

8 October 2018

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Dear Sir/Madam,

**RE: Ringwood MAC Masterplan Review**

Thank you for the opportunity to provide comment on the Ringwood Metropolitan Activity Centre Masterplan (MAC) Review (the Review). The National Trust of Australia (Victoria) is the state's largest community-based heritage advocacy organisation actively working towards conserving and protecting our heritage for future generations to enjoy, representing 28,000 members across Victoria.

The National Trust has a particular interest in the proposed objectives, strategies and outcomes included in the Review in relation to the identification, protection and future management of places of built and natural cultural heritage significant within the MAC boundary.

While the National Trust does not oppose increased development within the MAC boundary, we submit concern at the lack of comprehensive strategic guidance to guide the development of heritage places, and new development adjoining heritage places, in the context of the intensification of development within the MAC area. We have concerns that without adequate protection and guidance, the broader heritage character of the MAC area will be increasingly compromised and eroded over time. We also express concern at the immediate need to undertake a heritage gap review, and the potential threat to previously identified places that have not yet received heritage protection, such as the Ringwood Uniting Church.

**1. Strategic Framework and Urban Design Guidelines**

The National Trust is concerned that the Urban Design Guidelines prepared by Hansen Partnership, which sets out the preferred built form framework and precinct guidelines, does not adequately address the importance of heritage and its future protection and management within the MAC boundary.

We note that the protection of heritage has been identified through community consultation as an important issue. This supports the strong view of the National Trust that heritage contributes to vibrant and prosperous communities. For example, under the heading 'thriving community', the following community desire has been identified [our emphasis] (p.66):

*There is a desire to see more education facilities, cafes and restaurants that are family friendly, green spaces, community gardens, public art and to **protect heritage**.*

While the protection of heritage has been identified by the community as an important consideration, there is no further objective included under this statement to proactively address this.

We therefore recommended that more clear objectives and strategies to achieve these objectives are articulated which address the need to balance heritage protection with development outcomes.

For example, we note the following objective relating to heritage (p.79):

*To ensure the heritage values of Ringwood MAC are considered as the centre continues to grow.*

While we support this objective, there is no clear strategy or action plan to guide how these values will be considered and managed into the future.

We note the following analysis included in the Strategic Framework under the heading 'an attractive and well-built community' (p.69):

*The heritage buildings and places identified in the Maroondah Planning Scheme require specific considerations in the design and development of land adjoining these places. The connection of these heritage items and their ongoing relationship in the context of new development in the MAC requires consideration through specific design provisions and built form outcomes. Opportunities to review individual heritage significance or to integrate/adapt these historic places into the future public realm, that may include the use of curtilage areas for open public space or as future development sites, needs to be explored in practical terms.*

Further, the following objective has been provided (p.70):

*2.3. To continue to protect and promote the historical features of Ringwood MAC*

We have concerns that this objective does not go far enough to address the complex issues outlined above, such as the development of 'specific design provisions and built form outcomes' within the context of new development in the MAC. Also outlined above is the consideration of potential adaptive reuse of heritage sites, with the following statement incorporated into the specific precinct guidelines for the Eastern Precinct and Pitt Street Precinct (p.23&25):

*To encourage the repurposing of existing heritage buildings and integration with new development.*

We support the appropriate adaptive re-use of heritage places, and the integration of heritage places within a development context, however there must be clear policies in place to achieve this prior to the implementation of the MAC.

We further submit that the MAC masterplan should clearly specify how the urban design guidelines will ensure that the cultural heritage of the area is preserved. New urban guidelines should specifically reference heritage policy to ensure that new development respects the character and appearance of existing heritage places for the benefit of the community.

## **2. Aboriginal Cultural Heritage**

We submit concern that no proactive consultation with Traditional Owners has been included as part of the MAC masterplan review. We note in particular the following consideration:

*The Mullum Mullum Creek is an area of Aboriginal Cultural Heritage Sensitivity. The Aboriginal Heritage Act 2006 requires that a Cultural Heritage Management Plan is produced if culturally sensitive land is to be subject to a high impact activity. Redevelopment of land adjoining the Creek may result in the need for a CHMP to be undertaken.*

We encourage Council to proactively work alongside Traditional Owners to appropriately manage this area into the future, and that a voluntary CHMP is undertaken as a matter of priority to guide any proposed future redevelopment. Any genuine environmental and recreational enhance of Mullum Mullum Creek and valley floor should be undertaken in consultation with the relevant Traditional Owners (p.39).

## **3. Future Heritage Review**

Maroondah's heritage contributes to a distinctive character which provides amenity to those who live and work in the area, and should be viewed as an asset rather than an obstacle to progress. It is our understanding that the last comprehensive heritage study, was completed in 1998, with a review completed in 2003. We note that through Planning Scheme Amendment C42, only 61 out of 180 places were approved for inclusion under the Heritage Overlay. It may therefore be timely for Council to progress the implementation of the Heritage Study through a further planning scheme amendment.

We note that properties in Ringwood, including places of recognised significance identified in the 1998/2003 heritage studies, and places of potential significance, face increasing development pressures as part of Ringwood's designation as a Metropolitan Activity Centre.

We also note that there is currently no heritage policy in Clause 22 of the Maroondah Planning scheme, and that heritage is not referenced in the Ringwood Housing Strategy, meaning that heritage is not currently included in the decision-making process for places without a Heritage Overlay. Given current development pressures, we believe it is timely for the City of Maroondah to reassess its strategic approach to heritage to ensure it can be considered in the decision-making process on future development.

We also note that the post-war period is not comprehensively explored in the existing 1998/2003 studies, and we believe this warrants further investigation. Since the 1998/2003 studies were completed, the recognition and understanding of post-war architecture, particularly in middle and outer-ring suburbs, has progressed significantly. Neighbouring Whitehorse Council has previously implemented a comprehensive post-war heritage study, which we were pleased to support at a planning panel hearing, and we commend their approach to this important yet underrepresented period of architecture. One example of a post-war building which warrants further investigation by Maroondah Council is the Ringwood Uniting Church at 30–32 Station Street, which was identified in the 2003/1998 study.

We express concern that the Ringwood Uniting Church has been included within the boundary of the MAC, despite significant community opposition. We are concerned that there is no mention of the local heritage significance of the church or any plans to progress statutory heritage controls, even though a heritage assessment was undertaken 2 years ago which concluded that it met the threshold for local heritage significance. We understand that the Ringwood Uniting Church closely abuts the boundary of Ringwood's Metropolitan Activity Centre, and therefore strongly urge Council to request interim protection for the Church with a view to progressing a Planning Scheme Amendment for the site in the near future, so that the established heritage significance of this important building can be considered in any future planning for the site.

We would welcome the opportunity to discuss these issue in further detail. Please get in touch with this office on 9656 9837 if you have any further questions or concerns.

Kind Regards,

A handwritten signature in blue ink, appearing to read 'C Mitropoulos', written in a cursive style.

Caitlin Mitropoulos  
Community Advocate—Built Heritage  
National Trust of Australia (Victoria)