



4 December 2017

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Re: Planning Scheme Amendment C234—'Nanga Gnulle', 40 Harley Street, Strathdale

Dear Sir/Madam,

The National Trust of Australia (Victoria) generally supports Amendment C234 prepared by the City of Greater Bendigo to apply a Heritage Overlay to 'Nanga Gnulle', 40 Harley Street, Strathdale. While we are supportive of the Amendment and congratulate the City of Greater Bendigo for progressing heritage protection for the place, we do have some concerns regarding the recommendation not to apply 'Internal Alteration Controls', and the modest curtilage proposed to accompany the main residence. While these issues have been addressed by experts Built Heritage Pty Ltd and Context Pty Ltd, the National Trust believes that both issues warrant further interrogation at a Planning Panel hearing.

Interior Alteration Controls

We submit that it has been clearly demonstrated that the principal mud brick residence, also known as 'Nanga Gnulle' (1973-4), reaches the threshold for local significance to the City of Greater Bendigo, as outlined in the Built Environment Citation prepared by Built Heritage Pty Ltd. The National Trust supports the recommendations outlined in the assessment that the place reaches the threshold for local significance based on Criterion C, Criterion E and Criterion H.

The National Trust supports the decision to enact External Paint Controls for the place in the Schedule to the Heritage Overlay, however we submit that Interior Alteration Controls should also be applied. As noted under 'Description' in the Built Environment Citation prepared by Built Heritage Pty Ltd:

The rugged aesthetic of the exterior, with its rough natural finishes, is echoed inside the house, which is similarly characterised by exposed timber, bagged mudbrick and reclaimed brickwork.

While the National Trust acknowledges that the threshold for Interior Alteration Controls is very high, and is thus applied only sparingly and on a selective basis to special interiors of high significance, as outlined in *Planning Practice Note 1: Applying the Heritage Overlay*, we believe the interior of this residence reaches the threshold to warrant protection under the Heritage Overlay.

We submit that the interior of the residence is of an equivalent level of significance as the exterior, and that undermining the integrity of the interior would undermine the significant of the place as a whole, insofar as the exterior and interior together represent Knox's original design intent in its entirety. We argue that both the exterior and interior meet the threshold for Criterion C (based on the 'rare retention' of salvaged materials and the potential to 'yield information to contribute to an understanding of the region's rich history') and Criterion E ('highly distinctive aesthetic style' characterised by the 'extensive use of building materials' and by preference for 'open planning, spilt levels...ruggedness and organic style').

As noted in the proposed Statement of Significance prepared by Built Heritage Pty Ltd, the 'open planning', 'split levels', and rugged 'organic style' are significant features of the residence. We submit that any loss of these internal features (for example, if future owners were to 'gut' and remodel the interior), would significantly undermine the cultural heritage significance of the place.

We therefore submit that Interior Alteration Controls should be enacted through "switching on" interior controls in the Schedule to the Heritage Overlay.

Curtilage

As outlined in the Built Environment Citation prepared by Built Heritage Pty Ltd:

The significant fabric is defined as the exterior of the house (including veranda, carport and brick paving), with a nominal curtilage (minimum five metres to all sides) to preserve its immediate setting.'

As noted in *Planning Practice Note 1: Applying the Heritage Overlay* under 'Curtilages and Heritage Overlay Polygons', in addition to capturing elements that are significant, it is necessary to include some surrounding land in order to:

- *Retain the setting or context of the significant building, structure, tree or feature*
- *Regulate development (including subdivision) in close proximity to the significant building, tree or feature*

Based on this instruction, the National Trust does not believe that the proposed 'nominal curtilage' is sufficient in retaining the setting or context of the main residence, or regulating development in close proximity. We do not believe that sufficient rationale has been prepared to support this recommended curtilage relating specifically to potential new development which could impact upon significant views and view lines to the place.

We note the conclusion of the heritage assessment by Context Pty Ltd that "The proposed curtilage for the Heritage Overlay is limited and will provide the minimum of context to the building, but is adequate to conserve the significant fabric" (p 11). We submit that while the curtilage may be adequate to "conserve the significant fabric" of the house, it does not provide an adequate setting. As we have been unable to access the site, we are not in a position to provide a suggested alternative to the nominal 5m curtilage, and we submit that this could usefully be considered at a planning panel hearing.

Outbuildings

As outlined in the Built Environment Citation prepared by Built Heritage Pty Ltd:

The mudbrick outbuildings, of relatively recent date and far more conventional in their expression, are not considered to be significant.

We question this assessment particularly in reference to the rear shed, 'built (c1972) of salvaged bricks with an arched entry and gabled roof of corrugated steel.'

We note the following identified under 'History':

Back in Bendigo, the collection was stored in a gable-roofed brick shed that Rob built at the rear of the property in c.1972, which was the first structure to be built on the site.

We question the lack of significance attributed to the rear shed which was both the first structure to be built on the site, and the storage location for the collection of recycled materials used to construct the main residence. We believe the rear shed could have cultural heritage significance insofar as it relates to the main residence, and should be considered for inclusion in the Heritage Overlay.

Conclusion

The National Trust acknowledges that Amendment C234 is generally consistent with the objectives of Planning for Victoria, as identified by the *Planning and Environment Act 1987*, in particular:

- b) Provide for the protection of natural and man-made resources and the maintenance of ecological processes and genetic diversity;*
- d) Conserve and enhance those buildings, areas or other places which are of scientific, aesthetic, architectural or historical interest, or otherwise of special cultural value.*
- g) Balance the present and future interests of all Victorians.*

We also recognise that the Amendment generally supports the National Trust's vision that 'our diverse heritage is protected and respected, contributing to strong, vibrant and prosperous communities', and our mission to 'inspire the community to appreciate, conserve and celebrate its diverse natural, cultural, social and Indigenous heritage'.

We submit that the application of Internal Alteration Controls is warranted, and that the curtilage of the Heritage Overlay should be reassessed in order to provide an appropriate landscape setting, and protect viewlines to the property.

If you have any further questions or concerns regarding the submission outlined above, please get in touch with this office on 9656 9837.

Kind Regards,



Felicity Watson
Advocacy Manager
National Trust of Australia (Victoria)