

Heritage Council Regulatory Committee

Exclusion Determination Review

**Public Housing Tower, 120 Racecourse Road, Flemington, City of Moonee Valley,
Wurundjeri Woi Wurrung Country**

Members – Mr Simon Molesworth AO KC (Chair), Mr David Helms, Mr Peter Mathieson

Determination of the Heritage Council

To affirm the decision of the Executive Director – After conducting a review of the Executive Director's decision to make an exclusion determination in relation to Public Housing Tower, 120 Racecourse Road, Flemington, City of Moonee Valley, Wurundjeri Woi Wurrung Country, and seeking and receiving additional information from the Executive Director pursuant to section 36E(5) of the *Heritage Act 2017*, the Heritage Council has determined to affirm the decision under review in accordance section 36F(1)(a) of the *Heritage Act 2017*.

Mr Simon Molesworth AO KC (Chair)

Mr David Helms

Mr Peter Mathieson

Decision Date – 14 October 2025

Introduction / Background

Decision of the Executive Director to make an exclusion determination

01. On 7 May 2025, the Executive Director, Heritage Victoria ('the Executive Director'), received an application from Homes Victoria for an exclusion determination for the Public Housing Tower, 120 Racecourse Road, Flemington ('the Place').
02. After assessing the application received, the Executive Director was satisfied that the Place has no reasonable prospect of inclusion in the Heritage Register and determined on 17 July 2025, in accordance with section 36C(1)(a) of the *Heritage Act 2017* ('the Act'), to make an exclusion determination in relation to the Place ('the Exclusion Determination').

The Place

03. The following description of the place is taken verbatim from page 6 of the Executive Director's exclusion determination report:

Description of the place

The Public Housing Tower at 120 Racecourse Road, Flemington, is a 20-storey block of flats, constructed using the Large Panel System (LPS) manufactured by the Concrete House Project for the Housing Commission of Victoria (the Commission). The Tower is within Debney's Estate, which was developed in several stages. The tower at 120 Racecourse Road is one of three identical "Z" type towers constructed on the Estate between 1967 and 1969 when it was extended.¹ "Z" type refers to the configuration of the tower block when viewed from the air or in plan. A central lift and services core connects the two north-south aligned wings and the flats have balcony access. The building is raised on concrete stilts (pilotis), a feature common to the high-rise flats of the era, but the undercroft has been renovated and partially infilled. "Z" type towers were the most common configuration of the LPS towers in Victoria.

Integrity

The integrity of the place is very good. The place can be read as a public housing tower built by the Commission using the LPS.

Intactness

The intactness of the place is good. Modifications undertaken include glazing of the balconies, refurbishment of kitchens and bathrooms in apartments, and partial infill of the undercroft – but these modifications are consistent with the use of the place as a public housing tower.

Condition

The condition of the place is good, and consistent with buildings of their age, use and construction.

Request for Review

04. On 14 August 2025, the Heritage Council received a request in accordance with section 36E of the Act to review the Executive Director's decision to make an exclusion determination in relation to the Place ('the Request').
05. The Request was made by the Melbourne Public Tenants Association ('MPTA').
06. The Request included material in support of the view that the Place had a reasonable prospect of being included in the Heritage Register, submitting it had potential to satisfy the following criteria for registration, as set out by the *Victorian Heritage Register Criteria and Threshold Guidelines* (**Attachment 1**):
 - Criterion A – Importance to the course, or pattern, of Victoria's cultural history;
 - Criterion D – Importance in demonstrating the principal characteristics of a class of cultural places and objects.

07. MPTA further submitted the view that the Exclusion Determination made in relation to the Place was flawed, due to its assessment as an isolated building, rather than as a component of the broader Debney's Estate.

Validity of the Request

08. The Request was received within 28 days of the Exclusion Determination, in accordance with section 36E(2)(a) of the Act.
09. As an incorporated body, the MPTA was found to be an entity that meets the definition of legal person, being a person or entity who enjoys, and is subject to, rights and duties at law.
10. MPTA requested that the prescribed fee for the Request be waived, in accordance with regulation 26(e) of the *Heritage Regulations 2017*. After seeking further information from MPTA, this request for a fee waiver was approved.
11. MPTA was found to have a real or substantial interest in the Place in accordance with section 36F(1) of the Act.
12. In accordance with the information set out above, the Request was found to be valid, and thus a review of the Exclusion Determination was commenced by the Heritage Council, pursuant to sections 36E and 36F of the Act ('the Review').

Regulatory Committee

13. Pursuant to section 13(1) of the Act, a Regulatory Committee of the Heritage Council ('the Committee') was duly constituted to consider and determine the Review.
14. The Chair invited members of the Committee to consider whether written declarations or otherwise were required to be made in relation to any matters that may potentially give rise to an actual or apprehended conflict of interest.
15. Mr Helms declared that, in a previous professional role in 2012, he had acted as project manager for a thematic environmental history of Public Housing in Victoria. It was the view of the Committee Chair that this did not constitute a conflict, and rather confirmed Member Helms' relevant expertise to serve as a member of the Committee.
16. All members were satisfied that there were no relevant conflicts of interest present, and no further declarations were made.

Requests for Further Information

17. On 19 September, the Committee requested further information from the Executive Director pursuant to section 36E(5) of the Act. This information was received by the Committee on 25 September 2025.

Committee findings

No reasonable prospect of inclusion in the Heritage Register

18. The Committee has thoroughly reviewed all materials subject to this matter, including the Application, the Exclusion Determination, the Request, and has requested and received further information from the Executive Director pursuant to section 36E(5) of the Act. All materials have been considered by the Committee in making its determination.
19. The Committee's findings accord generally with those of the Executive Director.
20. The Committee refers to and accepts the analysis of the Executive Director that the Place has no reasonable prospect of satisfying the 'Step 2 tests' for State-level cultural heritage significance under either Criteria A or D as set out by the *Victorian Heritage Register Criteria and Threshold Guidelines*. The Committee formed this view having sought, and received, further information from the Executive Director pursuant to section 36E(5) of the Act.
21. The Committee, however, wishes to particularly note and address the view of MPTA that the Exclusion Determination was framed 'incorrectly', assessing the Place in isolation rather than assessing the entirety of Debney's Estate as one place. The Committee agrees with MPTA that a holistic assessment of Debney's Estate could be preferable to making separate and concurrent exclusion determinations in

relation to two buildings located within it.¹ Nevertheless, the Committee remains satisfied, based on the information before it, that the Place has no prospect of satisfying the requirements for inclusion in the Heritage Register, when compared to other public housing estates of the same class.

- 22.** The Committee has formed the view, based on the information before it, that there is insufficient evidence to conclude that the Place has a reasonable prospect of inclusion in the Heritage Register. The Committee therefore determines to affirm the decision of the Executive Director to make an exclusion determination in relation to the Place, in accordance with section 36F(1)(a) of the Act.

Conclusion

- 23.** After conducting a review of the Executive Director's decision to make an exclusion determination in relation to Public Housing Tower, 120 Racecourse Road, Flemington, City of Moonee Valley, Wurundjeri Woi Wurrung Country, and seeking and receiving additional information from the Executive Director pursuant to section 36E(5) of the *Heritage Act 2017*, the Heritage Council has determined to affirm the decision under review pursuant to section 36F(1)(a) of the *Heritage Act 2017*.
- 24.** The exclusion determination made by the Executive Director on 17 July 2025 is provided as **Attachment 2**.
- 25.** The Committee thanks all parties for their participation in this review.

¹ Being the Place and 12 Holland Court, Flemington. See *Decision of the Heritage Council, Public Housing Tower, 12 Holland Court, Flemington, issued 14 October 2025*.

Attachment 1

Victorian Heritage Register Criteria and Threshold Guidelines

Criterion A	Importance to the course, or pattern, of Victoria's cultural history.
Criterion B	Possession of uncommon, rare or endangered aspects of Victoria's cultural history.
Criterion C	Potential to yield information that will contribute to an understanding of Victoria's cultural history.
Criterion D	Importance in demonstrating the principal characteristics of a class of cultural places and objects.
Criterion E	Importance in exhibiting particular aesthetic characteristics.
Criterion F	Importance in demonstrating a high degree of creative or technical achievement at a particular period.
Criterion G	Strong or special association with a particular present-day community or cultural group for social, cultural or spiritual reasons.
Criterion H	Special association with the life or works of a person, or group of persons, of importance in Victoria's history.

These were adopted by the Heritage Council at its meeting on 1 December 2022, and replace the previous criteria adopted by the Heritage Council on 6 December 2012.

Attachment 2

Exclusion determination made by the Executive Director in relation to 120
Racecourse Road, Flemington, on 17 July 2025

Public Housing Tower

120 Racecourse Road, Flemington
City of Moonee Valley
Wurundjeri Woi-Wurrung Country

Reasons for making an Exclusion Determination under s.36D(3) of the *Heritage Act 2017*

RX1014

Date: 17 July 2025



Decision maker determination

Under s.36C(1)(a) of the *Heritage Act 2017* (**the Act**) I make an Exclusion Determination for the Public Housing Tower at 120 Racecourse Road, Flemington. I am satisfied that the place has no reasonable prospect of inclusion in the Victorian Heritage Register (**VHR**).

The reasons for my determination are provided in this report.

Name: Steven Avery

Role: Executive Director, Heritage Victoria

Signature:



Date: 17 July 2025

An exclusion determination has been made

On 7 May 2025 Heritage Victoria received an application for an exclusion determination for the Public Housing Tower at 120 Racecourse Road, Flemington. After carefully considering the material that was provided, the Executive Director has decided to make an exclusion determination.

What is an exclusion determination?

The effect of an exclusion determination is to exclude a place from the VHR for a period of five years. An exclusion determination application can only be made by certain public authorities and government asset managers, and in relation to projects costing at least \$5 million. The Executive Director may make or refuse to make an exclusion determination based on whether a place has 'no reasonable prospect of inclusion in the heritage register'.

If an exclusion determination is made

The Executive Director cannot accept a nomination for that place for five years, unless the nomination contains new information, and the Executive Director considers that information to be significant.

If an exclusion determination is refused

The Executive Director is taken to have accepted a nomination of that place.

What if the place has already been nominated?

If an exclusion determination application is made, any nomination made prior to 1 February 2024 is taken to be withdrawn. In deciding whether to make an exclusion determination, the Executive Director must have regard to information provided in that nomination.

Right to request a review

This information is provided under s.36E of the Act.

Can a review be requested?

Yes. Exclusion determinations made by the Executive Director can be subject to review by the Heritage Council of Victoria. [The process is outlined on the Heritage Council's website.](#)

What happens if a review is not requested?

If a review is not requested, the Executive Director's exclusion determination will stand.

Who can request a review?

- Any person with a real or substantial interest (which includes a nominator) in the place may request a review if an Exclusion Determination is made or refused
- The applicant may request a review if their application for an Exclusion Determination is refused.

How is a review requested?

Review requests must be made within 28 days after the written notice of the Executive Director's decision is given. Requests must be made on the relevant form through the [HCVHub portal](#) and accompanied by the prescribed fee of 25 fee units or \$420.25 (from 1 July 2025 to 30 June 2026). Some requestors may be eligible for a fee waiver if they are a not-for-profit society, association or club (other than a charity) or a person who is an eligible beneficiary within the meaning of the *State Concessions Act 2004*.

The Heritage Council must determine a review within 40 days of receiving the request.

What decisions can be made by the Heritage Council resulting from a review?

The Heritage Council may:

- 1) affirm the decision under review; or
- 2) set aside the decision under review and make another decision in substitution for it; or
- 3) set aside the decision under review and remit the matter for reconsideration by the Executive Director in accordance with any directions or recommendations.

More information

Further information about exclusion determinations can be found on the websites of [Heritage Victoria](#) and the [Heritage Council of Victoria](#).

Who can I contact about the review process?

If you have queries about the review process for an Exclusion Determination, please contact the Heritage Council on 03 8572 7949 or email heritage.council@transport.vic.gov.au

Documents publicly advertised with this Exclusion Determination

Documents lodged by the applicant (7 May 2025)

- Application form
- Supporting Report by Lovell Chen 'No. 120 Racecourse Road, Flemington (Part of Debneys Park Estate)'

Executive Director's Report (17 July 2025)

- Reasons for Making an Exclusion Determination under s.36D(3) of the *Heritage Act 2017*.

Definitions and abbreviations

The following terms and abbreviations are used throughout this report.

The Act – *Heritage Act 2017*

Commission – the Housing Commission of Victoria

LPS – Large Panel System

Place – 120 Racecourse Road, Flemington

VHR – Victorian Heritage Register

Details of the place

Name of place:	Public Housing Tower		
Address:	120 Racecourse Road, Flemington		
Municipality:	Moonee Valley		
Is the place currently included in a heritage overlay?	No	Heritage overlay number:	N/A
Responsible Authority:	Minister for Planning	LGA:	Moonee Valley City Council
Owner:	Homes Victoria		
Owner/s Address:	50 Lonsdale Street, Melbourne, Victoria, 3000		

Previous and current processes under the *Heritage Act 2017*

Has this place or part of it ever been, or is currently, the subject of any processes under the <i>Heritage Act 2017</i> ?			
Nomination lodged	Yes – for “Flemington Public Housing Towers”	Date: 29 October 2024	Status: Nomination incomplete s.27(4) A request for further information was sent to the nominator on 8 January 2025 under s.33(1) to clarify several matters, including the extent of the nomination. No response was received.
Nomination accepted	No	Date: 9 February 2025	Status: Withdrawn s.33(3)
Nomination refused	No		
IPO requested	No		
IPO issued	No		
Other process	No		

Details of the applicant

Person or Body applying for exclusion determination	Homes Victoria
What is the major development which has triggered the request:	Proposed demolition of tower at 120 Racecourse Road, Flemington and redevelopment of the site by Homes Victoria.

Name of person/organisation who prepared the application:	Lovell Chen
Fee received:	Yes
Date application received:	7 May 2025
What is the development?	Homes Victoria plans to replace all 44 public housing towers by 2051, and 120 Racecourse Road, Flemington is amongst the first to be redeveloped.
What is the impact of the development on the place?	The tower at 120 Racecourse Road, Flemington will be demolished.
Explain the impact of the development on the place	Demolition.

Requests by the Executive Director to the Applicant for further information

No.	Nature of request	Date of request	Date provided
1	The land title for the parcel including 120 Racecourse Road, Flemington	10 June 2025	11 June 2025

Place information

Description of the place

The Public Housing Tower at 120 Racecourse Road, Flemington, is a 20-storey block of flats, constructed using the Large Panel System (LPS) manufactured by the Concrete House Project for the Housing Commission of Victoria (**the Commission**). The Tower is within Debney's Estate, which was developed in several stages. The tower at 120 Racecourse Road is one of three identical "Z" type towers constructed on the Estate between 1967 and 1969 when it was extended.¹ "Z" type refers to the configuration of the tower block when viewed from the air or in plan. A central lift and services core connects the two north-south aligned wings and the flats have balcony access. The building is raised on concrete stilts (pilotis), a feature common to the high-rise flats of the era, but the undercroft has been renovated and partially infilled. "Z" type towers were the most common configuration of the LPS towers in Victoria.

Integrity

The integrity of the place is very good. The place can be read as a public housing tower built by the Commission using the LPS.

Intactness

The intactness of the place is good. Modifications undertaken include glazing of the balconies, refurbishment of kitchens and bathrooms in apartments, and partial infill of the undercroft – but these modifications are consistent with the use of the place as a public housing tower.

Condition

The condition of the place is good, and consistent with buildings of their age, use and construction.

¹ The Estate has been known historically as Debney Meadows, Debney's Park Estate and Debney's Estate, and is currently referred to as the Flemington Estate.

Extent

The extent of the place includes the whole of the Public Housing Tower at 120 Racecourse Road, Flemington shown on the extent diagram (Figure 1).

The place is situated on plan of consolidation PC367391W. The extent submitted by the applicant is shown in Figure 1 and only includes the footprint of the tower in the south-eastern corner of the parcel.

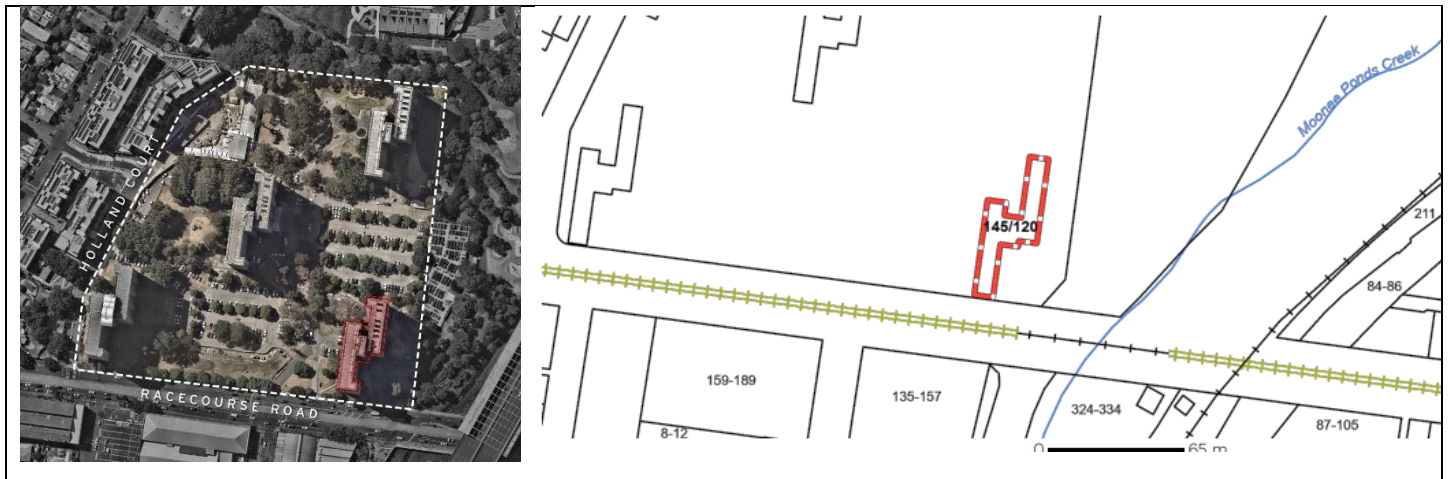


Figure 1: Extent plans (aerial and cadastre plan) submitted by the applicant highlighting in red the Public Housing Tower at 120 Racecourse Road, Flemington

Photographs of the place

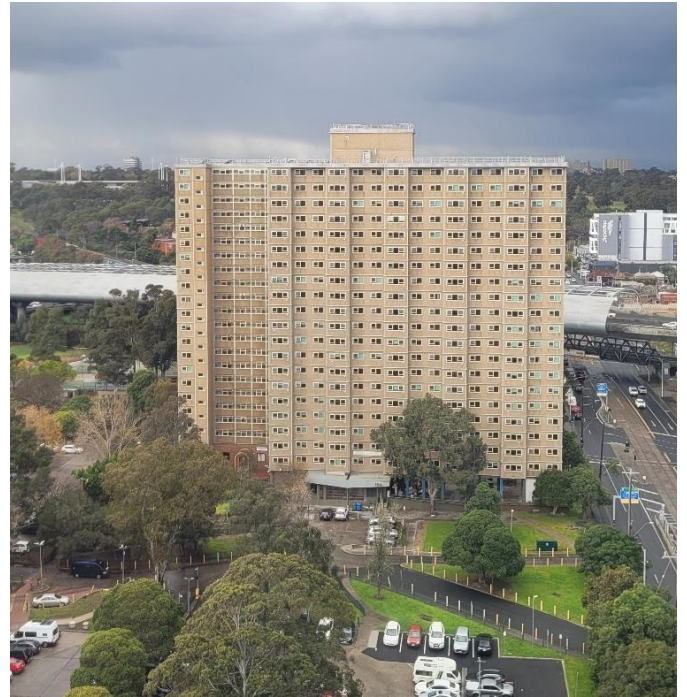
All photographs taken by Heritage Victoria on 25 June 2025.



Entrance to 120 Racecourse Road, Debney Park Estate



120 Racecourse Road, Flemington



120 Racecourse Road, viewed from 12 Holland Court, Flemington



The original balcony access to the flats has been infilled with metal framing and glazing



Lobby



Drying Room



View south, from level 20, noting drying room exterior and pebble dash finish at right



Typical kitchen, windows onto the balcony access



Typical lounge room, view onto 12 Holland Court



Community room on the ground floor



Pilotis

Place history and comparisons

Brief History

The Public Housing Tower at 120 Racecourse Road, Flemington is situated adjacent to Moonee Ponds Creek and Citylink. It is instantly recognisable as a Commission block of high-rise flats and represent a distinct era in the delivery of the Victorian Government's housing policy in the form of high-density 'elevator flats' that has not been replicated since the mid-1970s. The tower is situated on land acquired by the Commission in a land swap deal with Melbourne City Council. The site was known as Debney's Paddock, named after the neighbouring Debney Brothers tannery which had operated on the west bank of Moonee Ponds Creek since 1876 (Figure 2).

Housing Commission of Victoria

Melbourne had been suffering from a housing shortage for decades before the Great Depression exacerbated the problem with an influx of people into inner suburban areas seeking work.

After a groundswell of community campaigning, spearheaded by slum abolitionist F. Oswald Barnett, and a government investigation into housing conditions, the Commission was established by the *Housing Act 1937*. The following year, the *Slum Reclamation and Housing Act 1938* defined five main principles governing the operations of the Commission, crucially including the 'reclamation of insanitary areas' and 'the provision of houses for persons of limited means.'² Thus 'slum clearance' as it was known, was a key aspect of the Commission's charter underpinning its objectives from the outset.

World War II slowed the progress of the Commission's work, but did not halt it completely. In 1942, Commissioners Barnett and W.O. Burt, wrote a treatise calling for action from the Australian Government to commence planning for housing needs that would only increase following the end of the war. The pamphlet provides insight in the idealism and ambition of the Commission:

*Thousands of our fellow citizens who are contributing to the wealth and welfare of the Nation are unable to obtain a home. We have permitted thousands of good Australians, whose only crime is poverty to live under conditions which are a standing disgrace to a society which calls itself Christian... better homes make better citizens and better citizens inevitably raise the standard of social and national life.'*³

Barnett and Burt were correct in their prediction, and by the end of the war the housing shortage was even more acute, with the number of Victorians seeking housing from the Commission increasing from 5,161 in 1945, to 42,949 in 1949.⁴ In the aftermath of the war, "houses were required in large numbers as quickly as possible to house those returning to civilian life and catch up on the lag of construction over the war years".⁵ In the post-war period, the Commission focused its activities on supply of new housing to address the housing shortage. The Commission experimented with different types of construction materials, prefabrication methods and dwelling types, all to reduce costs and maximise output. Slum reclamation was not squarely back on the agenda until the mid-1950s.

Concrete House Project

The early work of the Commission is represented in the VHR by the Experimental Concrete Houses (VHR H1863) which were built at the first housing commission estate at Fisherman's Bend completed in 1939. The Commission adopted a system invented by T.W. Fowler from Werribee as an economical solution for the pre-fabrication of houses. Fowler's system "enabled complete concrete walls, including openings for doors, and windows, to be cast on horizontal steel tables. These walls after setting, were conveyed to the house site by means of trolley ways, tilted by special jacking equipment and erected."⁶

² Housing Commission *First Annual Report 1938-1939*. The other three governing principles were: improvement of existing housing conditions, determination of minimum standards with which new houses must comply, and zoning.

³ Barnett, F.O and Burt W.O *Housing the Australian Nation 1942*, Research Group of the Left Book Club pp 4-5, reproduced online <https://collections.museumsvictoria.com.au/items/289103> accessed on 24 June 2025.

⁴ Howe, R (ed), *New Houses for Old, New houses for old: fifty years of public housing in Victoria 1938-1988*, Ministry of Housing and Construction, Melbourne, 1988, p. 71.

⁵ 'Housing Commission, Victoria First 25 Years.

⁶ Stanford, N.W., n.d. *Concrete House Production, A study of Factory Reorganisation Pamphlet*.

In 1945, the Commission purchased a former munitions factory at Holmesglen for the mass manufacture of Fowler's concrete panels in what became known as the Concrete House Project (Figure 3). Ultimately, it was the concrete house that proved the cheapest and most efficient method of manufacture, but as architectural historian George Tibbits explains:

... behind the changing approach within the Commission lay the social ambition that through modern building design and new materials efficiently used, a new environment could be created that would bring a share of modern economic, material and technical developments to all.⁷

By the mid-1950s the Commission was again focusing on slum clearance and increasingly began to produce multi-storey flats, not just villa homes. In 1954 a development section was established at the Concrete House Project to investigate the expansion beyond the prefabrication of houses and the LPS began to evolve.⁸

From two-storey flats and maisonettes, the Commission sought higher-density solutions throughout the 1950s, moving on to design three- and four-storey blocks. The requirement for mass production and cost efficiency drove the utilisation of the LPS. In 1961, a block of four-storey walk-up flats designed in accordance with modernist principles, with a rooftop laundry and raised on stilts, was built at Canning Street, Carlton (now demolished, Figure 4). This became the dominant form for walk-ups in subsequent developments. The next innovation of the Concrete House Project was the eight-storey walk-ups built in Kensington (now demolished), a prototype for the high-rise towers to follow.

At the beginning of 1960, Horace Petty, the Minister for Housing, envisioned that Victoria was "... facing a decade in which... you will see many enormous blocks of flats going up to maximum height in the city and inner suburbs ... The State Government believes multi-story flats will help counter the outer-suburban sprawl and speculative land prices".⁹ The Minister's statement was made in the context of the walk-ups approved for the Stage 1 of Debney's Estate and reflected the prevailing sentiment of the government. Just as Petty forecast, before the end of the decade, skyline-dominating towers sprang up in inner suburbs including North Melbourne, Flemington, Carlton, Kensington and South Yarra.

The Housing Commission's High-rise Programme

The Commission's first experiment in high-rise 'elevator flats', as they were then called, was at Emerald Hill Court Estate in South Melbourne (extant). The 16-storey tower was built to a British design, of slip-form reinforced concrete. The tower was situated in a 'mixed estate' alongside four-storey walk-ups that followed the Canning Street design. The Emerald Hill Court Estate tower is one of four built by the Commission that did not utilise the LPS, so does not adhere to the same distinctive visual form as the 41 LPS towers (Appendix 2 provides a full list of towers by date).

The private sector was also experimenting with this new form of housing in Melbourne at the same time, and Melbournians were grappling with this new form of home. The first high-rise apartment block was designed by émigré architect Mordechai Benshemesh, the 13-storey Edgewater Towers at St Kilda (extant). The striking modernist design was completed in 1961. Robin Boyd's Domain Park Towers (extant) followed shortly after in 1962. In this context, the Commission's high-rise flats programme was cutting edge.

In February 1963, the Commission called for tenders for construction of two 20-storey towers at 12 Holland Court, Flemington and Reeves Street, Carlton.¹⁰ The Concrete House Project's method of construction using precast concrete load bearing panels was the most economical (compared with in situ concrete or steel frame construction) and these towers became the first of the Commission high-rises to be constructed using the LPS. The system utilised a standard set of pre-cast concrete panels, including load-bearing walls and floor panels. The public housing towers gain their uniformity of appearance thanks to the construction methodology and the restrictions imposed by the factory production. The same set of standard panels were rearranged in different configurations to create the various tower floorplans across six major types, the most common of which was the Z-plan, found at multiple locations across inner Melbourne.

Park Towers in South Melbourne (extant) was seen as the pinnacle of the public housing towers programme. Its lofty 30 storeys and attention to architectural detail was lauded when it was completed in 1969. Park Towers was a feat of engineering, and its use of post-tensioning to tie the vertical precast walls was innovative. It attracted a large crowd through its doors for an open day when it was completed and was heralded in a full colour brochure published by the Commission, eager to spruik its accomplishments.

⁷ Tibbits, G. "The Enemy Within Our Gates" in Howe, R (ed), *New Houses for Old*, 1988, p. 132.

⁸ Housing Commission, Annual Report 1953/54, p. 12.

⁹ 'Big Flat Plan for Debney's Paddock' *The Age* 15 March 1960, clipping found PROV, VPRS 1808/P0000, D7 Debney Meadows Estate.

¹⁰ Housing Commission of Victoria, Twenty-fifth Annual Report 1962/63, p. 9.

Public sentiment towards the high-rise towers and the slum reclamation activities began to shift. Protests were staged in Carlton and Fitzroy and criticism of the programme increased. In 1973, slum clearance ceased and the high-rise programme was abandoned. The towers at King Street, Prahran and at 139 Highett Street, North Richmond, were among the last to be completed under the programme in 1975. From that point, the focus of the Commission was on 'urban renewal' or 'urban rehabilitation.' This was facilitated by a change in the Commonwealth's funding agreement in 1973, which had a firmly stated objective that public housing should be scattered through the community rather than concentrated in large estates.¹¹ Subsequently the focus of the Ministry of Housing, the Commission's successor, turned to other approaches such as building infill housing and conservation projects in inner-urban areas and making 'spot purchases' of individual homes. The Kay Street Infill Housing site (VHR H2453) represents the radical change in public housing policy implemented by the Ministry of Housing after the demise of the high-rise programme.

Debney's Estate – 120 Racecourse Road

Debney's Estate was industrial land acquired from Melbourne City Council, and unlike other Commission high-rise developments was not associated with slum reclamation. The first stage of Debney Meadows Estate, as it was originally named, was completed in 1962 and comprised 12 walk-ups of three and four storeys along Victoria Street. Stage 2 saw the completion of the tower at 12 Holland Court (extant and subject of Exclusion Determination RX1015), the first 20-storey tower completed by the Commission using the LPS (Figure 5).

By the time 12 Holland Court opened in 1965, the Commission had already negotiated a further land swap deal with Melbourne City Council to extend Debney's Estate. 120 Racecourse Road was part of this final stage of the Estate's development (Figure 6). In 1963-64 the Commission had changed its preference from mixed estates to estates comprising solely of high-rise blocks.¹² The Debney's Estate Extension under construction in 1968 did not include any walk-ups (the ban on children under 12 in high-rise flats had been lifted) and was a 'tower only' development that utilised a repeating Z-type tower design (Figure 7). The Z-type high-rise was again repeated for all towers at the Atherton Gardens (extant) and Richmond (extant) Estates.

The 1967-68 Annual Report of the Commission noted two 20 storey blocks of two- and three-bedroom flats with 180 flats per block were under construction at Debney's Estate, one of which was 120 Racecourse Road. The following year the Estate featured in full colour in the annual report, showing the fourth tower nearing completion (Figure 8). The tower has been managed by Commission and its successor agencies up until the present day and has been home to numerous households over the past fifty years. Today, the Estate is home to a multicultural community. In July 2020 there were 399 residents living at 120 Racecourse Road.¹³

¹¹ Carter, R. A. and Luscombe, R. 'Public Housing Programmes and Urban Development in Melbourne: 1945-1984' Research Paper No. 28, University of Melbourne Department of Economics p. 14

¹² Housing Commission Annual Report 1963-64, p. 9

Historical images

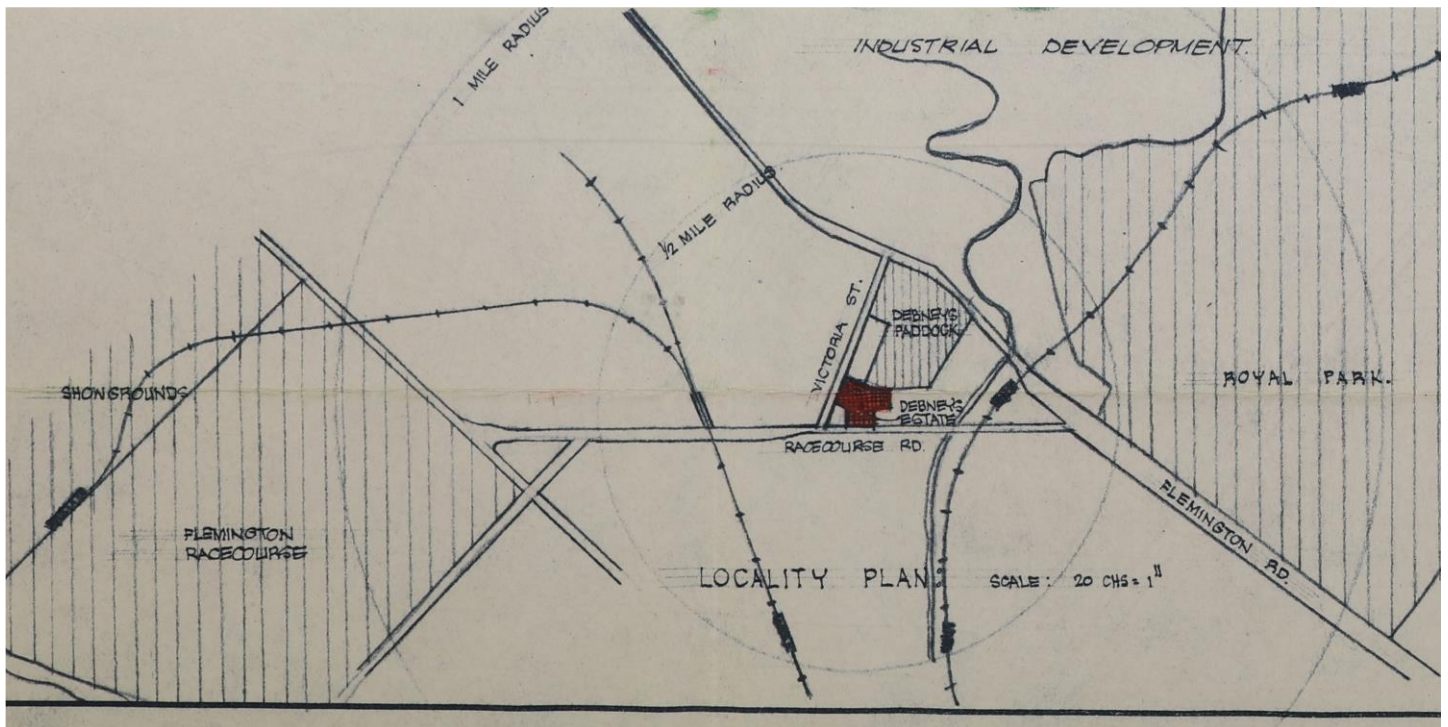


Figure 2: Locality Plan, Housing Commission of Victoria, detail from drawing 10978 (PROV, VPRS 1808/ P0000, D7, General Correspondence Subject Files [Chief Architect's Branch], 'Debney Meadows Estate'). Stage 1 of the Debney's Estate development is marked in red.

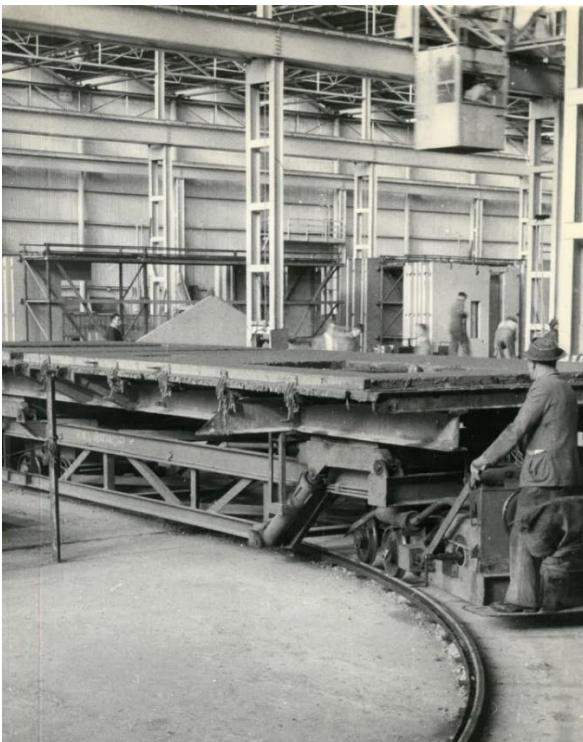


Figure 3: A concrete wall panel on the Holmesglen factory floor (Source: Stanford, N.W Concrete House Production)



Figure 4: Canning Street Walk-ups (Wolfgang Sievers, 1962 'Housing Commission Flats' State Library of Victoria)



Figure 5: 12 Holland Court as pictured in the Official Opening of Debney Meadows pamphlet

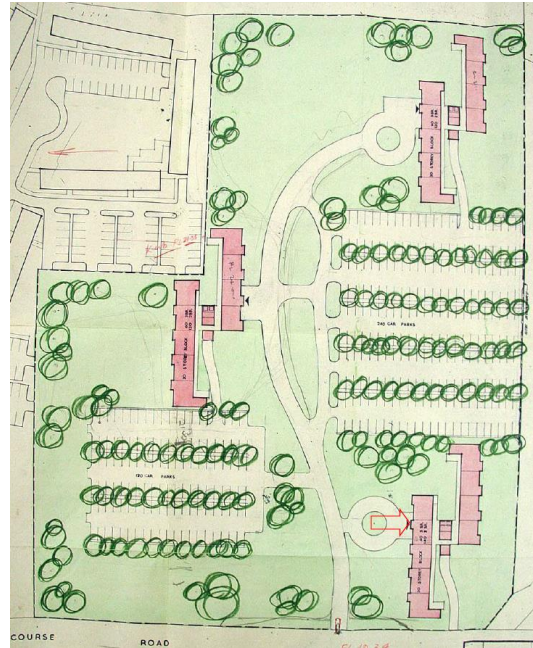


Figure 6: Plan of Debney Meadows Estate extension, Flemington, August 1966: 120 Racecourse Road indicated (Source: D7 Debney Meadows Estate, VPRS 1808/P0, Public Record Office Victoria reproduced in Exclusion Application)



Figure 7: Aerial photograph of Debney Meadows Estate (part), 1968, with Stage 2 towers under construction: the substructure of 120 Racecourse Road is indicated (Source: Historical Aerial Photography Collection, Landata, SERV – reproduced in Exclusion Application)



Provision of open space Debney Meadows Estate, Flemington

Figure 8: Debney Meadows Estate as pictured in the Housing Commission's Annual Report for 1968-69

Comparative analysis

The assessment of the significance of heritage places often requires a comparison with other places of a similar type, value, history or association. This is known as comparative analysis.

Public Housing delivered by Housing Commission of Victoria

The Public Housing Tower at 120 Racecourse Road, Flemington is in the class of “Housing Commission of Victoria high-rise flats”. There are currently no public housing towers included in the VHR. Although belonging to different classes, 120 Racecourse Road can be usefully compared with other examples of public housing in the VHR as they indicate the threshold for State-level cultural heritage significance for places that share a related history.

Experimental Concrete Houses (1939) VHR H1863

The Experimental Concrete Houses are of significance as the forerunner of the Commission's post-war Concrete House Project which — culminating in the high-rise flats of the 1960s and 1970s — had wide reaching implications for Victorian society (Statement of Significance, VHR H1863).

Kay Street Infill Housing (1982-83) VHR H2453

The Kay Street Infill Housing at 77 Kay Street, Carlton is historically significant as evidence of the innovative approach to public housing in Victoria in the late 1970s and early 1980s. It demonstrates the radical change in public housing policy from the high-rise developments of the 1950s, 1960s and 1970s under the Ministry of Housing's ‘New Directions’ policy (Statement of Significance, VHR H2453).

Both the Experimental Concrete Houses and the Kay Street Infill Housing demonstrate the important role the Commission played in Victoria's history. They also illustrate the high threshold for inclusion in the VHR.

Public Housing Towers

The Public Housing Tower at 120 Racecourse Road, Flemington is also usefully compared to other similar buildings from the same era. This tower belongs to a distinct phase of development, delivered by the Commission between 1962 and 1975 during the high-rise flats programme.

As above, there are currently no public housing towers included in the VHR, but it is still useful to compare the tower at 120 Racecourse Road with other towers within the same class. There were 45 towers built¹⁴ and over 40 extant.¹⁵ The vast majority (41) utilised the LPS developed in the Concrete House Project's factory at Holmesglen. Other examples of public housing towers that provide useful comparisons are:

- Emerald Hill Court Estate, the first tower built by the Commission, which was of slip-form reinforced concrete based on a British design and completed in 1962.
- Park Towers, South Melbourne, a 30-storey tower widely considered to be the zenith of the Commission's era of high-rise development.
- Atherton Gardens, a comparable estate similar to the Debney's Estate Extension in that it comprises only “Z type” blocks. Atherton Gardens reflects the slum reclamation activities of the Commission and was completed in 1971.

A full list of towers by construction date is included in Appendix 2.

¹⁴ The 45 towers do not include the forerunners of the high-rises, which were two eight-storey walk-ups at Kensington. With no lift access, and being less than 12 storeys, they are considered prototypes rather than members of the class.

¹⁵ At time of writing, the two red brick towers 20 Elgin Street and 141 Nicholson Street, Carlton, are in the process of being demolished.

Executive Director's reasons under s.36D(3)(b)(ii) of the *Heritage Act 2017* for recommending an exclusion determination

The Executive Director's reasons for recommending an Exclusion Determination in relation to the Public Housing Tower at 120 Racecourse Road, Flemington (**the place**) are below.

For a place or object to be included in the VHR, there must be evidence that it meets the threshold for State-level cultural heritage significance in relation to at least one of Heritage Council's Criteria in [The Victorian Heritage Register Criteria and Threshold Guidelines](#) (the Guidelines).

It is the Executive Director's view that the place **does not have a reasonable prospect** of meeting the State-level threshold under any of the Criteria.

Assessment against Criteria

The following assessment is based upon the contents of [The Victorian Heritage Register Criteria and Threshold Guidelines](#) (Heritage Council 2012 – reviewed and updated 1/12/2022).

Criterion A – Importance to the course, or pattern, of Victoria's cultural history

Step 1 Tests for Criterion A

The place has a clear association with the history of housing as a responsibility of the State through the Commission and in particular with the high-rise flats programme that was delivered between 1962 and 1975. This historical phase made a strong and influential contribution to Victoria. The work of the Commission in this period dramatically altered the built environment of Melbourne. The Commission's high-rise flats programme housed thousands of Victorians in the second half of the twentieth century and it had a profound impact on the lives of Victorians who otherwise would have struggled to afford housing.

Evidence of the Commission's policy shift to the provision of high-density housing is demonstrated in the scale and design of the 20-storey tower. The LPS construction of the tower links the built fabric to the Commission's Concrete House Project.

Step 2 Tests for State-level significance under Criterion A

The place does not allow a clear association with this historical phase to be understood better than most other places or objects in Victoria with substantially the same association.

The place was one of 45 high-rise towers constructed during the 1960s and 1970s which all have substantially the same association. It does not have qualities that enable this association to be understood better than any of the other towers built during the period.

The place does not have features that distinguish it above the other public housing towers.

The Commission had a lasting impact on the public housing stock of the State. It built a huge number of dwellings and provided low-cost housing for Victorians over many decades. The high-rise flats programme was a distinct phase of the Commission's operation. The place does not have any features that demonstrate the history of the Commission better than other places built by the Commission.

The high-rise towers were constructed during the Commission's focus on slum-reclamation. However, the Debney's Park Estate was built on industrial land obtained from the Melbourne City Council and does not allow the historical association with slum-reclamation to be readily understood.

The Executive Director is of the view that this place has no reasonable prospect of meeting the Step 2 tests for Criterion A.

Criterion B – Possession of uncommon, rare or endangered aspects of Victoria’s cultural history

Step 1 Tests for Criterion B

The place has a clear association with the history of the Commission and its high-rise flats programme, and there is evidence of this at the place. There is no evidence that the place is rare or uncommon.

The place is one of 45 built by the Commission during the 1960s and 1970s. The place was constructed using the LPS in a ‘Z type’ configuration, the most common typology constructed by the Commission. Even considering the current plan to demolish five towers in ‘Tranche 1’ of Homes Victoria’s renewal program, there will still be 39 towers left across Melbourne. There is no evidence that the place passes the Step 1 test for rarity in accordance with the Heritage Council’s Threshold Guidelines for Criterion B.

The Executive Director is of the view that this place has no reasonable prospect of meeting the Step 1 tests for Criterion B.

Criterion C – Potential to yield information that will contribute to an understanding of Victoria’s cultural history

Step 1 Tests for Criterion C

The place was built as part of the Debney’s Estate Extension on land acquired from the City of Melbourne. The:

- 1) physical fabric and
- 2) documentary evidence and
- 3) associated oral history or cultural narratives

relating to the place do not suggest a likelihood that the place contains evidence of cultural heritage significance that is not currently visible and/or well understood or available from other sources.

From what we know of the place, the physical evidence is not likely to be of an integrity or condition that it could yield information through detailed investigation.

The Executive Director is of the view that this place has no reasonable prospect of meeting the Step 1 tests for Criterion C.

Criterion D: Importance in demonstrating the principal characteristics of a class of cultural places and objects

Step 1 Tests for Criterion D

The place is in the class of place ‘Housing Commission of Victoria high-rise flats’. This class of place has a clear association with the history of the Commission and its pivot to the provision of high-density housing to address the twin problems of a housing supply shortage and unsanitary and cramped living conditions in the inner suburbs. This historical phase of high-rise public housing delivery made a strong and influential contribution to Victoria, altering the urban landscape and skyline, and influencing government planning and housing policies in to the future.

The place **demonstrates the principal characteristics of the class** in its physical fabric. The principal characteristics of the class are:

1. Built as public housing by the Commission between 1962–75
2. Constructed using the LPS of the Concrete House Project
3. High-rise tower form of 12 storeys or more
4. Utilisation of elevators for access
5. A standardised floor plan is replicated across each floor
6. Elevated structures, raised on stilts or ‘pilotis’
7. The towers are situated within a landscaped setting.

Step 2 Tests for State-level significance under Criterion D

The place is not a notable example of the class in Victoria. To meet this test the place needs to be a **fine, influential or pivotal** example under Reference Tool D.

Fine

The place displays the principal characteristics that are typical of the class in a way that allows the class to be easily understood or appreciated. The place does NOT display characteristics that are of a higher quality or historical relevance more than other places of this class:

- The physical characteristics of the place are shared by the vast majority of high-rise flats built by the Commission.
- The 'Z-type' towers are the most dominant form, with 24 of the 45 towers built utilising this configuration of the LPS.
- This is one of 24 extant 'Z-type' towers and is identical to the other two towers constructed at the same time in the Debney Meadows Estate extension.

Influential

The place contains physical characteristics of design, technology or materials that were mass produced. Subsequent public housing towers were not created, altered or used in response to the particular characteristics of the place. The place was not influential.

Pivotal

The place was delivered during the Debney's Estate Extension between 1967-69 and is identical to the other two towers delivered at the same time within the estate. It was delivered at roughly the mid-point of the high-rise flats programme and very is similar to the 23 other examples of Z-type towers in Melbourne. It is no more 'pivotal' than the slightly earlier 1967 Z-type at 12 Sutton Street, North Melbourne or the later Z-type towers at Atherton Gardens completed in 1970-71.

The Executive Director is of the view that this place has no reasonable prospect of meeting the Step 2 State-level tests for Criterion D.

Criterion E – Importance in exhibiting particular aesthetic characteristics

Step 1 Tests for Criterion E

The physical fabric of the place clearly exhibits particular aesthetic characteristics. It has visual and non-visual aspects such as sounds, smells and other factors having a strong impact on human thoughts, feelings and attitudes. The Concrete House Project produced public housing towers that are distinctive in appearance, are substantial landmarks and adhere to modernist architectural principles.

Step 2 Tests for State-level significance under Criterion E

The aesthetic characteristics of the place are not 'beyond the ordinary' or outstanding because there is no evidence or critical recognition from within the architecture or design fields. There is not wide public acknowledgement of exceptional aesthetic qualities of the place expressed in publications, print or digital media, painting, sculpture, songs, poetry, literature, or other media.

The towers at Debney's Estate by virtue of their relative height overshadow the surrounding area, and like all the towers produced by the Commission, are recognisable as landmarks in their neighbourhoods because of this. The status of the place as a landmark does not mean there are inherent aesthetic qualities.

The towers were mass produced from a factory, so the aesthetic characteristics were always secondary to the cost efficiencies, form and function. The logistics of the LPS production and transportation were the major contributors to the design, not aesthetic considerations.

The Executive Director is of the view that this place has no reasonable prospect of meeting the Step 2 State-level tests for Criterion E.

Criterion F – Importance in demonstrating a high degree of creative or technical achievement at a particular period

Step 1 Tests for Criterion F

The place does not contain physical evidence that clearly demonstrates creative or technical achievement for the time in which it was created.

The place was constructed using the LPS manufactured by the Concrete House Project

The place was one of 24 'Z block' towers produced during the high-rise flats programme, completed approximately mid-way through the programme.

The place does not exhibit any creative adaptations to the established template for the 'Z type' towers.

The Executive Director is of the view that this place has no reasonable prospect of meeting the Step 1 test for Criterion F.

Criterion G – Strong or special association with a particular present-day community or cultural group for social, cultural or spiritual reasons

Step 1 Tests for Criterion G

This place likely demonstrates social value to the many communities and cultural groups who have lived in the towers and have a sense of connection, to the place possibly over many years and generations. The tenants (past and present) of the place meet the definition of a community with a strong attachment to the place in accordance with the Step 1 Guidelines.

Step 2 Tests for State-level significance under Criterion G

There is no evidence that the social value of the tenant community, as it relates to the place, or the Debney's Estate more broadly, would resonate beyond metropolitan Melbourne and across the broader Victorian community.

It is likely that the social, cultural or spiritual associations of the place are more strongly felt at the local level.

The Executive Director is of the view that this place has no reasonable prospect of meeting the Step 2 State-level tests for Criterion G.

Criterion H – Special association with the life or works of a person, or group or persons, of importance in Victoria's history

Step 1 Tests for Criterion H

The place has a direct association with the Commission (now Homes Victoria). This organisation has made a strong and influential contribution in their field of endeavour. There is evidence of the association between the place and the Commission. This association is related directly to achievements of the Commission, a government entity borne out of societal pressure to address housing supply and quality issues. The place is a manifestation of the Commission's approach in the 1950s-60s seeking higher-density housing in inner urban areas and it demonstrates an enduring and close interaction between the organisation and the place.

Step 2 Tests for State-level significance for Criterion H

The work of the Commission is important to Victoria's history. However, the place does not allow the association between the Commission and its importance in Victoria's history to be readily appreciated better than most other places or objects in Victoria.

The place does not allow the work of the Commission to be readily appreciated better than most other public housing estates or towers.

It is characteristic of the work of the Commission in this period but could not be said to have particular qualities that represent its importance in Victoria's history

There were 45 'elevator flats' or 'high-rise flats' built during the 1960s and 1970s, which was just one phase in the delivery of public housing by Commission from 1938 onwards. The place is of the 'Z type', the most common tower typology built by the Commission, and other examples display the association with the Commission.

Earlier villa estates and later infill housing also demonstrate the work of the Commission and allow the association and historical importance of the organisation to be understood.

The Executive Director is of the view that this place has no reasonable prospect of meeting the Step 2 State-level tests for Criterion H.

Appendix 1: Material informing the determination

The following information been relied on in making the determination:

Housing Commission Publications

Annual Reports, Housing Commission Victoria, accessed online through the Victorian Government Library Service.
Housing Commission, Victoria, *Housing Commission, Victoria: first 25 years*, The Commission, Melbourne, 1963.
Housing Commission of Victoria, Slum Clearance Project, Debney's Estate Flemington (undated pamphlet).
Housing Commission of Victoria, Official Opening of Debney Meadows Twenty Storey Flats, 23 June 1965 (pamphlet).
N.W. Stanford, *Concrete House Production: A study of Factory Reorganisation*, Housing Commission, 1966.
PROV, VPRS 1808/P0000, General Correspondence Subject Files [Chief Architect's Branch] D7 Debney Meadows Estate.

Books, reports and theses

Barnett, F.O and Burt W.O *Housing the Australian Nation* 1942, Research Group of the Left Book Club pp 4-5, reproduced online, Museums Victoria, <https://collections.museumsvictoria.com.au/items/289103> accessed on 24 June 2025.
Carter, R. A. and Luscombe, R. 'Public Housing Programmes and Urban Development in Melbourne: 1945-1984' Research Paper No. 28, University of Melbourne Department of Economics.
Context, *Homeward: The Thematic History of Public Housing in Victoria*, prepared for Department of Human Services, Division of Housing & Community Building, July 2012.
Howe, R. (ed), *New houses for old: fifty years of public housing in Victoria 1938-1988*, Ministry of Housing and Construction, Melbourne, 1988.
Tibbits, G. "'The enemy within our gates': slum clearance and high-rise flats', Chapter 6 in Renate Howe (ed), *New houses for old: fifty years of public housing in Victoria 1938-1988*, Ministry of Housing and Construction, Melbourne, 1988, pp. 123-162.

Site inspection

A site inspection was undertaken by Heritage Victoria staff on 25 June 2025.

Appendix 2: List of towers built by the Housing Commission

Between 1962 and 1974, the Housing Commission of Victoria delivered 45 high-rise residential towers at locations across Melbourne. Of the total built, over 40 are extant. There were also two towers built at JJ Holland Park that were eight-storey walk-ups (now demolished) that were a prototype for the later LPS towers.

Year	High-rise tower development	Addresses	Suburb	No. of storeys
1961-62	Emerald Hill Court Estate [‡]	200 Dorcas Street	South Melbourne	16
1963	Hotham Estate [‡]	76 Canning Street	North Melbourne	20
1965	Debney's Estate	12 Holland Court [^]	Flemington	20
1965-67	Carlton Housing Site	480, 510, 530 Lygon Street, 478 Drummond Street	Carlton	20, 20, 12, 12
1966	Inkerman Heights	150 Inkerman Street	St Kilda	12
1966	Loxton Lodge	49 Union Street	Windsor	12
1967	Layfield Court	150 Victoria Avenue	Albert Park	12
1967	Nelson Heights	Pasco Street	Williamstown	12
1965-68	Horace Petty Estate	1 Surrey Road, 2 Simmons St and 259 Malvern Road	South Yarra	12, 12, 12
1966-68	Palmerston Street Estate [‡]	20 Elgin Street [^] & 141 Nicholson Street [^] (currently being demolished)	Carlton	16*, 16*
1966-69	Hotham Estate (Boundary Road Extension)	33 Alfred [^] , 159 Melrose and 12 Sutton Streets	North Melbourne	12/13, 12, 20
1967-69	Debney's Meadows Estate Extension	120 [^] , 126 and 130 Racecourse Road	Flemington	20, 20, 20
1969	Park Street Tower	332 Park Street	South Melbourne	30
1968-70	Holland Estate	94 Ormond Street, 56 Derby Street and 72 Derby Street (demolished)	Kensington	12, 12, 12**
1971	Collingwood Housing Site (across two separate parcels)	229 and 253 Hoddle Street, and 240 Wellington Sr	Collingwood	20, 20, 20
1971	Atherton Gardens	90 and 140 Brunswick St, and 95 and 125 Napier St	Fitzroy	20, 20, 20, 20
1971	Frank Wilke Court	1 Holmes Street	Northcote	12
1971	Wilson Street	351 Barkley Street	Brunswick	12
1972	Gaskin Gardens	127 Gordon Street	Footscray	12
1972	Floyd Lodge	63 Hamner Street	Williamstown	12
1973	Crown Street Estate	29 Crown Street	Flemington	13
1973-75	Langdon Park (North Richmond Housing Site)	139 Highett St and 106, 108, 110 and 112 Elizabeth St	Richmond	21, 20, 20, 20, 20
1974-75	King Street Estate	17 and 25 King Street	Prahran	12, 12
Total built				45
Total extant				42

[‡] Towers not constructed using the Concrete House Project's LPS

[^] Site subject to an Exclusion Determination

* 20 Elgin Street and 141 Nicholson Street are currently being demolished

**72 Derby Street demolished in 1999. It was a "Cee" or "L-type" identical to 56 Derby Street (extant) in the same estate