

The following comments are offered on the responses to submissions made by HLCD P/Ltd on behalf of the Department of Human Services (DHS) regarding the proposed redevelopment of the Kew Cottages site. For ease of reference paragraphs are referred to according to page number and position on the page of the HLCD submission eg. 2.5 means para 5 on page 2.

Executive Summary

- 2.3 The claim that all 6 buildings cannot be retained because of financial implications and difficulties for reuse must be regarded as utter nonsense. Please see KCC previous submission on these claims.
- 2.5 This statement is regarded as a matter of opinion and highly questionable.
- 2.6 “ “ “ “ “ “ “ “ “ “ “
- 3.1 A second opinion should be sought on the feasibility of any restoration proposed for the House Hostel (B2) before this argument is accepted.
- 3.2 What loss is this and why would it be a loss?
- 3.3 There is no reason for any of the trees listed in this paragraph to be touched if the proposed off take road junction is moved further west to the position shown on KCC Plan KCC1 previously submitted, where there is an existing access road to Units 4&5.
- 3.6 The claims made by HLCD that significant views will be retained appears to be rather extravagant particularly in view of the possibility of 3 No 4 storey buildings being built adjacent to the 3 heritage buildings proposed to be retained.
- 3.8 What is the further information referred to and to what does the reference (H0861) refer? The view diagram on Plan HVS-7 is considered to be incomplete and does not highlight the excellent panoramic view of the Willsmere Towers and the very attractive treed landscape along the ridgeline when viewed from the Yarra Bend Park boulevard and golf course. No mention also appears to be made of the many glimpse views of the towers that can be obtained from the Chandler Highway and Princess Street.
- 4.6 The KCC Precinct proposal does not isolate the Heritage Core as claimed by HLCD and if anything improves it by providing access both vehicular and pedestrian from all directions and not only from the limited access provided by the HLCD proposal. Regarding the claim that some of the changes to roads proposed under the KCC proposal would make them very steep etc can only be regarded as mischievous nonsense particularly as the same criticism could be leveled at the HLCD proposal.
- 4.7 The KCC proposal does all this; but only better particularly as it proposes to utilize all heritage listed assets and not just some which the HLCD proposal can only claim.
- 4.8 What is the viable use claimed for the Heritage Core buildings to be retained under HLCD proposal?
- 5.1 The small setback of upper floors of these buildings will do little to reduce the overpowering effect of the proposed 4 storey apartment buildings.
- 5.2 The claims made in this paragraph are regarded as highly debatable and very subjective and should be treated as such.

- 5.3 The claims made in this paragraph are regarded as subjective and highly questionable.
- 5.4 The claims made in this paragraph are a misstatement of the facts. It only allows the retention of SOME heritage buildings, SOME significant trees, SOME important views, SOME pathways (very few) and SOME open spaces. It destroys large sections of fully constructed sealed and drained roads and replaces some of these with walking tracks restricting vehicular access particularly in the case of emergencies such as ambulances and fire fighting vehicles.

Significant Fabric – Buildings

- 7.3 These arguments are considered to be a complete nonsense and should be disregarded.
- 7.6 We disagree with the claim that the retention of all 6 heritage listed buildings is against good heritage practice and that restoration of the 1887 period cannot be achieved. Also our reading of the Burra Charter supports this view .
- 8.2 What are the ‘many other aspects of the significance of the Kew site’ referred to in this case and why would Mrs Godwin’s proposal not be good heritage practice?
- 8.3 We do not agree with this statement as we believe some prime source physical evidence is better than none.
- 8.4 As for 8.3 above, we believe that documentary evidence no matter how reliable is not as good as the real physical thing.
- 8.5 How considerable is the change and what form has it taken?
- 11.1 Has the feasibility of Mrs Godwin’s proposal been properly investigated by a suitably qualified specialist such as a Heritage Landscape Architect?
- 11.3 Is not some relics of the past better than none at all eg. The Parthenon and other examples of earlier civilizations which although now in ruins still provide an insight into early cultures.
- 12.2 Who will carry out this procedure? Who will own these records and where will they be kept.?

Trees

Of the 23 trees listed in the schedule on page 13 of the HLCD submission it appears that 4 significant trees will be removed as a result of new road alignments, which in our view is not acceptable, as these new alignments are not essential and a careful review of the proposed new road layout would show these trees could be saved. With regard to the transplanting of the Prunus ilicifolia tree 388 and the shrub Wiganda caracasana it is hoped that competent tree transplanters will be used for this process.

Significant Views

Our comments on this question are summarized at 3.8 above and we would like to advise that we are presently having a computer model produced showing the adverse effect that the proposed 5 storey buildings will have on the Willsmere Towers and the

adjoining ridgeline views seen particularly from the west and south west aspects. We will make this available as soon as it is ready.

Design Considerations

- 19.2 We consider the whole of this paragraph to be complete and utter nonsense and not worthy of any further comment.
- 19.3 Likewise as for para. 19.2
- 19.4 This is a case of ‘ the pot calling the kettle black’ as the dKO plan does not appear to do this either. A visit to the site would reveal that many existing roads run at right angles to the contours quite satisfactorily.
- 19.5 The DHS masterplan shows an economic approach aimed at maximizing the financial returns to both the developer and the State Government.
- 19.6 Without the pressure from Heritage Victoria and many interested and concerned citizens there will probably be no buildings left standing to form a ‘heritage core’ if the Department of Human Services and a developer have their own way.