



*National Trust of Australia (Victoria)
Bendigo and Region Branch
PO Box 123
California Gully 3556
Phone: 0447 473674
Email natrustbendigo@gmail.com*

Mr Trevor Budge
Manager
Regional Sustainable Development Unit
City of Greater Bendigo
rsdenquiries@bendigo.vic.gov.au

**Re: Submission to the Draft Bendigo City Centre Plan by the National Trust of Australia (Victoria)
Bendigo & Region Branch**

Dear Mr Budge,

The following submission has been prepared on behalf of the Bendigo & Region Branch of the National Trust of Australia Victoria, following consultation with Branch members.

The Plan states that “Bendigo needs to be a contemporary city.” (Page 26). Our point of difference is the City’s wonderful heritage buildings, and its public spaces and promenades, which have added economic value for many years. We note that it is many of the lesser buildings within the Plan area that are in danger. There are miners cottages, workers cottages, both brick and weatherboard Victorian houses, Edwardian and Inter War dwellings that give Bendigo’s streetscapes their character and reflect our social history. If Bendigo is going to remain in contemporary society its point of difference needs to be maintained and its heritage exploited in a sensitive economic environment.

Bendigo CBD Heritage Study

As you are aware the Bendigo & Region Branch of the National Trust has been requesting the release of the Bendigo CBD Heritage Study for some time. With the study commencing in 2016 it is disappointing that priority has not been given to its release as heritage contributes to the economic and social fabric more than any other single factor in Greater Bendigo, in particular, to the Bendigo CBD.

People choose to live and visit the City because of its heritage and the social and cultural activities which are based on its history. It has a wonderful feel about it because of the planning which started over 170 years ago. The buildings, the promenades and the parks and public spaces were all conceived long ago. However, during the 1960s and 1970s, iconic buildings were lost, open spaces given up and verandahs were torn down all in the name of development.

It came as a surprise that Council would release the City Centre Plan (CCP) before the Bendigo CBD Heritage Study (CBDHS) for public comment. It is the Branch’s view that the Heritage Study must inform the City Centre Plan, not the other way around. The Council has the responsibility of putting these reports into context and by releasing the CCP first, it not only discourages the discussion of heritage in relation to the Plan but suggests development is the Council’s most important priority

even at the expense of the City's history. Both the protection of the City's history and heritage can be achieved alongside development but it requires leadership and open community discussion.

Now that the Plan has been released it is imperative that the CBD Heritage Study is released to the public and that no further action be taken on the City Centre Plan until public consultation takes place on the CBD Heritage Study.

Managing change in a heritage context

We have concerns regarding the inclusion of the following statement in the Plan's Report: "The heritage value of the City should not be compromised or undermined by the retention of every building because they are old and nice". This does not provide guidance on how to balance development and heritage conservation objectives, and undermines the role of rigorously applied heritage controls in guiding development outcomes. We suggest rephrasing this, for example, "the heritage values of the City should be maintained and enhanced, with decision-making regarding existing heritage places guided by an understanding of historical and cultural significance." We further request that relevant heritage policy documents are included in the "Policy Context" section on page 6. It may be useful to expand this section to provide context regarding the hierarchy of relevant policies, and also list relevant documentation as dot points for better legibility.

One Branch member wrote:

The statement that heritage concerns with regard to planning in the Bendigo CBD should be a secondary concern is absolutely reprehensible. This serves to undo all the good work that has been undertaken for nearly half a century and will lead us back into the dark ages of the 1950's & 1960's and the "anything goes" approach to planning and development that the council took then. This has left us a lot more lacking in our built heritage than most people realise. It almost appears that everything has been thrown into the "too hard basket" or being done so as not to upset potential investors and developers. Our unique Bendigo Heritage is why people want to visit and reside here, we do not want to become a city full of bland, aesthetically abhorrent and low quality constructions. People might as well stay living and working in metropolitan Melbourne. The CBD Heritage study was commenced and therefore must be finished, nothing else should even be considered until this is so.

This statement sums up the context in which Council needs to make its decision on these studies. There have been many regrets in the past when development has destroyed many heritage sites. The Branch urges Council to learn from history and consider heritage as a vehicle for development. It is disappointing that there is no reference to heritage studies in the Plan's stated context on page 6. It also states that "all relevant strategies, plans and policies have been considered in preparing the City Centre Plan." This is clearly not the case.

The Bendigo City Centre Plan

It is noted that the document is a strategic plan, building on work previously undertaken in 2005. We recommend that Council commits to monitoring and evaluating the implementation of the plan, with a view to undertaking periodic reviews incorporating public feedback.

The Branch agrees that previous Council decisions have driven residents from living in or close to the CBD, in particular, the wave of residential properties that have been taken over by business. Market forces will not be sufficient to counteract this trend. Planning action is needed to return these properties to residential and relocate businesses into the CBD.

It also agrees that “The look of the City Centre today is distinctive and memorable.” And it needs to remain so. (page 8)

It is somewhat more difficult to ensure high quality building design, the visual effect of height, layout and setbacks. It is one thing to read a plan and another to fully understand the consequences of its impact on the surrounding existing sites. To the untrained councillor making planning decisions and the development conscious council officer, considerations often become a debate between two parties where the overall look of the City is not the highest priority.

Food sales (12%) have grown quickly in the CBD while retail sales have declined. The City centre is now more focused on food and entertainment and with on line shopping growing, it is now more urgent to relocate small commercial enterprises into the very centre by refurbishing under-utilised heritage buildings. It will be important to strata title these commercial sites so that small business have ownership of their sites, a strategy that has been demonstrated by their purchase of residential properties to locate their enterprise.

Major hotel groups need to be encouraged to invest in large heritage buildings for tourist accommodation rather than constructing new buildings. The Shamrock Hotel in Williamson St and The Wine Bar in View St have demonstrated success in this sphere and the former Advertiser site has recently been converted to a more contemporary use. The Mining Exchange is currently being converted which demonstrates there is business interest.

111 Mitchell St and 177 View St have been highlighted as Bendigo’s heritage of the future in the Plan. We support the notion that contemporary buildings should display design excellence, and respect the heritage values of the surrounding precinct, with an aim to create the heritage of the future. However we do not believe these examples display design excellence that warrants highlighting in the Plan. Further, the Plan does not identify how these developments display design excellence.

The Plan states “The Bendigo City Centre has a rich heritage and culture which is integral to our future and must be embraced as part of the City’s evolution.” (Page 23) This should provide the foundation for future development, and that is why it is important that the Heritage Study, which should be implemented through a Planning Scheme Amendment, needs to inform the City Centre Plan.

The example of the Melbourne City Council “removing as many unnecessary barriers to development as possible to ensure that the private sector was incentivised to deliver” (page 17) is outdated, and not directly comparable to the Bendigo context. Bendigo has a far greater number of heritage buildings in a much smaller space and unlike Melbourne these buildings tell the story of local history over 170 years. We suggest either removing this reference, or providing further analysis to evaluate the legacy of such policies, and demonstrate the relevance to the Bendigo Context.

The critical issue is the design of new buildings. It would have been interesting for the Plan to have created a discussion on the design of the proposed GovHub building and its impact on the historic Bendigo Town Hall which has been explained in the Plan (Page 24) in excellent detail.

It states further “New buildings need to be designed as the heritage of the future.” The flaw in this statement is that Bendigo’s heritage was built during 70 years of financial boom as a result of gold mining. In fact, it did not only build Bendigo but also Marvellous Melbourne and contributed to many other cities and towns.

The Mining Exchange in Pall Mall is not only known for its architectural merit but also for its trading of millions of shares by people around the world. Can you imagine 5000 people gathered outside the Exchange on a Saturday night in the frantic buying and selling of shares in gold mining projects? The stories are as important as the architecture in the history of the building.

We suggest that Council develops illustrated guidelines demonstrating best practice approaches to new design in a heritage context, including examples from Bendigo, and Victoria and Australia more broadly. Alternatively, the Good Design + Heritage Guidelines published by the Office of the Victorian Government Architect, provides clear principles and examples of good contemporary design.¹

The Branch supports the proposed height limits put forward in the Plan, and we accept that they are well placed to encourage appropriate development.

Good design is essential for a strategic plan but when actual permits are issued it is a different story. 177 View Street was knocked back by Council but went to VCAT where it was approved. The Evergreen Waters development in Jackass Flat was hailed as an environmental village but now there are hundreds of poorly designed houses on small blocks and more are being built. Many large mature trees have been cut down in the name of development.

Council has a responsibility to lead, to insist on good design and to know how a project will finish up.

The design of the City needs to consider people first. On that point the Branch agrees with Council but there needs to be an informed community discussion on what design formulas mean. While the Plan illustrates some design principles, it appears not to discuss the impact of such designs on other buildings in the vicinity and the streetscapes.

A member reflected on the City Centre Plan:

One way of looking at the provisions is to look at some of the past decisions and seeing how they would be treated under the new framework. You will have your favourites, but mine would start with the Bank of Australia, opposite the Shamrock. Another is the Shamrock itself, only saved by government intervention. The Limerick Castle façade came close and a case can be put for it to be either retained or lost. There are lots.

There was a proposal for 10 storey building in Mundy Street that was withdrawn before it went to appeal. It would not meet the proposed height limits. I did notice that streetscapes are to be devoid of places where people can hide, or in other words, we will have streetscapes of uniform depth unrelieved by setbacks. That does not make a human-friendly environment.

Budapest does not permit high-rise buildings. The Gamla stan (old town) in Stockholm is quarantined from development, which happens in other parts of the city.

We say that if you don't have planning controls you end up with Shepparton. They have taken too much from that city to make it a desirable destination. The confounding factors of planners who want to make their mark; owners who want a higher return; and architects wanting a playground, can make a mess of the city if unrestrained. Suburban shopping has taken a lot from the CBD and will continue to do so.

¹ http://ovga.vic.gov.au/images/17008_07_Good_Design_and_Heritage_221117_Web.pdf

Vehicles

Vehicles need to be discouraged from entering the main part of the City and pedestrians given priority at all intersections where signals are not located.

The inner and outer Box vehicle routes need to be better signed to redirect vehicles away from the city centre with large transport vehicles banned from the city centre.

It seems contradictory to encourage vehicles into the city centre by building multi storey car parks yet have a policy of a people friendly city.

“The overall approach to parking is to encourage people to park a little sooner and walk a little further.” (Page 42) While this seems a sensible policy there is another contradiction in recommending that another multi storey car park needs to be built beside the Council offices in Market Street completely the opposite to the overall approach. It is saying to the people of Bendigo; you park a little sooner and walk a little further but as Council officers we will park right next to our workplace.

It reinforces the Plan’s statement “Parking clouds the minds of reasonable people” (Page 43). The current occupancy rate of existing multi storey car parks are well below being full (Edward St being 66% and Hargreaves St 76%) and again Council will want ratepayers to subsidise CBD workers by paying for any new multi storey car park while reducing on street parking which the majority of citizens use. There has been little discussion on the Market St car park and the Branch is surprised that a business case for this project is currently being drawn up. Very few people know about this project.

Will the design of future multi storey car parks be the City’s heritage of the future?

Bendigo Railway Station

While public transport needs to be greatly improved going into the future, the Bendigo Railway precinct does not have a master plan for the future. The heritage station has been treated poorly while greater importance has been shown to the Maryborough Station which has been refurbished to its former glory. Again people and the need for amenity needs to be incorporated at the Bendigo Station and its customers fully consulted before a master plan is drawn up. It is a mismatch of heritage v ugly construction, pedestrians v cars with little or no landscaping. It’s a scene where heritage can welcome the many visitors to the City Centre yet this opportunity has been missed.

The City’s Environment

It is acknowledged that the Council has worked hard to improve the City’s environment which reinforces the importance that our forefathers placed on wide streets and important public spaces such as Rosalind Park. It is worth noting that the diagram on page 51 does not show arrows entering from Barnard Street. That part of Rosalind Park needs improvement and can be promoted as a short walk to the city centre.

The Bendigo Creek could also provide an off-road walking path experience for those walking into the city centre.

The Bendigo Law Courts, the Bendigo Mechanics Institute & Free Library, the Bendigo School of Mines and the Railway Locomotive Turn Table Building are all in need of refurbishment along with possible reuse. These buildings need to be considered urgently as once they become vacant gross deterioration occurs.

Churches will increasingly be required to be considered for adaptive reuse. All Saints in Forest St is a good example but many others will need to be considered. It is understood that the car yards along High St will be used for residential development which will greatly improve the amenity of this area so long as quality design is incorporated with these sites.

Governments only pay lip service to heritage

In an opinion piece in The Age newspaper on 18 September 2019, National Trust of Australia (Victoria) Chair, Kristin Stegley said:

The destruction of any recognised heritage place leaves a tangible loss. The building and all that it represented as a place of architectural merit, design, beauty and aesthetic contribution is gone. There is also an intangible cost. Less easy to quantify but none the less real and genuinely dislocating. The identity of place becomes diluted and less well defined.

If heritage genuinely mattered then it would be appropriately resourced and it is not.

A lack of understanding of the true value of heritage further explains the parlous state of affairs. Many fail to appreciate how heritage contributes to social cohesion and to vibrant, prosperous and healthy communities. The value of heritage lies in creating a sense of place and connectedness.

Local government must be more proactive than reactive to heritage protection, and it would certainly help if local government ceased viewing heritage as an obstacle to development rather than the community benefit it can deliver. If heritage does matter to Australia's cultural wellbeing and has a genuinely acknowledged value to Australian society and its future, then all agencies working together to safeguard, champion and celebrate our rich and diverse heritage is essential.

Conclusion

In conclusion, the Bendigo & Region Branch of the National Trust supports the need for a City Centre Plan to guide development into the future, which recognises the importance of Bendigo's heritage to the state of Victoria, and its status as one of the state's most important regional centres. However we believe this plan should be informed by the finalisation of the CBD Heritage Study, which will provide a strong foundation for future planning decisions. We welcome the opportunity to consult with Council on the finalisation of the Draft Plan, and the implementation of the Heritage Study. I welcome you to contact me at hardhillpc@gmail.com or on 0447473674.

Yours sincerely,

Peter Cox
President
National Trust of Australia (Victoria) Bendigo & Region Branch