-based membership through effective administration

Reformed Residential Zones
Australia ICOMOS supports the introduction of the reformed residential zones as this will provide more certainty and clarity regarding what type of development is acceptable in the respective zones. We are also pleased that each municipality has been given the opportunity to determine where the new zones will be located.

While we are aware that the new zones were introduced in July 2013 prior to the release of Plan Melbourne, the new zones underpin Plan Melbourne’s section on Housing Choice and Affordability and most councils have still to finalise their deployment of the zones and are still to have their proposed amendments approved by the Minister.

In particular we welcome the introduction of the Neighbourhood Residential Zone and the inclusion of a principle for applying the zone being residential areas with Heritage Overlays. This should greatly assist in the conservation of such areas by lowering development expectations and thereby easing the pressure for redevelopment. This will be further assisted by development being encouraged elsewhere in the Residential Growth Zone and to some extent in the General Residential Zone.

We also welcome the expectation that at least 50% of residential areas will be covered by the Neighbourhood Residential Zone. This should provide sufficient area for all Heritage Overlay areas to be accommodated as well as areas of recognised neighbourhood character.
While this an acceptable average across the metropolitan area it is to be expected that the proportion of residential area zoned Neighbourhood Residential will be much higher in some municipalities than in others. Melbourne’s earlier suburbs, as would be expected, contain most of the heritage resource and consequently the proportion of the Neighbourhood Residential Zone will be much greater in the inner and some middle ring suburbs. Fortunately these suburbs often have areas of redundant industrial land available for redevelopment or conversion to higher density housing thus allowing for the conservation of heritage areas alongside a significant contribution to urban consolidation.

Heritage in Commercial Areas
Unfortunately the same certainty and clarity is not evident when dealing with heritage in commercial areas. The Victorian Strip shopping centres in the inner suburbs have been designated Major Activity Centres and this brings policy objectives encouraging growth and development into conflict with heritage conservation. These nineteenth century shopping strips include the first shopping strips in the city, and the buildings are admired by locals and visitors, including visitors from overseas. The nature and character of these strips cannot be re-created whereas they can be easily overwhelmed by higher development, often with insufficient setbacks, which towers over and shadows the footpaths and carriageway.

The resolution of this conflict needs to recognise that not all parts of these shopping strips are the same, that some areas will accommodate intensification better than others and that the heritage areas, which are so vital to the centre’s distinctive character, require special consideration.

Instead of resolving this conflict however structure plans for these areas often indicate ‘blanket’ building heights for the whole area well in excess of the prevailing heights of the Victorian and Edwardian two storey shops thereby increasing this tension and threatening the heritage fabric. As Direction 4.7 states:

Managing the tension between development and conservation is an important task for government and one that needs to be streamlined to make heritage management and planning more effective and supportive of efficient planning and development outcomes.

We fully support this statement and believe it should be given effect through better crafted structure planning and urban design. There is a need for planning for these areas to be undertaken at a more detailed level, which should be able to demonstrate how a reasonable setting for heritage buildings can be maintained while significant new development is encouraged. This would provide the clarity and certainty required for efficient decision-making and the avoidance of objector appeals.

We would therefore like to see more specific direction given under Initiative 4.7.1 ‘Value Heritage When Managing Growth and Change’.

The first of two proposed short-term actions is:

Work with local governments to enhance and improve heritage planning and assessment including closer engagement with affected owners

We would like to see this replaced or augmented with something like the following:

Assist local governments to use urban design and detailed structure planning to resolve the conflicts between new development and heritage conservation in Activity Centres.

Australia ICOMOS understands the contribution that urban consolidation can make to a sustainable future for our city. We also wish to see our inner suburban shopping areas flourish. By directing new higher density development to those places that can best accommodate it, the new residential zones bring a new level of sophistication to urban consolidation. We now seek a more sophisticated approach to the development of inner urban activity centres.

Yours faithfully

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President, Australia ICOMOS