

City of Yarra

Heritage Advice – Development Facilitation Program

Application No.: PPE22/0085
Address of Property: 9-13 Stewart St, Richmond
Planner: Katrina Thomas

I have provided heritage advice previously on a proposal (PLN19/0910) which is generally similar to this one and I have provided expert evidence at VCAT (P1090/2020) on that proposal.

Yarra Planning Scheme References: Clauses 43.01, 22.02 and 21.05.

Heritage Overlay No.: HO332 **Precinct:** in Sub-area E of the Richmond Hill Precinct

Drawings

A set of drawings prepared by Woods Bagot and dated 28/02/22.

Demolition

I did not have any heritage concerns with regard to the extent of demolition but I note that more of the east elevation is now proposed to be retained than was the case previously. While positive it does not counter my other concerns.

Height

The DFP proposal is for 9 storeys above a single level basement. It is the 4th application for this site on which I have commented. Heights proposed previously were 14 storeys, 8 storeys for which a permit was granted but never acted upon, 10 storeys and now 9 storeys (Ground, Levels 1-8, dimensioned height: 34.790 metres).

My concerns about height remain paramount with regard to the effects of any level above 8 storeys, on views from various vantage points within and without the heritage precinct. Constraining the height to 8 storeys would mitigate this to an extent.

From a policy perspective my concern is founded in Cl. 21.05 viz.:

Factors that contribute to the heritage character of particular neighbourhoods include the period of development and pattern of subdivision, predominant land uses, and the original socio-economic structure of the population. This has created unique neighbourhoods and retail activity centres which are identified in Yarra's Heritage Overlays. These factors must be considered when understanding a site's significance. The cultural significance of heritage places must not be compromised by new development. [Emphasis added.]

Strategy 14.3 Protect the heritage skyline of heritage precincts.

Strategy 14.6 Protect buildings, streetscapes and precincts of heritage significance from the visual intrusion of built form both within places and from adjoining areas.

My concern is also supported by Cl. 22.02 in that it seeks to ensure that the integrity of a place of cultural heritage significance will be maintained, significant view lines to a heritage place will be retained and the spatial characteristics and heritage character of the surrounding historic streetscape will be more appropriately respected.

In more detail my opinions are set out in my evidence to VCAT I where stated that, *inter alia*, viz.:

...the Heritage Overlay applies to the subject site and the surrounding precinct and does not apply to all sites south of the railway line. It applies to the low-rise Wellington Street Precinct (HO36), which borders Punt Road and extends two blocks to the east, and specific sites, including the Richmond Maltings site which is on the *Victorian Heritage Register*. In such circumstances, inevitably tall buildings on sites outside of a Heritage Overlay will, depending upon the circumstance, intrude on and be visible within the viewshed of a heritage precinct. In my opinion this is not a reason to factor them into a consideration of a site within a Heritage Overlay. (Para. 70)

Through the use of policy, the height of upper level additions to former industrial buildings in the immediate vicinity has been kept consistently to these levels [7 storeys] over time and the heritage skyline emanating from the industrial heritage buildings has not been compromised. (Para. 72)

The existing additional levels on the warehouse buildings are mostly of a recessive nature and do not seek to make an architectural statement in themselves whereas, and by way of contrast, this design is mostly an architectural statement. The design is a flat-sided rectangular box other than for the external stair [now deleted]. (Para. 79)

The height in combination with the width of these elevations will make the building dominant and visually conspicuous in views from Richmond Hill to the north, including a viewshed from the west and east, variously from the south, including the platforms of the Richmond Railway Station and probably Punt Road to the south. (Para. 80)

The western elevation will be visible in longer distance views such as from Punt Road, Brunton Avenue and parkland/oval, including importantly behind Shakspeare [sic.] Terrace and other terraces in Punt Road which are included in the Richmond Hill Precinct. Rather than being less dominant and/or apparent, as sought by the Heritage Policy, the upper levels will form a dominant and abrupt background and an undesirable punctuation on the skyline as demonstrated in the perspective [provided to VCAT] looking south west along Punt Road (p. 8). Further, the central portion of the west elevation will be textured precast concrete (CE 01, CE 02), and dark neutral standing seam metal (CD 01). In views from Punt Road this utilitarian materiality and dark colour will exacerbate the dominance of this building above the heritage skyline. (Para. 82)

The impact of the height on the Richmond Hill Precinct in views from the north is an important heritage consideration and the perspectives [provided to VCAT] demonstrate that the visibility of the upper levels will be dominant and intrusive on the skyline depending upon where the viewer stands". (Para. 94)

Constraining the height to 8 storeys would mitigate these concerns to some extent.

Design

A comparison between the 02/02/20 (previous) and the 28/02/22 drawings (current) reveals that there is very little difference with respect to the South (Stewart Street) elevation. The East (Margaret Street) elevation has abandoned the corner stair and division into three other components, all of which have been replaced by a pre-cast concrete grid frame infilled with glazing. This is more resolved. There is very little difference with respect to the North elevation. There are no significant differences between the West elevations. My comments with regard to the impact of height and width (North and South elevations) and of the impact and materiality of the West elevation generally still remain.

In my Heritage Advice of 23 December, 2020 I commented *viz.*:

Textured metal cladding is proposed to be applied to the west wall of the amenities. While this material is a slight improvement on precast concrete panels, it is still utilitarian. The use of this material does not alleviate the fundamental issue of the visibility, visual intrusion and dominance of the building above and behind Shakspeare Terrace in views from the west and north-west along Punt Road.

While not labelled on SK3203, the dark cladding at the south end of the West elevation appears to still be metal (CD01 and CD02).

In my opinion, the current proposal is very similar to the previous proposal and my concerns in relation to that have not been addressed in the current proposal.

Signed:



Robyn Riddett

Director – Anthemion Consultancies

Date: 26 May, 2022