

# Application for exclusion



## Before you start

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Please call Heritage Victoria to discuss your application prior to its lodgement

Telephone: (03) 7022 6390

Email: [heritage.registrations@transport.vic.gov.au](mailto:heritage.registrations@transport.vic.gov.au)

### What does exclusion from the Victorian Heritage Register mean?

Exclusion from the Victorian Heritage Register will result in a 5-year period during which Heritage Victoria will be unable to accept nominations for the place or object for the Victorian Heritage Register. For more information refer to the Heritage Victoria website.

### Who can apply for an exclusion?

Exclusions can only be applied for by a government asset manager, a government Department Head, a public authority, or an Administrative Office Head when the application is in facilitation of a major development which costs at least \$5 million.

If you don't know whether you are able to make this application, please contact us on the above details.

### Who can complete this form?

This form must be completed a person with an appropriate level of knowledge and experience in the identification and assessment of places, objects, or land in order to determine heritage significance or value, being a person with a relevant tertiary qualification and/or extensive relevant experience.

### What is the fee for applying?

An application for exclusion requires a fee payment. For all fee details visit [Heritage Victorias's website](#)

## Your details

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Please confirm or update your details before proceeding.

First name

■■■■■

Last name

■■■■■

Business or organisation name

Lovell Chen

Position title

Heritage Consultant

Contact number

■■■■■

Please see the *Privacy collection statement* for information on how the details you provide will be used.

## Contact details

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**Who is the applicant for this Exclusion Determination?** The applicant is a government asset manager or public authority

Please provide the contact details for the person acting on behalf of the public authority / government asset manager for this application below.

### Details for the government asset manager or public authority

**Name of \*Minister/\*entity  
/\*public authority** Homes Victoria

**\*ABN/\*ACN/\*ARBN** 88139482080

**Position title** Chief Development Officer, Housing Development

**First name**

[REDACTED]

**Last name**

[REDACTED]

**Email**

[REDACTED]

**Contact number**

[REDACTED]

**Postal address** 50 Lonsdale Street, GPO Box 4057

**Suburb** Melbourne

**State** Victoria

**Postcode** 3001

**Country** Australia

**I am also the owner of this place** Yes

**Do you have other relevant  
contact details you want to  
provide us** Yes

**The works involve common  
property** No

### Additional Contact details

First name	
Last name	
Email	

### Additional Contact details

First name	
Last name	
Email	

### Additional Contact details

First name	
Last name	
Email	

### Additional Contact details

First name	
Last name	
Email	

## Pre-application details

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Have you had a pre-application discussion with Heritage Victoria in relation to this application?

No

## Major development

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Provide a brief description of the major development to which the application relates

Proposed demolition of tower at 120 Racecourse Road, Flemington and redevelopment of the site by Homes Victoria.

Estimated cost of the major development (\$)

Failed to convert value: 290000000000

**Impact of major development on place or object** The proposal involves the demolition of the tower at 120

Racecourse Road, Flemington.

## Details of the place or object

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**Type** Place

### Place or object details

**Place or object name** Public housing tower at 120 Racecourse Road, Flemington

**Address** 120 Racecourse Road, Flemington.

**Responsible Authority** MINISTER FOR PLANNING  
MOONEE VALLEY CITY

**Victorian Heritage Inventory number (if any)**

**National Trust reference number (if known)** N/A

**Has the place or object previously been identified in a heritage study? If yes please give details.** The tower at 120 Racecourse Road, Flemington has not been individually assessed nor formally identified in a heritage study. It is noted, however, that the Moonee Valley Heritage Study prepared by heritage ALLIANCE, 2023 stated the following in regard to the Debney Estate, which includes 12 Holland Court: "Given the potential significance in the development of public housing in Victoria of the various innovations on this estate, the whole site should be assessed and it could be found to have State significance. However given government plans for redevelopment of the site potential future actions should include the recording of the architectural values of the first tower block to ensure this information is retained into the future for interpretation." (p. 27)

**Does this place have a local Heritage Overlay (HO) within a planning scheme?** No

**Briefly describe the extent of the place and what it includes** The extent of the place includes the public housing tower at 120 Racecourse Road, Flemington shown on the extent diagram. The property is located on Crown Allotment 2548, Parish of Doutta Galla (Volume 12505 Folio 287).

**If you are including part of a land parcel, identify that part** The extent of the place includes the public housing tower at 120 Racecourse Road, Flemington shown on the extent diagram. The property is located on Crown Allotment 2548, Parish of Doutta Galla (Volume 12505 Folio 287).



Is the proposed major development to be carried out entirely on Crown land? Yes

## Heritage Council criteria

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### Assessment of State-level significance

Include reasons why the place or object should not be included in the Heritage Register. These must be reasons based on the assessment criteria published by the Heritage Council. This means you must provide reasons why the place or object does not meet the threshold of State-level cultural heritage significance in relation to each of the criteria selected. For further information on the Heritage Council criteria and thresholds please refer to [their guidance](#).

<b>CRITERION A</b>	See attached report.
<b>CRITERION B</b>	See attached report.
<b>CRITERION C</b>	See attached report.
<b>CRITERION D</b>	See attached report.
<b>CRITERION E</b>	See attached report.
<b>CRITERION F</b>	See attached report.
<b>CRITERION G</b>	See attached report.
<b>CRITERION H</b>	See attached report.

### Other Information

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Information in this section should demonstrate why the criteria selected for assessment are the relevant criteria. It should provide the evidence that supports the assessments. Information should be based on robust research and analysis. Exclusion determinations can be overturned if significant new information is identified.

<b>Physical description</b>	See attached report.
<b>History of the place or object</b>	See attached report.
<b>Comparative analysis</b>	See attached report.

You can view recent Heritage Council decisions through [Austlii](#).

**Aboriginal cultural heritage values (where known)**

<b>Who are the traditional Aboriginal owners of this place or object?</b>	Wurundjeri Woi Wurrung Cultural Heritage Aboriginal Corporation
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<b>Does this place or object have Aboriginal cultural heritage values in addition to non-Aboriginal cultural heritage values (shared values)?</b>	N/A
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**Note:** If the place or object is of cultural heritage significance only on the grounds of its association with Aboriginal tradition, Aboriginal traditional use, or Aboriginal archaeology, it may be appropriate for registration in the Victorian Aboriginal Heritage Register. Please contact [First Peoples – State Relations](#)

<b>Key sources</b>	See attached report.
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## Condition of the place or object

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<b>Condition</b>	Good
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<b>Is there any damage to the fabric (the materials from which the place or object is made)?</b>	No
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## Intactness and integrity

<b>How much of the original form or appearance remains?</b>	See attached report.
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<b>What alterations are present and why was the place or object altered?</b>	See attached report.
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<b>Have the changes or alterations affected the heritage value of the place or object?</b>	See attached report.
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## Supporting documents

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You must provide all required documents before submitting your application

<b>Cost of works</b>	Attachment 7 Signed Applicant Statement - XD Application 120 Racecourse Road.pdf
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<b>Photographs</b>	120 Racecourse Rd_Exclusion Determination Citation.pdf
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<b>Extent Diagram</b>	Aerial Plans_120 Racecourse Road Flemington.jpg Extent Diagram_Vicplan.PNG
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<b>Additional Information</b>	Attachment 6 Letter of consent - XD Application - 120 Racecourse Road.pdf 120 Racecourse Rd_Exclusion Determination Citation.pdf Copy of title_Volume 12505 Folio 287.PDF Copy of plan_Volume 12505 Folio 287.PDF
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## Fee calculation

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Heritage fees are determined in accordance with the Heritage Regulations 2017.

Details of fees are listed on the [Heritage Victoria website](#).

**Fee to be paid:** \$7838.40

**Details of the fee calculation** Application for Exclusion from the Victorian Heritage Register Fee for lodging an application for Exclusion from the Victorian Heritage Register. Regulation: 6D


## Fee payment

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**Payment method** EFT

**Attention to details**

**BSB** 

**Account and reference number** 

**EFT confirmation** I confirm that the fee has been paid via EFT

**Proof of payment** 

## Declarations & privacy

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### Declarations

I state that the information I have given on this form is correct to the best of my knowledge.

I declare that the application has been made to facilitate the development or delivery of a project where the cost of the project is no less than \$5 million.

### Privacy statement

Heritage Victoria is a branch of the Department of Transport and Planning (DTP). Heritage Victoria is committed to protecting personal information provided by you in accordance with the principles of the Victorian privacy laws. The information you provide, and anything provided in relation to this process or any subsequent decision pertaining to the site card, will be used for the following purposes:

- correspond with you about your application
- to inform Heritage Victoria in making a recommendation or a decision as to the matter.
- the material may be made available to the public through a public notice process as required under the Heritage Act 2017, to the Heritage Council of Victoria for use in a public hearing, or to the Minister for Planning in making a determination.
- to provide information about the site card, including the initial application and subsequent regulation of that site card, where requested by successive owners of the property or consultants engaged in relation to the property

Your contact details may be used by DTP or its contracted service providers under confidentiality agreements to survey you about your experience with DTP.

The information you provide may be made available to:

- any person who may wish to inspect your proposal until the process is concluded. In this instance, the 'process' includes not only the current site card application but also any further aspects of Heritage Victoria regulation under this site card process.
- relevant officers in DTP, other Government agencies or Ministers directly involved in the heritage process.

If all requested information is not received, DTP is unable to process your request.

You may access the information you have provided to DTP by contacting [heritage.victoria@transport.vic.gov.au](mailto:heritage.victoria@transport.vic.gov.au)

## NO. 120 RACECOURSE ROAD, FLEMINGTON (PART OF DEBNEYS PARK ESTATE)



DATE INSPECTED	13 August 2024	CURRENT HERITAGE CONTROLS	N/A
DATE OF COMPLETION	1969	TOWER TYPOLOGY	'Z' block
LEVELS	20	CONSTRUCTION	CHP panel system,
DESIGNER/ ARCHITECT	Chief Architect's Branch, Housing Commission of Victoria	BUILDER	Housing Commission of Victoria, construction division
ENGINEER	W P Brown & Associates	OTHER	Wurundjeri





Figure 1 East elevation of 120 Racecourse Road





Figure 2 View of the entrance to 120 Racecourse Road: west elevation

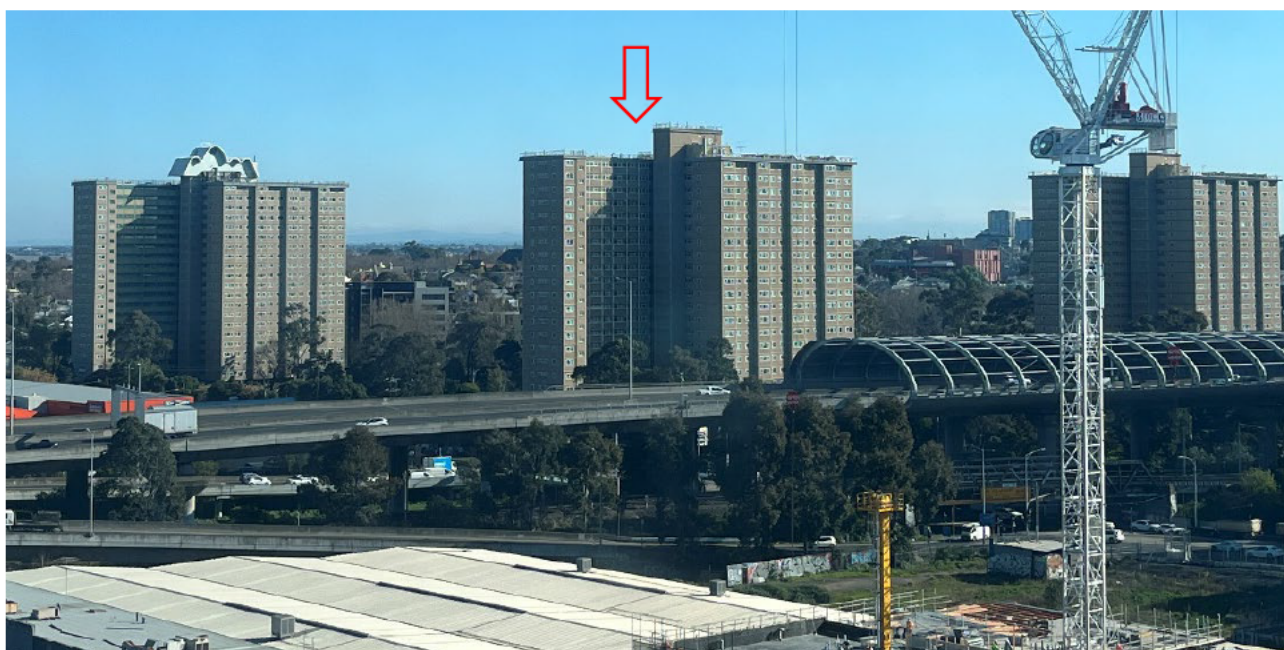


Figure 3 View of 120 Racecourse Road (indicated) from 33 Alfred Street, North Melbourne

## CONTEXTUAL HISTORY

### *Housing Commission of Victoria high-rise tower programme*

The provision of public housing has been the responsibility of the Victorian state government since the passage of the *Housing Act* (Victoria) in November 1937. The Act, which followed recommendations made by the Slum Reclamation Board, established the Housing Commission of Victoria (HCV) which was tasked with demolishing slums (areas of concentrated poverty and insanitary housing), determining standards for construction, providing accommodation for people of limited means and undertaking town planning. A panel of architects was appointed to oversee the HCV in 1939.<sup>1</sup>

Early types of HCV housing included the Experimental Concrete Houses, Port Melbourne (1939, VHR H1863) and low-rise family housing estates (including Kitchener Street, West Brunswick, 1939-40, for example). This was followed by the escalation of 'slum reclamation' from the mid-1950s, whereby large areas of housing deemed to be sub-standard were compulsorily acquired, demolished and redeveloped. These new estates, commencing with the Molesworth Estate, North Melbourne from 1948 (since redeveloped), comprised blocks of flats and, subsequently, blocks of 'walk-ups' and maisonettes, which were to become prevalent at the Commission's inner urban housing sites, including at Carlton, Collingwood, Fitzroy, Kensington, Flemington, North Melbourne, Richmond and Prahran. The HCV also delivered large scale housing estates in the outer suburbs and regional areas.

The tower form was a distinct phase in the provision of public housing by the HCV across the metropolitan area from the early 1960s – the programme was delivered between 1962 and 1975. The construction of towers, the majority on land cleared of 'slums', signalled a shift in approach, drawing on international precedents of the mid-twentieth century. The introduction of high-rise developments responded to a need for greater efficiencies, and to facilitate provision of open space across the estates while retaining density.<sup>2</sup> It was grounded, philosophically, in an acceptance of modernism as a force for social progress and urban renewal.

Melbourne's high-rise towers (with four exceptions<sup>3</sup>) apply the system of precast concrete panels developed by the Commission from the mid-1940s; the 'Concrete House Project' (CHP) was established by the Commission at a former Commonwealth munitions factory at Holmesglen. Precast and prestressed load bearing concrete panels were produced in huge volumes, initially for single-storey houses (5,000 were complete by 1953).

A 'Development Section' was formed at the CHP factory in 1954. The Commission then engaged consultant structural engineer W P Brown and Melbourne University Professor of Civil Engineering, A J Francis, to examine the feasibility of extending the system to taller forms. They reported that up to ten storeys was feasible with the existing panel thickness and reinforcement.<sup>4</sup> During the 1950s and early-1960s a series of prototypes was developed, including two, three, four and eight-level walk-up blocks of flats. The units were stacked vertically, with walls placed directly over the walls of the floor below, carrying loads directly to the ground and enabling use of light weight floor panels.

The HCV's programme of high-rise towers commenced with 'Emerald Hill Court', South Melbourne in 1962 – the 16-storey tower was a facsimile of a British precedent, and did not apply the Commission's structural system. The tower

<sup>1</sup> Renate Howe, 'Reform and Social Responsibility: the establishment of the housing commission', in Renate Howe, ed., *New Houses for Old: Fifty Years of Public Housing in Victoria 1938–1988*, Ministry of Housing and Construction, Melbourne, 1988, p. 38.

<sup>2</sup> *Home Truths*, Winter 1963, p. 4.

<sup>3</sup> The exceptions are: 200 Dorcas Street, North Melbourne (Emerald Hill Court); 76 Canning Street, North Melbourne (Hotham Estate Stage 1); and the two red brick towers at 141 Nicholson and 20 Elgin street, Carlton.

<sup>4</sup> Peter Mills, *Refabricating the Towers: The genesis of the Victorian Housing Commission's high-rise estates to 1969*, PhD thesis, Monash University, December 2010, pp.106-107.



was co-located with four-storey walk-ups constructed of HCV's LPS, and public open space. Other 'mixed estates', where a single tower was co-located with walk-ups, were developed at the Hotham Estate Stage 1, North Melbourne (1963) and the Inkerman Street, St Kilda (1966). From 1967/68, HCV estates were tower-only, with walk-ups having been discontinued. The second stage of the Debneys Park estate – which included 120 Racecourse Road – was an example of a tower only development.

The HCV high-rise public housing towers, almost all of which are of 12 or 20-storeys, adopted a number of plan forms – referred to colloquially as 'T', 'Z', 'Y', 'E' etc blocks. This variety enabled the delivery of units of varied size, consistent with different life stages. Of the 47 towers built, over half were Z blocks, including 120 Racecourse Road.

## PLACE HISTORY

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The subject tower (120 Racecourse Road) was constructed as part of a group of three towers in 1967-69. This group constituted Stage 2 of the Commission's existing Debneys Park estate. Stage 1 was a mixed estate that comprised three and four-storey walk-ups and a single tower, 12 Holland Court.

At the beginning of the 1960s, Debney's Paddock in Flemington comprised a mix of open land, war-era warehouses and industrial buildings which had been acquired by Melbourne City Council (MCC). In 1961, the HCV negotiated the exchange of land formed by slum clearance in North Melbourne for the western part of Debneys Paddock. The MCC planned to use the land in North Melbourne for recreational purposes.

By the mid-1960s, the HCV was having difficulty in reclaiming slum land fast enough to provide for the required housing stock. At Flemington the solution was to expand the existing Debney's Paddock estate to the east via a further exchange of land with the MCC, this time for five acres (two hectares) of reclaimed slum land in Carlton. In the process, the HCV acquired 9.75 acres (four hectares) of land fronting Racecourse Road, occupied by warehouses and industrial buildings (Figure 4).<sup>5</sup>

The chairman of the HCV, J P Gaskin, announced in December 1965 that tenders would be called for three 20-storey Z-blocks for the eastern extension of the estate:

The latest development at Debney's Estate, Flemington into Australia's largest and most modern complex of flats by the Housing Commission, Victoria, adds another page to the history of Melbourne.<sup>6</sup>

The extension to the Debney Meadows Estate was the first HCV project to deliver high rise in the form of three identical 'Z' block towers (Figure 5) – the first six estates delivered by the HCV were mixed estates of high-rise and walk-up flats. The intention was to accommodate more large families and accordingly, the original Type 61 'Z' block design, which had already been delivered on several sites around Melbourne, was modified by replacing the one-bedroom flat on the 'inside' end of one of the slabs of two-bedroom flats with a three-bedroom flat. This delivered three three-bedroom flats and six two-bedroom flats per floor. By this time the Commission's ban on young children living in flats over 12 storeys had been removed. Any adverse effects of this change were expected to be ameliorated by the provision of more extensive play facilities in the park-like surrounds, and also by provision of a small play-room adjacent to the laundry on each floor.<sup>7</sup>

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<sup>5</sup> Peter Mills, *Refabricating the Towers: The genesis of the Victorian Housing Commission's high-rise estates to 1969*, PhD thesis, Monash University, December 2010, p. 298; *Home Truths*, Summer 1966, p. 2.

<sup>6</sup> *Home Truths*, Summer 1966, p. 2. Note, Debney's Estate and Debney Meadows were still used interchangeably at this time.

<sup>7</sup> Peter Mills, *Refabricating the Towers*: PhD thesis, Monash University, December 2010, p. 359.



Figure 4 Aerial view of 'Debney's Paddock', c. 1950s  
Source: Airspy, H2008.32/58, State Library Victoria



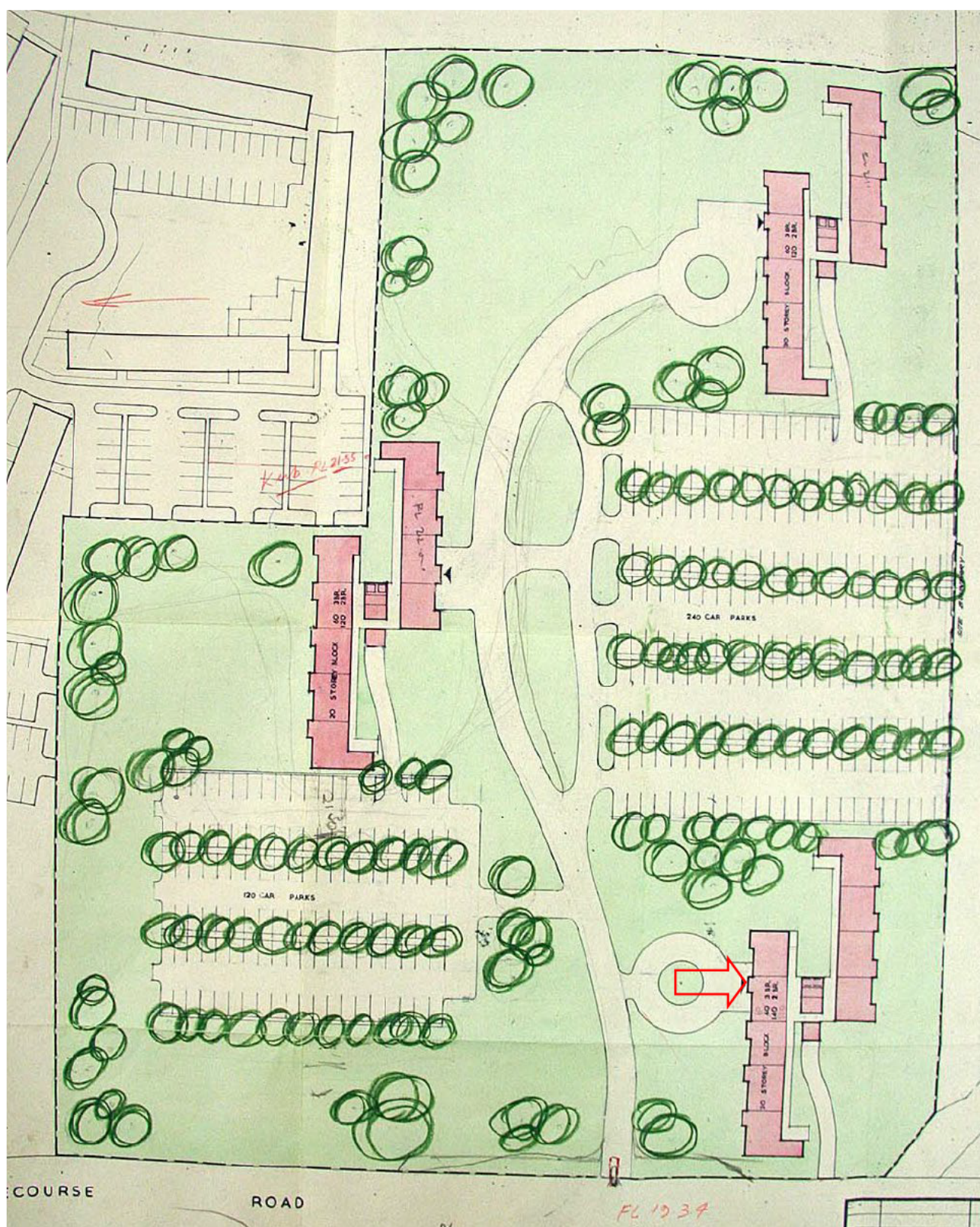


Figure 5 Plan of Debney Meadows Estate extension, Flemington, August 1966: 120 Racecourse Road indicated  
 Source: D7 Debney Meadows Estate, VPRS 1808/P0, Public Record Office Victoria



When the Housing Minister announced commencement of works on the new estate in December 1966, he explained it as part of a process of experimenting with various types of high density development to seek the type best suited for Victorian conditions, however in fact little experiment would occur beyond this point. Further commitments were that the net density of the combined estate would be 221.7 persons per acre, and 95 per cent of the land area at the new estate would remain open space.

The substructure for the first of the new three 'Z' block towers on the Debney Meadow's estate was commenced in November 1967 (Figure 6),<sup>8</sup> and the last tower was completed in the 1969-70 financial year.<sup>9</sup>



Figure 6 Aerial photograph of Debney Meadows Estate (part), 1968, with Stage 2 towers under construction: the substructure of 120 Racecourse Road is indicated  
Source: Historical Aerial Photography Collection, Landata, SERV

<sup>8</sup> Peter Mills, *Refabricating the Towers*: PhD thesis, Monash University, December 2010, p. 360.

<sup>9</sup> Housing Commission of Victoria, *Annual Report, 1969-70*, p. 8.

## DESCRIPTION AND INTEGRITY

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### Description

The 20-storey residential tower at 120 Racecourse Road is constructed in the 'Z' block form. It is located at the south-east corner of the Debneys Park Estate, which includes three other 'Z' block towers. No. 12 Holland Court, at the south-west, is a Type 61 'Z' block built in 1965 as part of a mixed estate. No. 120 Racecourse Road (and numbers 126 and 130 Racecourse Road) is an example of the second (of four) types of 'Z' towers developed by the HCV during the high-rise programme (discussed further at 'comparative analysis' below).

The 'Z' block form comprises two flat roofed, narrow and broadly rectangular building volumes on a split north-south alignment, connected by a central lift and service core. The building is of a precast load-bearing concrete panel construction, for both walls and floors, elevated by tapered concrete stilts.

The main east and west elevations have a consistent gravel coated cement walls with paired (bedrooms) or triple (living room) window openings. Living areas project slightly from the main walls, creating a repetitive rhythm of projecting and recessed elements across these elevations. The balconies that provide access to the flats on each level have been infilled with glazing.

The recessed east and west elevations are decorated with white framed windows and white vertical bands. The shorter north and south elevations incorporate smaller bathroom/toilet windows, with '120 Racecourse Rd' signage at the lower level.

The main entry is to the west side of the building. A community garden is located to the north of the tower and to the east are walking paths that provide access to playground and other recreational facility areas.

### Integrity

Alterations to 120 Racecourse Road are typical of the HCV towers. They include:

- Balconies infilled with metal framing and glazing;
- Modified/upgraded common areas;
- Replacement of the entry enclosure, including the introduction of a concrete ramp;
- Partial infilling of the ground level undercroft; and
- Refurbishment of apartments throughout.

## COMPARATIVE ANALYSIS

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No. 120 Racecourse Road is one of 24 'Z' blocks delivered by the HCV during its towers programme. 'Z' blocks were by far the most common plan type for the HCV towers, accounting for approximately 50 per cent of the 47 towers in the portfolio.

Four iterations of the Z block were developed during the HCV's high-rise programme, each with minor variations to optimise construction efficiencies and deliver the unit diversity required. No. 120 Racecourse Road is an example of the second iteration. The original type (of which an example is 12 Holland Court, also at the Debneys Park Estate) was modified by replacing the one-bedroom flat on the 'inside' end of one of the slabs of two-bedroom flats with a three-bedroom flat, to deliver six two-bedroom flats per floor. No 120 Racecourse Road is the same model as nos. 126 and 130 Racecourse Road, as well as 253 Hoddle Street, Collingwood, all of which are extant.

All of the 'Z' blocks (and all the towers delivered by the HCV, with the exception of 200 Dorcas Street, South Melbourne, 76 Canning Street, North Melbourne and the two 'red brick towers in Carlton) were constructed of the

HCV's large panel system of prestressed concrete panels. The units were stacked vertically, with walls placed directly over the walls of the floor below, carrying loads directly to the ground and enabling use of light weight floor panels. The system evolved from the HCV's low-scale panelised precedents (two, three and four-level walk-ups) and incorporated lessons learned from the two eight-storey towers built at the Commission's Kensington housing site (both demolished).

Alterations and upgrades undertaken to 120 Racecourse Road are typical of the public housing tower typology (summarised at 'Integrity' above).

## ASSESSMENT AGAINST HERITAGE COUNCIL OF VICTORIA CRITERIA

The assessment below is based on, *The Victorian Heritage Register Criteria and Threshold Guidelines, assessing the cultural heritage significance of places and objects for possible state heritage listing*, endorsed by the Heritage Council of Victoria, 6 December 2012, reviewed and updated 1 December 2022.

CRITERION	ASSESSMENT	APPLICATION
CRITERION A Importance to the course, or pattern, of Victoria's cultural history	<p>The Step 1 test (applicability of the criteria) is met. The high-rise public housing tower at 120 Racecourse Road has a clear association with the history of public housing in Victoria generally and more specifically with the Housing Commission of Victoria's high-rise tower programme of the 1960s and early 1970s. There is evidence of the historical association, both physical and documentary.</p> <p>The Step 2 test (for State significance) is not met. The tower does not allow the historical association to be understood better than most other places in Victoria with substantially the same association.</p> <p>No. 120 Racecourse Road was completed in 1969, well into the towers programme. It is one of three identical towers at the Flemington housing site. Another tower of the same model ('Z' block) is at 253 Hoddle Street, Collingwood.</p> <p>'Z' blocks accounted for approximately 50 per cent of the public housing towers delivered by the Commission. It is an example of the second (of four) iterations of the 'Z' block plan. Each iteration included minor variations to optimise construction efficiencies and deliver the unit diversity required.</p>	Criterion does not apply at the state level
CRITERION B Possession of uncommon, rare or endangered aspects of Victoria's cultural history	<p>The Step 1 test is not met. While 120 Racecourse Road, Debneys Park Estate, has an association with historical processes and events (as for Criterion A), it does not have rare or uncommon features for the purposes of this criterion. The tower was one of 24 'Z' blocks delivered by the Commission, and one of four examples of exactly the same type – the others being 126 Racecourse Road, 130 Racecourse Road and 253 Hoddle Street, Collingwood. With the exceptions noted above, all of the HCV towers were constructed of the HCV's LPS of stacked precast concrete panels.</p> <p>At the time of writing the high-rise towers were not rare (there were 44 of them). The Victorian Government had, however, stated its intention to demolish the towers between now (2025) and 2051.</p>	Criterion does not apply at the state level

CRITERION	ASSESSMENT	APPLICATION
	As such it can be anticipated that they will become increasingly rare over the next 26 years and may, in time, be regarded as endangered. It is not, however, considered to be appropriate to ascribe Criterion B on the basis of a potential future condition.	
CRITERION C Potential to yield information that will contribute to an understanding of Victoria's cultural history	The Step 1 test is not met. Further investigation of or research into the public housing tower at 120 Racecourse Road has limited potential to yield evidence of heritage significance that is not currently visible, well understood or available from other sources.	Criterion does not apply at the state level
CRITERION D Importance in demonstrating the principal characteristics of a class of cultural places and objects	<p>The Step 1 test is met, in that the place is one of a class of places (public housing towers) that has a clear association with the history of public housing in Victoria generally and more specifically with the Housing Commission of Victoria's high-rise tower programme of the 1960s and early 1970s.</p> <p>The Step 2 test is not met. The tower is not 'a notable example of the class in Victoria', having regard for the guidance provided by Reference Tool D.</p> <p>The tower is not a <i>fine</i> example. It displays physical and technological characteristics of the class (public housing towers) but not in a manner that these would be considered to be of a higher quality or historical relevance than is typically the case.</p> <p>It is also not <i>influential</i> or <i>pivotal</i>. The tower at 120 Racecourse Road was completed in 1969, seven years after the first HCV high-rise (200 Dorcas Street, South Melbourne). It is one of 24 'Z' blocks delivered by the HCV during the towers programme.</p>	Criterion does not apply at the state level
CRITERION E Importance in exhibiting particular aesthetic characteristics	<p>The Step 1 test is not met. As for most of the HCV high-rise public housing towers, historically the towers at this estate (including 120 Racecourse Road) could be seen as local landmarks by virtue of their contrasting scale and form in the low-rise context. Along with close-up views from Racecourse Road, the Flemington towers can be seen from an elevated position on the Citylink freeway. However, such visibility in and of itself is not sufficient to be considered of aesthetic significance.</p> <p>It is accepted that the HCV towers share particular visual/design characteristics that are consistent and highly recognisable across the group as a whole. They are easily understood and identifiable, and they loom large, both physically and in popular culture. As part of this, depending on the viewer, the towers may evoke a positive or negative response. This is not interpreted as an aesthetic value, however, rather it relates to the broader understanding of the towers as part of Victoria's collective history</p>	Criterion does not apply at the state level

CRITERION	ASSESSMENT	APPLICATION
<b>CRITERION F</b> Importance in demonstrating a high degree of creative or technical achievement at a particular period	<p>No evidence has been identified to suggest that 120 Racecourse Road satisfies this criterion. Over the course of the high-rise programme (1962-75) a common set of standardised panels, connections and details remained consistent. These were applied in varied configurations – Z, E, Y etc plans – to provide units of varied size.</p> <p>The HCV's Large Panel System applied to the high-rise towers was a successful application of existing technologies, which was itself the outcome of iterative refinements and overseas influences over a sustained period. The model was, however, not widely replicated or repeated following the completion of the towers programme. Indeed, the structural vulnerabilities inherent in the cost-efficient design meant that the model had been broadly superseded by the early-1970s.</p>	Criterion does not apply at the state level
<b>CRITERION G</b> Strong or special association with a particular present-day community or cultural group for social, cultural or spiritual reasons	<p>While a detailed analysis of social value has not been investigated specifically for 120 Racecourse Road, no evidence has come to light to suggest that there exists a community whose strength of connection to the tower has the potential to 'resonate[s] across the broader Victorian community' (the state threshold test).</p> <p>It is possible that communities comprising tenants (or potentially broader communities) exist and are found to have an association with the tower. If that is the case, it can reasonably be anticipated that these associations would be at the local, as opposed to state level.</p>	Criterion does not apply at the state level
<b>CRITERION H</b> Special association with the life or works of a person, or group of persons, of importance in Victoria's history	<p>It is not considered that this criterion applies to 120 Racecourse Road. As is the case for all of the high-rise public housing towers, the strength of association is primarily with the HCV, as opposed to a 'person or group of persons'.</p>	Criterion does not apply at the state level

## CONCLUSION

The high-rise public housing tower at 120 Racecourse Road, Flemington does not satisfy any of the Heritage Council of Victoria criteria at a state level.