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**Planning Department  
City of Yarra  
PO Box 168  
Melbourne, Vic 3121**

To Whom It May Concern

***Re: 25-43 Wangaratta Street, Richmond  
Proposed Demolition and New Development***

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This letter was prepared on behalf of the owners of the subject site at 25-43 Wangaratta Street, Richmond in support of an application for works. It comments on the potential heritage impacts of a proposal to demolish the existing building on the site and construct a new multi-storey commercial development.

The site has been inspected (externally) and also its environs. A review has been undertaken of relevant sections of the *Yarra Planning Scheme*, including the City of Yarra's Development Guidelines for Sites Subject to the Heritage Overlay at *Clause 22.02* and the Heritage Overlay at *Clause 43.01*. Also referenced is the *City of Yarra Review of Heritage Overlay Areas 2007* (Revised May 2017) and the *Yarra Heritage Database*. This letter should be read in conjunction with the drawings and other documentation prepared by Bates Smart Architects in relation to this application.

25-43 Wangaratta Street is a rectangular portion of land with street frontages onto Botherambo Street to the east and Wangaratta Street to the west. The site contains a three-storey c.1970s brick industrial/commercial complex incorporating on site parking along the Wangaratta Street frontage. The principal facade to Wangaratta Street is articulated into a series of bays, the external treatment including brick fins, open blockwork, concrete panels and glazing. The rear eastern elevation to Botherambo Street is of plain red face brick inset with garage roller doors and metal framed windows.

The site is located within the Richmond Hill Precinct, Richmond (HO332) of the Heritage Overlay. The statement of significance for this precinct sub-area of HO332 provided in the *City of Yarra Review of Heritage Overlay Areas* reads as follows:

***D. The Richmond Hill Heritage Overlay Area (south residential sub-area)***

*This sub-area is demarcated by the Reverend Docker's 'Clifton Village' standard grid plan, with large and small intermediate service streets. It originally had small regularly sized urban allotments and small early Victorian-era cottage development. The sub-area is generally bordered by Wangaratta St on the west, Montgomery St and the Richmond Terrace service lane on the north, and the rear of properties facing Church St on the east and Swan Street on the south. [...]*

***The Richmond Hill Heritage Overlay Area (south) is significant:***

- *As one of the earliest private development areas in the City for worker housing, dating initially from the 1840s but extending in the gold-era of the 1850s, as early small cottages set on small allotments;*

- *For the historical links of the street layout and subsequent housing development with the Docker family and the estate's designer, the noted architect and surveyor, Charles Laing;*
- *As an illustration of a rare type of model private subdivision and development in the Melbourne area in the form of a planned 'village', as shown by the regular street patterns, similar allotment sizes, and the originally residential land use.*

25-43 Wangaratta Street is graded 'non-contributory' in the *City of Yarra Review of Heritage Overlay Areas 2007* (Revised May 2017). It is located in non-heritage streetscapes along its Wangaratta and Botherambo Street frontages. The *Review of Heritage Overlay Areas 2007* lists all the Wangaratta Street addresses along the west side of Wangaratta Street between Stewart Street and Tanner Street as 'not contributory'. The exception to this is 61 Stewart Street (on the corner of Stewart and Wangaratta Streets) to the south-west, which is a double-storey rendered masonry Moderne style factory that is graded 'individually significant'. The east side of Botherambo Street opposite the subject site consists of garage doors and fences belonging to the rear frontages of properties addressing Lennox Street further to the east, and is not a heritage streetscape.

The site is subject to the provisions of *Clause 43.01*, the Heritage Overlay and the associated policy at *Clause 22.02*. *Clause 22.02-5.7* offers the following guidance for new developments at heritage places, and alterations and additions to them.

*22.02-5.7 New Development, Alterations or Additions*

*22.02-5.7.1 General*

*Encourage the design of new development and alterations and additions to a heritage place or a contributory element to a heritage place to:*

- *Respect the pattern, rhythm, orientation to the street, spatial characteristics, fenestration, roof form, materials and heritage character of the surrounding historic streetscape.*
- *Be articulated and massed to correspond with the prevailing building form of the heritage place or contributory elements to the heritage place.*
- *Be visually recessive and not dominate the heritage place.*
- *Be distinguishable from the original historic fabric.*
- *Not remove, cover, damage or change original historic fabric.*
- *Not obscure views of principle façades.*
- *Consider the architectural integrity and context of the heritage place or contributory element.*

*Encourage setbacks from the principal street frontage to be similar to those of adjoining contributory buildings; where there are differing adjoining setbacks, the greater setback will apply.*

*Encourage similar façade heights to the adjoining contributory elements in the street. Where there are differing façade heights, the design should adopt the lesser height. [...]*

*22.02-5.7.2 Specific Requirements (where there is a conflict or inconsistency between the general and specific requirements, the specific requirements prevail)*

*Corner Sites and Sites with Dual Frontages*

*Encourage new building and additions on a site with frontages to two streets, being either a corner site or a site with dual street frontages, to respect the built form and character of the heritage place and adjoining or adjacent contributory elements to the heritage place.*

*Encourage new buildings on corner sites to reflect the setbacks of buildings that occupy other corners of the intersection. [...]*

It is proposed to demolish the existing built form on the subject land in its entirety. This is acceptable and consistent with Council policy given the site is graded 'not contributory' and the modern origins of the existing building.

The proposed development will comprise two buildings separated by a narrow paved walkway providing public pedestrian access between the site's street frontages. While reading as separate entities from the street, the buildings will be connected at each of the upper levels by a narrow link. Two full basement levels will be incorporated in the

development. The style of both buildings will draw on existing factory typologies seen in the broader industrial area. The northern building will be 7 storeys. It will occupy the larger part of the site, and comprise a podium volume at ground to 2nd floor that will be clad with masonry glazed tiles, with the upper levels set back from both street frontages and treated in a different, lightweight contemporary manner. The roof will have a sawtooth profile. The southern building will be 8 storeys. It will interpret a factory tower typology, and include a facade treatment of predominantly glazing, including steel framed windows evocative of those commonly used in interwar industrial buildings.

In terms of setbacks, the buildings will abut the street boundary at ground to 2nd floor level, then incorporate increasing (and varying) setbacks to the levels above. The 3rd and 4th floor setbacks will be a minimum of approximately 3 metres from Wangaratta Street and 4.6 metres from Botherambo Street. At the 5th and 6th floors, the southern building will have an increased setback from Botherambo Street of approximately 12.2 metres. The northern building will incorporate greater setbacks at the 6th floor of 5 metres from Wangaratta Street and 10.2 metres from Botherambo Street.

Key considerations in assessing the proposed development are its impacts on the significance of the adjacent streetscapes and precinct. It is noted that Council policy as provided above generally allows for infill design that is responsive and respectful of the heritage values of graded buildings in this vicinity and within the wider precinct. The scheme provides a sensitive and considered response to its context through its external treatment, scale and setbacks. The exterior will reference and reinforce the traditional industrial character of this part of Richmond immediately north of Richmond Railway Station through its materials, fenestration, massing and sawtooth roof profile.

It is noted that a permit was recently awarded at the VCAT for the construction of a 7 storey building on the adjacent site immediately to the south at 45 Wangaratta Street to replace the existing double storey industrial building [Shaw and Wangaratta Street Pty Ltd v Yarra CC (Corrected) [2017] VCAT 758 (31 May 2017)]. The height of the proposed scheme for the subject site is comparable to the scale of this development and of building stock in the adjacent industrial precinct to the west. It will include an 8-storey interface abutting 45 Wangaratta Street that will result in a stepped height transition.

The development will have no negative impacts with respect to the frontage to both adjacent streetscapes, which are not considered sensitive heritage environments. The scheme is in keeping with policy relating to dual frontages in this regard. To the extent that the subject site is adjacent to a lower scale residential area to the east that includes graded buildings, the proposed scheme incorporates setbacks, staggered heights and architectural treatment that will provide a visually neutral, low impact interface. The house frontages along the west site of Lennox Street are at a very considerable visual separation from the subject site. This separation includes both the rear (western portions) of these residential properties, and the full width of Botherambo Street and its footpaths. Further separation will be provided by the setbacks to the upper levels of the development. The new building envelopes will result in a visually neutral, distant backdrop in views from nearby residential streetscapes that are comparable to those formed by existing buildings in the industrial precinct.

In conclusion, the proposed development for 25-43 Wangaratta Street, Richmond will have no negative heritage impacts on the significance of its adjacent streetscapes and the Richmond Hill Precinct, Richmond. The scheme is interpretative of the character and height of the industrial precinct to the west of which it will form part, and provides a sensitive interface to the lower scale residential streetscapes further to the east. The proposal demonstrates an appropriate, considered response to the policies and provisions at *Clauses 43.01* and *22.02* of the *Yarra Planning Scheme*, and on this basis is acceptable.

Yours sincerely

**GUY MURPHY & BRYCE RAWORTH**