

6 October 2021

**Statutory Planning Department
City of Port Phillip Council**

To whom it may concern,

Re: *8 Louise Street, Melbourne*
Proposed demolition and redevelopment (PDPL/01019/2021)

This letter has been prepared at the request of the owners of the subject site at 8 Louise Street, Melbourne. It comments on a proposal (application PDPL/01019/2021) to redevelop the site with new mixed use, multi-storey building, with particular reference to potential impacts of the works on the significance of nearby heritage places.

The analysis below draws upon an external inspection of the site and a review of the relevant sections of the Port Phillip Planning Scheme, including the Heritage Overlay provisions at Clause 43.01 and local heritage policy at Clause 22.04. Reference has also been made to the *Port Phillip Heritage Review* (Version 35 March 2021), the *City of Port Phillip Heritage Policy Map July 2020* and the Town Planning application documents including the drawings prepared by Cera Stribley Architecture.

The subject property at 8 Louise Street, is a rectangular shaped allotment on the north east corner of Louise Street and Queens Lane. It is occupied by a three storey brick post-war apartment complex. This building is not considered to be of any heritage significance and is not subject to a Heritage Overlay.

Louise Street is a relatively short two-way street that extends between St Kilda Road in the east and Queens Road to the west. Along Louise Street, three properties have frontages along the south side, with only two having frontages on the north side. The subject site is the only property on Louise Street to have a primary frontage addressing Louise Street, with other properties, as will be described below, fronting either St Kilda Road or Queens Road.

To the immediate east, 490 St Kilda Road (HO331) is occupied by a two storey turn of the century red brick building, described in its citation as '*an imposing Queen Anne influenced two storeyed red brick villa with an asymmetrical arrangement and hipped terra cotta tiled roof*'. To the west, and occupying the block between Queens Lane and Queens Road is 'Stanhill' (former Lenhurst Flats) (HO346), a three storey interwar apartment building constructed in the English Domestic Revival style.

Opposite the subject property, 482 St Kilda Road is occupied by a 16 storey glazed and concrete high rise building, which is also of no heritage significance. The building to the north west of the site, at 32 Queens Road, is a three storey rendered masonry Moderne/Art Deco style complex of flats (HO335).

The subject site is not included in a Heritage Overlay however the properties of heritage value described above are subject to individual Heritage Overlays, HO331, HO348 and HO335 and are graded Significant in the *City of Port Phillip Heritage Policy Map* (refer *Figure 2*).

The site is also subject to several DDOs, including DDO13, DDO28 and DDO26-5A, which relate to vistas to the Shrine of Remembrance (DDO13), emergency flight paths for the Alfred Hospital (DDO28) and development along St Kilda Road (DDO26-5A).



Figure 1 Extract of the Planning and Property report, showing Heritage Overlay places neighbouring the subject site. The subject site is indicated with a blue arrow.



Figure 2 Extract of Port Phillip Schedule of Gradings map. Red properties are significant, green are contributory and grey represents non-contributory. The location of the subject site is indicated by the blue arrow.

While the site is not subject to a Heritage Overlay, it is adjacent to heritage buildings that are subject to heritage controls. The design of any new development on the site should be responsive to broader policy objectives by sensitively and respectfully managing the interface with the adjacent heritage places, the size and articulation of the proposed development and its appropriateness in relation to adjacent historic built form and the broader streetscape environment should still be considered in terms of good planning and design outcomes. As such the provisions of Clause 43.01 and objectives and general policy provisions at Clause 22.04 are outlined below for reference.

The purpose of Clause 43.01 is as follows:

To implement the Municipal Planning Strategy and the Planning Policy Framework.

To conserve and enhance heritage places of natural or cultural significance.

To conserve and enhance those elements which contribute to the significance of heritage places.

To ensure that development does not adversely affect the significance of heritage places.

To conserve specified heritage places by allowing a use that would otherwise be prohibited if this will demonstrably assist with the conservation of the significance of the heritage place.

Before deciding on an application, in addition to the decision guidelines in Clause 65, the responsible authority will need to consider:

- *The Municipal Planning Strategy and the Planning Policy Framework.*
- *The significance of the heritage place and whether the proposal will adversely affect the natural or cultural significance of the place.*
- *Any applicable statement of significance (whether or not specified in this schedule to this overlay), heritage study and any applicable conservation policy.*
- *Any applicable heritage design guidelines specified in the schedule to this overlay.*
- *Whether the location, bulk, form or appearance of the proposed building will adversely affect the significance of the heritage place.*
- *Whether the location, bulk, form or appearance of the proposed building is in keeping with the character and appearance of adjacent buildings and the heritage place.*
- *Whether the demolition, removal or external alteration will adversely affect the significance of the heritage place.*
- *Whether the proposed works will adversely affect the significance, character or appearance of the heritage place*

The objectives and policy guidelines of Clause 22.04 are as follow:

22.04-2 Objectives

- *To retain and conserve all significant and contributory heritage places.*
- *To discourage the demolition of significant and contributory heritage places.*
- *To ensure all new development and redevelopment of significant and contributory places is respectfully and harmoniously integrated with the surrounding character.*
- *To promote design excellence (in terms of building siting, scale, massing, articulation and materials) which clearly and positively supports the heritage significance of all Heritage Overlay areas.*
- *To ensure that new development and any publicly visible additions and/or alterations in or to a heritage place maintains the significance of the heritage place and employs a contextual design approach.*
- *To encourage development, in particular use of materials, that responds to the historic character of laneways and to minimise elements that adversely impact on that character.*
- *To ensure that reconstruction and repair of significant heritage bluestone kerb and channelling, bluestone laneways and significant concrete kerb and channel is carried out in a way that reflects as closely as possible the original appearance.*

22.04-3 Policy

General

It is policy to:

- Encourage the restoration and reconstruction of heritage places (including the accurate reconstruction of original streetscape elements such as verandahs) in all areas, and in particular, in intact or substantially consistent streetscapes in the South Melbourne, Albert Park, Middle Park and St Kilda West Heritage Overlay areas (HO440, HO441, HO442, HO443, HO444, HO445 or HO446).
- Encourage the removal of alterations and additions that detract from the heritage significance of a heritage place.
- Encourage new development to be respectful of the scale, form, siting and setbacks of nearby significant and contributory buildings.
- Disregard the impact of buildings that are obviously atypical to the character of the streetscape when determining the appropriate mass and scale for new buildings or extensions or upper storey additions.
- Encourage a contextual design approach for additions and/or alterations to a heritage place or for new development. A contextual approach is where the alteration, addition or new development incorporates an interpretive design approach, derived through comprehensive research and analysis. New development should sit comfortably and harmoniously integrate with the site and within the streetscape and not diminish, detract from or compete with the significance of the heritage place or streetscape character. This approach can include
 - Contemporary architecture and innovative design which is an important part of the contextual approach because it adds to the existing diversity and layering of styles through time. This layering is a defining feature in a number of areas and is therefore an important component of Port Phillip's heritage.
 - Accurate reproduction architecture may be employed in limited instances where detailed evidence, such as photographic evidence, exists for that alteration, addition or new development. This approach may be more appropriate in the South Melbourne, Albert Park, Middle Park and St Kilda West Heritage Overlay areas (HO440, HO441, HO442, HO443, HO444, HO445 or HO446), but may have limited application elsewhere.

[...]

The proposal for the subject site involves complete demolition of the existing apartment complex and the construction of a multi storey mixed use development including ground floor commercial tenancies with apartments to the levels above and basement carparking.

The proposed demolition is acceptable, given the property is not subject to the Heritage Overlay and not considered to be of heritage significance.

The proposed new built form is massed into a podium and tower typology. The architectural treatment to the podium will have an asymmetrical composition with projecting balconies and the entry delineated by an archway. The tower above will be broadly rectangular in plan at each level, with the corners and edges rounded as to give a curvilinear expression. With regards for materiality, the podium will be finished in red face brick with concrete balconies, and the tower element above will be predominantly glazed with concrete banding expressing each level, resulting in the tower having a contrasting, lighter appearance. The massing and external treatment will provide a clear distinction between the lower level street interface and the higher tower component of the scheme.

As mentioned above, the site is not subject to a Heritage Overlay, though subject to various Design and Development Overlays. Of these, DDO26 is considered to be the most relevant to the current proposal. Schedule 26 to Clause 43.02 contains guidelines in relation to heritage, specifically the objective 'To ensure development does not compromise any identified heritage value of adjoining or nearby properties.' And the requirements that 'New development should respect the form, massing and siting of heritage buildings on the development site or adjoining sites.'

The set back of the proposed new envelope from Louise Street is not less than the front set back of the adjoining graded 490 St Kilda Road or 33 Queens Road. With regards to the eastern boundary adjoining 490 St Kilda Road, the podium has a stepped set back, being 3m at ground floor (noting that the terraces extend to the boundary) and 4.3m for Levels 1 and 2 above, with the glazing line of the tower element above setback 4.5m. These setbacks are supported insofar as they establish a clear visual and physical separation between the proposed building and the adjoining heritage property, sufficient to enable the heritage

built form at 490 St Kilda Road to retain its integrity as a free standing element in the street as seen from both St Kilda Road and Louise Street.

Notably, the extent of separation of the proposed building and 490 St Kilda Road is substantially greater than that permitted nearby in terms of the Warwillah, 572 St Kilda Road (HO332) and the residential tower to its immediate rear, the Tate Luxury Apartments (also known as 572 St Kilda Road) that face on to Beatrice Street.



Figure 3 View of the truncated rear of Warwillah, 572 St Kilda Road (HO332) and the residential tower to its immediate rear, the Tate Luxury Apartments, showing the limited setback or space between the two.

The podium façade references the height of the roof ridges to the nearby heritage buildings, reinforcing the street wall scale established by these nearby heritage properties. The proposed red brick is an interpretive response to the materiality and articulation of the adjacent properties and the broader context along St Kilda Road.

While the overall building height is taller than the adjacent two and three storey buildings, the podium articulation and setbacks will ensure the scheme does not dominate the adjacent graded properties in a manner that is unacceptable, accepting that these are already seen in conjunction with other taller built form located on St Kilda Road as part of the backdrop to the broader streetscape.

In summary, the proposed development for 8 Louise Street is supported in relation to heritage considerations.

Demolition of the existing building is consistent with Council policy given the property is not subject to the Heritage Overlay or considered to be of any heritage note. The design of the new scheme is appropriately responsive to the applicable heritage objectives within the Design and Development Overlay. While located adjacent to and opposite low rise buildings subject to individual Heritage Overlays, the broader urban context is more varied with nearby St Kilda Road a busy commercial thoroughfare with buildings of varied ages, materiality and heights, with several high rise buildings nearby.

The proposed scheme will sit comfortably within this streetscape and will not adversely impact upon the significance of the neighbouring, graded, heritage properties or significant view lines/ corridors and is supported on that basis. On the basis of these considerations, it is recommended a permit be issued.

Please contact this office if there are any questions in relation to the above.

Bryce Raworth Pty Ltd

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