



20 December 2017

Mr Steven Avery  
Executive Director  
Heritage Victoria  
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T 03 9656 9818

**Re: Permit application P27814 VHR2060 Former Smiths Nursery**

Dear Mr Avery,

We write with regard to permit application P27814 Former Smiths Nursery. We understand that the proposed works are “to create a six lot subdivision and creation of reserve, provision of services (telecommunications, electricity, water, water management, water treatment systems and drainage) and removal and pruning of vegetation.”

The National Trust recognises the Former Smiths Nursery site as documented in the Victorian Heritage Register as one of Victoria’s earliest plant nurseries which played a significant role in the trade of Australian native plants and trees both cultivated and existing, sourced from the slopes of Mt Macedon. We recognise that the site contains potential for further archaeological investigation that may reveal information regarding operation of the nursery and mid-century nursery practice in Victoria. We note that the Heritage Impact Statement states that there has not been any active use of the site in recent years and this highlights the need for conservation work to be undertaken as a priority at this site. We also note that most of the site contains Areas of Aboriginal Cultural Heritage Sensitivity, particularly important given its proximity to the Riddells Creek.

The National Trust is generally comfortable with the proposal on the provision that it will see conservation and ongoing maintenance of this heritage place along with the creation of a public reserve containing features of high significance. We would like to raise the following to be considered in the permit assessment process.

**Proposed Public Reserve**

We strongly support the creation of a public reserve for the Former Smiths Nursery site along the southern bank of Riddells Creek. On balance we support the view put forward in the Context Heritage Impact Statement that this reserve contains the most significant features of vegetation across the site, particularly those that relate directly to the site’s use as an early nursery. As such we recommend that a vegetation management plan be prepared for the future management site as suggested in the Context Heritage Impact Statement.

While we recognise a requirement for an agreement with Macedon Ranges Shire Council to be in principle during the proposal stages, we submit that the finalising of such an agreement be a permit condition should this proposal be approved. The creation of a public reserve provides an opportunity for the preparation of an interpretation strategy by a suitably qualified

professional, which could usefully be included as a condition of any permit granted. Given the range of cultural heritage significance in this area, a wide range of interpretation could be undertaken, including Aboriginal use and connections to the site, vegetation and landform interpretation, the development of the site as Smiths Nursery display garden, connections of the site to the role of trade in Australian native plants, interpretation of archaeological features, and the season variations of the site (for example the flowering of bulbs at particular times of the year). Interpretation of the Aboriginal cultural heritage should be undertaken via meaningful consultation with the Wurundjeri Tribe Land and Compensation Cultural Heritage Council and any other relevant Traditional Owner Groups. Interpretation planning for the site should be done in accordance with the Australian ICOMOS Interpretation Practice Note (2013).

### **Proposed works for Lot 1**

The National Trust recognises that a larger lot has been allocated for Lot 1, allowing provisions for the retention of important features of the garden at this location, including the use of the original driveway. We support the extent of restoration works proposed for Lot 1 as documented in the Context Heritage Impact statement, including the restoration and resurfacing of the curved driveway, the reinstatement of replacement stones, the retention of culturally significant plantings (trees, shrubs and bulbs), the replacement of an Algerian oak, the replacement of rural post and wire fencing, and new drainage works. We submit that any existing vegetation to be maintained throughout the restoration works to the garden and during the development of the associated dwelling, are protected as per the Australian Standard 4970-2009 *Protection of trees on development sites*.

### **Archaeological potential**

We understand that a Historic Archaeological Assessment has informed the development of the current proposal, and would guide future archaeological management of features related to the site's former use as Smiths Nursery. We acknowledge that the significant features of the propagating house and dry stone wall enclosure are located within the public reserve and therefore are not likely to be disturbed by the proposal. We support the recommendation made in the Context Heritage Impact Statement that a Consent to Damage be obtained from Heritage Victoria for the excavation for effluent envelopes.

We note that most of the site contains Areas of Aboriginal Cultural Heritage Sensitivity and as such we advocate for meaningful consultation the Wurundjeri Tribe Land and Compensation Cultural Heritage Council, Traditional Owner Groups and Aboriginal Victoria to be ongoing, providing an opportunity to address issues which may arise during works, and inform the future management and interpretation the site. Contingencies should be made in consultation with Aboriginal Victoria for the event that Aboriginal artefacts are discovered on the site.

### **Visual impacts of Lots 2-6**

We strongly support revised position of the shed in Lot 5 on the south west of the site away from the exposed ridgeline. This is particularly important for retaining views within the proposed public reserve.

We strongly support the recommendations made in the Context Heritage Impact Statement, particularly with regard to Design Guidelines (built form and landscaping), a Vegetation Management Plan for the former nursery and display garden site, the preparation of a historic

structures conservation and presentation plan, an interpretation strategy (see above), and a Consent to Damage obtained for excavation for effluent envelopes (see above). We would be pleased to provide feedback on the preparation of the Vegetation Management Plan for the former nursery and display garden site should there be an opportunity to do so.

With regard to Design Guidelines we submit that all care be taken to develop such guidelines, as this will help mitigate adverse visual impacts and maintain important landscape views before they get to permit application stage. We submit that built form should be site responsive, and recessive within the landscape, particularly with regards to the boundary between the Lots and the public reserve. Regarding built form within the landscape in this way will give those using the guidelines clearer direction as to how architecture is to consider its context in the landscape. As such we recommend that the guidelines do not give prescriptive architectural features. No dominating built form should be located on the exposed ridgeline and we generally support the location of the building envelopes as documented in the Subdivision Concept Plan included in the Context Heritage Impact Statement. We note that exhibited the Subdivision Concept Plan is different from this plan in its labelling of features, and may cause confusion.

Any fences constructed should retain the property boundaries of any approved subdivision. With regard to fencing form, we submit that fences should be kept low at this boundary between the public reserve and Lots 6, 5 and 1 and should further privacy issues be raised we would expect that the planting of appropriate vegetation would be the most sympathetic treatment to screen the property rather than high, bulky or solid fences. To a large extent, private landscaping constitutes the most significant opportunity to mitigate the overall visual impact of any future residential development when viewed from the adjacent public reserve. We submit that Design Guidelines for built form and landscape are a permit condition for the subdivision and that they are made apparent to prospective purchasers of this land.

We thank you for the opportunity to provide comment on this subdivision proposal. If you have any questions regarding the above, I can be contacted at my office on (03) 9656 9823.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Jessica Hood', written in a cursive style.

Jessica Hood  
Community Advocate Environmental Heritage