

Public Housing Tower

33 Alfred Street, North Melbourne
City of Melbourne
Wurundjeri Woi Wurrung Country

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

RX1016

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 33 Alfred Street, North Melbourne. 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:

A handwritten signature in black ink, appearing to read 'Steven Avery', with a horizontal line underneath.

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 33 Alfred Street, North Melbourne. 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If an exclusion determination application is made, any nomination made prior to 1 February 2024 is taken to be withdrawn.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. 33 Alfred Street, North Melbourne Housing Site (Hotham Estate, Stage 2)'

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 – 33 Alfred Street, North Melbourne

VHR – Victorian Heritage Register

Details of the place

Name of place:	Public Housing Tower		
Address:	33 Alfred Street, North Melbourne		
Municipality:	City of Melbourne		
Is the place currently included in a heritage overlay?	No	Heritage overlay number:	N/A
Responsible Authority:	Minister for Planning	LGA:	Melbourne 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	No
Nomination accepted	No
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 33 Alfred Street, North Melbourne 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 plan to replace all 44 housing commission towers in a program to 2051, and 33 Alfred Street, North Melbourne, is amongst the first to be redeveloped.
What is the impact of the development on the place?	The tower at 33 Alfred Street, North Melbourne 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 application as submitted was complete, and no further information was sought from the applicant during the assessment.	N/A	N/A

Place information

Description of the place

The Public Housing Tower at 33 Alfred Street, North Melbourne is a 12-storey high-rise block of flats, constructed using the Large Panel System (LPS) manufactured by the Concrete House Project for the Housing Commission of Victoria (**the Commission**).¹ The tower is one of four “Y” or “star” type blocks constructed by the Commission, so called for the shape of the building from an aerial perspective. A 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. The building is raised on concrete stilts or pilotis, a feature common to the high-rise flats of the era, and access stairs are located at the end of each wing.

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 at the place include: infill of the balconies with metal framing and glazing; refurbishment of apartments throughout; updating of the lobby and common areas; infill of part of the ground-floor undercroft; and on the upper floors, internal doorways through the load-bearing walls have been added to turn three-bedroom units into six-bedroom units to accommodate larger family groups. The 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 Sometimes referred to as a 12/13 storey building, as it was constructed on a slope.

Extent

The extent of the place includes the tower at 33 Alfred Street North Melbourne and all of the land shown marked in red on the extent diagram, part of plan TP845338K (Figure 1). The exclusion application does not include the other two towers on the estate (12 Sutton Street or 159 Melrose Street, North Melbourne).

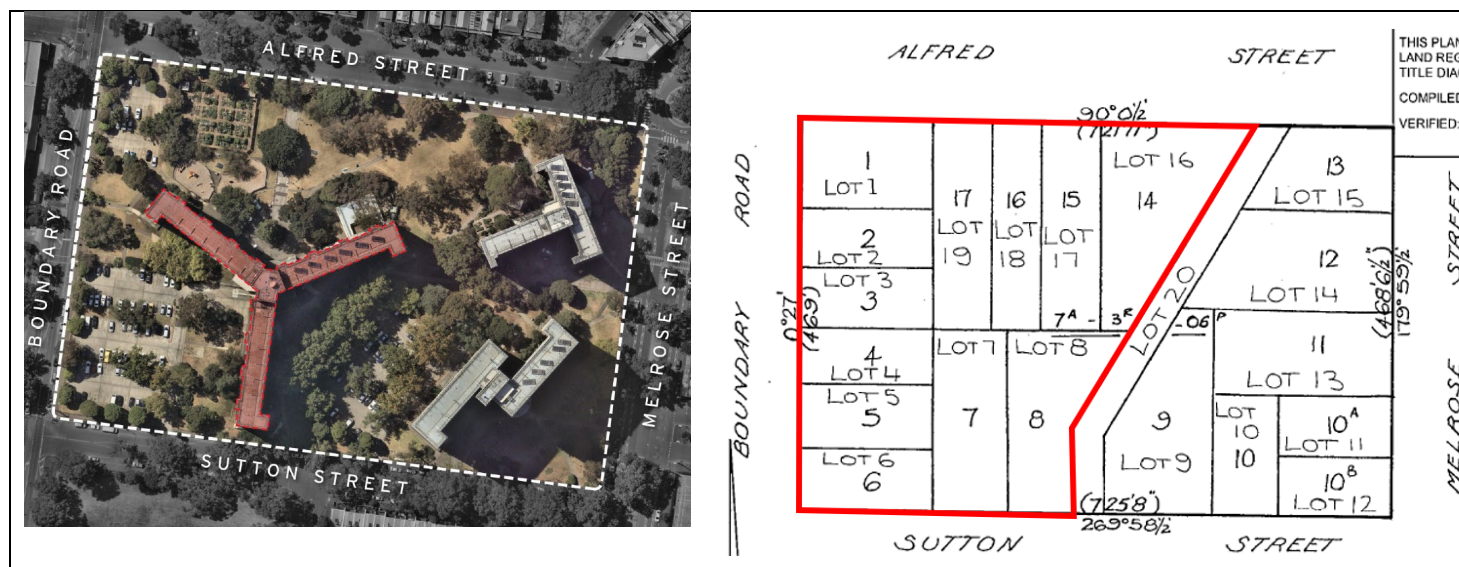


Figure 1: The tower at 33 Alfred Street, North Melbourne highlighted on an aerial image and the extent diagram submitted with application showing parcel boundaries (supplied by the applicant)

Photos of the place

All photographs taken by Heritage Victoria on 25 June 2025, unless otherwise stated.



Public Housing Tower, 33 Alfred Street, North Melbourne



Ground floor entry



Ground floor



*Corridor A, Level 12. Original balcony access to flats
infilled with metal and glazing to form corridor*



*Corridor B, Level 12. Original balcony access to flats
infilled with metal and glazing to form corridor*



Lift lobby level 12



Pilotis



Living room in 12th level apartment (Lovel Chen, supplied in application)

Place history and comparisons

Brief History

The Public Housing Tower at 33 Alfred Street, North Melbourne, is part of the Hotham Estate Extension, now called the North Melbourne Housing Site. It is instantly recognisable as a Commission block of high-rise flats, which represents 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.

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 Victorian Heritage Register (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

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 2). Ultimately, it was the concrete house that proved the cheapest and most efficient method of manufacture, but as architectural historian George Tibbits explains:

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.

... 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 3). 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 constructed with load-bearing wall panels.

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 in Flemington 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 (demolished) 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. There were four Y-plans constructed; 33 Alfred Street, North Melbourne was the last one completed.

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. *New Houses for Old*, 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, with no new approvals to be granted after that date. 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, 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.

Hotham Estate - 33 Alfred Street, North Melbourne

Stage 1 of the Hotham Estate was developed on land the Commission declared a slum reclamation area on 22 September 1958. Much like Emerald Hill Court Estate, a tower (76 Canning Street, North Melbourne) was surrounded by family-friendly four-storey walk-ups. The estate could accommodate 1470 people across the tower (extant) and walk-ups (demolished). It was the second tower built by the Commission as part of the high-rise programme, and was a steel-frame concrete clad structure opened by the Governor, Sir Rohan Delacombe, on 30 July 1963.¹²

In 1963-64 as well as completing the 20-storey tower at Canning Street, the Commission reported that they had sketched a plan for the extension of the Hotham Estate to the north¹³. The annual report also noted the "year was marked by the transition from blocks of four-storey three-bedroom walk-up flats to high-rise buildings of twelve and twenty storeys," which is reflected in the design of the Hotham Estate Stage 2.¹⁴ Whereas previously families with young children would be accommodated in the low-rise walk-ups; in the Hotham Estate Stage 2, the 12-storey Y-Plan was configured with families in mind.

In addition to the Y-plan of 33 Alfred Street, the Hotham Estate Extension also included a 'T' and a 'Z' plan (Figure 4). High Street Estate (Carlton), built almost concurrently to the Hotham Estate Stage 2, followed a similar arrangement. These estates were described as "high-rise ensemble estates", with the different configurations of tower utilising the Large Panel System serving people at different stages of life, for families, the elderly, couples or singles.

In May 1968, the tower at 33 Alfred Street was completed (Figure 5). It consisted of 152 flats of two- and three-bedrooms. More recently, the three-bedroom flats on the upper two levels have been converted into six-bedroom flats designed to accommodate large family groups. This was done by creating a doorway through from the hall in one, to the adjoining living space of the neighbouring flat. The second kitchen is reduced to a kitchenette, allowing for the six bedroom flats to have a larger second living space.

A thriving community garden is located out the front of the tower facing Alfred Street, and is maintained by the residents. From the mid-1990s, public gardens were added to many housing estates as part of a push to improve the environment surrounding the towers and encourage community engagement.¹⁵

In July 2020, there were 484 residents living at 33 Alfred Street, with 45% of the population being children under 18 demonstrating the continued family demographics of the tower.

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, Victoria "Official Opening of Hotham Estate Twenty Storey Flats" pamphlet.

¹³ Hotham Estate Stage 2 or the Hotham Estate Extension, was also sometimes historically referred to as the Boundary Road Extension.

¹⁴ Housing Commission, Annual Report 1963/64, p. 9.

¹⁵ Context, *Homeward: A Thematic History of Public Housing in Victoria*, Prepared for the Department of Human Services, 2012, p.66.

Historical images

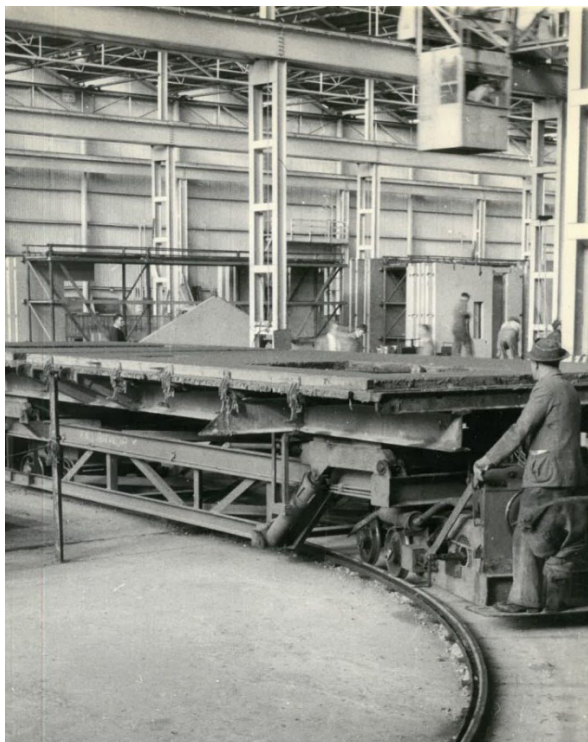


Figure 2: A concrete wall panel on the Holmesglen factory floor (Source: Stanford, N.W Concrete House Production)



Figure 3: Canning Street Walk-ups (Wolfgang Sievers, 1962 'Housing Commission Flats' State Library of Victoria)



Figure 4: The Hotham Estate, showing the three towers including the 'Y type' at 33 Alfred Street (source: Housing Commission Annual report 1966/67 p.14 and reproduced in Exclusion Application)



Hotham Estate extension, North Melbourne

*Figure 5: 33 Alfred Street, North Melbourne nearing completion at right.
(source: Housing Commission Annual report 1966/67 p.14 and reproduced in Exclusion Application)*

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 33 Alfred Street, North Melbourne 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, 33 Alfred Street 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 33 Alfred Street 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.

There are currently no public housing towers included in the VHR, but it is still useful to compare the tower at 33 Alfred Street with other towers within the same class. There were 45 towers built¹⁶ and over 40 extant.¹⁷ The large majority (41) utilised the LPS developed in the Concrete House Project's factory at Holmesglen. There were three other towers constructed to the same 'Y' plan as 33 Alfred Street. 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.
- The 'High Street Estate'¹⁸ (extant) is comparable to the Hotham Estate Stage 2 in that it was a 'tower only' estate that comprised different tower typologies including 'Y-type', 'T-type' and 'Z-type'.
- There are two 'Y-type' towers at the Horace Petty Estate in South Yarra, completed in 1967, slightly earlier than the one at 33 Alfred Street.

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

¹⁶ 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.

¹⁷ At time of writing, the two red brick towers 20 Elgin Street and 141 Nicholson Street, Carlton, are in the process of being demolished.

¹⁸ This is now part of the Carlton Housing Site, together with what was originally called the Reeves Street Estate.

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 33 Alfred Street, North Melbourne (**the place**) are below.

For a place to be included in the VHR, there must be evidence that meets the threshold for State-level cultural heritage significance in relation to at least one of Heritage Council's Criteria [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 Commission addressed the critical housing shortage following World War II with a focus on supply, and by subsequently undertaking slum reclamation activities. The work of the Commission irrevocably changed the built fabric of the inner suburbs and regional towns. Thousands of Victorians were able to purchase or rent a home built by the Commission in the last 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 place. The LPS construction of the place links it 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, all of which 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 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 display the history of the Commission better than other places built by the Commission.

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. There is no evidence that the place is rare or uncommon, or has rare or uncommon features.

The tower is one of 45 built by the Commission during the 1960s and 1970s. 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:

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

relating to the place 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.

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 place was in a slum reclamation area, but the construction of the tower is likely to have disturbed any remaining physical evidence of the dwellings that existed prior to the high-rise. Slum-type dwellings tend to have a light archaeological footprint and any archaeological physical evidence is likely to have been so disturbed by subsequent activity that any research potential is compromised.

The Executive Director is of the view that this 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 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 for decades to come.

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

1. Built for public housing by the Commission between 1962-75
2. Constructed using the Concrete House Project’s LPS
3. High-rise tower form of 12 storeys or more
4. The towers utilise elevator 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.
- There are no architectural or aesthetic features that elevate this tower above others of the class.

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 Y-plan was never used again. The place was not influential.

Pivotal

The place does not encapsulate a key evolutionary stage in the development of the class. Three Y-plan towers had been constructed previously.

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 are not 'beyond the ordinary' or outstanding because there is no evidence or critical recognition from within the architecture or design fields relating to the place. 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 place and its neighbouring towers within the Hotham 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 tower as a landmark does not mean there are inherent aesthetic qualities.

The towers were mass produced from a factory, so the aesthetic characteristics of the place were always secondary to the cost efficiencies, form and function. The economies and logistics of the large panel system 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 four 'Y-type' towers produced during the high-rise flats programme, completed approximately mid-way through the programme.

It does not exhibit any creative adaptations to the methodology already established in previously completed towers using the LPS.

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) 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 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 the Commission from 1938 onwards. The place is of the 'Y plan', one of the lesser utilised plans built by the Commission, and other typologies better 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, Official Opening of Hotham Estate Twenty Storey Flats, 30 July 1963 (pamphlet).
Housing Commission of Victoria, Slum Clearance Project, Debney's Estate Flemington (undated 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.
Gurciullo, S. 'Reclaiming the slums: the Housing Commission of Victoria's plans for inner Melbourne', *Provenance: the Journal of the Public Records Office Victoria*, issue 20, 2022.
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 Commission delivered 45 high-rise residential towers at locations across Melbourne. Of the total built, 44 are extant. There were also two towers built at JJ Holland Park that were eight-storey walkups (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 [^]	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	Debneys 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