

Statement of Recommendation from the Executive Director, Heritage Victoria

Hotham Estate

North Melbourne, Melbourne City

Wurundjeri Woi Wurrung Country



Executive Director recommendation

Under section 37 of the *Heritage Act 2017* (**the Act**) I recommend to the Heritage Council of Victoria (**Heritage Council**) that the Hotham Estate, located at Boundary Road and Alfred, Melrose, Sutton, Buncle, Mark and Canning streets, North Melbourne, is not of State-level cultural heritage significance and should not be included in the Victorian Heritage Register (**VHR**).

I suggest that the Heritage Council determine that:

- The Hotham Estate is not of State-level cultural heritage significance and should not be included in the VHR in accordance with section 49(1)(b) of the Act.



STEVEN AVERY
Executive Director, Heritage Victoria

Date of recommendation: 9 December 2025

The process from here

1. The Heritage Council publishes the Executive Director's recommendation (section 41)

The Heritage Council will publish the Executive Director's recommendation on its [website](#) for a period of 60 days.

2. Making a submission to the Heritage Council (sections 44 and 45)

Within the 60-day publication period, any person or body may make a written submission to the Heritage Council. This submission can support the recommendation, or object to the recommendation and a hearing can be requested in relation to the submission. Information about making a submission and submission forms are available on the [Heritage Council's website](#).

3. Heritage Council determination (sections 46, 46A and 49)

The Heritage Council is an independent statutory body. It is responsible for making the final determination to include or not include the place, object or land in the VHR or amend a place, object or land already in the VHR.

If no submissions are received the Heritage Council must make a determination within 40 days of the publication closing date.

If submissions are received, the Heritage Council may decide to hold a hearing in relation to the submission. The Heritage Council must conduct a hearing if a submission requests a hearing, and that submission is made by a person or body with a real or substantial interest in the place, object or land.

If a hearing does take place, the Heritage Council must make a determination within 90 days after the completion of the hearing.

4. Obligations of owners of places, objects and land (sections 42, 42A, 42B, 42C, 42D and 43)

The owner of a place, object or land which is the subject of a recommendation to the Heritage Council has certain obligations under the Act. These relate to advising the Executive Director in writing of any works or activities that are being carried out, proposed or planned for the place, object or land.

The owner also has an obligation to provide a copy of this statement of recommendation to any potential purchasers of the place, object or land before entering into a contract.

5. Further information

The relevant sections of the Act are provided at the end of this report.

Terminology and abbreviations

The following terms and abbreviations are used throughout this report.

The Act –	<i>Heritage Act 2017</i>
Commission –	The Housing Commission of Victoria
CHP –	Concrete House Project
LPS –	Large Panel System
Place –	Hotham Estate
VHR –	Victorian Heritage Register

Class of place

Housing Commission of Victoria High-Rise Housing Estate

A public housing estate which comprises at least one tower of 12-storeys or more in a landscaped setting.

Hotham

From the 1850s to 1887, the name for North Melbourne was 'Hotham'. Some place names in North Melbourne include the word 'Hotham'. For example, 'Hotham Gardens' was built between 1959 and 1961 by Master Builders at O'Shanassy Street, North Melbourne (HO1387). It is located on reclaimed slum land approximately 650 metres south-west of the Hotham Estate but is not part of this estate.

Description

Heritage Victoria staff conducted site visits to the Hotham Estate on 25 June, 28 October and 18 November 2025. The following is a description of the place.

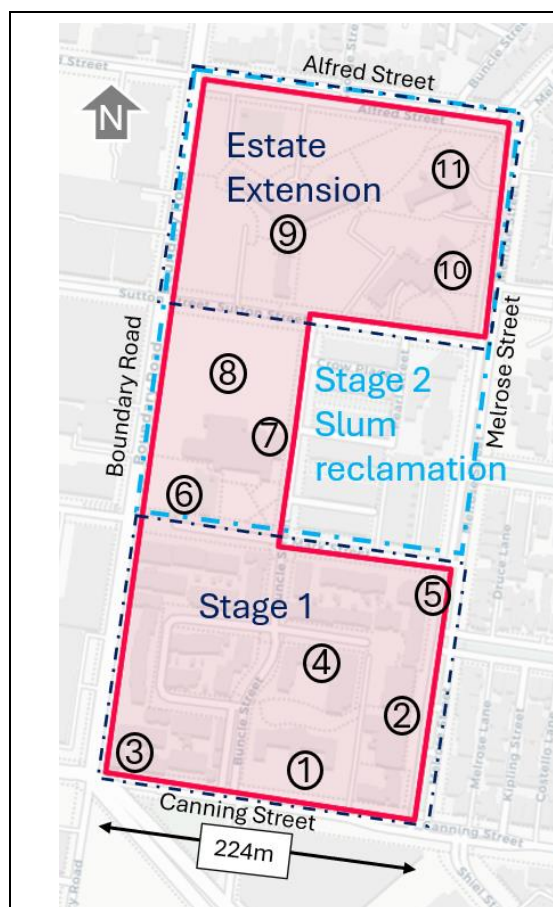
Overview

The Hotham Estate is located in the suburb of North Melbourne, between Alfred Street in the north, Canning Street in the south, Melrose Street to the east and Boundary Road in the west. It comprises a public housing estate developed by the Housing Commission of Victoria (**the Commission**) in two stages with a recreational space managed by Melbourne City Council (Figures 1 and 2).

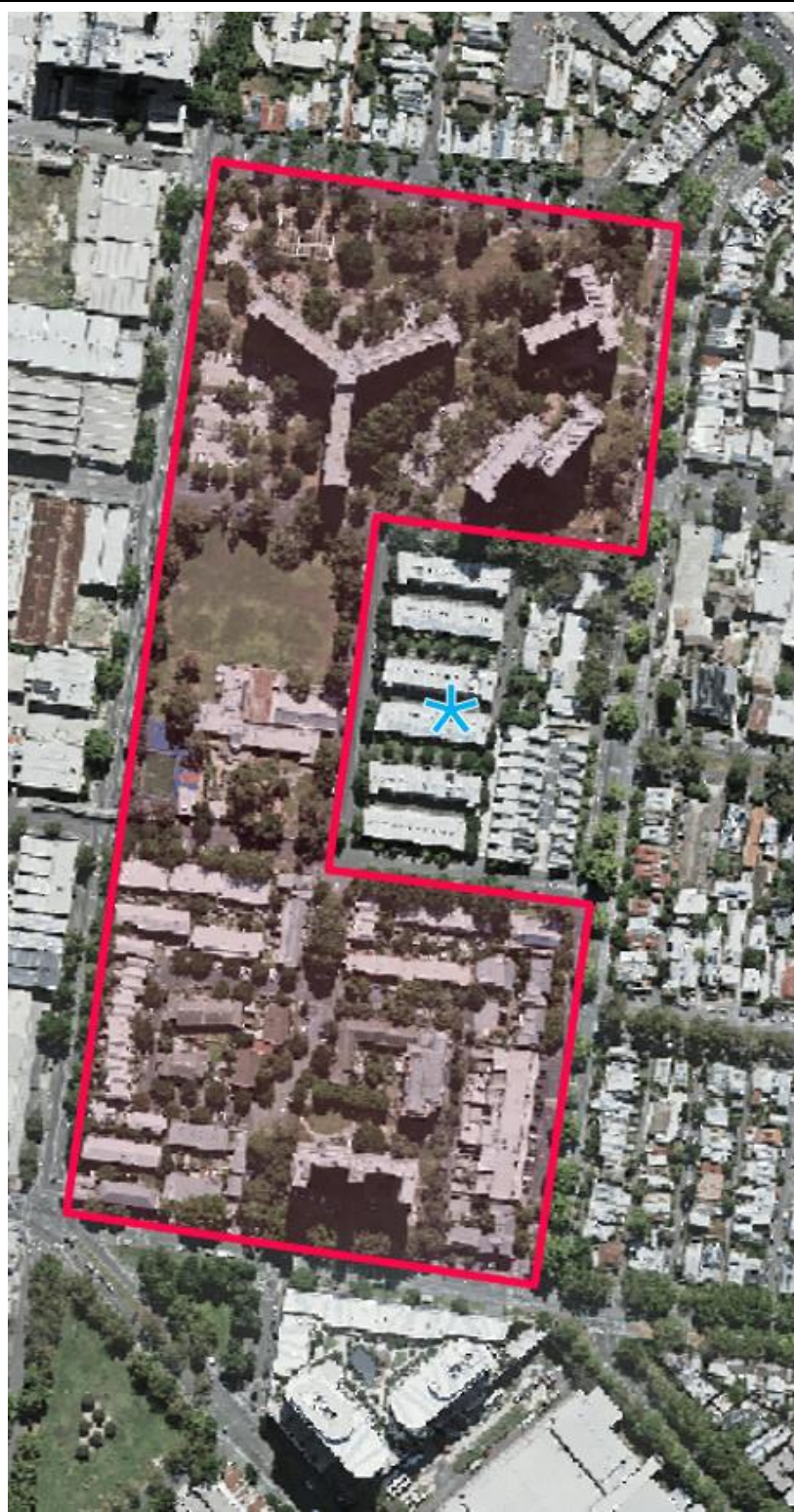
Note: The land between Sutton, Melrose, Buncle and Mark streets is now a private housing development. This land was not part of the nomination and is not included in this assessment.



Figure 1: The Hotham Estate, indicating location of high-rises across both stages of its development, viewed from 12 Holland Court (Heritage Victoria, 25 June 2025).



	Hotham Estate
1	Tower – 76 Canning Street
2	Melrose Street Shops
3	Former Kensington Hotel (HO1108)
4	9 Pampas Street
5	St Albans Church of England (HO1115)
6	Citywide Substation (Former Melbourne Electric Supply, HO1114)
7	North Melbourne Community Centre (Former Scrubb & Co Ammonia works, HO1109)
8	Boundary Road Reserve
9	33 Alfred Street – Y-type tower
10	12 Sutton Street – Z-type tower
11	159 Melrose Street – T-type tower



* NB Area marked with asterisk is not within assessment area.
Most of this area was redeveloped in the 2000s.

Figure 2: The Hotham Estate.

Hotham Estate Stage 1

High-rise tower, 76 Canning Street

The principal feature of Hotham Estate Stage 1 is a 20-storey tower completed in 1963 consisting of 160 two-bedroom flats located at 76 Canning Street. It is constructed from a steel frame encased in concrete, with concrete block walls and concrete floors poured in-situ. The building is in an E shaped plan, with the building oriented east-west on the block. Sets of triple windows form horizontal bands across the northern elevation of the building. The concrete walls are painted grey with the structural frame between the windows painted with pops of primary colours adding interest to the façade. The ends of the building are painted white, contrasting with the northern and southern elevations.

The Canning Street tower has two entrances for residents. The main entrance faces on to the estate and is located on the north side of the tower, facing away from Canning Street. This entrance has a renovated undercover brick entryway at ground level, as well as a small playground in the forecourt. The second entrance is accessible from the carpark on Canning Street. There is also a basement entrance from Canning Street for garbage collection and service access.

Cream brick shops and residences, Melrose Street

A strip of cream brick shops, with lone-person units above them, front Melrose Street and were designed by the Commission to service the estate and provide another type of housing. The shopping strip is divided in two at ground level with an access walkway through to the estate.

South of Mark Street - 1990s development

To the north of the Canning Street tower, and south of Mark Street, are areas of low-rise development, constructed during the 1990s to replace the original 1960s four-storey walk-ups. This development comprises two-storey terrace townhouses and apartments, predominantly in cream-brick with a variety of finishes and has a 1990s post-modern aesthetic. One six-storey medium-rise building is situated at 9 Pampas Street (1995) and occupies part of what was once a large designed landscaped area on the north side of the tower. It is the only building of more than three-storeys in the redevelopment.

There was no vehicular access through the Stage 1 section of the estate until the 1990s, when the new street layout of Cayenne Crescent and Pampas Street off Buncle Street was established providing access to the new terraces and apartments. Low-rental units on the corner of Canning and Melrose streets were also demolished during the redevelopment, and a three-storey brick apartment building and two-storey terraces have replaced them.

Other buildings

Buildings pre-dating the 1960s Commission development are the former Kensington Hotel (1873), on the corner of Boundary Road and Canning Street, and the St Albans Church of England (1926) on Melrose Street.

Recreational precinct

A recreational precinct, between Mark and Sutton streets, links the two sections of the housing estate. It includes the Buncle Reserve, a Community Garden, a Community Centre and the Boundary Road Reserve. The latter consists of a large open grassed playing field with soccer goal posts. This land was within the 'Boundary Road No. 2' slum reclamation area declared by the Commission in 1962, and once cleared, was handed over to Melbourne City Council as recreational land.

The former Ammonia Works (1921, extant) was not demolished as part of the slum reclamation and retained for use as a Community Centre servicing residents of the Hotham Estate. It is a brick factory building, with a simple gabled roof clad in corrugated iron and a central circular louvered vent feature fronting Buncle Street. The original building has been renovated and extended.

A red-brick substation building with painted cream detailing (1919, extant) at 46 Mark Street also pre-dates the Hotham Estate. The rear wall is painted cream, providing a backdrop to the open-air sporting facilities behind it, which include a half-sized soccer pitch and basketball and netball hoops.

Hotham Estate Extension (Hotham Estate Stage 2)

The Hotham Estate Extension (Hotham Estate Stage 2) comprises three public housing towers set in landscaped grounds as well as carparks, a community garden and two playgrounds. The towers were constructed between 1967 and 1969 using the precast concrete components, including walls and floors, manufactured by the Commission's Concrete House Project (**CHP**). The large panel system (**LPS**) construction method utilised load-bearing walls, and floor plans that are replicated across each level. Each tower within the estate extension retains a uniformity of appearance, though each is configured in a distinctive shape:

- 12 Sutton Street, Z-type, 20-storey, 1967 (extant)
- 33 Alfred Street, Y-type, 12-storey, 1968 (extant)
- 159 Melrose Street, T-type, 12-storey, 1969 (extant).

Each tower was built on raised stilts, or pilotis, allowing for views to the garden setting. Although the pilotis are still visible on all towers, some undercroft areas have been infilled to create or enlarge indoor spaces. All towers have a central services core with laundries, lifts and garbage chutes and were designed with balcony access to each flat. Balconies have all long-since been infilled with glazing and metal grates to allow airflow.

High-rise tower, 12 Sutton Street

This 20-storey high-rise tower, completed in 1967, is situated in the south-east corner of the Hotham Estate Extension. Its two rectangular wings are parallel, but offset, with the northern end of one joined to the southern end of the other by the central core of the building. The ground floor was refurbished in the 1980s. The durable, low-maintenance tiled finishes in the public spaces of the building are typical of Commission towers, with decorative patterned tiles incorporated into the lobby.

The living room walls project out from the main face of the building, with slightly longer panels providing extra living space, and creating a repetitive pattern of projecting living rooms and recessed bedrooms on the outward facing elevations. On the other side of the rectangular wing, entry to each flat is gained from the access balconies, now infilled with metal-framing and glazing so that they appear more like corridors than balconies.

High-rise tower, 33 Alfred Street

Completed in 1968, 33 Alfred Street is a 12-storey high-rise tower in a 'Y' plan, the external walls are finished in a brown aggregate which does not require painting. Like all the Commission towers, the tower is characterised by its durable and low-maintenance finishes. The central lift and services core connects three uniform radiating wings and the flats are accessed from what was an external balcony. The balconies have been infilled with metal framing and glazing. Access stairs are located at the end of each wing.

The undercroft of the tower has been mostly filled in, with office space and community rooms occupying the ground floor spaces. The top two floors have been renovated, with pairs of three-bedroom units having an internal doorway added at the end of the corridor of one into the living space of the other, creating large six-bedroom apartments.

High-rise tower, 159 Melrose Street

The last tower completed on the estate (1969) was built for elderly people comprising bedsit apartments. It is located in the north-east corner of the Hotham Estate Extension. It has a bright lobby that looks out on to a pleasant, well-maintained garden courtyard. A community room is provided on the ground floor. It does not have the distinctive pattern of projecting living rooms from recessed bedrooms like the other two towers on the Hotham Estate Extension.

Description images

All photographs taken by Heritage Victoria.



76 Canning Street with Melrose Street shops in the foreground and 9 Pampas Street visible behind them (18 November 2025).



View of Hotham Estate from Mark Street, facing south; St Alban's Anglican Church to left; 9 Pampas Street in the middle distance with 76 Canning Street tower behind (18 November 2025).



North Melbourne Community Centre, Buncle Street (18 November 2025).



South-west corner of Mark and Buncle streets in area of Hotham Estate redeveloped in the mid-1990s (18 November 2025).



Renovated cream-brick entrance to 76 Canning Street facing on to the estate (18 November 2025).



76 Canning Street entrance on left; 9 Pampas Street on right, facing west towards Buncle Street (18 November 2025).



Hotham Estate (Stage 2) facing south. 159 Melrose Street (T-type) at left; 12 Sutton Street (Z-type) in middle distance; and 33 Alfred Street (Y-type) at right (28 October 2025).



12 Sutton Street, Z-type 20-storey high-rise. Living rooms with three windows project from the façade. The infilled balconies of the rear wing can be seen on the left (28 October 2025).



159 Melrose Street, T-type 12-storey high-rise (28 October 2025).



33 Alfred Street, Y-type tower (25 June 2025).



Playground at left and entry to office space on the ground floor of 33 Alfred Street, with 159 Melrose Street in distance (25 June 2025).



Ground floor entry, 33 Alfred Street (25 June 2025).



Corridor B, Level 12, 33 Alfred Street. Original balcony access to flats infilled with metal and glazing to form corridor (25 June 2025).



Painted pilonis and view through to garden landscape, 12 Sutton Street (28 October 2025).



Typical living room, 12 Sutton Street. View across to Debneys Estate, Flemington (28 October 2025).



Typical kitchen, 12 Sutton Street, viewed from the living room (28 October 2025).



Entrance foyer of 12 Sutton Street, looking through to lift lobby (28 October 2025).



Looking onto the T-type tower from the 19th floor of 12 Sutton Street. Note the infill of glazing and yellow metal grills that now enclose the originally open balconies (28 October 2025).



Entrance to 159 Melrose Street (28 October 2025).



Ground floor foyer, 159 Melrose Street (28 October 2025).



View on to landscaped garden and courtyard seating area from the foyer at 159 Melrose Street (28 October 2025).

History

The Housing Commission

In the late 1930s sustained community campaigning for improved living conditions for impoverished children and families, combined with the pressures of an acute housing shortage, resulted in government intervention and the establishment of the Housing Commission of Victoria.

The *Slum Reclamation and Housing Act 1938* defined five main principles governing the operations of the Commission, including the 'reclamation of insanitary areas' and 'the provision of houses for persons of limited means' which were the two primary priorities of the Commission's work over the decades that followed.¹

The Commission relied on both Commonwealth and State funding, combined with revenue from rental income, and proceeds from the sale of some of the property and land it developed. The breadth of the Commission's work over almost five decades was vast. From 1938 it built villa estates in places like Broadmeadows, Sandringham, Coburg, Geelong and as far afield as Churchill and Colac (Figure 3).

To service the residents in these estates, the Commission developed amenities and infrastructure including roads, schools and shopping strips. The Commission experimented with designs and materials for affordable housing using timber, brick, and even limestone and metal. Construction using pre-cast concrete components became a signature of the Commission's work as it was affordable, modern, and with it more dwellings could be built more quickly.

The Commission purchased a former munitions factory at Holmesglen in 1945 and it became the subsidiary Concrete House Project (**CHP**, Figure 4). It developed the Commission's capabilities in utilising pre-cast concrete panels for ever more complex builds. From the prototype concrete house in 1939,² to multi-storey flats in the 1950s, the work of the CHP ultimately led to the creation of a large panel system (**LPS**) that was used for the construction of the high-rise flats.

High-rise program (1962-75)

By its own admission, 'during the late Fifties and Sixties, the Commission, in the general public's and the media's mind, became synonymous with high-rise flats'.³ The high-rise flats program was implemented over a short, but impactful, thirteen year period. Between 1962 and 1975, the Commission built 45 high-rise flats across 21 estates (as of December 2025, 20 estates are extant and one is currently being demolished - refer Figure 5 and Appendix 1). The high-rise estate program is one of the most significant legacies of the Commission's almost fifty-year existence, as it transformed the inner suburbs during the 1960s, changed the skyline and forced Melbournians to grapple with the idea of apartment living.

In 1958 the Commission proposed the development of high-rises situated alongside walk-ups within estate settings. By the early 1960s, 'high-rise estates' became the preferred development type for inner Melbourne, making 'better use of costly land, available essential services and proximity to transport and employment'.⁴

The first of the high-rise estates was the Emerald Hill Court Estate, South Melbourne (1960-62). This 16-storey tower was built to a British design, of slip-form reinforced concrete surrounded by four-storey walk-up flats set within a landscaped park (the walk ups have been demolished).

In February 1963, the Commission called for tenders for construction of two 20-storey towers at 12 Holland Court, Flemington and Reeves Street, Carlton.⁵ They became the first towers to be built using the LPS of the CHP. The public housing towers gain their uniformity of appearance thanks to this construction methodology. Restrictions imposed by the factory production, and the logistics of transportation and installation, determined the maximum panel size and design. Very similar sets 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, built with slight variations 24 times at sites across Melbourne.

¹ Housing Commission *First Annual Report 1938-39*. The other three governing principles were: improvement of existing housing conditions, determination of minimum standards with which new houses must comply, and zoning.

² The first prototype concrete houses were a forerunner to the Concrete House Project, using a system patented by a Mr Fowler of Werribee. The prototypes are represented in the VHR by 'Experimental Concrete Houses' VHR H1813.

³ Housing Commission, *Housing is People: The Policy and Operations of the Housing Commission, Victoria*, May 1972.

⁴ Renate Howe (ed), *New houses for old. Fifty years of public housing in Victoria 1938-1988*, 1988, p.144, quoted in Context, p. 37. Also see Housing Commission of Victoria, *Annual Report, 1964-65* p..

⁵ Housing Commission of Victoria, *Annual Report 1962-63*, p.9; Public notice, *The Age*, 23 February 1963, p.44.

A shift in policy to allow young children to live in high-rise towers with their families was evident in the 1963-64 annual report, as the Commission stated that subsequent developments in reclamation areas would only include 12 and 20 storey elevator blocks – not walk-ups.⁶ It had become clear that families struggled to ‘walk up’ four-storeys with babies, toddlers, prams and arms full of shopping. The Commission could not justify the cost of four-storey flats with elevators and decided to exclusively build ‘elevator towers’ in slum reclamation areas which would also meet higher density requirements, partly relying on the feedback from walk-up tenants to justify the case.⁷

Park Towers in South Melbourne (1969, extant) has come to be seen as the pinnacle of the public housing high-rise program. A single tower with a large garden setting and landscaped forecourt, it encapsulated the planning ideals of the higher density housing being serviced by attractive parkland and amenities, on slum reclamation land. It was heavily promoted by the Commission at the time for its ambitious 30-storeys, attention to architectural detail and for its promise of a modern future (Figure 6). Architect Robin Boyd and Director of the National Gallery of Victoria, Eric Westbrook, were on the panel which awarded Park Towers a City of South Melbourne outstanding architecture award that year.⁸

Public sentiment towards high-rise towers and slum reclamation activities had already begun to shift. Protests were staged in Carlton and Fitzroy and criticism of the program increased, around its dislocation of communities moved out of areas declared slums, and a questioning of high-rise living for disadvantaged people. In 1972 the Commission declared that it was progressing ‘from the multi-storey flats of yesteryear to the town and terrace house estates of today and tomorrow’.⁹ In 1973 slum clearance ceased and the high-rise program was abandoned, and no new approvals were granted after that date. The towers at King Street, Prahran and 139 Highett Street, North Richmond, were among the last to be completed under the program in 1975.

Subsequently the focus of the Ministry of Housing, the Commission’s successor, turned to other approaches such as building infill housing, 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. The 1983-84 Annual Report details the final six months of the Commission’s operations and includes an introduction by the Director of Housing. The Director wrote optimistically about the future of the Ministry of Housing but lamented ‘we still have the problem of the high-rise’ demonstrating that the program was by that stage widely understood to have significant shortcomings.¹⁰

In 1990, prior to major work at the Kensington Estate when all 45 towers were still extant, the Ministry of Housing reported that there were a total of 7,834 flats across all the towers, which accounted for 13% of the total public housing rental stock.¹¹

The Hotham Estate

The Hotham Estate was one of the 21 estates built by the Commission during its high-rise era. Like many of the Commission’s estates it developed in stages (Figure 7). The block bounded by Canning Street to the south, Boundary Road to the west, Mark Street to the north and Melrose Street to the east was declared a slum reclamation area on 22 September 1958. The Commission experimented with multiple plans for the site.¹² The final estate comprised one high-rise tower of 160 two-bedroom flats, 184 three-bedroom flats across 23 blocks of 8-unit four-storey walk ups, and two three-storey buildings of 15 flats each for lone persons and elderly couples.¹³ All of this plan was realised between 1962 and 1964.

⁶ Annual report, 1963/64 p.3.

⁷ The draft of the ‘High Living’ study on the Commission’s file notes this problem being ‘quite basic to families with young children’ (refer PROV, VPRS 1808 ‘General Correspondence Subject Files [Chief Architects Branch], Item N12, North Melbourne Boundary Road). The High Living study interviewed tenants of 76 Canning Street and the Hotham Estate walk-ups and addressed noise levels and amenities and found (in keeping with many assumptions prevalent in the wider community) that the estate environment, including the flat and the wider estate, did not provide ‘for the easy functioning of family life’. Peter Mills discusses the study and its findings in his thesis (*Refabricating the Towers*, pp.299–305) noting how the Commission used the findings selectively to justify high-rise over walk-ups, though the framing is within the false dichotomy and does not entertain other possible solutions. See also Tibbets, G. in Howe, 1988, p.145.

⁸ ‘High flats are tops’ *The Age*, 12 December 1969, p. 2

⁹ Housing Commission, *Housing is People*, 1972, p. 5

¹⁰ Ministry of Housing, Report of the Ministry of Housing for the Year ending 30 June 1984’, p. 7

¹¹ Ministry of Housing and Construction, *The High Rise at a Glance: A summary paper profiling the Ministry of Housing and Construction High Rise Accommodation*, 1990, p.18.

¹² VPRS 1808 ‘General Correspondence Subject Files [Chief Architects Branch], Item N12, North Melbourne Boundary Road. For discussion of the development of early schemes see Mills, P. ‘*Refabricating the Towers: The genesis of the Victorian Housing Commission’s high-rise estates to 1969*’, PhD Thesis, Monash University, 2010, pp. 208-211.

¹³ Housing Commission, *Official opening of the Hotham Estate*, brochure 1963.

The high-rise tower at 76 Canning Street was the second high-rise tower constructed by the Commission. It pre-dated the Commission's adoption of the LPS for high-rise buildings and was constructed with a steel frame encased in concrete, concrete block walls, and concrete floors poured in situ. It opened in July 1963 (Figure 9).

The estate also contained eleven brick shops with flats above that fronted Melrose Street (Figure 10). They were completed in the 1963-64 financial year, seven of which were sold off, three were leased out and one was retained as a Commission Rent Office.¹⁴

The 1963-64 Annual Report of the Commission noted that as well as completing the tower at 76 Canning Street, it had also produced its first sketch plan for the Estate Extension (Hotham Estate Stage 2). Foundations for the first of the three towers, the 20-storey Z-type, were laid during the 1965-66 financial year (Figure 11). Located at 12 Sutton Street, it opened in November 1967. The second tower developed on site was 33 Alfred Street, which had its Y-plan approved at a meeting of the Commission on the 16 May 1966.¹⁵ The tower was completed in May 1968 (Figure 12). The 12-storey lone person T-type tower was completed in 1969 (Figure 13).

The Hotham Estate Extension, with no walk-ups and multiple high-rise tower types, was similar to the design of the High Street Estate, Carlton which had been completed in 1967, two years earlier. The High Street Estate and the Hotham Estate Extension were made up of three different tower types configured differently to serve people at different stages of life, families, the elderly, couples and singles.¹⁶ This contrasts with the Debney Estate Extension in Flemington, which repeated the three Z-type towers, all completed by 1969 (Figure 14). The Hotham Estate layout was not repeated. The subsequent multi-tower estates favoured the approach taken at Flemington, with Atherton Gardens and Richmond estates both composed of only Z-type towers.

In the early 1990s the then Housing Division of the Department of Planning and Development undertook a major redevelopment of the Stage 1 area of the Hotham Estate. Only the Melrose Street shops and the Canning Street tower from the Commission's original estate layout survive; all 25 walk ups were demolished and the open grassed forecourt was altered.

Housing Commission and Hotham Estate Timeline

- **Oct 1937** The report "*First Report of the Housing Investigation and Slum Abolition Board*" documented slum conditions and articulated the case for a central housing authority.
- **1938** The Housing Commission of Victoria established.
- **1939** Prototype concrete house constructed at Fishermans Bend using TW Fowler's precast concrete panels.
- **Nov 1940** First reclamation area declared by the Commission being 4.7 acres at Molesworth Street, North Melbourne.
- **1945** Purchase of a former munitions factory at Holmesglen for the production of precast concrete panels which became the Concrete House Project.
- **1956** Escalation of slum reclamation work by the Commission.
- **Sep 1958** ***Boundary Road slum reclamation area proclaimed, including all the land between Canning, Melrose and Mark streets and Boundary Road, North Melbourne.***

¹⁴ Housing Commission, Annual Report, 1963/64 p.14. In 1958-59 the Commission reported that it had sold 85 shop sites during the year and declared 'this policy of selling sites in suitable locations on its estates in recent years has resulted in the development of well-planned "daily needs" shopping centres which are proving of considerable convenience to tenants.'

¹⁵ PROV, VPRS 1808 'General Correspondence Subject Files [Chief Architects Branch], Item N12, North Melbourne Boundary Road.

¹⁶ Mills, *Refabricating the Towers*, p.87. Mills terms these 'ensemble estates', which is a useful descriptor.

- **1959 - 1961** The Commission partner with Master Builders Association who built 'O-Y-O flats' (own-your-own) at Hotham Gardens on O'Shanassy Street, North Melbourne (HO1387). It was the first time this alternative development model was pursued by the Commission, where private enterprise built flats on cleared slum reclamation land to sell to private owners.
- **Apr 1962** The Commission's first 'elevator flats' at Emerald Hill Court, South Melbourne were opened by the Premier in April 1962. This was not an LPS building, as this technology was still being tested (see below). This was a 16-storey slip-form concrete structure, with internal corridor access to flats and private balconies, and building commenced in July 1960.
- **1961/1962** The Commission appoints a consultant landscape architect to help design estate layouts with the needs of families and children in mind.
- **Dec 1962** ***'Boundary Road No. 2' slum reclamation area proclaimed.***
- **1963** Prototype eight-storey walk-ups completed at Kensington (now demolished), demonstrating the adaptability of the LPS to high-rise buildings.
- **Jul 1963** ***Official opening of 76 Canning Street high-rise at the Hotham Estate by the Governor of Victoria.***
- **1963/1964** ***Melrose Street Shops completed. One retained as a Commission Rent Collection Office.***
- **Jun 1965** First LPS tower using CHP components opened at Debney's Estate, Flemington.
- **Jun 1969** ***159 Melrose Street high-rise opened, completing the Hotham Estate Stage 2.***
- **Oct 1969** The Commission's 30-storey Park Towers opened by the Minister of Housing, E.R Meagher after a well-attended public open day.
- **1975** The last high-rises of the program are opened (149 Highett Street Richmond and King Street Prahran).
- **Jan 1984** The *Housing Act 1983* dissolved the Housing Commission of Victoria and the Ministry of Housing took over all former Commission roles and responsibilities from 1 January 1984.
- **1986** ***The foyer of 12 Sutton Street was refurbished by architecture firm Ashton Raggatt McDougall (ARM). This project won a merit award in 1987 from the Australian Institute of Architects (Victorian Chapter).***
- **1992 - 1995** ***Hotham Estate Stage 1 redeveloped. The walk-ups were demolished, roads created, and terraces and apartments constructed. 9 Pampas Street opened in May 1995 consisting of 68 older person units.***

Historical images

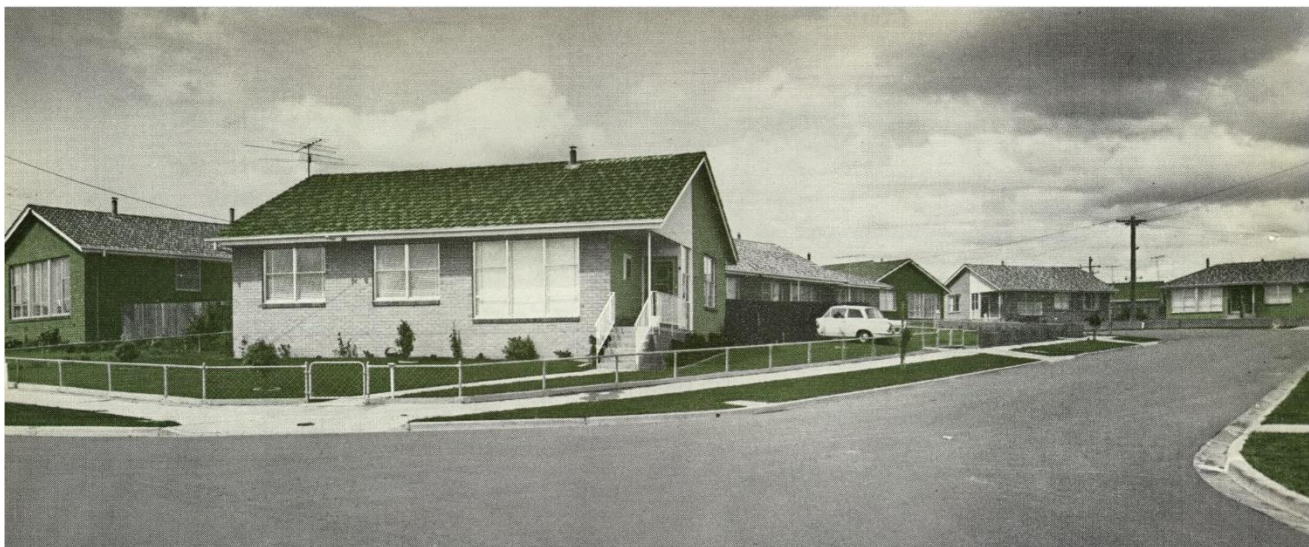


Figure 3: Churchill, one of the larger Commission country estates (Housing Commission Annual Report 1967-68).

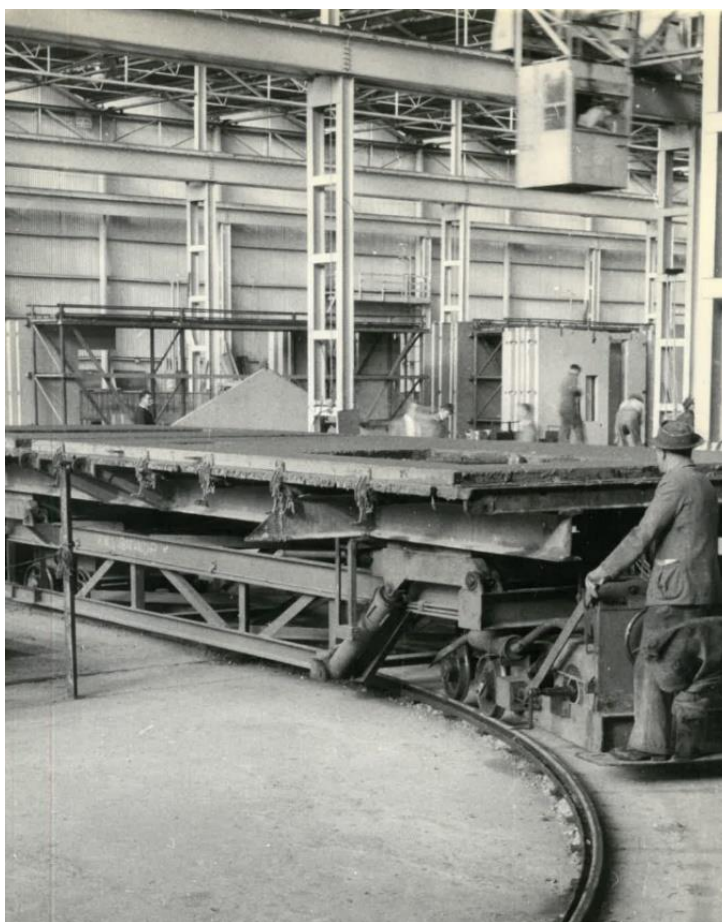
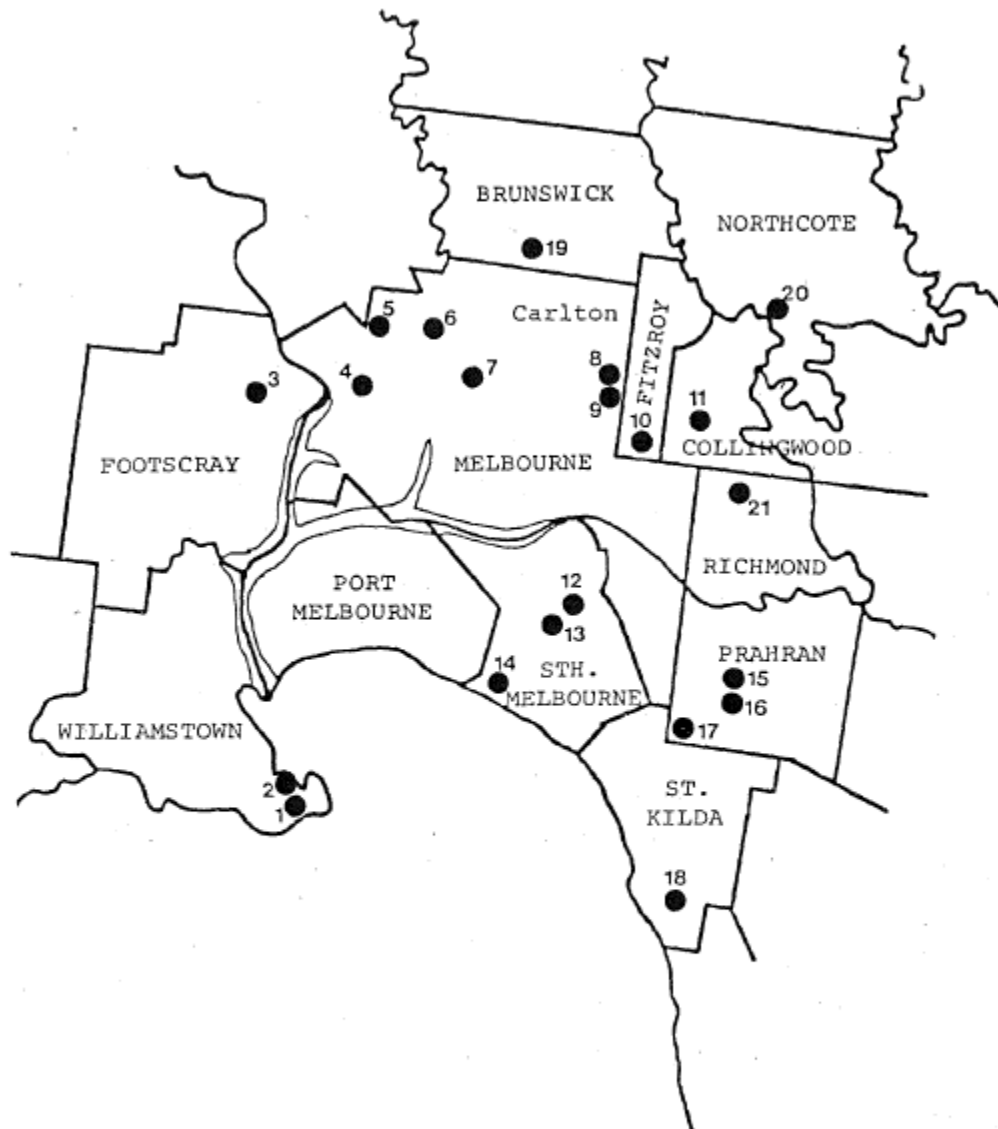


Figure 4: A concrete wall panel at the Holmesglen factory (Stanford, N.W Concrete House Production, 1966).

Map: Location of Melbourne High Rise Estates



Key to Map 1:

- | | |
|--|--------------------------------------|
| 1. Floyd Lodge, Williamstown | 12. Emerald Hill, South Melbourne |
| 2. Nelson Heights, Williamstown | 13. Park Towers, South Melbourne |
| 3. Gaskin Gardens, Footscray | 14. Layfield Court, South Melbourne |
| 4. Kensington Estate, Kensington | 15. Horace Petty, South Yarra |
| 5. Crown Street Estate, Flemington | 16. King Street Estate, Prahran |
| 6. Debney Park, Flemington | 17. Loxton Lodge, Windsor |
| 7. North Melbourne/Hotham Hill Estate, North Melbourne | 18. Inkerman Heights, East St. Kilda |
| 8. Reeves Street/Lygon Street Estate, Carlton | 19. Barkly Street Estate, Brunswick |
| 9. Elgin & Nicholson Street Estate, Carlton | 20. Frank Wilkes Court, Northcote |
| 10. Atherton Gardens, Fitzroy | 21. Langdon Park, Richmond |
| 11. Collingwood Estate, Collingwood | |

Figure 5: Locations of all Commission high-rise housing estates (Ministry of Housing, 1990).



Figure 6: An artist's sketch of Park Towers published under the headline "Australia's Highest Pre-Fabrication Building Taking Shape at South Melbourne" (Housing Commission News, March 1968).

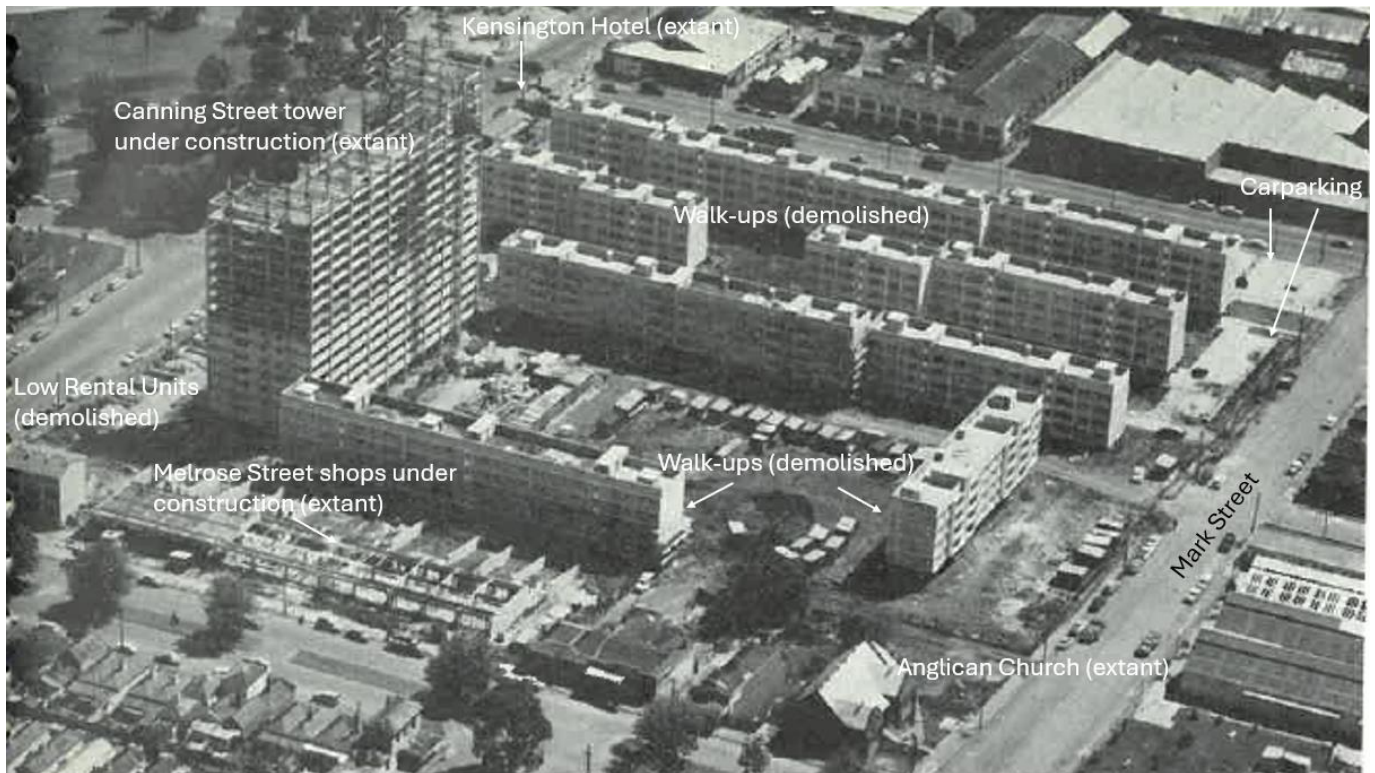


Figure 7: Aerial photograph of the Hotham Estate Stage 1 under construction c.1962-63 (Housing Commission, First 25 Years).

Hotham Estate Stage 1

Demolished walk ups indicated with \ (each line indicates a separate street address)

- 1. 20 STOREY BLOCK
- 2. 4 STOREY BLOCK
- 3. SHOPS WITH FLATS OVER
- 4. LOW RENTAL UNITS
- 5. EXISTING CHURCH
- 6. EXISTING HOTEL
- 7. PLAYGROUND EQUIPMENT
- 8. CAR PARKING

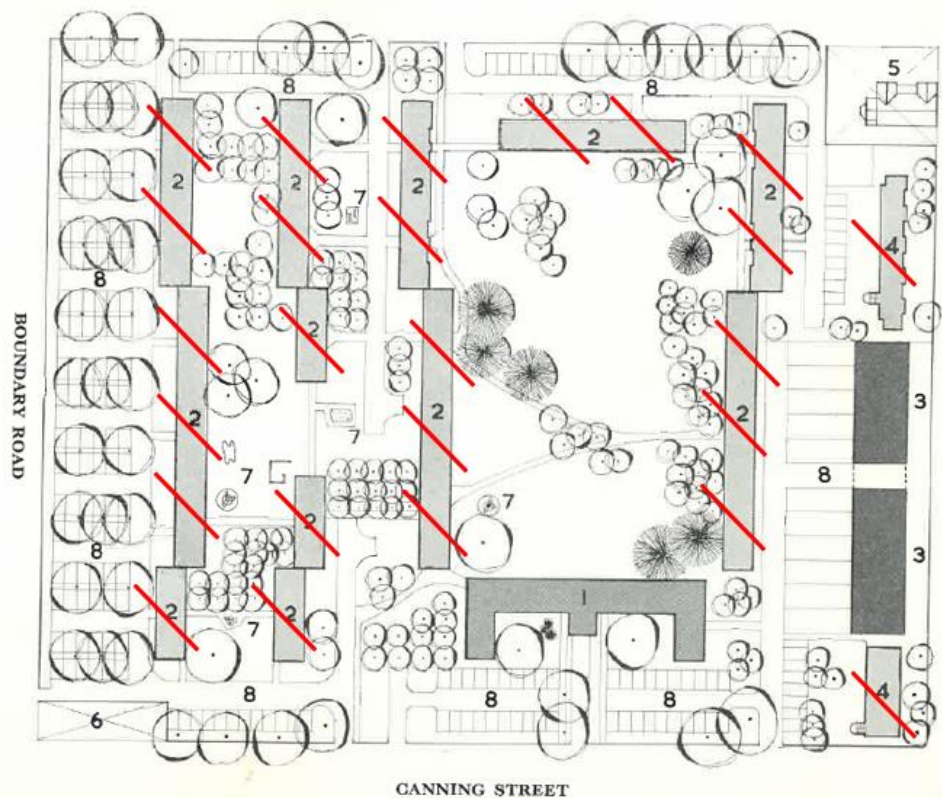


Figure 8: Hotham Estate plan with mark ups showing extent of demolition (Housing Commission First 25 Years, 1963 p.17).



Figure 9: 'Official Opening of the Hotham Estate Twenty Storey Flats' pamphlet celebrating the high-rise, featuring photos of kids playing within the grounds of the estate and a sample floor plan (Housing Commission, 1963).



Figure 10: 'Housing Commission Shops – North Melbourne (Melrose St)' (VPRS 14517/P0001/47, Image S978). Directly behind the shops are four storey walk-ups (not on stilts) with laundries on the roof. The high-rise at 76 Canning Street is in the distance.



Figure 11: 12 Sutton Street under construction, 76 Canning Street in the distance (Housing Commission Annual Report 1965-66 p.9).



Figure 12: The Hotham Estate Stage 1 complete, with Hotham Estate extension in progress and the foundations of the T-type at 159 Melrose Street evident (Housing Commission, Annual Report 1967-68 p.9).



Figure 13: The Hotham Estate Extension, showing the three towers including 12 storey 'Y' and 'T-type' towers and a 20 storey Z-type (Housing Commission Annual Report 1968-69 p.19).



Figure 14: Hotham Estate on left, Debney Estate Flemington with repeating Z-type high-rise flats on right. Note the commanding presence of the towers on the surrounding low-rise environment (Housing Commission Annual Report 1969/70 p.12).

Further information

Registered Aboriginal Party information

The Hotham Estate is located on Wurundjeri Country.

Under the *Aboriginal Heritage Act 2006*, the Registered Aboriginal Party for this land is the Wurundjeri Woi Wurrung Cultural Heritage Aboriginal Corporation.

Victorian Aboriginal Heritage Register

The place is not included in the Victorian Aboriginal Heritage Register and is not in an area of Aboriginal cultural heritage sensitivity.

(27 October 2025)

Integrity

The integrity of the place is fair. Some of the key components of the estate - including the high-rise towers, the Melrose Street shops and the Melbourne City Council recreational area - have good integrity as only relatively minor modifications have taken place. South of Mark Street the integrity of the estate is poor. The walk-ups were demolished and the estate redeveloped in the 1990s, with the internal street layout updated and landscaped areas altered and removed so that the original design intent is difficult to discern. The redeveloped terraces and apartments which replaced the walk-ups have a post-modern aesthetic and as a result the ability to read the cultural heritage values of the place is diminished.

(18 November 2025)

Intactness

The overall intactness of the place is fair. The intactness of the stage one of the estate is poor, but the intactness of the Hotham Estate Extension is good.

Modifications undertaken at the four high-rises across the estate include: infill of the balconies with metal framing and glazing; refurbishment of apartments throughout; updating of the lobbies and common areas; and some infill in parts of the ground-floor undercroft at each of the towers.

Stage 1

South of Mark Street, the original landscape design has been greatly altered and the original walk-ups demolished. They were replaced with mostly two-storey terraced townhouses and one six-storey mid-rise block of elderly person units. The internal street layout was also altered. The change in this area occurred in the 1990s. The loss of the large lawned forecourt to the north of 76 Canning Street, and the reduction of play equipment and play areas has altered the place from the original Commission design of the 1960s.

Stage 2

The playground equipment at the Hotham Estate Extension has been updated and the community garden has evolved, in keeping with the ongoing use of the place as a public housing estate. The concrete pilotis at 12 Sutton Street have been brightly painted, but the undercroft remains open, allowing for the view through to the landscaped areas to be seen as originally planned.

(18 November 2025)

Condition

The condition of the place appears visually to be good. The condition of the high-rise towers is consistent with buildings of a similar age, use and construction.

(18 November 2025)

Note: The condition of a place or object does not influence the assessment of its cultural heritage significance. A place or object may be in very poor condition and still be of very high cultural heritage significance. Alternatively, a place or object may be in excellent condition but be of low cultural heritage significance.

Other information

Heritage Overlay

There are four individual Heritage Overlays within the place extent. They are:

- Former Kensington Hotel (HO1108)
- St Georges Church Hall (Anglican) and Kindergarten, later St Albans Church of England (HO1115)
- Melbourne Electric Supply, later Citywide substation (HO1114)
- Scrubb & Co Ammonia works, later Hotham or North Melbourne Community Centre (HO1109).

Other relevant planning scheme overlays

The place is subject to the following overlays:

- Design and Development Overlay DDO63: Macaulay Urban Renewal Area, Kensington and North Melbourne
- Design and Development Overlay DDO66: Hospital Emergency Medical Services Helicopter Flight Path Protection (Outer Area)
- Special Building Overlay SBO3: Council Drains - Elizabeth Street, Arden, Macaulay and Moonee Ponds Creek, Hobsons Road, Fishermans Bend and Southbank Catchments
- Development Contributions Plan Overlay DCPO2: Macaulay Urban Renewal Area Development Contributions Plan.

There are no other planning scheme overlays for the place.

Other Listings

There are no other listings for the place.

Other Names

The Hotham Estate was also referred to as the 'Boundary Road Estate'. Some current maps label it the 'Melrose Street Public Housing Estate'. It is now part of the 'North Melbourne Housing Site' managed by Homes Victoria. In the 1980s-90s the stage one area was referred to as 'Hotham Hill Estate' and the estate in its entirety was called the North Melbourne/Hotham Hill Estate.

Date of construction/creation

c.1963-6

Architect

Housing Commission of Victoria (Chief Architect Roy Prentice).

Builder

Maiella Constructions (76 Canning Street) and Concrete House Project (33 Alfred Street, 12 Sutton Street and 159 Melrose Street)

Architectural style

Late 20th century (1960-c2000) – Modernist

Statutory requirements under section 40

Terms of the recommendation (section 40(3)(a))

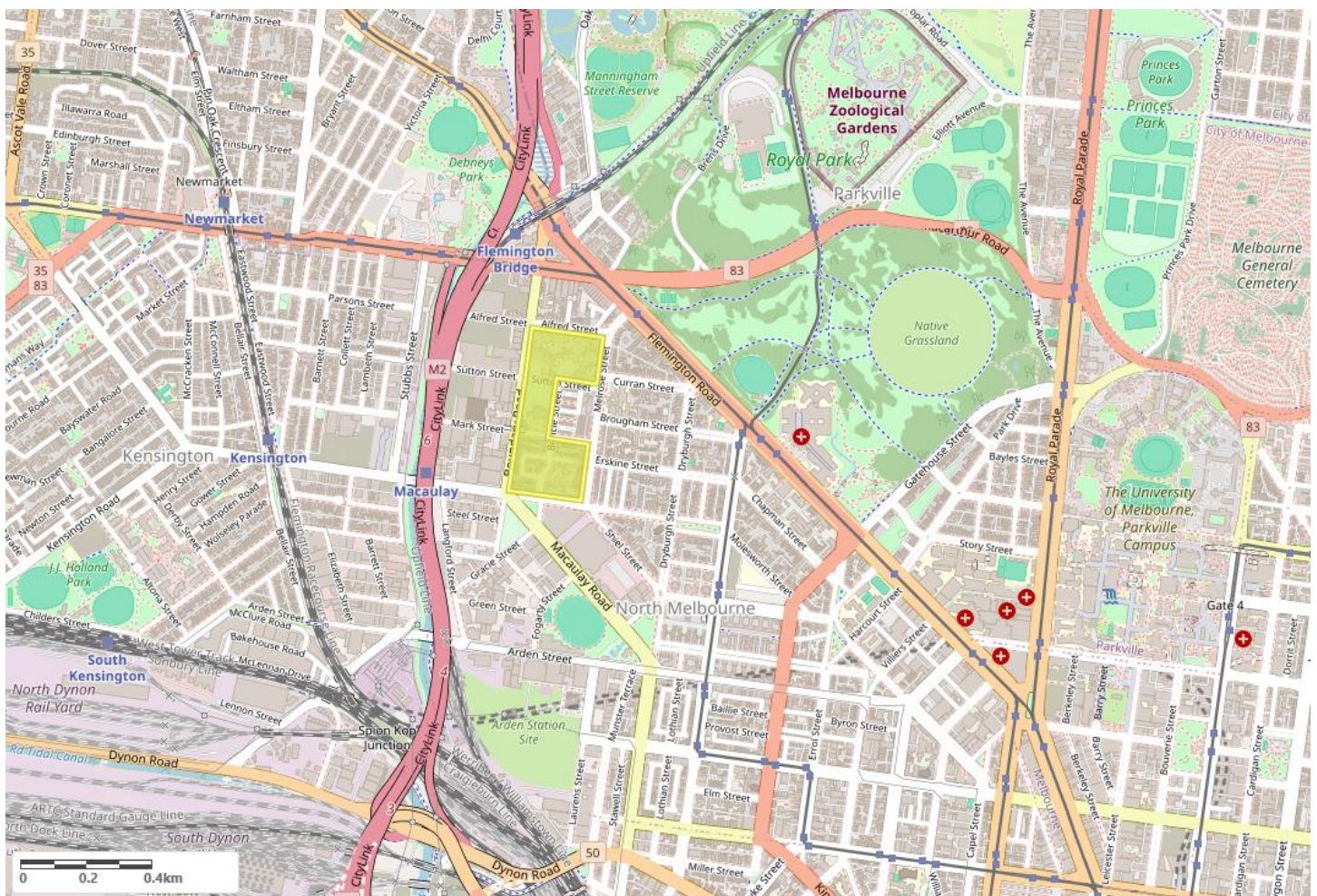
The Executive Director recommends that the Hotham Estate is not included in the VHR.

Information to identify the place or object or land (section 40(3)(b))

Name: Hotham Estate

Location: Canning, Alfred, Melrose, Sutton, Buncle and Mark streets, and Boundary Road, North Melbourne

Location diagram



Location of Hotham Estate, North Melbourne, highlighted in yellow

Reasons for the recommendation, including an assessment of the State-level cultural heritage significance of the place (section 40(3)(c))

Following is the Executive Director's assessment of the Hotham Estate against the tests set out in [The Victorian Heritage Register Criteria and Thresholds Guidelines \(2022\)](#). A place or object must be found by the Heritage Council to meet Step 2 of at least one criterion to meet the State level threshold for inclusion in the VHR.

CRITERION A: Importance to the course, or pattern, of Victoria's cultural history.

Step 1 Test for Criterion A

No.	Test	Yes/No	Reason
A1)	Does the place/object have a clear association with an event, phase, period, process, function, movement, custom or way of life in Victoria's cultural history?	Yes	<p>The place has a clear association with:</p> <ul style="list-style-type: none"> a) The history of housing as a responsibility of the State through the Housing Commission of Victoria since its establishment in 1938. b) The Commission's activities to declare and demolish slums, and reclaim land on which to build public housing, which escalated from 1956. c) The Commission's high-rise housing program which developed and implemented high-density solutions to the housing shortage and resulted in the construction of 45 high-rise towers across 21 estates between 1962 and 1975.
A2)	Is the event, phase, period, process, function, movement, custom or way of life of historical importance, having made a strong or influential contribution to Victoria?	Yes	<p>The Commission's activities during the high-rise housing program are of historical importance having made a strong and influential contribution to Victoria. The program:</p> <ul style="list-style-type: none"> a) Housed thousands of Victorians in the second half of the twentieth century. b) Had a profound impact on the lives of Victorians who otherwise would have struggled to afford housing. c) Dramatically altered the built environment and skyline of inner Melbourne. d) Proliferated the idea of apartment-based living, a new mode of dwelling at the time for Victorians.
A3)	Is there evidence of the association to the event, phase, period, process, function, movement, custom or way of life in Victoria's cultural history?	Yes	Evidence of the Commission's high-rise housing program is present in the fabric of the towers and in documentary sources.

If A1, A2 and A3 are all satisfied, then Criterion A is likely to be relevant (but not necessarily at the State level)

Executive Director's Response:	Yes	Criterion A is likely to be relevant.
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Step 2 State-level test for Criterion A

No.	Test	Yes/No	Reason
SA1)	Does the place/object allow the clear association with the event, phase, period, process, function, movement, custom or way of life of historical importance to be understood better than most other places or objects in Victoria with substantially the same association?	No	<p>The place does not allow the association with the following historical themes to be better understood than most other places and objects with substantially the same association:</p> <p>a) The history of housing as a responsibility of the State through the Commission since its establishment in 1938.</p> <p>This history is well demonstrated by a large number of places built, acquired and/or managed by the Commission since 1938 to the present day.</p> <p>b) The Commission's activities to declare and demolish slums, and reclaim land on which to build public housing, which escalated from 1956.</p> <p>The history of slum declaration and demolition is expressed at multiple Commission sites from the 1950s onwards, including across the many high-rise housing estates.</p> <p>c) The Commission's high-rise housing program which developed and implemented high-density solutions to the housing shortage, resulting in the construction of 45 high-rise towers across 21 estates (20 extant) between 1962 and 1975.</p> <p>Each Commission high-rise housing estate has a history which reflects its time of construction within the thirteen-year high-rise program.</p> <p>Each high-rise housing estate has at least one point of difference, whether it be the configuration of towers, refinement of estate amenity, the landscaping, the type of carparking or the provision of community spaces. A theme running through the entire program is constant experimentation and refinement.</p> <p>The capacity of the Hotham Estate to demonstrate its historical values as a high-rise housing estate has been diminished by the demolition of all 25 early 1960s walk-ups in the 1990s, and the development of this land with a new internal street layout and the construction of postmodern residences and units.</p> <p>The development of the Hotham Estate in two stages straddles the policy shift away from 'mixed estates' (which included walk-ups) to 'tower-only' estates. This policy shift is also evident and better expressed at the other estates including Park Towers and Atherton Gardens.</p>

If SA1 is satisfied, then Criterion A is likely to be relevant at the State level

Executive Director's Response:	No	Criterion A is not likely to be relevant at the State level.
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CRITERION B: Possession of uncommon, rare or endangered aspects of Victoria's cultural history.

Step 1 Test for Criterion B

No.	Test	Yes/No	Reason
B1)	Does the place/object have a clear association with an event, phase, period, process, function, movement, custom or way of life of importance in Victoria's cultural history?	Yes	See A1 and A2 above.
B2)	Is there evidence of the association to the historical phases etc identified at B1)?	Yes	See A3 above.
B3)	Is there evidence that place/object is rare or uncommon, <u>or</u> has rare or uncommon features?	No	<p>B3(i) There is no evidence that the place is rare or uncommon.</p> <p>The Hotham Estate is one of 20 extant high-rise estate developments across 17 suburbs.</p> <p>B3(ii) There is no evidence that the place has rare or uncommon features.</p> <p>The estate includes cream brick shops with flats above them, which are a point of interest but are not unique. Extant shops built by the Housing Commission of Victoria include:</p> <ul style="list-style-type: none">• Labuan Square, Norlane (1954)• Haines Street, North Melbourne (with flats above) (1956)• Churchill Avenue, Maidstone (shopping strip) (1955-56)• Laverton (housing was provided for shopkeepers in adjacent townhouses) (1957-58)• Moresby Court, West Heidelberg (1956-57)• Doveton (1956-57)• Jacana ('daily needs' cream brick shopping centre without dwellings) (1958-59)• Bell Street Heidelberg West ('drive in' shopping centre) (1959).

If B1, B2 AND B3 are satisfied, then Criterion B is likely to be relevant (but not necessarily at the State level)

Executive Director's Response:	No	Criterion B is not likely to be relevant.
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CRITERION C: Potential to yield information that will contribute to an understanding of Victoria's cultural history.

Step 1 Test for Criterion C

No.	Test	Yes/No	Reason
C1)	Does physical fabric and/or documentary evidence and/or associated oral history or cultural narratives relating to the place/object indicate a likelihood that the place/object contains evidence of cultural heritage significance that is not currently visible and/or well understood or available from other sources?	No	<p>The:</p> <ol style="list-style-type: none"> 1) physical fabric and 2) documentary evidence and 3) associated oral history or cultural narratives <p>relating to the Hotham Estate do not indicate 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.</p>
C2)	And, from what we know of the place/object, is the physical evidence likely to be of an integrity and/or condition that it could yield information through detailed investigation?	No	<p>The integrity and condition of the place may be fair, but it is unlikely to yield information through investigation that is not currently visible and/or well understood or available from other sources (see C1).</p> <p>The Hotham Estate was in a slum reclamation area, but the construction of the towers and the development of the walk ups, and the subsequent redevelopment of that area, is likely to have disturbed most remaining physical evidence of the dwellings that existed prior to the high-rises. Archaeological physical evidence is likely to have been so disturbed by subsequent activity that any research potential is compromised.</p> <p>Any archaeological material that may be present is likely to be of a similar nature and no more significant than archaeological material present in other slum reclamation areas or estates. The archaeological heritage provisions in Part 6 of the <i>Heritage Act 2017</i> may be appropriate for managing any archaeological material identified at the place.</p>

If **both** C1 AND C2 are satisfied, then Criterion C is likely to be relevant (but not necessarily at the State level)

Executive Director's Response:	No	Criterion C is not likely to be relevant.
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CRITERION D: Importance in demonstrating the principal characteristics of a class of cultural places and objects

Step 1 Test for Criterion D

No.	Test	Yes/No	Reason
D1)	Is the place/object one of a class of places/objects that has a clear association with an event, phase, period, process, function, movement, custom or way of life in Victoria's history?	Yes	<p>The place belongs to the class of:</p> <p>Housing Commission of Victoria High-Rise Housing Estates (a public housing estate which comprises at least one tower of 12-storeys or more in a landscaped setting).</p> <p>This class of place has a clear association with the history of the Commission and its program to build and provide high-density housing to address the twin problems of a housing supply shortage and unsanitary and cramped living conditions in the inner suburbs.</p>
D2)	Is the event, phase, period, process, function, movement, custom or way of life of historical importance, having made a strong or influential contribution to Victoria?	Yes	<p>The construction of estates consisting of high-rise towers in landscaped settings for public housing is a distinct historical phase which has made a strong and influential contribution to Victoria.</p> <p>The high-rise housing estate program emerged as a State response to housing needs in the post-war period and embodies a local solution to pressures that were similarly being felt interstate and internationally during this era.</p> <p>It contributed to Victorians becoming accustomed to higher density housing stock in the form of apartment towers, called 'high-rise flats' or sometimes 'elevator flats' demonstrating that the lifts servicing the residents represented a new technology enabling higher-density developments.</p>
D3)	Are the principal characteristics of the class evident in the physical fabric of the place/object?	Yes	<p>The principal characteristics of the class are evident in the physical fabric of the place.</p> <p>The principal characteristics of the class are:</p> <ul style="list-style-type: none"> • Built as public housing by the Commission between 1962 and 1975. • Planned estates incorporating at least one high-rise tower in a landscaped, garden setting. • Estates may include walk-ups in addition to towers. • The towers within the estates typically constructed using the LPS of the CHS. • High-rise towers have 12-storeys or more, utilising elevators for access and are often raised on stilts or 'pilotis'. • Estates include playgrounds, carparking and community facilities.

If D1, D2 AND D3 are satisfied, then Criterion D is likely to be relevant (but not necessarily at the State level)

Executive Director's Response:	Yes	Criterion D is likely to be relevant.
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Step 2 State-level test for Criterion D

No.	Test	Yes/No	Reason
SD1)	Is the place/object a notable (fine, influential or pivotal) example of the class in Victoria?	No	<p>The place is not a notable example of the class of Commission high-rise housing estates. To meet this test the place needs to be a fine, influential or pivotal example under Reference Tool D.</p> <p>Fine</p> <p>i) The Hotham Estate displays the principal characteristics that are typical of the class in a way that allows the class to be easily understood or appreciated.</p> <p>ii) It does not display characteristics that are of a higher quality or historical relevance more than other places of this class:</p> <ul style="list-style-type: none"> The principal characteristics of the Hotham Estate are shared by the vast majority of high-rise flats built by the Commission. There are no architectural or aesthetic features at the Hotham Estate that demonstrate a higher quality or historical relevance. The demolition of all the early 1960s walk-ups at the Hotham Estate means that its potential to demonstrate a higher historical relevance is greatly diminished. The Hotham Estate is not covered by a heritage overlay nor identified as notable in any study related to architectural or historical significance. <p>Influential</p> <p>iii) The Hotham Estate does not contain physical characteristics of design, technology or materials that were copied in subsequent places of the class (direct physical influence):</p> <ul style="list-style-type: none"> The Y-type was never used again. The configuration of multiple tower types on one estate was not subsequently used. The 76 Canning Street tower was never replicated. <p>iv) Every high-rise housing estate was created, altered and/or used in response to its physical characteristics. Due to the iterative nature of the high-rise housing estate program, all estates were successively refined and influential across the chronological sequence. In this respect, Hotham Estate is no different.</p>

Pivotal

The place **does not** encapsulate a key evolutionary stage in the development of the class.

- Due to the iterative nature of the high-rise estate program, each estate represents a refinement of the class.
- The Hotham Estate does not represent a pivotal innovation or substantial leap in design or construction.
- The Hotham Estate was composed of multiple tower typologies, but this is evident at other estates and does not mark a pivotal change in direction.

If SD1 is satisfied, then Criterion D is likely to be relevant at the State level

Executive Director's Response:	No	Criterion D is not likely to be relevant at the State level.
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CRITERION E: Importance in exhibiting particular aesthetic characteristics.

Step 1 Test for Criterion E

No.	Test	Yes/No	Reason
E1)	Does the physical fabric of the place/object clearly exhibit particular aesthetic characteristics?	Yes	<p>The physical fabric of the place clearly exhibits particular aesthetic characteristics associated with Housing Commission of Victoria high-rise housing estates.</p> <p>These particular aesthetic characteristics relate to:</p> <ul style="list-style-type: none">• Well-designed and constructed modernist high-rise towers.• Attractive landscaped setting immediately around towers.

If E1 is satisfied, then Criterion E is likely to be relevant (but not necessarily at the State level)

Executive Director's Response:	Yes	Criterion E is likely to be relevant.
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Step 2 State-level test for Criterion E

No.	Test	Yes/No	Reason
SE1)	<p>Are the aesthetic characteristics 'beyond the ordinary' or are outstanding as demonstrated by:</p> <ul style="list-style-type: none">• Evidence from within the relevant discipline (architecture, art, design or equivalent); and/or	No	<p>There is no evidence that the aesthetic characteristics at the place are 'beyond the ordinary' or are outstanding.</p> <ul style="list-style-type: none">• All the Commission's high-rise towers demonstrate a Modernist aesthetic.• The Hotham Estate has not received critical recognition or widespread public acknowledgement for its aesthetic qualities.

- Critical recognition of the aesthetic characteristics of the place/object within a relevant art, design, architectural or related discipline within Victoria; and/or
- Wide public acknowledgement of exceptional aesthetic qualities of the place/object in Victoria expressed in publications, print or digital media, painting, sculpture, songs, poetry, literature, or other media?
- The Hotham Estate's four high-rise towers have a distinctive Modernist architectural form, are readily identifiable as public housing towers and have landmark qualities.
- Under these guidelines, being a landmark does not equate to having aesthetic qualities.

If SE1 is satisfied, then Criterion E is likely to be relevant at the State level

Executive Director's Response:	No	Criterion E is not likely to be relevant at the State level.
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CRITERION F: Importance in demonstrating a high degree of creative or technical achievement at a particular period.

Step 1 Test for Criterion F

No.	Test	Yes/No	Reason
F1)	Does the place/object contain physical evidence that clearly demonstrates creative or technical achievement for the time in which it was created?	No	<p>The place does not contain physical evidence that clearly demonstrates creative or technical achievement for the time in which it was created.</p> <ul style="list-style-type: none"> • The tower at 76 Canning Street demonstrates existing conventional construction methods involving steel frame and concrete infill panels. • The three towers in the Stage 2 development were constructed using the LPS manufactured by the CHP. They do not represent any advancement in the existing technology of the large panel system method of construction used by the Housing Commission of Victoria.
F2)	Does the physical evidence demonstrate a high degree of integrity?	NA	The high-rise towers within the estate have a high degree of integrity, but do not demonstrate a creative or technical achievement for their time (see above).

If **both** F1 and F2 are satisfied, then Criterion F is likely to be relevant (but not necessarily at the State level)

Executive Director's Response:	No	Criterion F is not likely to be relevant.
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CRITERION G: Strong or special association with a particular present-day community or cultural group for social, cultural or spiritual reasons

Step 1 Test for Criterion G

No.	Test	Yes/No	Reason
G1)	Does the place/object demonstrate social value to a community or cultural group in the present day in the context of its cultural heritage significance? Evidence must be provided for all three facets of social value listed here:		
i)	Existence of a community or cultural group; <u>and</u>	Yes	<p>There is evidence that a community or cultural group exists.</p> <p>The place demonstrates social value to the many communities and cultural groups who have lived in the towers over many years, including the Somali, Eritrean, Ethiopian, Chinese, Vietnamese and other communities.</p> <p>The resident community is supported by the Melbourne Public Tenants Association (MPTA).</p>
ii)	Existence of a strong attachment of a community or cultural group to the place or object; <u>and</u>	Yes	<p>There is evidence of a strong attachment of the residents in the present day.</p> <p>Public protests held against the proposed demolition of 33 Alfred Street demonstrate a strong attachment of the resident community to the place.</p> <p>There is evidence of a strong attachment of the Somali community to the place through their establishment of a community language school at the place.</p>
iii)	Existence of a time depth to that attachment.	Yes	<p>There is evidence of the attachment of residents and former residents potentially dating to the 1960s.</p> <p>The cultural groups living in the towers reflect the different waves of immigration.</p> <p>In 1990, after English, the most spoken languages at home in the Hotham Estate were Chinese (11.4%), Vietnamese (7.9%) and Turkish (2.9%).</p> <p>In 2023-24, residents born in East Africa made up 33% of the population in the Hotham Estate Extension.</p>

If all facets of G1 are satisfied, then Criterion G is likely to be relevant (but not necessarily at the State level)

Executive Director's Response:	Yes	Criterion G is likely to be relevant.
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Step 2 State-level test for Criterion G

No.	Test	Yes/No	Reason
SG1)	Is there evidence that the social value resonates across the broader	Yes	SG1(i) The social value of the place is part of a story in Victoria that contributes to Victoria's identity, particularly in

Victorian community as part of a story that contributes to Victoria's identity?

relation to migration. The Hotham Estate has been home to many recently arrived immigrants, including those from the Horn of Africa and other places.

No

SG1(ii) There is no evidence that the social value of the place to the resident community resonates across the broader Victorian community.

It is likely that the social value of the place is experienced at a local level, or within Melbourne, but not across Victoria.

If **all facets** of SG1 are satisfied, then Criterion G is likely to be relevant at the State level

Executive Director's Response:

No

Criterion G is not likely to be relevant at the State level.

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

Step 1 Test for Criterion H

No.	Test	Yes/No	Reason
H1)	Does the place/object have a direct association with a person, or group of persons who has made a strong or influential contribution in their field of endeavour?	Yes	H1(i) There is a direct association between the place and the Housing Commission of Victoria. H1(ii) The Commission has made a strong or influential contribution in their field.
H2)	Is there evidence of the association between the place/object and the person(s)?	Yes	There is evidence of the association between the place and the Commission. All high-rise towers were products of the Commission's work in the 1960s and are still widely linked to the organisation in the public's consciousness. There is abundant documentary evidence, including historical reports and newspaper articles linking the Commission and the place.
H3)	Does the association relate: • directly to achievements of the person(s); <u>and</u> • to an enduring and/or close interaction between the person(s) and the place/object?	Yes	H3(i) The association between the place and the Commission relates directly to the achievements of the Commission. H3(ii) The association relates to a close and enduring interaction between the Commission and the place. 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 1960s seeking higher-density housing in inner urban areas and it demonstrates an enduring and close interaction between the organisation and the place. The public housing within the estate is managed by Homes Victoria, a successor agency to the Commission.

If all facets of H1, H2 AND H3 are satisfied, then Criterion H is likely to be relevant (but not necessarily at the State level)

Executive Director's Response:	Yes	Criterion H is likely to be relevant.
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Step 2 State-level test for Criterion H

No.	Test	Yes/No	Reason
SH1)	Are the life or works of the person/persons important to Victoria's history?	Yes	<p>The work of the Commission is important in Victoria's history.</p> <p>The Commission built tens of thousands of dwellings between 1938 and 1983 which housed over a quarter of a million people. The Commission had an undeniable impact on both the built environment of the State and on the welfare of the communities it housed.</p>
SH2)	Does this place/object allow the association between the person or group of persons and their importance in Victoria's history to be readily appreciated better than most other places or objects in Victoria?	No	<p>The place does not allow the association between the Commission and its importance in Victoria's history to be readily appreciated more than most other places or objects in Victoria with the same association.</p> <p>The place could not be considered a 'flagship' development and was not pivotal in the development of the high-rise program, like Park Towers.</p> <p>The place does not capture the achievements of the Commission better than any of the other high-rise estate developed by the Commission during the 1960s and 1970s. Moreover, the demolition of the walk-ups and changes to the original landscape design in the 1990s has diminished its significance.</p>

If SH1 and SH2 are satisfied, then Criterion H is likely to be relevant at the State level

Executive Director's Response:	No	Criterion H is not likely to be relevant at the State level.
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Comparisons

Housing Commission high-rise housing estates

There are currently no Commission high-rise housing estates or public housing towers from its 1962-75 construction program included in the VHR.

Nominations accepted

The Executive Director has accepted two nominations for the inclusion of the following high-rise housing estates in the VHR.

PARK TOWERS (1969)

332 PARK STREET, SOUTH MELBOURNE, CITY OF PORT PHILLIP

Significant property, within Precinct HO440 City of Port Phillip

The 30-storey tower, opened officially on 2 October 1969, **is widely considered the zenith of the Commission's high-rise flats program.** At the time the Commission laid claim to the construction of the world's tallest precast load-bearing-wall building in the world and it won an architectural award in 1969.

A 2008 study of Victoria's post-war heritage describes it as "the most ambitious, most architecturally considered and most celebrated of the high-rise blocks built by [the Commission]." The landscaped parkland at the front of the building contains playgrounds and lawns, with a paved forecourt including a rock sculpture at the entry.



ATHERTON GARDENS (1970-71)

FITZROY, CITY OF YARRA

Within HO334 (precinct)

The Atherton Gardens Estate represents the confidence of the Commission in the LPS Z-type and a refinement of methodology in the construction of tower only public housing estates.

The repeating Z-type tower demonstrates the Commission's embrace of this design for optimum economic efficiency, density and liveability. It clearly displays the uniformity of the CHP precast concrete construction.

Atherton Gardens is an estate comprising four Z-type CHP towers. As an estate it encapsulates the planning policies of the Commission, with the parkland setting and the history of slum-reclamation contributing to the heritage values of the place.



Similar form to Hotham Estate

CARLTON HOUSING SITE (1965-67)

DRUMMOND STREET, CARLTON, CITY OF MELBOURNE

Reason for comparison

The Carlton Estate developed in stages, similar to and roughly contemporaneously with the Hotham Estate.

Stage 1 at the Carlton Estate included one 20-storey Z-type tower (478 Drummond Street, extant) and walk-ups (demolished). It was known as the Reeves Street Estate. Stage 2 was known as the High Street Estate and is the same configuration as the Hotham Estate Stage 2. Both contain Z, Y and T-type towers, with no walk ups constructed. The Carlton Estate was also built on slum reclamation land.



LANGDON PARK (1971-75) [RICHMOND ESTATE]

ELIZABETH STREET and HIGHETT STREET, RICHMOND, CITY OF YARRA

Reason for comparison

The Richmond Estate (1967-75) is a tower-only estate without walk ups, with the most towers (five) on any of the Commission estates.

The last of the multi-tower estates for families developed by the Commission marking a culmination of the program. It comprises five 'Z-type' towers, but without the distinctive projecting lounge room panels of other Z-type towers.



INKERMAN HEIGHTS (1966)

150 INKERMAN STREET, ST KILDA, CITY OF PORT PHILLIP

Reason for comparison

Inkerman Heights is the first lone person tower estate built by the Commission of Victoria and includes a T-Type lone person tower. The Hotham Estate Extension also includes a T-Type lone person tower.

This estate consists of one T-type with walk-ups which all remain extant. The tower was the first of the T-type LPS towers and was also a prototype for a new battery-casting technique. It is representative of the Commission's constant process of innovation and experimentation. The tower is situated on a slum reclamation site that had been declared in 1952 and is co-located with walk-ups in a landscaped setting with carparking.



Public housing estates identified in heritage studies

EMERALD HILL COURT ESTATE (1962)

200 DORCAS STREET, SOUTH MELBOURNE, CITY OF PORT PHILLIP

Reason for comparison

The Emerald Hill Court Estate (1962) has been identified in two heritage studies.

The Emerald Hill Court Estate was identified in the *Survey of Post-war Built Heritage in Victoria* (Heritage Alliance, 2008) as significant for marking the start of the Commission's ambitious high-rise program.

It was also the only high-rise that was covered by a case study in the thematic history of public housing (Context, 2012).

The 16-storey slip-form reinforced concrete tower in South Melbourne was a milestone for the Commission as it was the first high-rise they constructed. It was completed in 1962 to a British design and was conceived as a tower in a mixed-estate setting, co-located with walk-ups that have now been demolished. It is the only 'corridor access' type high-rise built by the Commission.

Unlike Emerald Hill Court, the Hotham Estate has not been identified as significant in any previous heritage study.



Housing Commission towers subject to an exclusion determination

The Executive Director has made exclusion determinations for the following high-rise towers from the VHR.

- Nicholson and Elgin Street Public Housing Towers, Carlton
- Public Housing Tower, 12 Holland Court, Flemington
- Public Housing Tower, 120 Racecourse Road, Flemington.

Private apartment developments

Nominations accepted

DOMAIN PARK

191 – 201 DOMAIN ROAD, SOUTH YARRA, MELBOURNE CITY

CITY OF MELBOURNE HERITAGE OVERLAY HO1404

Reason for comparison

Domain Park Flats (1962) represent an early example of high-rise flats built for the private market. The has a similar modern, simple rectangular block form to 76 Canning Street.

Designed by Robin Boyd and constructed in 1960-62, Domain Park flats is a 20-storey high-rise residential building, one of the earliest constructed in Melbourne's inner suburbs.

The City of Melbourne's statement of significance for the building notes that it is a "pioneering example of a new typology that emerged in early 1960s Melbourne – the modern high-rise residential building."

The architectural merit of the building was recognised when it won the Australian Institute of Architect's Victorian Chapter Enduring Architecture Award in 2015.

A nomination for Domain Park for inclusion in the Victorian Heritage Register has been accepted by the Executive Director.



Summary of Comparisons

The Hotham Estate is one of 20 extant high-rise estates in Melbourne. All have much in common in relation to their history, design, and construction. As the vast majority of towers within the Commission estates were built using the CHP's precast components, most display an aesthetic uniformity. Twelve of the original 21 estates included walk-ups (typically earlier in the program), and nine were 'tower only' estates (typically later in the program).

The Hotham Estate provides an example of a development that, like many of the Commission's projects, comprised multiple stages of development. However, the extensive 1990s redevelopment of Hotham Estate Stage 1 involved the demolition of all 25 walk-ups, and substantial changes to the landscaped layout integral to the original Commission design.

There are other good intact examples of other high-rise estate types, including those with one tower only (Park Towers), one tower with walk ups (Inkerman Heights, St Kilda), and other multi-tower combinations (Atherton Gardens). These better represent the accomplishments of the Commission and its historical significance, than the Hotham Estate, partly because of their intactness.

The Hotham Estate comprises four different tower types on one estate. The 76 Canning Street and 33 Alfred Street designs were never repeated. The Hotham Estate has had its significance reduced by the demolition of its 25 walk-ups during the 1990s, and through the postmodern redevelopment which now fills the centre of the estate.

More intact estates, such as Park Towers, Atherton Gardens or Inkerman Heights, may warrant assessment for inclusion in the VHR within this class.

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The Age

Appendix 1: Index of the 21 Housing Commission High-Rise Housing Estates

Key to table:

Blue shading	Executive Director has accepted a nomination/s.	Grey Shading	Less intact high-rise estate where some demolition has occurred or exclusion determination issued
‡	Not constructed with Concrete House Project's LPS		Demolished high-rise housing estate

Year/s towers opened	Estate name	Suburb	Address	Description
1962	Emerald Hill Court Estate	South Melbourne	200 Dorcas Street‡	Tower and walk-up estate One 16-storey non-LPS tower (extant) with walk-ups (demolished)
1963 - 1969	Hotham Estate	North Melbourne	76 Canning Street‡ 33 Alfred Street, 159 Melrose and 12 Sutton Street	Stage 1: Tower and walk-up estate One 20-storey non-LPS tower (extant) with walk ups (demolished) Stage 2: Tower only estate (all extant) One 20-storey Z-type, one 12/13-storey Y-type, one and one 12-storey T-type
1965 - 1969	Debney's Estate	Flemington	12 Holland Court and 120, 126 and 130 Racecourse Road	Stage 1: Tower and walk-up estate One 20-storey Z-type tower with walk-ups Stage 2: Tower only estate Three Z-type 20-storey towers
1965-67	Carlton Housing Site	Carlton	480, 510, 530 Lygon Street, and 478 Drummond Street	Multiple tower estate (All four towers extant) Two 20-storey Z-type towers; one Y-type 12-storey tower, one T-type 12-storey tower. Walk-ups from the first stage (Reeves Street Estate) demolished. High Street Estate intact.
1966	Inkerman Heights	St Kilda	150 Inkerman Street	One lone person tower with walk-ups (extant). 12-storey, first of the T-type high-rises for lone persons.
1966	Loxton Lodge	Windsor	49 Union Street	One 12-storey modified Z-type lone person tower (extant). Situated alongside walk-ups (demolished).
1967	Layfield Court	Albert Park	150 Victoria Avenue	One 12-storey lone person tower, Line-type
1967	Nelson Heights	Williamstown	Pasco Street	One 12-storey 'truncated Z-type' tower
1966 - 1968	Horace Petty Estate	South Yarra	1 Surrey Road, 2 Simmons St and 259 Malvern Road	Walk-ups developed from 1962 (demolished). One 12-storey Z type (1966) and two 12-storey Y-type towers (1967-68) extant.

1966-68	Palmerston Street Estate	Carlton	20 Elgin Street* and 141 Nicholson Street*	Two non-LPS 16-storey red brick towers (being demolished) and walk ups (demolished)
1969	Park Street Tower	South Melbourne	332 Park Street	One 31-storey LPS E-type tower, in a landscaped estate setting, with playground, underground carpark and community facilities. The Executive Director, Heritage Victoria has accepted nominations for inclusion in the VHR.
1969-70	Holland Estate	Kensington	94 Ormond Street, 56 Derby Street (extant) and 72 Derby Street (demolished)	The towers were developed between 1968-70, after walk-ups and two prototype LPS 8-storey walk-ups (1962) had demonstrated the viability of the CHP system. Two towers are extant, a 12-storey 'L-type' and a 12-storey 'Z-type'. One 12-storey 'L-type' demolished in 1999.
1968, and 1971	Collingwood Housing Site	Collingwood	229 and 253 Hoddle Street, and 240 Wellington St	Three 20-storey Z-type towers across two separate parcels, with earlier walk-ups between. Developed in stages on slum reclamation land.
1970-71	Atherton Gardens	Fitzroy	90 and 140 Brunswick St, and 95 and 125 Napier St	Four 20-storey Z-type towers The Executive Director, Heritage Victoria has accepted a nomination for inclusion of the place in the VHR.
1971	Frank Wilkes Court	Northcote	1 Holmes Street	One lone person 12-storey tower situated on land donated by Northcote Council.
1971	Wilson Street	Brunswick	351 Barkley Street	One lone person modified 'Z-type' 12-storey tower
1972	Gaskin Gardens	Footscray	127 Gordon Street	One lone person modified 'Z-type' 12-storey tower. In 2009 a prototype 'pod' extension by BKK architects was installed to extend one apartment. The design won a competition but the prototype was never replicated.
1972	Floyd Lodge	Williamstown	63 Hamner Street	One lone person 'line-type' 12-storey tower
1973	Crown Street Estate	Flemington	29 Crown Street	One lone person 'line-type' 13-storey tower
1973-75	Langdon Park (North Richmond Housing Site)	Richmond	139 Highett St and 106, 108, 110 and 112 Elizabeth St	Five Z-type towers (one 21-storey and four 20 storey towers)
1974-75	King Street Estate	Prahran	17 and 25 King Street	Two lone person towers 12-storey (extant) with walk-ups (demolished)
Totals:	21 Estates, 20 Extant Estates	17 suburbs		45 towers built, 42 extant

Appendix 2: Important information for owners and interested parties

Heritage Council determination (section 49)

The Heritage Council is an independent statutory body that will make a determination on this recommendation under section 49 of the Act. It will consider the recommendation after a period of 60 days from the date the notice of recommendation is published on its [website](#) under section 41.

Making a submission to the Heritage Council (section 44)

Within the period of 60 days, any person or body may make a submission to the Heritage Council regarding the recommendation and request a hearing in relation to that submission. Information about making a submission and submission forms are available on the [Heritage Council's website](#). The owner can also make a submission about proposed permit exemptions (Section 40(4)(d)).

Consideration of submissions to the Heritage Council (section 46)

(1) The Heritage Council must consider—

- (a) any written submission made to it under section 44; and
- (b) any further information provided to the Heritage Council in response to a request under section 45.

Conduct of hearings by Heritage Council in relation to a recommendation (section 46A)

(1) The Heritage Council may conduct a hearing in relation to a recommendation under section 37, 38 or 39 in any circumstances that the Heritage Council considers appropriate.

(2) The Heritage Council must conduct a hearing if—

- (a) a submission made to it under section 44 includes a request for a hearing before the Heritage Council; and
- (b) the submission is made by a person or body with a real or substantial interest in the place, object or land that is the subject of the submission.

Determinations of the Heritage Council (section 49)

(1) After considering a recommendation that a place, object or land should or should not be included in the Heritage Register and any submissions in respect of the recommendation and conducting any hearing, the Heritage Council may—

- (a) determine that the place or object is of State-level cultural heritage significance and is to be included in the Heritage Register; or
- (ab) in the case of a place, determine that—
 - (i) part of the place is of State-level cultural heritage significance and is to be included in the Heritage Register; and
 - (ii) part of the place is not of State-level cultural heritage significance and is not to be included in the Heritage Register; or
- (ac) in the case of an object, determine that—
 - (i) part of the object is of State-level cultural heritage significance and is to be included in the Heritage Register; and
 - (ii) part of the object is not of State-level cultural heritage significance and is not to be included in the Heritage Register; or
- (b) determine that the place or object is not of State-level cultural heritage significance and is not to be included in the Heritage Register; or

- (c) in the case of a recommendation in respect of a place, determine that the place or part of the place is not to be included in the Heritage Register but—
 - (i) refer the recommendation and any submissions to the relevant planning authority or the Minister administering the Planning and Environment Act 1987 to consider the inclusion of the place or part of the place in a planning scheme in accordance with the objectives set out in section 4(1)(d) of that Act; or
 - (ii) determine that it is more appropriate for steps to be taken under the Planning and Environment Act 1987 or by any other means to protect or conserve the place or part of the place; or
 - (ca) in the case of a recommendation in respect of an object nominated under section 27A, determine that the object, or part of the object, is to be included in the Heritage Register if it is integral to understanding the cultural heritage significance of a registered place or a place the Heritage Council has determined to be included in the Heritage Register; or
 - (d) in the case of a recommendation in respect of additional land nominated under section 27B, determine that the additional land, or any part of the additional land, is to be included in the Heritage Register if—
 - (i) the State-level cultural heritage significance of the place, or part of the place, would be substantially less if the additional land or any part of the additional land which is or has been used in conjunction with the place were developed; or
 - (ii) the additional land or any part of the additional land surrounding the place, or part of the place, is important to the protection or conservation of the place or contributes to the understanding of the place.
- (2) The Heritage Council must make a determination under subsection (1)—
- (a) within 40 days after the date on which written submissions may be made under section 44; or
 - (b) if any hearing is conducted, within 90 days after the completion of the hearing.
- (3) A determination made under subsection (1)(a), (ab), (ac), (ca) or (d)—
- (a) may include categories of works or activities which may be carried out in relation to a place, object or land, or part of a place, object or land, for which a permit under this Act is not required, if the Heritage Council considers that the works or activities would not harm the cultural heritage significance of the place, object or land; and
 - (b) must include a statement of the reasons for the making of the determination.
- (4) If the Heritage Council determines to include a place, or part of a place, in the Heritage Register, the Heritage Council may also determine to include land that is not the subject of a nomination under section 27B in the Heritage Register as part of the place if—
- (a) the land is ancillary to the place; and
 - (b) the person who owns the place, or part of the place—
 - (i) is the owner of the land; and
 - (ii) consents to its inclusion.
- (5) If a member of the Heritage Council makes a submission under section 44 in respect of a recommendation, the member must not take part in the consideration or determination of the Heritage Council.
- (6) The Heritage Council must notify the Executive Director of any determination under this section as soon as practicable after the determination.

Obligations of owners (section 42, 42A, 42B, 42C, 42D)

42 Obligations of owners—to advise of works, permits etc. on foot when statement of recommendation given

- (1) The owner of a place, object or land to whom a statement of recommendation has been given must advise the Executive Director in writing of—

- (a) any works or activities that are being carried out in relation to the place, object or land at the time the statement is given; and
- (b) if the place, object or land is a place or additional land, any application for a planning permit or a building permit, or any application for an amendment to a planning permit or a building permit, that has been made in relation to the place or additional land but not determined at the time the statement is given; and
- (c) any works or activities that are proposed to be carried out in relation to the place, object or land at the time the statement is given.

(2) An advice under subsection (1) must be given within 10 days after the statement of recommendation is given under section 40.

42A Obligations of owners before determination or inclusion in the Heritage Register—to advise of permits

(1) This section applies if—

- (a) an owner of any of the following is given a statement of recommendation—
 - (i) a place or object nominated under section 27;
 - (ii) an object nominated under section 27A;
 - (iii) land nominated under section 27B; and
- (b) any of the following occurs within the statement of recommendation period in relation to the place, object or land—
 - (i) the making of an application for a planning permit or a building permit;
 - (ii) the making of an application for an amendment to a planning permit or a building permit;
 - (iii) the grant of a planning permit or building permit;
 - (iv) the grant of an amendment to a planning permit or building permit.

(2) The owner must advise the Executive Director in writing of—

- (a) the making of an application referred to in subsection (1)(b)(i) or (ii), within 10 days of the making of the application; or
- (b) a grant referred to in subsection (1)(b)(iii) or (iv), within 10 days of the owner becoming aware of the grant.

42B Obligations of owners before determination or inclusion in the Heritage Register—to advise of activities

(1) This section applies if—

- (a) an owner of a place, object or land is given a statement of recommendation; and
- (b) within the statement of recommendation period it is proposed that activities that could harm the place, object or land be carried out.

(2) The owner, not less than 10 days before carrying out the activities, must advise the Executive Director in writing of the proposal to do so.

42C Obligations of owners before determination or inclusion in the Heritage Register—to advise of proposal to dispose

(1) This section applies if—

- (a) an owner of a place, object or land is given a statement of recommendation; and
- (b) within the statement of recommendation period a proposal is made to dispose of the whole or any part of the place, object or land.

(2) The owner, within 10 days after entering into an agreement, arrangement or understanding for the disposal of the whole or any part of the place, object or land, must advise the Executive Director in writing of the proposal to do so.

42D Obligations of owners before determination or inclusion in the Heritage Register—requirement to give statement to purchaser

(1) This section applies if—

- (a) an owner of a place, object or land is given a statement of recommendation; and
- (b) the owner proposes to dispose of the whole or any part of the place, object or land within the statement of recommendation period.

(2) Before entering into an agreement, arrangement or understanding to dispose of the whole or any part of the place, object or land during the statement of recommendation period, the owner must give a copy of the statement of recommendation to the person who, under the proposed agreement, arrangement or understanding, is to acquire the place, object or land or part of the place, object or land.

Owners of places and objects must comply with obligations (section 43)

An owner of a place, object or land who is subject to an obligation under section 42, 42A, 42B, 42C or 42D must comply with that obligation.

Penalty: In the case of a natural person, 120 penalty units;
 In the case of a body corporate, 240 penalty units.