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Name: * Greg Moore

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Phone number *

Date of meeting: * Tuesday 3 May 2022

Agenda item title: * 6.1 Ministerial Planning Referral: ID-2022-1 Punt Road Oval, Yarra Park, Punt Road, East Melbourne

Please write your submission in the space provided below and submit by no later than 10am on the day of the scheduled meeting. Submissions will not be accepted after 10am.

I was stunned to see these documents that were made available so late and with so little time to respond. I would ask, "Has the Yarra Park Advisory Committee been advised of these proposals?" If so, what was the committee's response to them? If the committee has not been consulted and the committee's response to the proposal sought, I ask. "Why not?"

In considering the documents, they were more like a sales brochure than a document that proposes significant changes to this part of Yarra Park. In particular, I strongly oppose the suggestion of removing 6 mature elms to allow site works.

These mature elms are real assets to both Yarra Park and the City of Melbourne. They should not be dealt with in such a cavalier fashion. They have significant financial value, which does not seem to have been considered. I can only hope that Council will oppose any suggestion of their removal. I also find it hard to believe that an AFL club which espoused environmental values and which has supported tree planting in Yarra Park in the past is now seeking to remove 6 mature trees from the precinct of Yarra Park most associated with the club.

I would strongly urge Council and all councillors to oppose any proposal that involves the loss of mature trees and

which results in significant change to Yarra Park. Yarra Park needs custodians who will defend it and see its vegetation preserved for future generations

Dr Greg Moore

Senior Research Associate

University of Melbourne, Burnley.

Chair National Trust, Significant Tree Committee

Please indicate No
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would like to
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the Future
Melbourne in
support of your
submission: *

Future Melbourne Committee submission form:

<https://comdigital.wufoo.com/forms/quz7ch409xevdq/>

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FMC Submission: Report to the Future Melbourne (Planning) Committee Agenda item 6.1 Ministerial Planning Referral: ID-2022-1 Punt Road Oval, Yarra Park, Punt Road, East Melbourne, and 6.1.1 Ministerial Planning Referral: ID-2022-1 Punt Road Oval, Yarra Park, Punt Road, East Melbourne (Part 2 of 2)

3 May 2022 Presenter: Marjorie Kennedy, Head of Statutory Planning

Purpose and background

1. The purpose of this report is to advise the Future Melbourne Committee of Melbourne Planning Scheme Amendment C421melb, which seeks to introduce an Incorporated Document that allows redevelopment of the land located at Punt Road Oval, Yarra Park (refer Attachment 2 – Locality Plan).
2. **The applicant is Richmond Football Club, the land is Crown Land under the management of the Melbourne Cricket Ground Trust (leased to Richmond Football Club),** and the architect is Cox Architecture.

Recommendation from management

12. That the Future Melbourne Committee resolves to authorise management to advise the Department of Environment, Land, Water and Planning that the Melbourne City Council supports Amendment C421melb, subject to conditions being included in the Incorporated Document (refer to Attachment 4 of the report from management).

2 May 2022

To: com.meetings@melbourne.vic.gov.au

Dear Lord Mayor and Councillors,

Re: 6.1 and 6.11 Ministerial Planning Referral: ID-2022-1 Punt Road Oval, Yarra Park, Punt Road, East Melbourne

CPTED (Crime prevention through environmental design) relies on now-discredited beliefs that lighting prevents or deters crime against persons and property. If there is any effect at all of lighting on crime it is to increase the risk of crime, contrary to what is stated or implied in the applicable Australian lighting standards AS/NZS 1158.3.1: 2020 and AS/NZS 4282: 2019. Graffiti is substantially aided by artificial lighting at night.

To achieve the expansion of the Punt Road oval and its crowd capacity and amenities, the associated buildings will need to be bigger. This is highly likely to increase the amount of

overshadowing of parkland during daytime. **There is no point in having overshadowing controls if they can be overridden in the manner proposed.**

The CoM has had evidence presented to it about the facts relating to crime and lighting. It should take due account of these facts when considering planning applications. The Minister for Planning is to be asked to approve aspects of the planned upgrade. **It is the duty of the CoM to ensure that the Minister is made fully aware of the facts before being asked to approve changes that are contraindicated by the facts in relation to crime and lighting.**

The proposed development plans and Amendment are not supported.

Sincerely,

Dr Barry Clark

Director, Outdoor Lighting Improvement Section, Astronomical Society of Victoria
Inc. Committee member, Victorian Chapter of the International Dark-Sky Association

Report to the Future Melbourne (Planning) Committee Agenda item 6.1, and 6.11 (part 2 of 2): Ministerial Planning Referral: ID-2022-1, Punt Road Oval, Yarra Park, Punt Road, East Melbourne, FMC 3 May 2022; Presenter: Marjorie Kennedy, Head of Statutory Planning

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<https://www.melbourne.vic.gov.au/about-council/committees-meetings/meeting-archive/Pages/Future-Melbourne-Committee-3-May-2022.aspx>

Email to: com.meetings@melbourne.vic.gov.au

3 May 2022

Dear Lord Mayor and Councillors,

Councillor Leppert stated, 4.59pm Monday 2 May 2022, that *'(t)he Punt Rd report went up by 2pm on Friday and the governance rules have not been breached'*, however that is almost a day after the FMC Agenda was posted without the reports for this Agenda item.

This does not allow adequate time for community, resident, public inclusion.

Should community views not be a component informing and influencing Council's views and its resolution?

It is requested that Agenda item 6.1 and 6.11 be deferred to the next Future Melbourne Committee meeting to allow at least the standard/minimum time for provision of documentation to the public and residents prior to FMC resolution, to enable effective, informed submissions from the community, and our participation in decision-making.

Enough time has not been provided by City of Melbourne to consult, read and understand this. Council staff and councillors have not been adequately available for consultation since the documentation was provided (after 2pm Friday). Presenting information at the FMC meeting or a day and a half (business days) before submissions are due does not allow proper consideration, consultation and informed resident and community submissions, perhaps even with expert advice. That means we do not really have a voice, a say, an influence on what our Councillors resolve at the FMC meeting for this Agenda item.

What is clear is that this is important, it is Crown Land and the community has not been consulted or adequately pre-informed or been given enough time to read and consider the reports on the FMC Agenda item. That is not inclusion in Council's resolution, decision, advice to the Minister/State government, rather that effectively excludes residents, the public, the community in Council decision-making and in the changes proposed by our Council.

Issues and possible issues with the proposal include:

1. lack of adequate time to read the reports to the agenda item on FMC website. (one business day and 4 business hours for 214 pages of reports and architectural drawings and plans, Amendment(s), PSAs, recommendations...).

As the reports on this agenda item were a day late (they were missing from the FMC Agenda when it went up on the website on Thursday afternoon), shouldn't the Agenda item be postponed to the next FMC meeting, to allow for community inclusion in the City of Melbourne position on this important proposal for re-development of Punt Road Oval?

2. Why is an Amendment being approved to be made to incorporate these proposed Re-development plans into the Planning Scheme before Council can incorporate the views of its constituents and stakeholders, before adequate community inclusion, which should likely lead to some changes?

- Shouldn't the plans be considered by the community and changes made FIRST, before the proposed Amendment is approved by Council and the Re-Development proposal approved by City of Melbourne, (on our behalf)? Should we not be a part of Council's decisions and advice? Does our Council not **represent us**? Shouldn't we have a say, input on 'the city's big issues and future plans', on all public, published FMC Agenda items?

3. Research confirms that lighting does not provide safety, yet that is not reflected in the reports/proposals.

4. there are new Lighting Standards to comply with but no Lighting Plan is listed eg see page 56

Thankfully Council has requested one, specifying in CoM's proposed conditions for approving the Amendment "a lighting plan must be prepared to the satisfaction of Council" and "plans and specifications first approved by the Melbourne City Council – City Infrastructure" - but community, residents, rate-payers, the public are not included here.

5. Traffic issues are not adequately considered, including:

- **impacts on Punt Road** traffic flow
- **on access to the CBD via Brunton Avenue from South of the Yarra**

- **impacts on residents in East Melbourne and South Yarra residential streets**, as it is considered with the increased capacity, hospitality and alcohol catering that car parking will likely extend to streets in those residential neighbourhoods.
 - o have they been consulted in forming these plans, in making Council's decisions and recommendations? Eg Melbourne South Yarra Residents Groups? East Melbourne Residents Group? CoRBA? Planning Democracy?
- **Patron capacity will be doubled** – 'from 4000 to 8000'
- LIQUOR LICENCE: 'Red line area supporting 450 persons currently'. "Proposed to expand it to Red line area supporting 1,250 persons: = **ALMOST TREBLING the liquor licence capacity.**

6 RE: TREE REMOVAL - It is requested that the 6 mature Elm Trees NOT be removed or damaged and that retention of the trees marked for removal be an added condition.

"Page 56: **Demolition and Tree Removal: Removal** of the car parking area and associated pavement / hardstanding to the north of the oval, **including the removal of six (6) mature Elms within the car parking area**, and **a series of juvenile replanted elms on the south side of Marathon Way.**"

It is not clear if 51 additional trees are also planned for removal:

"Development of land adjacent to Richmond Cricket Ground, including demolition of existing carpark, **removal of 51 trees**, construction of new grandstand building and elevated terrace with below ground facilities, and associated hard and soft landscaping..."

page 56 of 6.11 pdf.

We request you please re-consider and prioritise tree retention as a policy. The 28 February 2022 United Nations IPCC Report on Climate Change "... emphasises **the urgency of immediate and more ambitious action to address climate risk**" including strongly urging that **no trees be removed**, that "**safeguarding and strengthening nature is key to securing a liveable future**". Ref. Press Release, Berlin, 28 February 2022.

Could Council include: How can the proposed tree removals be avoided?

7. Heritage Protections for Punt Road Oval are in progress – please hold Council support for the Amendment until they are completed to allow a full and fair assessment.

"Proposal summary: **Planning Scheme Amendment C421melb** under Section 20(4) of the P&E Act 1987 to introduce a site specific Incorporated Document and Specific Controls Overlay over the subject site, **allowing the redevelopment of Punt Road Oval.**"

However, the documentation also states:

- **PSA C405melb**, which seeks to implement the recommendations of the 'Punt Road Oval (Richmond Cricket Ground) Heritage Review', prepared for City of Melbourne by Context,

dated 27 October 2021 (the Context Heritage Study). The Context Heritage Study recommends that the Punt Road Oval be classified as a 'Significant' heritage place in Council's Heritage Places Inventory. PSA C405melb concluded public exhibition on 31 March 2022."

- **PSA C427melb, which seeks to classify Punt Road Oval as a 'Significant' heritage place on an interim basis while PSA C405melb (seeking permanent controls) is progressed."**

If Council resolves to endorse the re-development plans and supports passing the Amendment now, prior to completion of the heritage PSAs, doesn't that mean that these heritage protections for the Planning Scheme in process, currently being sought for Punt Road Oval, will be ineffective, that they would no longer apply?

If so, I would like to see Council support heritage and assert a delay of approval of the Amendment – or write that as a condition - until the heritage protections are in place, to allow a full consideration of the proposed re-development works and its Amendment within its heritage assessed context, rather than over-riding the heritage PSAs-in-progress (but not completed) with passing the Amendment proposed here first ie *nipping them in the bud*. Please re-consider stymieing the Heritage PSAs with rushed, premature support and approval of an Amendment which would override them, render them null and void, remove their power.

Conclusion

Hence, my requests to Council on the Agenda item are:

- to **stand up for Environment and prioritise tree retention** and state that in the conditions
- to **stand up for Heritage and request the Heritage Amendments pass first** so that they have full and fair sway in considerations, and to state that as a condition
- to respect and honour **community inclusion in resolutions and decisions of FMC**, even when it is Council advice and recommendation to the Minister/State government (it is still a FMC Agenda item and resolution of our Council), and to fulfil the promise to **provide FMC documentation earlier (preferable) but not to provide it late** – and thus to defer this Agenda item for the next FMC.

Thank you for the opportunity to make a submission on these important matters.

Sincerely,

B. McNicholas

Director, Walk in St Kilda Rd & Environs

Convenor, Lighting Panel Presentations and Nature Care Events, Planet Ark, NTD

Privacy acknowledgement: I have read and acknowledge how Council will use and disclose my personal information.

*

Name: * Chris Thrum

Email address: * mineralsands@hotmail.com

Phone number *

Date of meeting: * Tuesday 3 May 2022

Agenda item title: * 6.1 Ministerial Planning Referral ID 2022-1 Punt Road Oval Yarra Park Punt Road East
* Melbourne

Please write your submission in the space provided below and submit by no later than 10am on the day of the scheduled meeting. Submissions will not be accepted after 10am.

Dear City of Melbourne

This concerns the Punt Road Yarra Park redevelopment, Part 1 of 2.

I fully support the City of Melbourne management team recommendation that gives the green light recommendation for the redevelopment of Punt Road Oval.

Richmond Football Club has been established in this area for many years. It is a well respected Football Club. With Captain Cotchin as a leader Richmond recently won 3 AFL Premierships in 4 years.

Richmond has a strong relationship with First Nation tribes and will continue to strengthen this relationship with this redevelopment.

Cox Architects no doubt will find subtle and sophisticated ways to incorporate the heritage traditions of Jack Dyer and the Richmond Football Club.

Best regards

Chris Thrum

Please indicate whether you would like to No

verbally address
the Future
Melbourne in
support of your
submission: *

Privacy acknowledgement: *

I have read and acknowledge how Council will use and disclose my personal information.

Name: *

Greg BISINELLA

Email address: *

GREG@AUSTRALIANCLOTHINGCOMPANY.COM.AU

Phone number *

Date of meeting: *

Tuesday 3 May 2022

Agenda item title: *

6.1 Ministerial Planning Referral – Punt rd oval Yarra Park

Please write your submission in the space provided below and submit by no later than 10am on the day of the scheduled meeting.

please refer to attached submission prepared by the East Melbourne Group and East Melbourne Historical Society.

Submissions will not be accepted after 10am.

Alternatively you may attach your written submission by uploading your file here:



[emg_emhs_submission_to_c421_march_2022.docx](#) 1.62 MB ·

DOCX

Please indicate whether you would like to verbally address the Future Melbourne in support of your submission: *

No

EAST MELBOURNE GROUP INC. (EMG).

152 POWLETT ST. EAST MELBOURNE VIC 3002.



EAST MELBOURNE HISTORICAL SOCIETY. (EMHS)

122 GEORGE ST EAST MELBOURNE VIC 3002.



SUBMISSION TO ENGAGE VICTORIA

**[Department of Environment, Land, Water and Planning -
DELWP]**

**Regarding City of Melbourne Planning Scheme
Amendment C421 – March 2022.**

**THE PUNT ROAD OVAL REDEVELOPMENT FOR
THE RICHMOND FOOTBALL CLUB.**

Introduction

1. The East Melbourne Group is the Residents Association of East Melbourne founded in 1953 comprising approximately 600 members.
2. The East Melbourne Historical Society is an association of 250 members who are interested in the history of East Melbourne.
3. This submission should be read with the Richmond Football Club (RFC) application for a development permit, described in a series of plans by Cox Architecture and various appendices including a Reasonable Use discussion, Cox Architecture Design Concept reports and a Heritage Impact Statement by Lovel Chen.
4. The proposal involves redevelopment of spectator facilities, including a new grandstand and expansion of the playing area to meet current demands for training and competition. It includes the provision of dedicated facilities for women's football and men's football, increased spectator capacity and facilities for patrons, state-of-the-art training and workplace space for significant community programming, and dedicated car parking.
5. The application will result in significant expansion of the RFC lease area into the Victorian Heritage Register listed Yarra Park and demolition of the historic Jack Dyer Grandstand.
6. The proposed works that intrude into the park have been approved by Heritage Victoria under VHR Permit No P35150 [14 February 2022] subject to a series of secondary conditions. The works within the present area of the RFC lease are not relevant to this permit but are subject to the current Heritage Overlay HO2 under the City of Melbourne Planning Scheme. Such an overlay would normally be managed by the Melbourne City Council [MCC], but in this case, due to the 1873 vesting of the land to the former Board of Works, the administration of the site now falls under the responsibility of the DELWP and the Minister for Planning has the final right of decision over matters pertaining to it.

Summary of the East Melbourne Group concerns.

7. The permit process by Heritage Victoria does not relate to the whole scheme because it was limited to consideration only of the elements of the proposal on the VHR registered land. It did not interrogate the complete design which gives rise to the features overlapping into the park from the Heritage Overlay and it is potentially vulnerable to changes derived from the HO2 area during design development. As best it can be considered as establishing the parameters for what is ultimately acceptable within the relevant VHR area.

Because the majority of the proposed works are outside the VHR area, the permit process ignored the design decisions that led to its intrusive aspects, eg, why the raised forecourt is essential.

8. The "diagonal path" behind the grandstand is unnecessarily lost to the pattern of early pathways through the park due to the raised forecourt. The EMG contends

that a modification of the proposal could avoid this negative outcome for the VHR area.

9. The heritage values of the Punt Road Oval are not yet adequately defined. To date there is no formally adopted independent heritage assessment of the Punt Road oval and its 1914/1927 grandstand. Planning Scheme Amendment C405, which would restore the former heritage status of the place¹, is not yet complete².

The EMG contends that until C405 is adopted, there is no credible heritage analysis of the place that would provide a basis for any decision on the significance of the heritage place and particularly the acceptability of the demolition of the Jack Dyer Grandstand.

10. The applicant's Heritage Impact Statement is limited in its scope and relevance to the whole proposal because it principally addresses the aspects of the proposal that occur within the VHR registered land. With respect to the proposal as a whole, it is deficient in that it does not give adequate consideration to the affected heritage aspects of the context within Heritage Overlay HO2, particularly the Jack Dyer Grandstand.

Furthermore, in spite of obvious heritage concerns, it does not question the basis of the proposal. It does not critically interrogate the applicant's options for alternative layouts from the basis of the heritage conservation of the place. It lacks any discussion of issues under Clause 43.01 of the Planning Scheme, particularly CI 43.01-8 Decision Guidelines, which might clarify questions about the desirability of the demolition of the historic Jack Dyer Grandstand.

The Cultural Significance of Yarra Park

11. In spite of the recent HV Permit, there remains a concern about the impact on the cultural heritage of the park through the intrusion of the underground carpark and the raised forecourt above it, in relation to the removal of trees and the historic "diagonal path" which it would eliminate.
12. Yarra Park was part of a proposal to surround the City of Melbourne with a ring of parks and gardens. This is largely credited to Charles La Trobe, who was appointed to govern the Port Phillip District in 1839 and responded to instructions to make sufficient land available for public purposes. The result was an inner ring of gardens, including the Fitzroy, Treasury, Parliament, Alexandra and Royal Botanic Gardens and the Domain, and an outer ring including Yarra, Albert, Fawkner, Princes and Royal Parks. The former were generally designed spaces, intended for passive recreation, while the latter were developed in a less sophisticated manner for both active and passive recreation.
13. Yarra Park developed on the Government Paddock which was east of the adjacent Police Magistrate's Paddock. This land, of some 157 acres, was recommended for reservation in 1862. By that time Richmond Cricket Club had been playing since 1855. It became known as Richmond Park before being

¹ The former identification of the site as a heritage place was inadvertently overlooked in the most recent revision of the Heritage Places Inventory 2017 under Amendment C258.

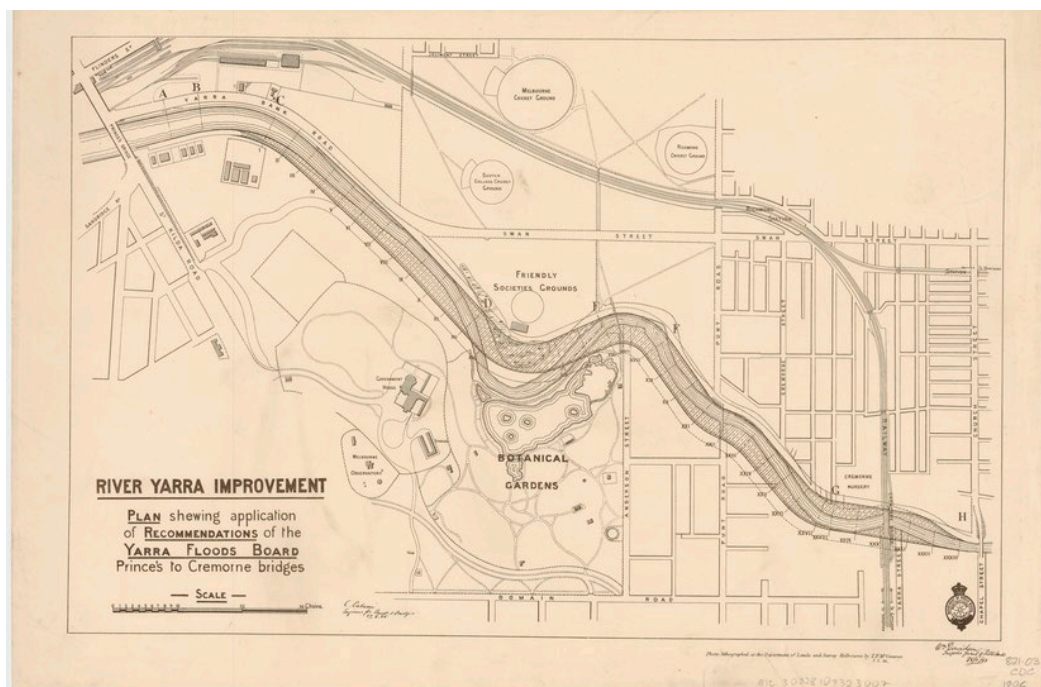
² Consultation on the Context Pty Ltd heritage review does not close until March 31.

temporarily reserved and renamed Yarra Park in 1867. It was not permanently reserved until 1873 [see above].

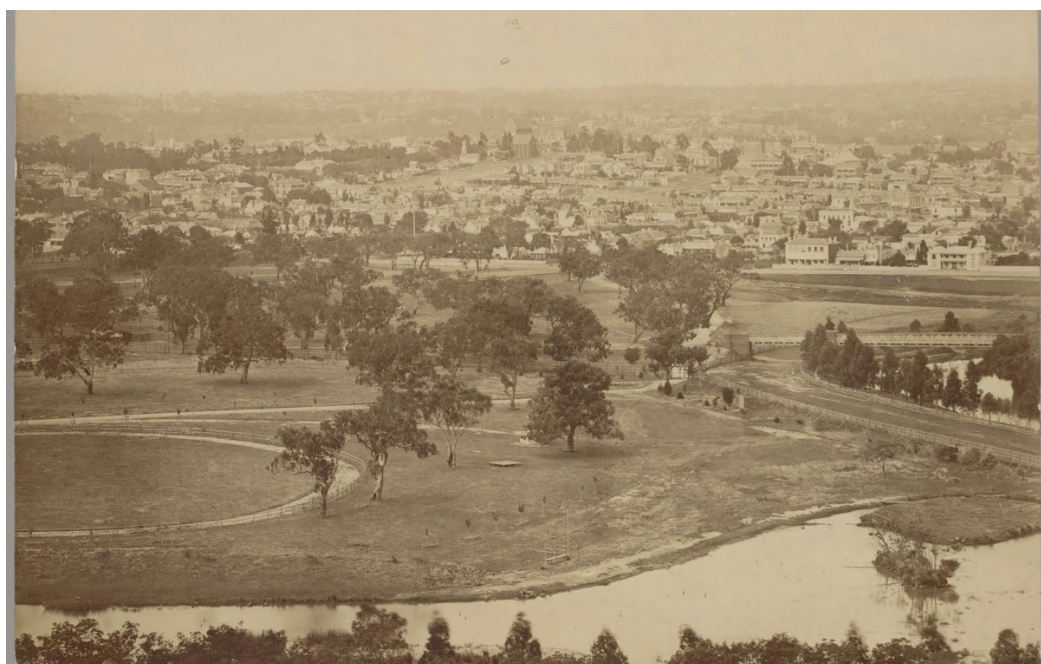
14. A network of paths developed through Yarra Park, along the routes taken by early settlers. The first group of these, from east-west between Punt Road to Wellington Street, were established as early as 1852. With these a further pathway diagonally across the NW of the Punt Road Oval [referred to herein as the “diagonal path”] defines the subject site. These pathways, by now made permanent with paving, drains and avenues of trees generally continue to be used. Yarra Park has been used for the provision of parking for sporting events since the 1920s and continues to be used in this manner.
15. Yarra Park is historically significant as the 'village green' for Melbourne and for its role in the development of Australian Rules Football, being the place where the earliest games were played in 1858.

Loss of the “diagonal path” to the NW of the oval

16. This path presently exists but has a compromised setting having been partially absorbed into an area of car parking associated with the Punt Road Oval.
17. The three major E-W paths through the park are in direct and purposeful lines between access points to Richmond streets at Punt Road and the park’s NW corner behind Jolimont. They are the most direct pedestrian routes between Richmond and the CBD.
18. The "diagonal path", presently between the northern end of Punt Road and a point on the length of Bunton Avenue and the railway, appears to have no rationale. However, if the wider area is considered in the late 19th C, its purpose is clear.
19. Prior to the redevelopment of the area south of the railway reserve there was also a N-S connection extending as far south as South Yarra via a pedestrian bridge over the sharp bend of then narrow Yarra River at Anderson Street [see at RHS in c.1875 photo below].It led to a N-S path crossing Yarra Park South to a rail bridge before branching north-east with the other extant diagonal path past the MCG to the NW corner on Wellington Parade.
20. The 1896 map of the straightening and widening of the Yarra River at the Botanical Gardens clearly indicates the N-S extent of this network and the former connection of the three paths on what is now Brunton Avenue. This route would have been maintained with the construction of the Anderson Street (Morrell) bridge in 1901 and later rail bridges including the existing bridge.



1896 Map of Carlo Catani's straightening and widening of the Yarra River at the Botanical Garden [SLV MAPS 821.03 CDC 1896].



A c1875 Nettleton photo [SLV H96.160/2731] from the Govt House tower showing Punt Road and Cremorne behind Gosch's paddock with the pedestrian bridge over the Yarra at the RHS and Richmond Hill at centre. The oval to the left is probably the Friendly Societies Grounds shown on the map above.

21. This means that the "diagonal path" to Richmond Hill via Rowena Parade is probably one of the earliest in the park and that it has much wider historic significance than that associated with Yarra Park only - something that is not mentioned in the VHR citation and the 2001 Conservation Analysis of the park. The pathways in Yarra Park are not leisure paths and they are not designed to access the MCG. They are almost all major metropolitan transit routes that cross the park en-route to somewhere else.

22. As such they are a reminder that the common means of travel within the metropolis in the 19th C was by still by foot.
23. This application will result in the removal of the “diagonal path”, a route taken by the earliest settlers around Melbourne through Yarra Park. The geometry of the paths passing the Punt Road oval almost certainly defines its original location.
24. The removal of the path and loss of its sightlines due to the proposed raised forecourt would therefore destroy an important element of the early structure of the park.

Demolition of the Jack Dyer Grandstand

25. The proposed building of the new grandstand will require the demolition of the present Jack Dyer Grandstand.
26. The existing Jack Dyer Stand (constructed in 1914 and extended in 1927) has intrinsic heritage significance as an example of a pre-WW1 grandstand at a cricket/football oval.
27. For enhancement of its architectural values, restoration of missing components such as the ridge cresting, the ocular roof vents and the timber frieze brackets would be a simple exercise.
28. In the application, there is no discussion about what would be required or evidence of the cost to upgrade/restore the grandstand. Though the RFC are in possession of various reports about its condition/viability these have not been revealed and thus their credibility cannot be interrogated. However, although there are some obvious defects and a lack of maintenance, it is unlikely that any issues could not be dealt with in a manner normal for buildings of its type and age.
29. Of the extant pre-WW2 grandstands in inner Melbourne, only the former Fitzroy grandstand on Brunswick Street [1888] and the Gardiner Stand in Princes Park Carlton [1909] are earlier. The VHR lists other places similar to the Punt Road Oval. The Jack Dyer grandstand compares well with those already on the Register in having a connection with a place of wider significance (Yarra Park), a long term and enduring connection with one of the early football clubs (Richmond), connections with major player figures (eight Australian Football Hall of Fame Immortals including Jack Dyer, Kevin Bartlett, Royce Hart, Kevin Sheedy and Ian Stewart and numerous Inductees) along with being a pre-WW1 grandstand designed by prominent Melbourne architects.
30. It is a significant contributory element to Yarra Park even though it is not included in the extent of the Yarra Park VHR, which makes an artificial distinction with the adjacent heritage overlay of the oval. The exclusion from the VHR extent and also from the Yarra Park heritage overlay HO194, while being mapped as part of HO2 (the general overlay for East Melbourne), is odd. Its character has no relationship with the mainly residential character of HO2 from which it is also geographically separated - while it is clearly an element of Yarra Park.
31. The City of Melbourne is currently undertaking a Planning Scheme Amendment [C405] which would restore the mistaken exclusion of the place as a Significant

heritage place and which would provide it with a new place specific heritage overlay. C405 overlaps the subject C421 in both place and timing and its outcome should be a relevant factor in decisions pertaining to C421 [see CI 8 above].

32. The heritage significance of the Oval and the Jack Dyer Grandstand are described in the *Punt Road Oval Heritage Review* by Context Pty Ltd [21 October 2021] which assesses the oval with grandstand as a **significant** heritage place and recommends its inclusion in the Schedule to the Heritage Overlay at CI 43.01 of the Melbourne Planning Scheme.
33. In Yarra Park, over time, a series of historic grandstands have been removed from the MCG leaving the Punt Road Oval grandstand as the one remaining major historic built form that identifies the evolution of the greater place, ie., Yarra Park. Proper citations for the Punt Road Oval (see the draft National Trust Classification Report and the Context report) read just as convincingly as those for the Junction Oval in St Kilda and Princes Park in Carlton, noting that at St Kilda both the early grandstands are later Interwar examples [and being identical but 10 years apart, they do not have the architectural values of the Punt Road example]. The Punt Road Oval is one of only two ovals with early metropolitan grandstands where the original connection with the host football club is maintained. The other is Princes Park with the Carlton Football Club.
34. While a replacement grandstand can also memorialise Jack Dyer, it would not have the same meaning as for the place that he actually inhabited during his playing and coaching career. This is a significant loss to the spiritual home of the Richmond Football Club. The grandstand has important historic significance for the community of Richmond and the football club's wider supporter base, "the Tribe".
35. It also has connections with two significant Melbourne architects. The original architect, Thomas Watts, one of the founders of the Royal Victorian Institute of Architects in 1856, was a significant and prolific architect across Victoria. He designed the Princes Park grandstand in Maryborough [1895] on which the Richmond stand was modelled, the demolished grandstand at Victoria Park, the former Baptist Church House in Albert Street, "Bontharamobo" near Wangaratta, and "Malvern House" in Glen Iris - may on the VHR.

Frank Stapley who architect for the 1927 extension was also the designer of the Princes Park stand in Carlton [1909] and one of the early MCG stands. He was a significant and influential advocate for town planning and the foundation Chair of the first Commission into Melbourne's planning in 1922 [see ADB]. He designed numerous and notably innovative buildings across Melbourne, including the St Kilda Road tram shelters.

Increased use of Yarra Park

36. What is not addressed in the application is the increased use of Yarra Park if the permit is granted. If AFLW matches and Richmond VFL team play upon the oval, there will be car parking, access by spectators and a great intensification of the use of Punt Road Oval that will detrimentally affect the park and surrounding

residents. To properly consider the application more information must be given as to how much extra use of Punt Road Oval is anticipated.

Reasonable or economic use

37. The reasonable or economic use of Punt Road Oval seems to be underpinned by a desire to increase the size of the oval. As attached Table A shows, ground sizes across the AFL are not uniform.
38. There is no law of football or specified requirement that the ovals must be of an MCG size. It appears to be an aspiration. A number of clubs in the AFL have smaller ovals which they train and play, including the newest major competition venues at Adelaide and Perth.
39. Richmond last played an AFL (Then VFL) game on the Punt Road Oval on 22 August 1964. It has been 57 years since they played on the oval but have continued to train there. In that time, despite the oval being smaller than the MCG, they have managed to win eight premierships - three in the last five years.
40. The Lovell Chen report relies upon the reasonable economic use prepared by Mr Robert Gibbins of SC Lennon & Associates in October 2021 being Appendix A. However, the Gibbins report also relies on unsubstantiated issues about the condition of the grandstand and the limited options for the proposal produced by Cox Architecture.
41. The estimate for a 27-month build commencing in July 2022 is said to be \$65 million. \$30 million has been obtained from the Federal and State governments and the Richmond Football Club site says "(it) will shortly ramp up its fund-raising efforts through the Fighting Tiger Fund to secure the balance" which would be \$35 million.
42. The RFC is a large organisation. The extent of the organisation is not made clear in the economic report. For example, the RFC operates poker machines at venues outside the Punt Road Oval. Which in 2020 had 97 machines which grossed \$3.5 million
43. Nor is it made clear what staff are at Punt Road and what staff are off site.
44. Korin Gamadji Institute and the Bashar Houli Foundation and the Melbourne Indigenous Transition School, whilst they are worthy causes, seem to have no imperative to be at Punt Road Oval although the proposal report does not explain how they might be excluded by the limitations of the options.
45. The redevelopment will comfortably accommodate 8,000 spectators, so the RFC website says. It is not made clear why RFC need to demolish the Jack Dyer Stand and have a capacity of 8,000 which, it seems, will promptly become redundant. The COVID-21 AFL women's season, there are an average of roughly 2,300 attendees per AFLW match and at the grand final there were 22,934 spectators.
46. The AFL is expecting an expansion in the number of spectators that attend matches. A grandstand of 8,000 will soon be redundant.

47. More problematically, for an outlay of \$65 million to increase the capacity of the oval by a relatively small amount without assessing the cost benefit of the \$65 million spend, appears futile, and will leave RFC with a white elephant with little connection with RFC.
48. The construction of the grandstand and the expenditure of the money involved for infrastructure that will require a considerable cost to maintain and repair would appear to be beyond the economic capacity of RFC
49. RFC's operating profit for the year ended 31 October 2021 was \$2.5 million from a base of \$73.8 million. The profit seems attributable to pokies income.
50. The reasonable or economic use of the registered place if refused contemplates a degree of practical compromise. There is no evidence that retention of the grandstand is not a practicable possibility – it is unknown what the cost of the repairs to the grandstand would be. No evidence has been given [description or cost of necessary repairs and enhancements] as to why the present Jack Dyer Grandstand cannot be utilised apart from a desire to broaden Punt Road Oval on a basis that is not clearly articulated.
51. The permit application, if refused, is unlikely to affect the reasonable or economic use of the Punt Road Oval.
52. There is no evidence that Punt Road Oval has any economic use to RFC in the sense of generating income. Nor would a refusal affect the reasonable use of Punt Road Oval as there is no evidence that the facilities as presently constituted are inadequate to the task except, again, for the assertion that the oval should be widened.
53. RFC has not given an overall picture first of the club itself, its operations and its physical location. RFC employ 150 staff, many of those staff are off site but there is no evidence of where they are off site and no reason given why the whole of the RFC administration cannot move off site and why it is necessary for administration and education to remain at Punt Road Oval.
54. As well, it appears that RFC generates significant income from its poker machines and those poker machines are not located with the Punt Road Oval, and although it is said it is for engagement with the community, there is no evidence given of the RFC demographic.
55. It is clear that most clubs in the AFL demographic have moved the outposts of the Melbourne metropolitan area for ease of convenience and also to areas where their membership live.
56. So, all that is provided in the application by RFC is a snapshot of why it would be beneficially to them, for the sum of \$65 million, to demolish a grandstand, which barely increases the capacity of the oval, and to widen the oval where there is minimal detriment to the players with the present training facility.
57. But, more importantly, area around the RFC has become degraded as a result of the car parking which has no permit basis to it and is outside, it is believed, the RFC leased area and there is no need for an underground car park which will

result in the removal of a significant desire path across Yarra Park and the loss of mature elms

58. The proposal would result in a significant loss of Yarra Park by reason of what appears to be the increased usage of Punt Road Oval, especially if it is intended to hold AFLW matches upon the oval. That would also mean associated car parking which would be beyond the ability of the underground car park to manage. Crowd noise and all the associated issues of large-scale matches that have been dormant for 57 years.
59. It seems the underground car park is simply for the administrators of RFC and no more. Which leads again to the issue of why much of the operation of the RFC cannot be relocated.
60. For an expenditure of \$65 million, a properly reasoned application must be made setting out the structure of RFC, the need to increase the oval and demolish the Jack Dyer stand and why it is there should be underground car parking for the administration of Richmond Oval and an examination of what the consequences will be of an enlarged oval with presumably AFLW matches being played there.

The Rationale for the proposal.

61. Without making a thorough analysis of the demands and potential solutions it is a reasonable assumption that the additional buildings and spectator accommodation required could be fitted on the existing site. It would also be likely that given the VHR permit, the underground parking could be provided outside the lease area with the elements of the park acceptably reinstated above it, leaving the increase in oval size as the only unsatisfied demand.

The underlying reason for the enlarged oval is that the marginal increase of its playing area will advantage a minority of RFC players – those VFL [not AFL] players who are not experienced in match-play on the larger MCG³ [see CI 2.5.2 of the Design Concept Report quoted below], when apart from this one factor, there is scope on the site to accommodate the balance of its needs⁴.

For their VFL players who never play at the MCG, transition onto the senior list means they have limited experience of matches on a wider field of play and at a ground with deeper pockets. [*Arcs of the boundary adjacent the goalposts. Wider pockets require greater skills in score attempts*]

It is a core project objective to achieve parity with the MCG to support player preparation and ensure that the Tigers are not disadvantaged in comparison to their competitors who are increasingly developing MCG sized training ovals.

62. It appears that this ambition - a focus on the needs of secondary [VFL] players and on uniform preparation for what in reality will be highly variable scenarios at other grounds [with the varied playing areas, weather, player form, quality of the opposition, etc, etc.] is the rationale that leads to the perceived necessity to demolish a building that is historically significant for both Yarra Park as a context and the RFC itself. It denies a series of contrary factors that apply across the wider

³ The MCG is the RFC home-ground but it is not available for RFC training and practice.

⁴ See below for discussion on potentially acceptable intrusions into the park.

context of VFL competition grounds, many of which do not match the MCG in size or shape⁵.

63. It also seems to fly in the face of the fact that Richmond has managed to win three recent premierships, including in 2020 at The Gabba, an even larger ground than the MCG⁶. While agreeing that a larger practice oval is desirable, it can hardly be argued that it is essential and that the negative outcomes for the existing grandstand are justifiably inevitable.
64. In considering a limited range of options, the proposal values preservation of the recent architecturally low-grade Swinburne building over the historic Jack Dyer grandstand – a building that not only embodies much of the history of the Club but is the one remaining major historic structure in the wider context Yarra Park.
65. The alternatives considered by the applicant seem to choose the opportunities and constraints that suit the preferred outcome and do not explore less intrusive possibilities such as variations of the lease boundaries that might facilitate a more sensitive solution.

Potential options for the proposal.

66. The Cox Architecture drawings [Design Concept Report Pt 2, pp 1-4] showing the development options are based on a small-scale and possibly inaccurate base-map so it is difficult to make a definitive response to the potential options available. However, the following possibilities should be considered before a decision to demolish the Grandstand is taken.
67. The diagram and descriptions below illustrate possible variations that might enable provision of the enlarged oval while keeping the Jack Dyer Grandstand in place while enabling provision the other RFC requirements. This also takes into account the flexibility provided by the VHR permit as explained below.

The suggestions also may depend on the preparedness of VicRoads to marginally reverse the historic sequence of road encroachments on the site – favouring road transport over all else - which are essentially responsible for the present dilemma⁷. The questions are whether there might be some flexibility in the present road layouts that would allow the enlargement of the oval while maintaining road function and whether such changes can be justified for the sake of conserving a historic grandstand?

⁵ Punt Road is 159m x 125.5m, the MCG is 160m x 137m, the AFL preferred size is 165m x 135m, Those smaller are Kardinia Park 170m x 116m, Adelaide 169m x 123m, the new Optus Oval in Perth 160m x 130m and Blundstone Arena 160m x 124m

⁶ The “Gabba” where the grand final was held in 2020 is 166m x 148m.

⁷ Punt Road was first widened in 1925 and again in 1964. Brunton Avenue was constructed in 1938. The recent Punt Road clearway further facilitates road traffic.

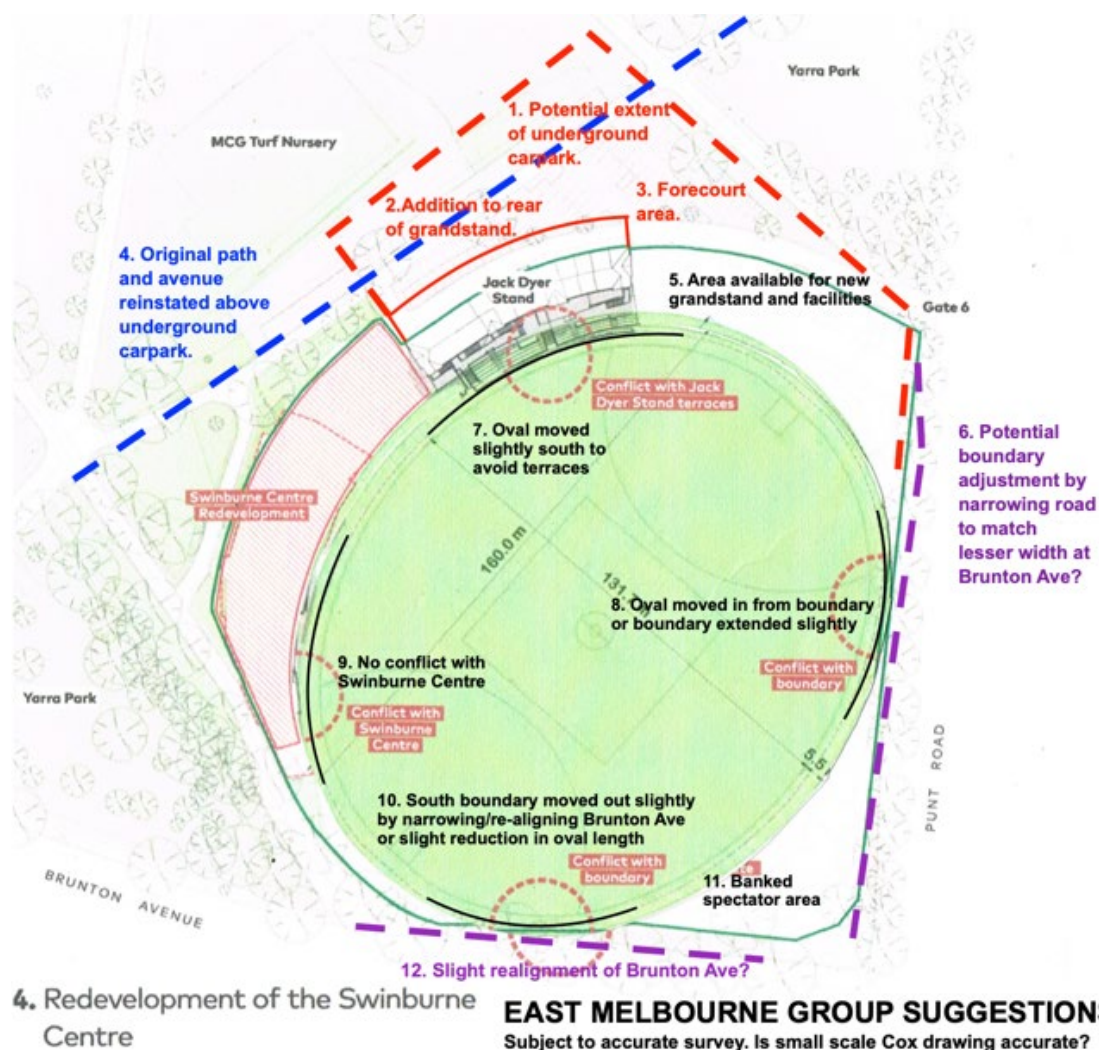


DIAGRAM SHOWING POSSIBLE LAYOUT MODIFICATIONS THAT MAY PRESERVE THE JACK DYER GRANDSTAND WHILE PROVIDING FOR RFC REQUIREMENTS [based on Option 4 of the Cox Architecture Design Concept report].

1. Potential for underground car parking within VHR permit area allowing historic pathway [4] with associated tree avenue to pass uninterrupted above it.
2. Possible addition to rear of the existing grandstand, within the parameters of the VHR permit.
3. Location of a forecourt area that is directly associated with and at same level as major access paths.
4. The original alignment and levels of the “diagonal path” maintained [see 1 above].
5. Potential for the construction of a new grandstand to augment numbers available in an adapted Jack Dyer stand.
6. Potential to revise the west side kerb alignment of Punt Road so that the carriageway is parallel and narrower north of Brunton Ave, providing internal access around the oval at the east.
7. The Option 4 oval moved slightly south and rotated west to clear the existing grandstand terraces.
8. Modification of the kerb alignment and perhaps some extension of the east RFC boundary to achieve access past the oval.
9. Slight reorientation of the Option 4 oval avoids conflict with the Swinburne Centre.
10. The south arc of the oval boundary may be resolved by a slight reduction in oval length but which would not alter the configuration of the “pockets”.
11. Potential for internally accessible banked seating.
12. Potential for southern extension of RFC boundary if VicRoads is prepared to narrow or reconfigure the Brunton Ave curve and Richmond Station entry,

68. It would appear that these questions have not even been considered – let alone asked. There is no evidence of any discussions with VicRoads.
69. In general, there is often some flexibility in the widths of multi-lane roads - a few centimetres off each lane can add up to a useful dimension. For example, in investigating options for the *St Kilda Junction Movement and Place Improvement Project* [Metropolitan partnerships 2018] VicRoads' officers conceded that narrowing of lane widths could advantage the perimeters of the area. There has been no analysis of this potential in relation to either Punt Road or Brunton Avenue but relatively minor concessions by VicRoads could be the difference for the Jack Dyer Grandstand.
70. On Punt Road, the lane width is already narrowed at the intersection with Brunton Avenue. Extension of this lesser width north could provide the extra dimension required to gain internal access past the oval fence and the Punt Road boundary.
71. On Brunton Avenue the curve to the Punt Road railway bridge is potentially variable as are the carriageway lane widths. Modification of these elements could potentially occur in tandem with an improvement to the presently very low standard Brunton Avenue entry to the Richmond Station.

Deficiencies in the design process.

72. Analysis of the scheme and comparison with similar facilities suggests major deficiencies as following.

Lighting.

73. The current lighting, carried on four tall posts at the four sides of the site, would probably not be adequate for the enhanced match-play mode, which would presumably involve more intense lighting and consequently more or larger poles and light banks.

Regardless of what might be required, while the application shows the location of existing light poles on plan [without annotation], the issue is not referred to elsewhere. This deficiency and the physical and visual impacts of an effective system of lighting should be addressed before the application can be considered seriously.

Name signage.

74. It appears that for facilities of the type, naming rights of the venue are part of its commercial profile and viability, eg, Optus Oval Perth, the Marvel Stadium, Docklands and CitiPower at Junction Oval, St Kilda.

It can be assumed that a similar scenario will apply at Punt Road and that the corporate signage will be expected to be highly prominent. But there is no indication in the proposal as to where such prominent signage might be located.

Conclusion.

75. Consideration of Amendment C421 should be deferred until the outcome of Amendment C405 is known and considered.

76. To avoid the demolition of the historic Jack Dyer Grandstand the options for the provision of the demands of the RFC client brief, notably for a larger playing area, should be explored more thoroughly. In particular the possibility of increasing the site area to the east and south through negotiation with VicRoads should be explored.
77. Given that the variations in the site boundaries required to achieve a “win-win” outcome that gives the RFC what it demands while saving the Jack Dyer Grandstand from demolition are minimal, the RFC and its consultants should vigorously pursue the concept and that Amendment C421 should not be concluded until such negotiations produce an outcome – and, if appropriate, a revised proposal.

DATED March 2022

For and on behalf of:

East Melbourne Group Inc.

Greg Bisinella

Heritage and Planning

Convenor

planning@emg.org.au

EMHS

Barbara Paterson

Vice President



ATTACHMENT A

Team	Original oval	Oval dimensions (length x width)	New oval	New oval dimensions (length x width)	Year moved
Melbourne	MCG	171 m x 146 m	Casey Fields*	175 m x 145 m	2008
St Kilda	Junction Oval	172 m x 133 m	Moorabbin Oval	164 m x 130 m	1965
Carlton	Princes/ Ikon Park	157 m x 127 m	N/A	N/A	N/A
Hawthorn	Glenferrie Oval	453 m perimeter	Waverley Park	182 m x 142 m	2006
Essendon	Windy Hill	164.5 m x 139.8 m	The NEC Hangar	N/A	2013
Collingwood	Victoria Park	159 m x 131 m	Olympic Park Oval	N/A	2004
Richmond	Punt Road Oval	160 m x 129 m	N/A	N/A	1964
Geelong	Kardinia Park	170 m x 116 m	Deakin Uni's Elite Sport Precinct	MCG sized oval	**uses both ovals
South Melbourne (Swans)	Lake Oval	N/A	Sydney Cricket Ground	155 m x 136 m	1982
Fitzroy (Lions)	Brunswick Street Oval	N/A	Princes Park	157 m x 127 m	1967
Footscray (Bulldogs)	Whitten Oval	159 m x 121 m	N/A	N/A	N/A

Team	Original oval	Oval dimensions (length x width)	New oval	New oval dimensions (length x width)	Year moved
North Melbourne	Arden Street Oval	160 m x 129 m	N/A	N/A	N/A

*Melbourne FC is, whilst maintaining a presence at Casey Fields, trains at Gosch's Paddock, which is to be upgraded during the 2021/22 offseason to increase the dimensions to better match the MCG and Docklands Stadium.

Greg Bisinella

Heritage and Planning Convenor

planning@emg.org.au

Barbara Paterson

Vice President



Privacy acknowledgement: * I have read and acknowledge how Council will use and disclose my personal information.

Name: * Naomi Evans


Email address: * naomi.evans@cox.com.au

Phone number *

Date of meeting: * Tuesday 3 May 2022

Agenda item title: * Punt Road Oval, Yarra Park, Punt Road, East Melbourne

Please write your submission in the space provided below and submit by no later than 10am on the day of the scheduled meeting. Submissions will not be accepted after 10am. As a representative of COX Architecture, I will be making a verbal submission.

Alternatively you may attach your written submission by uploading your file here:  [220503_punt_road_oval_redevelopment_future_melbourne_committee.pptx](#)
2.93 MB · PPTX

Please indicate whether you would like to verbally address the Future Melbourne in support of your submission: * Yes

If yes, please indicate if you would like to make your submission in person, or via a virtual link (Zoom) to the meeting. Please note, physical attendance will be limited in accordance with City of Melbourne security protocols and COVID-safe I wish to make my submission in person

plans and be allocated on a first
registered, first served basis. *

Richmond Football Club Redevelopment

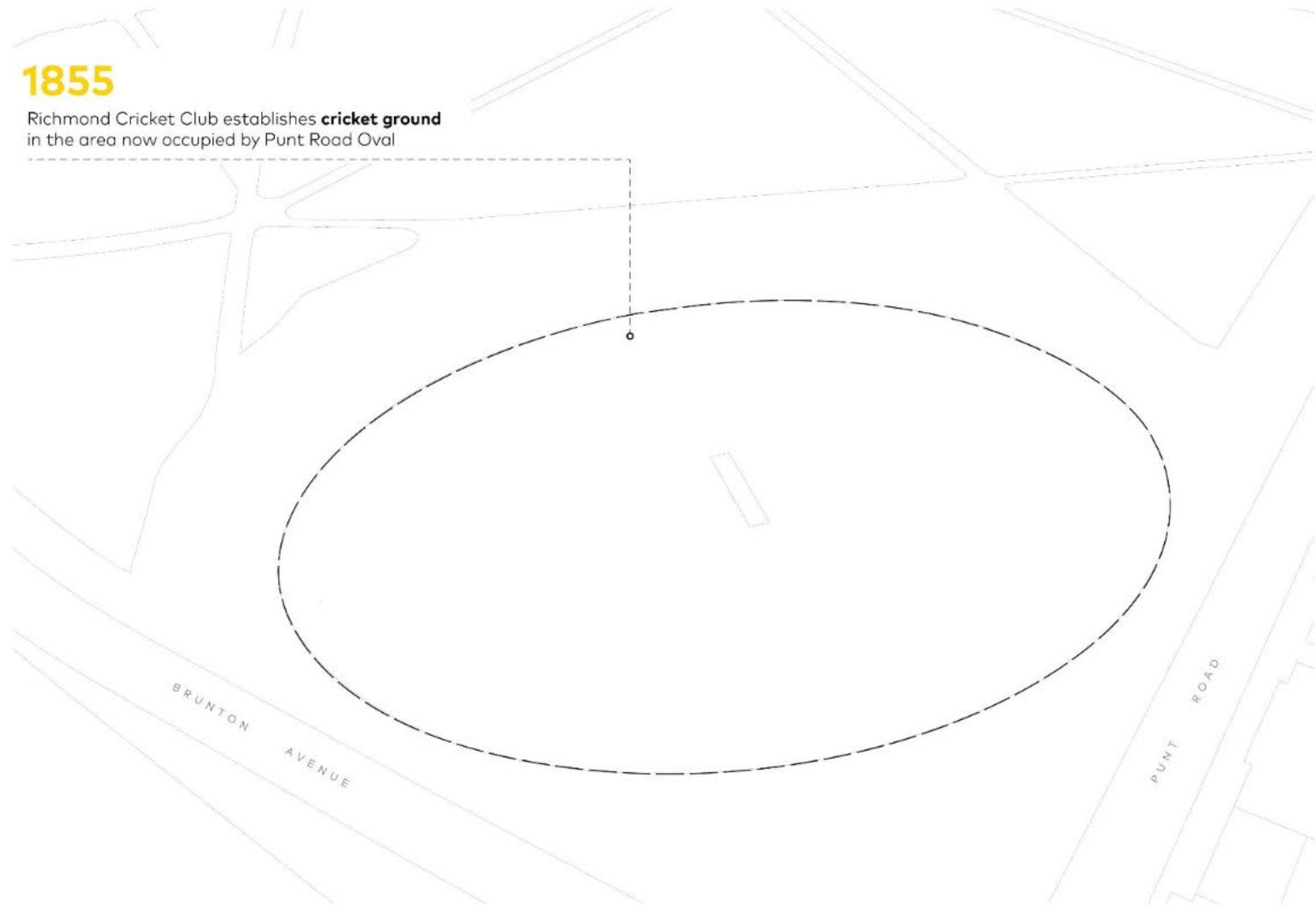
Presentation to Future Melbourne Planning Committee

Prepared by COX Architecture for the Richmond Football Club | 03 May 2022



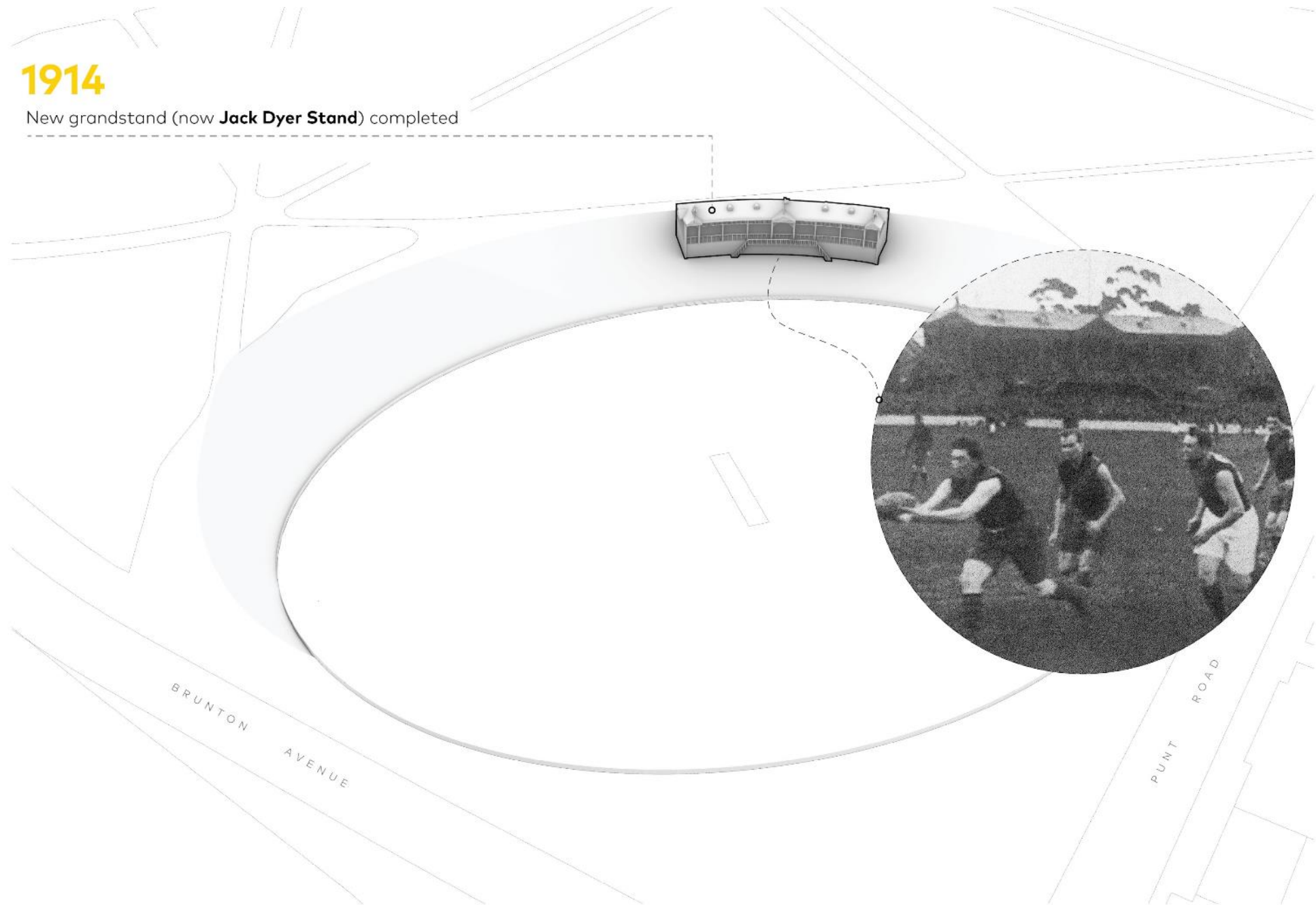
1855

Richmond Cricket Club establishes **cricket ground**
in the area now occupied by Punt Road Oval



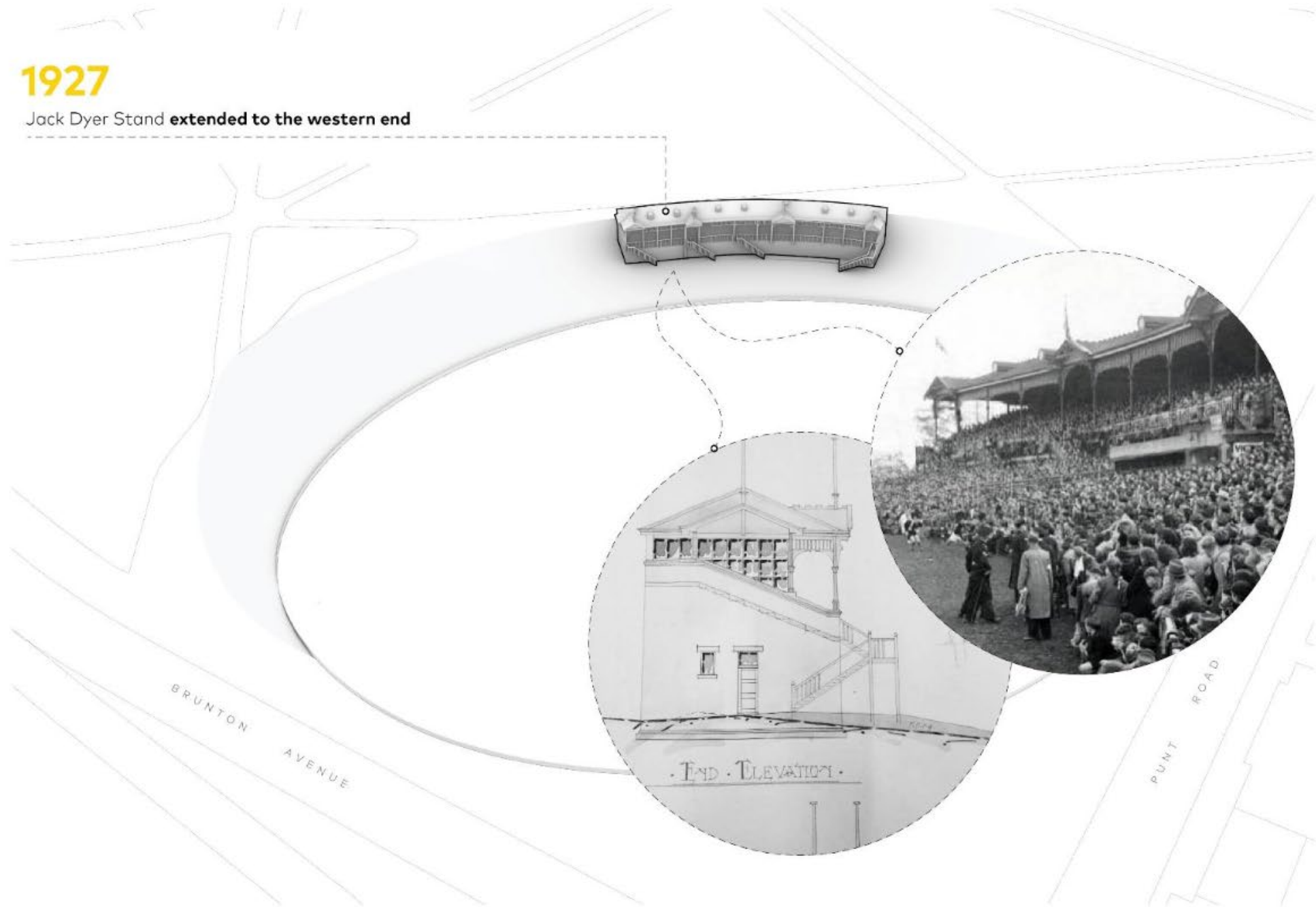
1914

New grandstand (now **Jack Dyer Stand**) completed



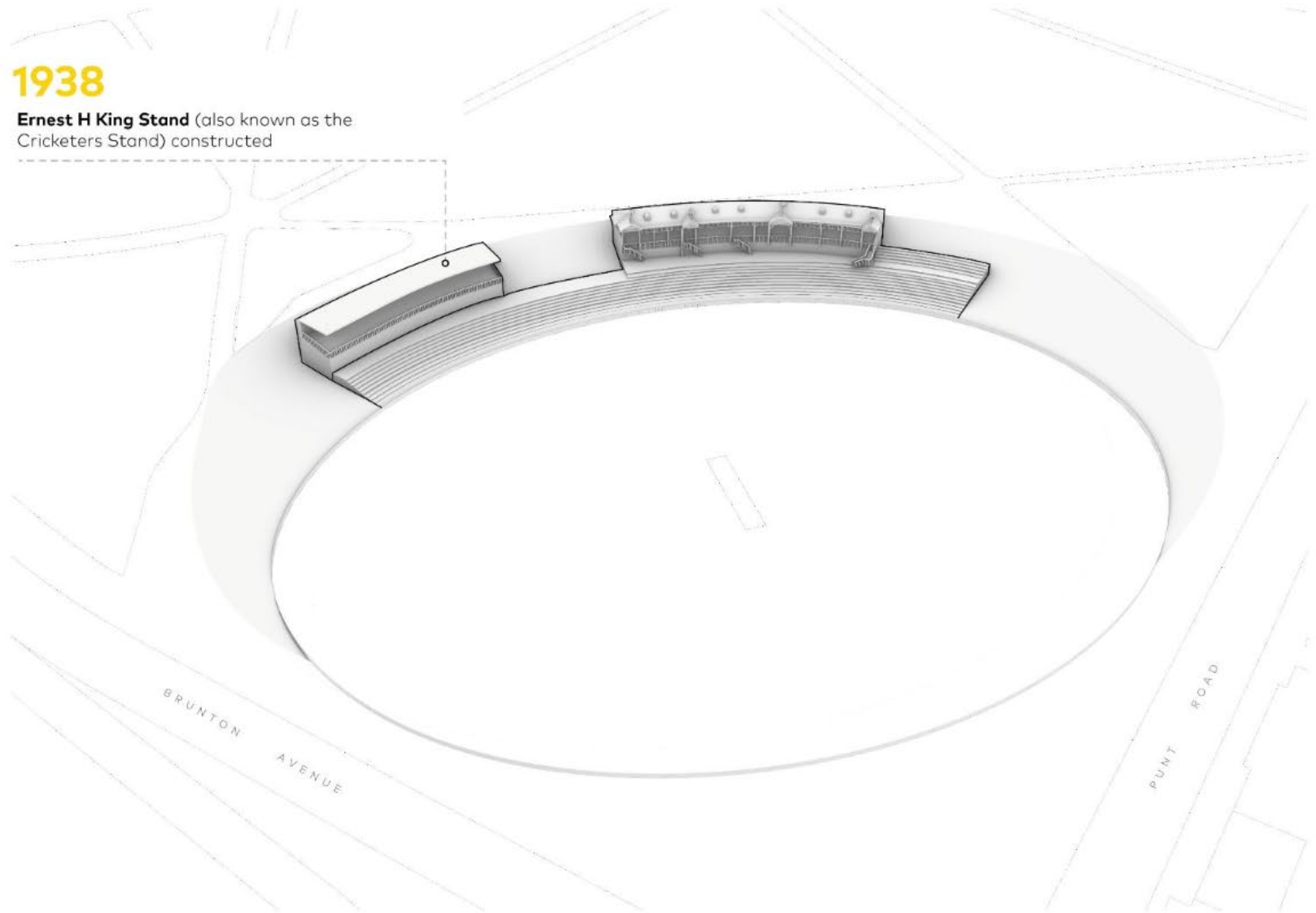
1927

Jack Dyer Stand **extended to the western end**



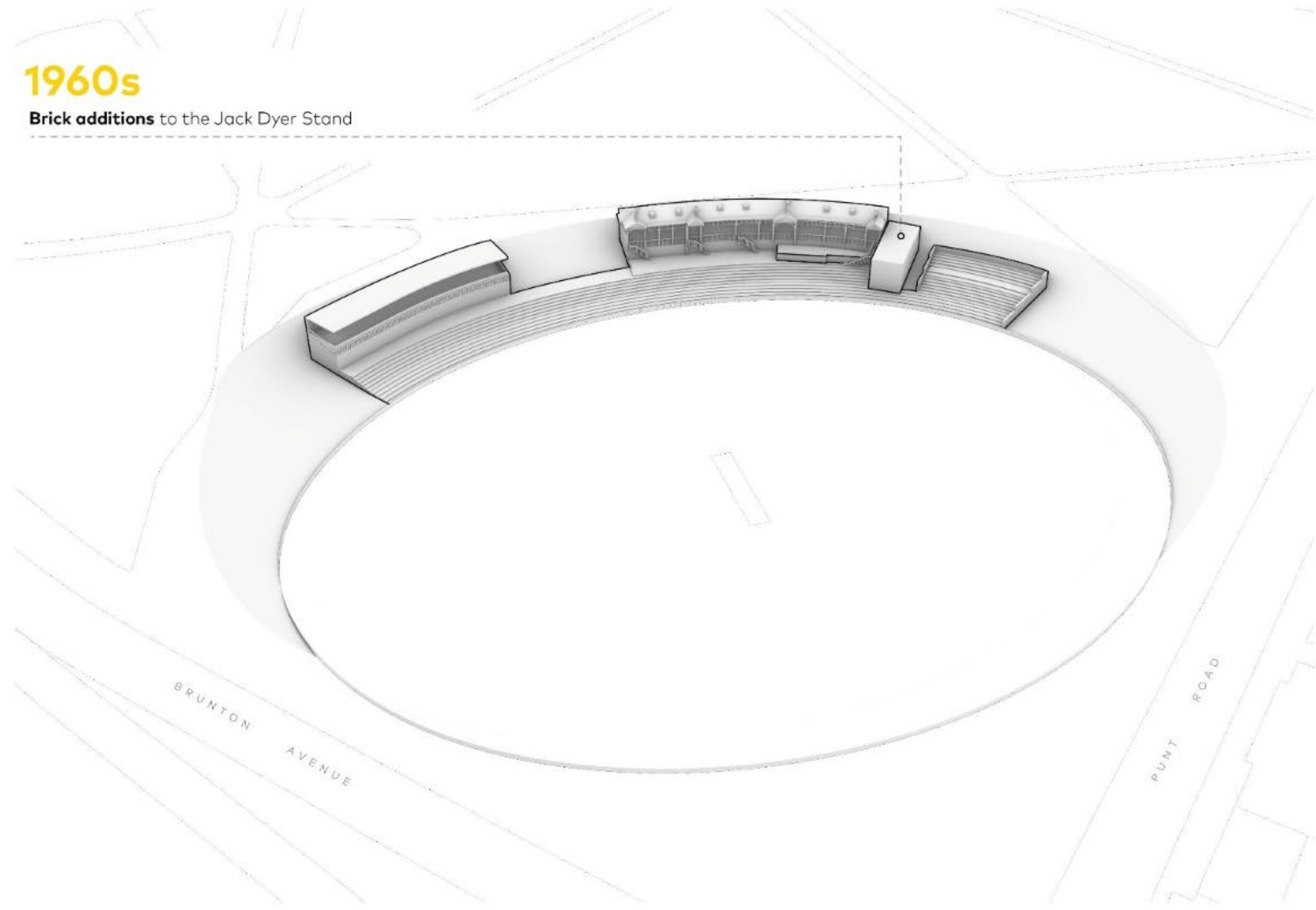
1938

Ernest H King Stand (also known as the Cricketers Stand) constructed



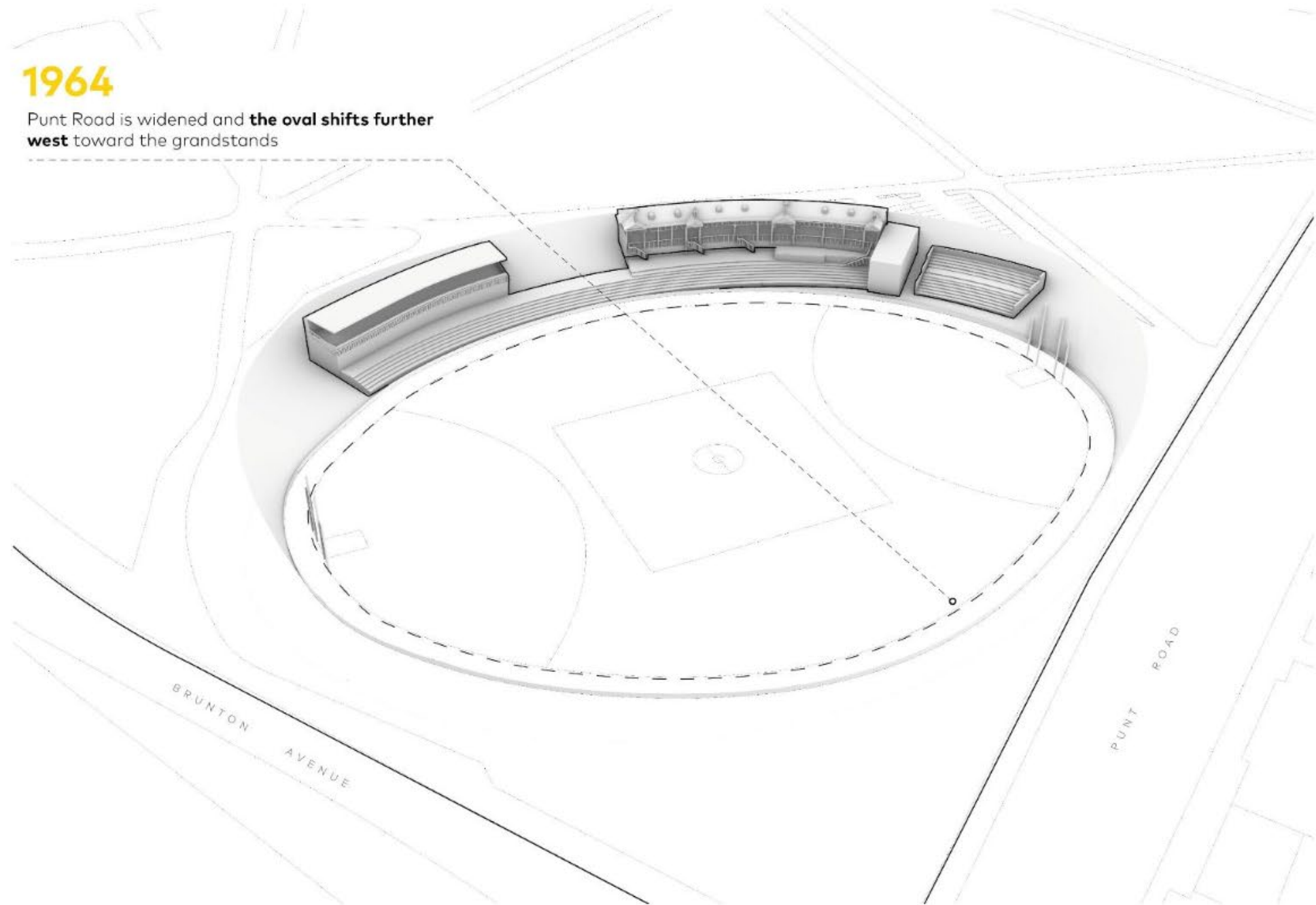
1960s

Brick additions to the Jack Dyer Stand



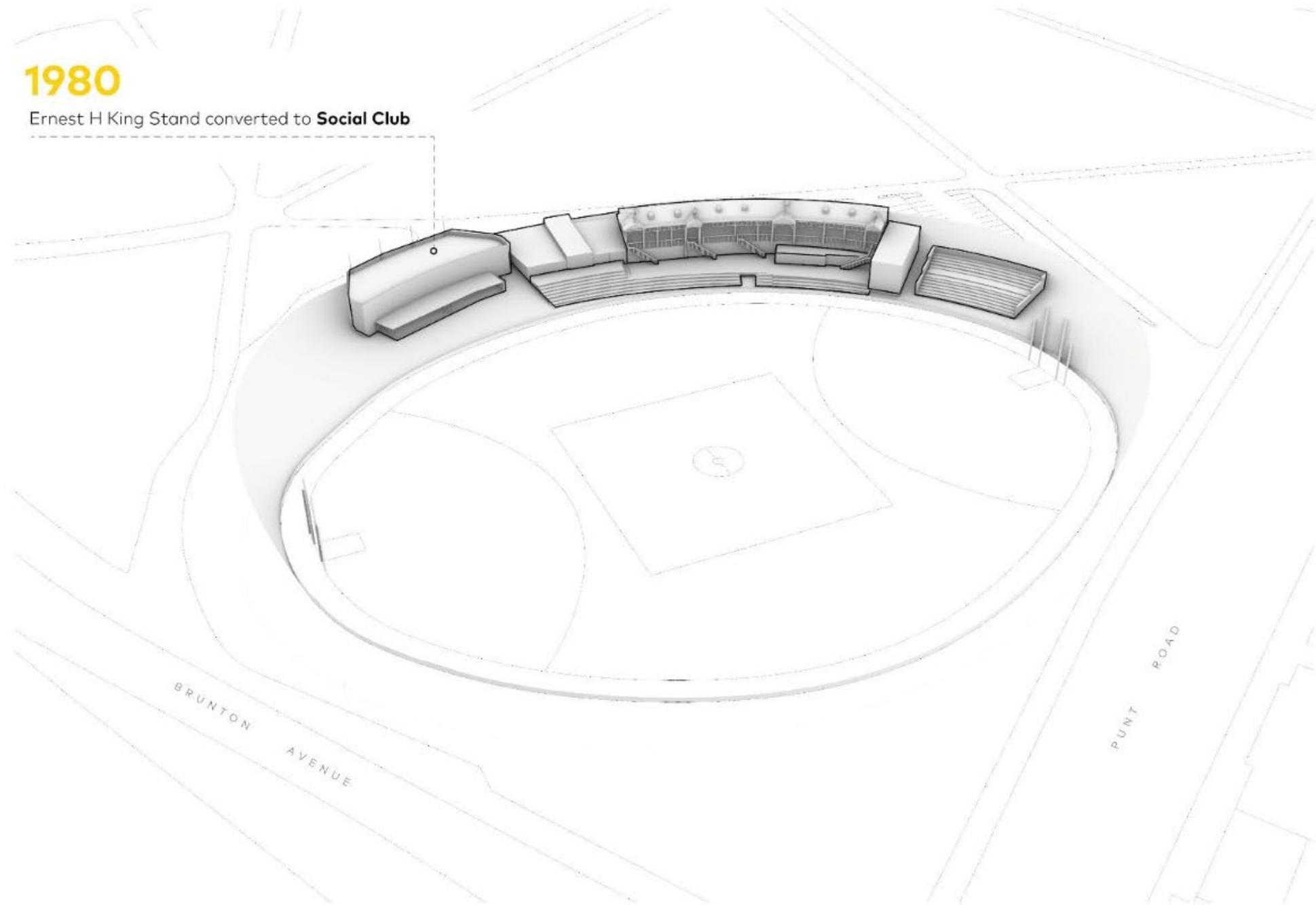
1964

Punt Road is widened and **the oval shifts further west** toward the grandstands



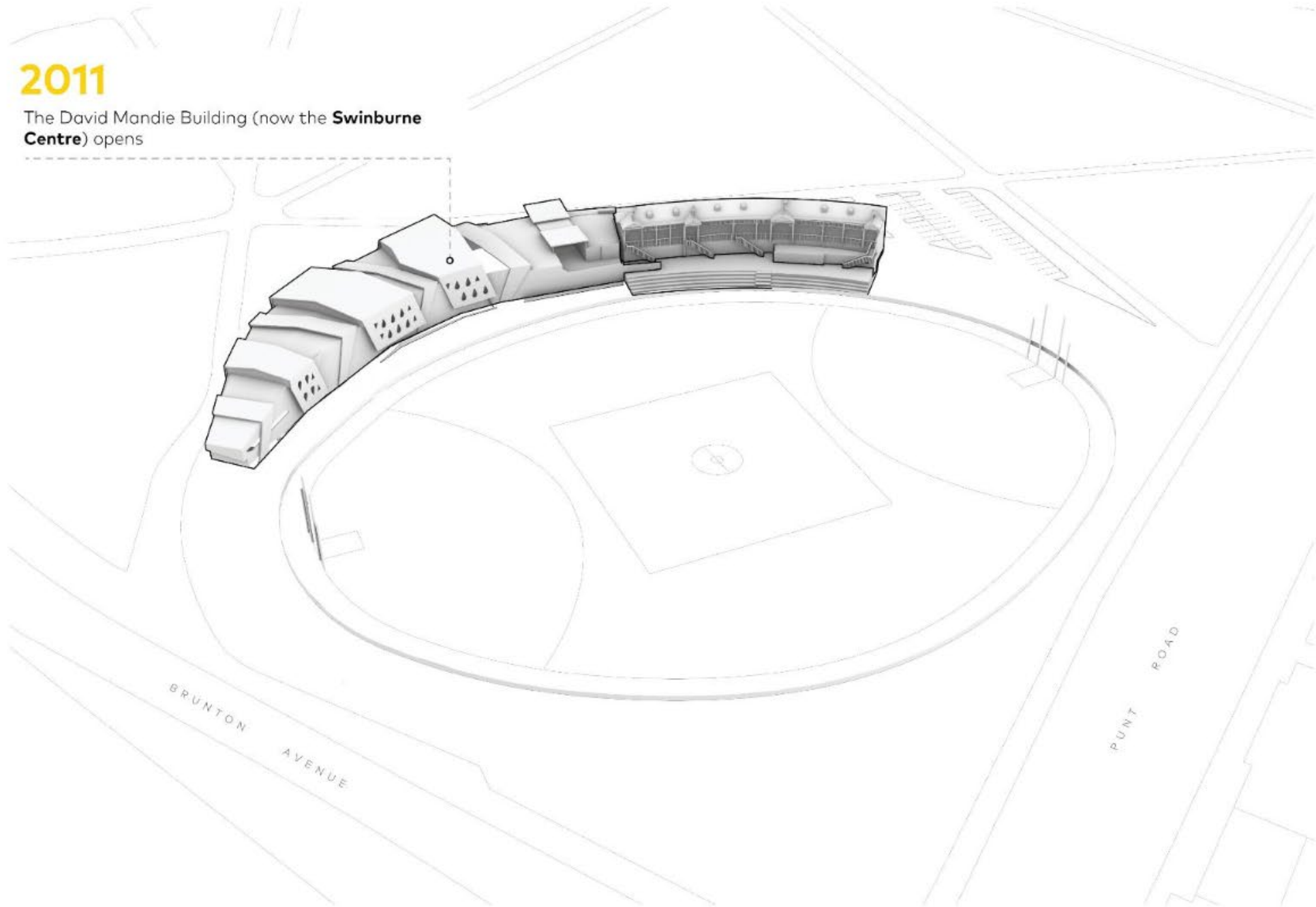
1980

Ernest H King Stand converted to **Social Club**



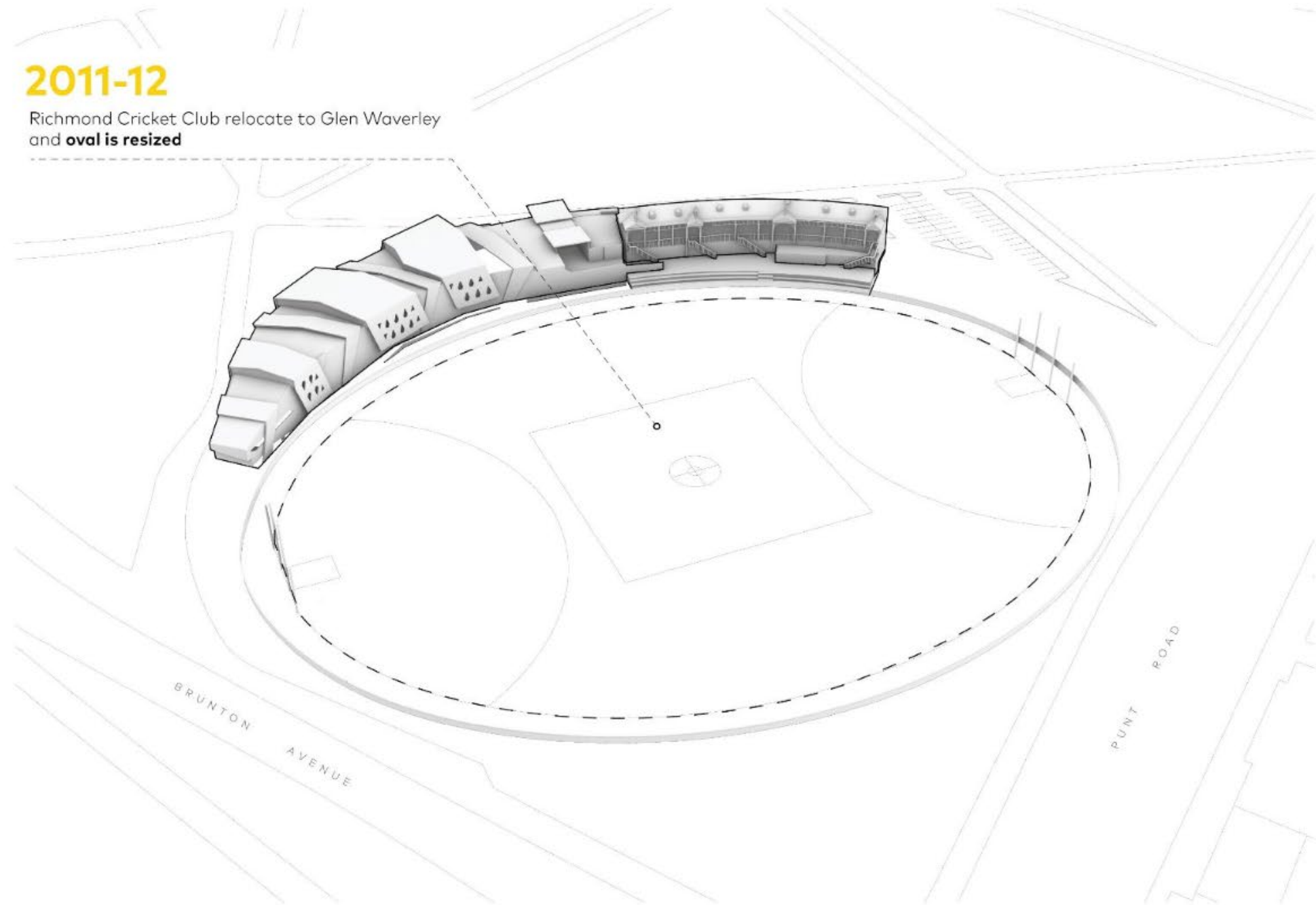
2011

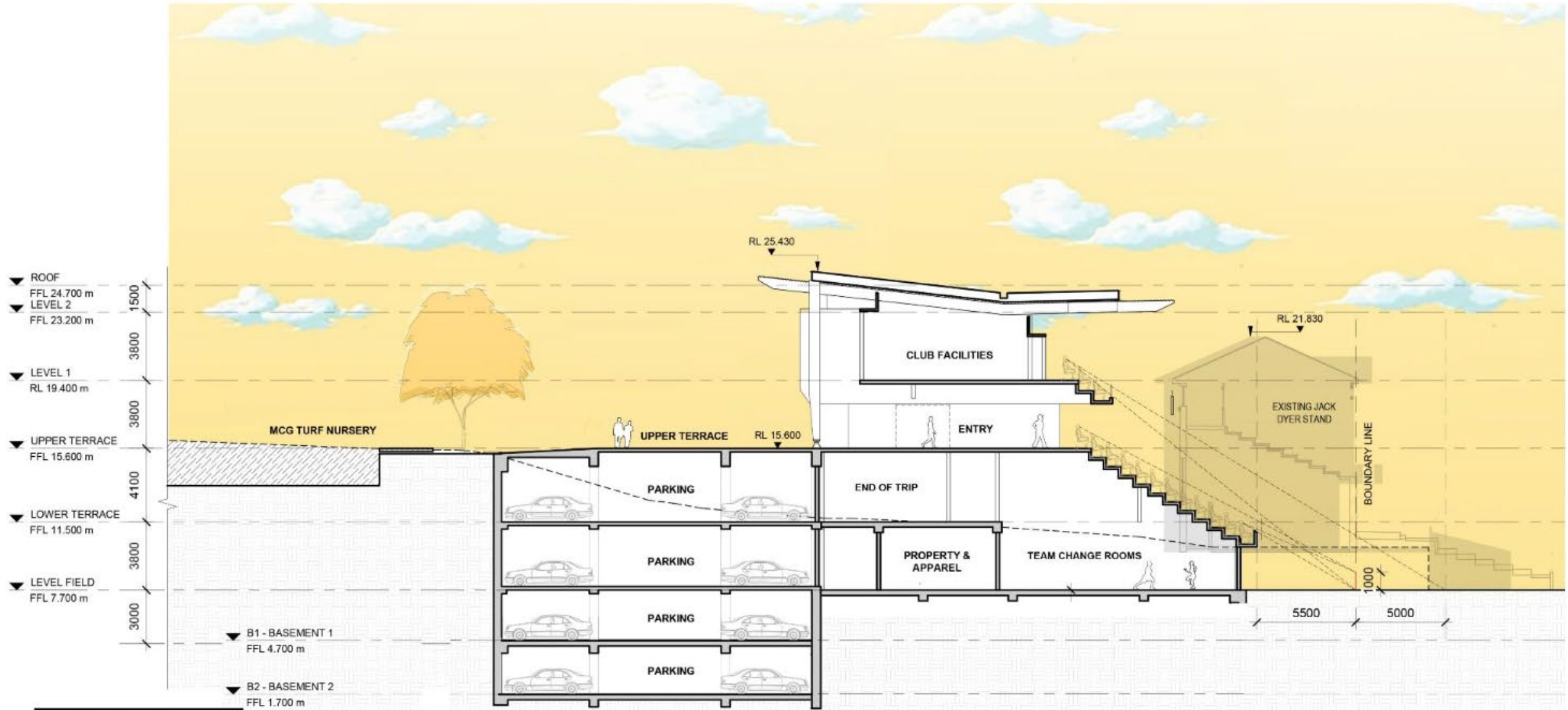
The David Mandie Building (now the **Swinburne Centre**) opens



2011-12

Richmond Cricket Club relocate to Glen Waverley and **oval is resized**





Section A | North-South
through new Grandstand







THE JACK DYER
STAND

K DYER
ND

RICHMOND
EST 1881

RICHMOND
EST 1881



Privacy acknowledgement: * I have read and acknowledge how Council will use and disclose my personal information.

Name: * Charles Sowerwine

Email address: * c.sowerwine@gmail.com

Phone number *

Date of meeting: * Monday 2 May 2022

Agenda item title: * 6.1 Ministerial Planning Referral: ID-2022-1

Please write your submission in the space provided below and submit by no later than 10am on the day of the scheduled meeting. Submissions will not be accepted after 10am. Submission attached

Alternatively you may attach your written submission by uploading your file here:  [rhsv_fmc_22.05.02_dyer_stand.docx](#) 46.19 KB · DOCX

Please indicate whether you would like to verbally address the Future Melbourne in support of your submission: * Yes

If yes, please indicate if you would like to make your submission in person, or via a virtual link (Zoom) to the meeting. Please note, physical attendance will be limited in accordance with City of Melbourne security protocols and COVID-safe plans and be allocated on a first registered, first served basis. * I wish to make by submission via Zoom



ROYAL HISTORICAL SOCIETY OF VICTORIA INC.

239 A'Beckett Street, Melbourne 3000

Future Melbourne Committee, Agenda Item 6.1, 2nd May 2022

Ministerial Planning Referral: ID-2022-1:

Punt Road Oval, Yarra Park, Punt Road, East Melbourne

I write on behalf of the Royal Historical Society of Victoria to urge the Committee to reject the recommendation and to advise the Department of Environment, Land, Water and Planning that the Melbourne City Council opposes Amendment C421melb in so far as it would result in the demolition of the historic Jack Dyer Stand.

Throughout the process of consideration of the status of the Stand and the development of the Punt Road Oval, the RHSV Heritage Committee, having examined these alternatives, strongly and consistently commended 'Option 4: Retain Jack Dyer Stand and redevelop Swinburne Centre' of the report by Cox Architects for the consultants for the applicant. This option would retain the Jack Dyer Stand while still allowing for the optimal training oval dimensions central to this development proposal. Although it would necessitate added costs for the redevelopment of the Swinburne Centre, this is infinitely preferable to the demolition of the highly significant Jack Dyer Stand, which is central to the identity of the Richmond Football Ground within Yarra Park. We submit that the Richmond Football Club can afford the additional cost whereas the City of Melbourne cannot afford the loss of this remarkable part of its heritage.

The City of Melbourne itself detailed the case for the significance of the Jack Dyer Stand in its recommendations concerning an amendment (C405) to the Melbourne Planning Scheme. This is to be considered by the Future Melbourne Committee meeting 16 November 2021. (See pp. 1162–65 'Statement of Significance for Punt Road Oval', and pp. 1179–1232 Punt Road Oval (Richmond Cricket Ground) Heritage Review). By way of explanation the Heritage Review document notes: The Punt Road Oval (East Melbourne) had local heritage protection from the 1980s until 10 July 2020 when the C grading in the heritage places inventory was inadvertently omitted following the gazettal of Amendment C258. As a result of this omission, the grading was never translated from C to the new Significant/Contributory system through C258.

In arguing for Option 4 in the HIS, which would preserve the Jack Dyer Stand, we highlight the importance of the stand (named for Dyer in 1998) as a rare surviving example of an Edwardian-era grandstand (1913–14 designed by Thomas Watts and Son, extended 1927 in accordance with plans by architect Frank Stapley). It is characterised by an unusual curved design reflecting the curve of the oval and foreshadowing the later streamlined and curved forms of Moderne stands. The stand is of representative significance as an example of the larger and more elaborate football stands that emerged in this period and a fine example of the work of Watts and Stapley, two of the key

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ABN 36 520 675 471

architects of such stands. It is also the earliest surviving building on the site and is largely intact apart from replacement of the original stairs and alterations to some fenestration and the podium. As such we contend, as is also argued by the City of Melbourne, that the stand meets Heritage Victoria's Criterion B, Possession of uncommon, rare or endangered aspects of our cultural history (rarity). It is also, however, meets Criterion D, Importance in demonstrating the principal characteristics of a class of cultural places (representativeness), though they are becoming rare.

Because it is of great significance as the longest and most evocative surviving symbol of the Richmond Football Club's long association with the Punt Road Oval and its spiritual home, the stand also meets Criterion G (Strong or special association with a particular community or cultural group for social, cultural or spiritual reasons). The Richmond community generally has had a strong attachment to the place for over a century, anchored in deep working-class community identity and loyalty through much of the 20th century. It still has powerful symbolic meaning to many Richmond residents and club followers. This is particularly evident in the association of the stand and its longevity with the name of Jack Dyer who played for Richmond from 1931 to 1949, much of that time as captain and coach, and has hero status at the club and throughout the Victorian football community. The names of those who contributed to the Jack Dyer Foundation, which was set up to fund ground improvements, are on nine plaques at the back of the stand. As such the Jack Dyer Stand meets Criterion H, Special association with the life or works of a person of importance in our history (associative significance). To this we add its association with the early history of Federation: Prime Minister Andrew Fisher opened the stand before the match between Richmond and South Melbourne on 6 June 1914.

We therefore strongly urge the Committee to reject the recommendation and to make representation at every level to preserve and protect for re-use the Jack Dyer Stand.

Professor Charles Sowerwine, FAHA, FRHSV,
Chair, Heritage Committee,
Royal Historical Society of Victoria.

Privacy acknowledgement: I have read and acknowledge how Council will use and disclose my personal information.

*

Name: * Jill Quirk

Email address: * jillq@optusnet.com.au

Phone number *

Date of meeting: * Tuesday 3 May 2022

Agenda item title: * Report to the Future Melbourne (Planning) Committee Agenda item 6.1, and 6.11 (part 2 of 2):
Ministerial Planning Referral: ID-2022-1, Punt Road Oval, Yarra Park, Punt Road, East Melbourne, FMC 3 May 2022; Presenter: Marjorie Kennedy, Head of Statutory PI

Please write your submission in the space provided below and submit by no later than 10am on the day of the scheduled meeting. Submissions will not be accepted after 10am.

On behalf of Protectors of Public Lands, Victoria I am requesting that the above items be deferred at least until the next FMC meeting as there has been insufficient time for our organisation to consider the documents and all the implications of the proposal. It looks to be a very major work which will substantially change the aspect of the area.

Areas of concern for Protectors of Public Lands

1. Loss of mature trees. I understand that 6 mature elms are earmarked for removal. This is unacceptable and it is hard to fathom how any development could be considered that necessitates this destruction.
2. Loss of sunlight to the park. Any increase of size of built structures will reduce this. More information on this is needed.

For optimum outcomes for Melbourne long term, community consultation is essential. We will be living with the result of this development for a long time. Please let's get it right with a balance of aesthetics, preservation of natural assets and provision of sporting opportunity.

Sincerely,

Jill Quirk

for Protectors of Public Lands , Victoria

P.O. Box 197 Parkville 3052

Please indicate No
whether you
would like to
verbally address
the Future
Melbourne in
support of your
submission: *

Privacy acknowledgement: *

I have read and acknowledge how Council will use and disclose my personal information.

Name: *

Felicity Watson

Email address: *

felicity.watson@nattrust.com.au

Phone number *

Date of meeting: *

Tuesday 3 May 2022

Agenda item title: *

Agenda Item 6.1 Ministerial Planning Referral: ID-2022-1 Punt Road Oval, Yarra Park, Punt Road, East Melbourne

Please write your submission in the space provided below and submit by no later than 10am on the day of the scheduled meeting. Submissions will not be accepted after 10am.

See attached.

Alternatively you may attach your written submission by uploading your file here:



[2022_05_03_submission_to_fmc_agenda_item_6.1_punt_road_oval.pdf](#)

482.47 KB · PDF

Please indicate whether you would like to verbally address the Future Melbourne in support of your submission: *

No



3 May 2022

Future Melbourne Committee
City of Melbourne
GPO Box 1603
Melbourne VIC 3001

6 Parliament Place
East Melbourne
VIC 3002

Email: conservation@nattrust.com.au

Web: www.nationaltrust.org.au

T 03 9656 9818

**Re: Future Melbourne Committee Agenda Item 6.1 Ministerial Planning Referral: ID-2022-1
Punt Road Oval, Yarra Park, Punt Road, East Melbourne**

Dear Councillors,

Thank you for the opportunity to comment on Planning Scheme Amendment C421melb to the Melbourne Planning Scheme for the Punt Road Oval Redevelopment. The submission below provides an overview of our submission to the Minister for Planning in response to this proposed development.

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 40,000 members across Victoria.

Punt Road Oval is historically significant for its longstanding associations with the Richmond Cricket Club and Richmond Football Club, and its continued association with Richmond Football Club as its training ground and administrative headquarters. It stands as an important reminder of the contribution made by Richmond to the history of Australian Rules football in Victoria.

We commend Council for its recent work to assess and protect the heritage values of Punt Road Oval through Planning Scheme Amendment C405. The National Trust strongly supports the proposed upgrading of the significance of Punt Road Oval pursuant to the *Punt Road Oval (Richmond Cricket Ground) Heritage Review, October 2021* undertaken by GML/Context.

The Jack Dyer Stand embodies the enduring connection of the Richmond Cricket Club and Richmond Football Club with the ground, and has architectural significance as an example of an early twentieth-century grandstand at a major sporting venue. Grandstands were a prominent feature of nineteenth and early twentieth-century recreation but many in Victoria have been demolished or severely altered. The Jack Dyer Stand therefore stands as one of a now small group of survivors of its class in Victoria. It also has social significance for generations of Richmond supporters and Melburnians more broadly.

The National Trust broadly supports the intention of the proposed redevelopment of Punt Road Oval to enable the ongoing use of the ground by Richmond Football Club, and provide additional facilities and capacity to support the use of the ground by the AFLW.

As the documentation being considered by Council notes, striking the right balance between enabling the ongoing use of historic sporting grounds and protecting significant heritage fabric can be challenging. In heritage terms, supporting the ongoing use of the ground, and the evolution of facilities to respond to changing practices, enables the historical and social significance of the place to be maintained, and to evolve along with the sport.

However, we advocate for options to retain and refurbish the historically significant Jack Dyer Stand to be meaningfully considered. The National Trust supports the retention of the Jack Dyer Stand, and advocates for further consideration to be given to Option 4 as outlined in the Concept Design Report, the redevelopment of the Swinburne Centre, which would enable optimum training oval dimensions to be achieved, and support the retention and refurbishment of the Jack Dyer Stand.

While we support the retention of the Jack Dyer Stand, should the proposed scheme be approved, and stand not retained, we call on Council to advocate for materials to be salvaged and meaningfully incorporated into the redevelopment, as well as the preparation of a site-wide interpretation plan to communicate the history and significance of Punt Road Oval, including the Jack Dyer Stand. Measured drawings and a photographic archival recording should also be prepared in accordance with Heritage Victoria's guidelines.

Yours faithfully,

Felicity Watson
Executive Manager—Advocacy
National Trust of Australia (Victoria)

Privacy acknowledgement: I have read and acknowledge how Council will use and disclose my personal information.

*

Name: * Felicity Watson

Email address: * felicity.watson@nattrust.com.au

Phone number *

Date of meeting: * Tuesday 3 May 2022

Agenda item title: * Agenda Item 6.2—Melbourne Planning Scheme Amendment C394—Fishermans Bend In-Depth Heritage Review

Please write your submission in the space provided below and submit by no later than 10am on the day of the scheduled meeting.
Submissions will not be accepted after 10am.

Alternatively you may attach your written submission by uploading your file here:



[2022_05_03_ntav_submission_to_fmc_agenda_item_6.2_fishermans_bend_indepth_heritage_review.pdf](#)

333.46 KB · PDF

Please indicate whether you No

would like to
verbally address
the Future
Melbourne in
support of your
submission: *



3 May 2022

Future Melbourne Committee
City of Melbourne
GPO Box 1603
Melbourne VIC 3001

6 Parliament Place
East Melbourne
VIC 3002

Email: conservation@nattrust.com.au

Web: www.nationaltrust.org.au

T 03 9656 9818

Re: Future Melbourne Committee Agenda Item 6.2—Melbourne Planning Scheme Amendment C394—Fishermans Bend In-Depth Heritage Review

Dear Councillors,

The National Trust of Australia (Victoria) is pleased to write in strong support of the recommendations relating to the Fishermans Bend In-Depth Heritage Review outlined in the report for Agenda Item 6.2.

This planning scheme amendment strongly aligns with the mission of the National Trust to 'inspire the community to appreciate, conserve and celebrate its diverse natural, cultural, social and Indigenous heritage' and vision that our 'diverse heritage is protected and respected, contributing to strong, vibrant and prosperous communities'.

The National Trust has been pleased to support the implementation of this heritage study, which will provide protection for significant places in one of Victoria's most important industrial heritage landscapes. We commend Council for undertaking this work to lay the foundation for planning in the precinct.

We strongly support the adoption of the Planning Panel's recommendations, as outlined in the Recommendation from Management.

We congratulate Council for its ongoing commitment to recognising, protecting, and celebrating heritage places across the municipality.

Yours faithfully,

Felicity Watson
Executive Manager—Advocacy
National Trust of Australia (Victoria)

Privacy acknowledgement: I have read and acknowledge how Council will use and disclose my personal information.

*

Name: * Edmund Munday

Phone number: *

Email address: * edmund@need2know.io

Date of Council meeting: * Tuesday 3 May 2022

Agenda item title: Growing Melbourne's innovation ecosystem – progress and next steps

*

Please write your submission in the space provided below and submit by no later than 10am on the day of the scheduled meeting. We encourage you to make your submission as early as possible.

I write in response to the report labelled "Growing Melbourne's innovation ecosystem".

As a software startup founder, based in the City of Melbourne, I find it incredibly frustrating to watch governments at all levels expend so much effort and so many resources to try and support innovative and high-tech industries through incredibly convoluted and indirect processes, all whilst refusing to engage with actual startups in any kind of meaningful way.

I note that of the numerous activities the COM is undertaking to try to foster growth within our innovative industries, literally none of them focus on the actual challenges faced by early-stage technology companies and instead they are all focussed on "warm and fuzzies" that look great in marketing material for the Council, but do almost nothing to actually help the industry.

This is made even worse by the fact that when innovative businesses approach the Council directly, with specific requests for support that the council is uniquely placed to facilitate, the Council seems to show zero interest in actually providing any support at all.

My company is developing a Software-as-a-Service product aimed specifically at local-government customers. We are based in the City of Melbourne and have approached the city on numerous occasions to discuss how we might partner with COM to validate and test our product so that we can prove its validity in the eyes of Local Governments around Australia and launch an exciting new enterprise based out of Melbourne.

This is the kind of obvious opportunity that we assumed the council would be extremely interested in partnering with us on. Something it is uniquely positioned to be able to spring-board and the start of potentially a new SaaS Success Story for Melbourne that one day could sit alongside companies like Culture Amp and Envato.

But instead, we were turned away at multiple points. Requests to the Business Concierge service were responded to with "wait for a tender... then you might be able to apply", and attempts to connect with the city's "Pilot & Trial Lead" (via multiple channels) were met with literal silence, not even a response.

So I ask... what is the point? Does the Council ACTUALLY want to support local innovation and startups? Or does it just want to say it does so it can publish exciting looking content and newspaper articles? Because as a founder of one of those innovative businesses, one which the council is uniquely positioned to support and partner with, it feels a lot like the answer is the latter of those two options.

Do you also wish No

**to attend the
Council meeting
in person, noting
that there is no
provision to make
verbal
submissions at
Council meetings?**

Note from Council Business: Edmund will be making a verbal submission via Zoom.

*