



29 November 2019

Statutory Planning  
Banyule City Council  
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T 03 9656 9818

**Re: P648/2019 Alterations to Mary Immaculate Church, 2-6 Waverley Avenue Ivanhoe**

Dear Sir/ Madam,

The National Trust of Australia (Victoria) (National Trust) is the state's largest community-based heritage advocacy organisation actively working towards conserving and protecting our heritage for future generations, representing 27,000 members across Victoria. As Victoria's premier heritage and conservation organisation, the National Trust has an interest in ensuring that a wide range of natural, cultural, social and Indigenous heritage values of the state are protected and respected, contributing to strong, vibrant and prosperous communities.

Thank you for the opportunity to provide comment regarding a Permit Application P648/2019 for the Mary Immaculate Church, located at 2-6 Waverley Avenue Ivanhoe. This application proposes building and works associated with a Place of Assembly (Parish Centre and Church), vegetation removal, works in Design and Development Overlay 11, and variation of an easement and parking waiver.

Mary Immaculate Church, designed by noted architects Morkridge Stahle & Mitchell (built in 1960-62), is one of the largest and most striking of the many modernist churches built in Victoria's postwar boom, and one of the most boldly conceived and elaborately fitted out. As such, we submit that Mary Immaculate has demonstrated cultural heritage significance to the City of Banyule, providing a strong case for protection under the Heritage Overlay.

On this basis, we strongly object to the proposed works as we believe they will have a significant detrimental impact on the cultural heritage significance of the place. We submit that the permit application should not be approved until a heritage assessment of the site has been undertaken. Below we have outlined our reasons for why we believe the works are not in keeping with the cultural heritage significance of the place, and the background information which has informed our position.

**Background**

On 29 June 2018 the Heritage Council of Victoria recommended not to include the Mary Immaculate Church in the Victorian Heritage Register. As part of this determination, the Heritage Council resolved to refer the recommendation and any submissions to the City of Banyule for consideration for an amendment to the Banyule Planning Scheme.

In light of this recommendation, on 5 July 2018 the National Trust wrote to Cr Mayor Pasquale requesting that Council write to the Planning Minister to apply an Interim Heritage Overlay to the site as a matter of urgency, with a view to pursuing permanent protection for the place.

We made this request based on the assessment that the Mary Immaculate Church has demonstrated architectural, historic and aesthetic significance to the City of Banyule, and has a strong case for protection under the Heritage Overlay.

Disappointingly, we did not receive a response from Council, and as far as we are made aware, no further action was taken to consider the cultural heritage values of the place. We submit that this action is not consistent with Section 21.03-1 of the Banyule Planning Scheme, which identifies the objective 'To protect, conserve and enhance places and precincts that contribute to Banyule's cultural heritage'.

We submit that a heritage assessment of the place should be undertaken with some urgency. If found to reach the threshold for local significance, we strongly encourage Council to apply to the Planning Minister for an Interim Heritage Overlay to ensure that any proposed alterations are consistent with the provision set out in *Section 43.11 Heritage Overlay* of the Banyule Planning Scheme.

### **Response to the Permit Application**

In the absence of any statutory listing there is little basis for Council to act to conserve the architectural, aesthetic and historical values of the church, and though the bulk of the fabric is being retained in this proposal, we submit that the alterations proposed are extremely unsympathetic. Not only are additions being proposed on all sides, in different contrasting materials and forms, largely overwhelming the existing building, many of the original features are being lost. The Chapel with its fine stained glass will be completely demolished, new windows inserted, the existing ones covered, the bespoke entry doors removed, and steel roofing replacing the tiles. Only the spire, the general shape, and some external walls will remain of the original.

We submit that it should be possible to achieve the wide range of uses proposed without such an unsympathetic approach. Any additions should seek to keep the bulk of the east façade free of additions, and retain the triangular entry area intact – to achieve this the new vestry could be located on the west side, with additions on that side above or instead of the area proposed for driveway to the enclosed garages, which could be accessed via the carpark. The carpark could be located in a basement or semi-basement, with the proposed parish centre and apartments above, leaving the chapel intact and allowing the whole frontage unaltered, and attractively landscaped.

### **Conclusion**

For the reasons outlined above, the National Trust objects to the works proposed as part of this permit application. We strongly believe that this place is of cultural heritage significance to the City of Banyule, and as such, should be subject to the provisions as specified for the alteration of individually significant places protected under the Heritage Overlay. We would welcome the opportunity to meet Council officers to discuss this matter in further detail. Please get in touch with this office on 9656 9837 or at [conservation@nattrust.com.au](mailto:conservation@nattrust.com.au).

Yours faithfully,

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

Caitlin Mitropoulos  
Heritage Advocacy Advisor  
National Trust of Australia (Victoria)