

12 December 2022

Darren Rudd  
Manager City Design and Strategy  
Melton City Council  
PO Box 21  
Melton VIC 3337

**Submission to Amendment C231melt: 117 Diggers Rest-Coimadai Road, Diggers Rest**

Insight Planning Consultants act on behalf of Prime Equity Group, who are the landowners of 117 Diggers Rest-Coimadai Road in Diggers Rest (Lot 1, TP334591W).

I refer to Amendment C231 of the Melton Planning Scheme which *“proposes to implement the findings of the City of Melton Heritage Assessment Project 2020/2021 by adding five places to the Schedule to the Heritage Overlay and the associated Heritage Overlay mapping and incorporating the statements of significance for each of these places and an incorporated plan into the Melton Planning Scheme”*.

Specifically in relation to our client’s land at 117 Diggers Rest-Coimadai Rd, the Amendment will:

1. *Amend the Schedule to Clause 43.01 to include the following heritage places on a permanent basis as follows:*
  - *HO139 – Diggers Rest Army Housing Estate at Unit 1-6, Unit 8-18, 117 Diggers Rest-Coimadai Road, Diggers Rest*
2. *Amend Planning Scheme Maps as follows:*
  - *3HO to include HO139*
3. *Amend the Schedule to Clause 72.04 to incorporate the City of Melton Heritage Assessment Project 2020/21: Diggers Rest Army Housing Estate Heritage Design Guidelines and Permit Exemptions and the following documents:*
  - *Statement of Significance: Unit 1-6, Unit 8-18, 117 Diggers Rest-Coimadai Road, Diggers Rest. ‘Diggers Rest Army Housing Estate’ June 2022*

Firstly, it appears that the land address has been incorrectly referenced as 117 Diggers Rest-Coimadai Rd, when the land that it should apply to is referenced as 107-207 Plumpton Rd (Lot 1, TP552504C). Our client owns this land also.

The inclusion of the units into the heritage overlay has come as a complete surprise to our client, particularly as there has been an entire incorporated document outlining guidelines for the future development and subdivision of the site and they have not been contacted or consulted about this to date.

We do not agree that these units hold any standalone heritage significance nor do they significantly contribute to the heritage value of the Former Army Radio Station, which has an existing HO49 applied. The units are in varying levels of disrepair, and over the years a series of alterations and additions have been undertaken on the units, which reduce any architectural heritage values or consistency they may have previously had.

The proposed Heritage Overlay (HO139) over the units only seeks to impose external paint controls. As previously outlined, the units have undergone various alterations in the past and are not currently consistent in their facades or external paint schemes, or any other significant feature that would warrant such a control imposed.

The Development Guidelines which are also proposed to be incorporated into the Scheme as part of this amendment are also not supported by our client. No consultation has been undertaken with our client in relation to the proposed document, and the guidelines outlined within it are considered excessive and unnecessary given that we do not agree that the units hold any contributing heritage significance.

Specifically, the guidelines encourage preservation of the front facades in particular and common architectural features, when the alterations that have occurred on the units result in non-consistent facades, colours, and even materials. Given the poor condition that many of the units are in, it is not appropriate to require the retention and preservation of these, given that they are not considered to significantly contribute to the existing heritage place nor have significant heritage value on their own.

Furthermore, the guidelines do not seem to take proper consideration of the existing planning controls which apply to the site and its location with the Green Wedge Zone (GWZ). The GWZ does not currently permit the construction of any additional dwellings on the site, so having guidelines that encourage infill development to occur on the 'vacant lots' is not only inaccurate in relation to the titling of the site, but also is not in accordance with the existing planning control which apply to the site. This indicates that the proposed design guidelines have not been sufficiently considered.

**As such, we wish to lodge a submission objecting to the proposed heritage listing (HO139) on our client's land.** However, due to the busy Christmas period and the need to seek specialised heritage advice, we reserve our rights to make further submissions in relation to this Amendment once this specialist advice is received.

I trust the above appropriately outlines our request however please don't hesitate to contact me on 0433 410 449 if you require further clarification.

Sincerely,

**Jason Black**  
**Managing Director**  
**Insight Planning Consultants**