

Heritage Analysis

81-95 Burnley Street & 26-34 Doonside Street
Richmond

December 2021



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1.0 Introduction

This report was prepared for Gurner™ in respect to the Development Plan proposed for the site at 81-95 Burnley Street and 26-34 Doonside Street, Richmond. It provides a heritage analysis of the Development Plan, as required under Schedule 15 to Clause 43.04 Development Plan Overlay:

Comprehensive Heritage Analysis

A Comprehensive Heritage Analysis must be prepared by a suitably qualified professional that includes the following, having regard to the heritage expert assessments prepared for Amendment C223yara:

- *Written description of the heritage places;*
- *History of the heritage places;*
- *Assessment of significance of individual elements; and*
- *Copies of the existing Statements of Significance of HO252 and HO375.*

2.0 Sources of Information

The following documents have been reviewed in the preparation of this report:

- The relevant provisions of the Yarra Planning Scheme, notably the Heritage Overlay at Clause 43.01, the Development Guidelines for Sites Subject to the Heritage Overlay at Clause 22.02, Built Form and Design Policy at Clause 22.10 and Schedule 15 to Clause 43.04 Development Plan Overlay.
- Heritage expert witness statements in relation to Amendment C223 to the Yarra Planning Scheme and associated panel report.
- *Heritage Gap Study: Review of 17 Heritage Precincts* (Context Pty Ltd, 2014).
- *City of Yarra Heritage Gap Study* (Graeme Butler & Assoc., 2007)
- *City of Yarra Heritage Review* (Allom Lovell & Assoc., 1998).

3.0 History

At the end of the nineteenth century, a number of tanneries were dispersed along the banks of the Yarra River on the east side of Burnley Street. Industrial development in this area continued into the early twentieth century with the establishment of the Vickers Ruwolt engineering works on Victoria Street around 1915.



Figure 1 Part of a 1902 MMBW plan showing the subject site (shaded red). It was largely undeveloped land at that time apart from two dwellings on the Burnley Street frontage and several dwellings fronting Appleton Street. 'Doonside' (Dame Nellie Melba's birthplace) was located to the north of the subject site. Source: State Library of Victoria.

Concerns about the impact of noxious industries eventually resulted in zoning by-laws that divided Richmond into residential and factory areas. In 1929, the east side of Burnley Street in the vicinity of Appleton Street was recommended as a factory area. This included land occupied by 'Doonside', Dame Nellie Melba's birthplace (where her father David Mitchell resided until his death in 1916). Doonside was demolished in February 1931 and the estate subdivided and offered for sale in May of that year, providing 34 lots on Burnley, Doonside, Appleton Streets and David Streets (the latter named after David Mitchell).

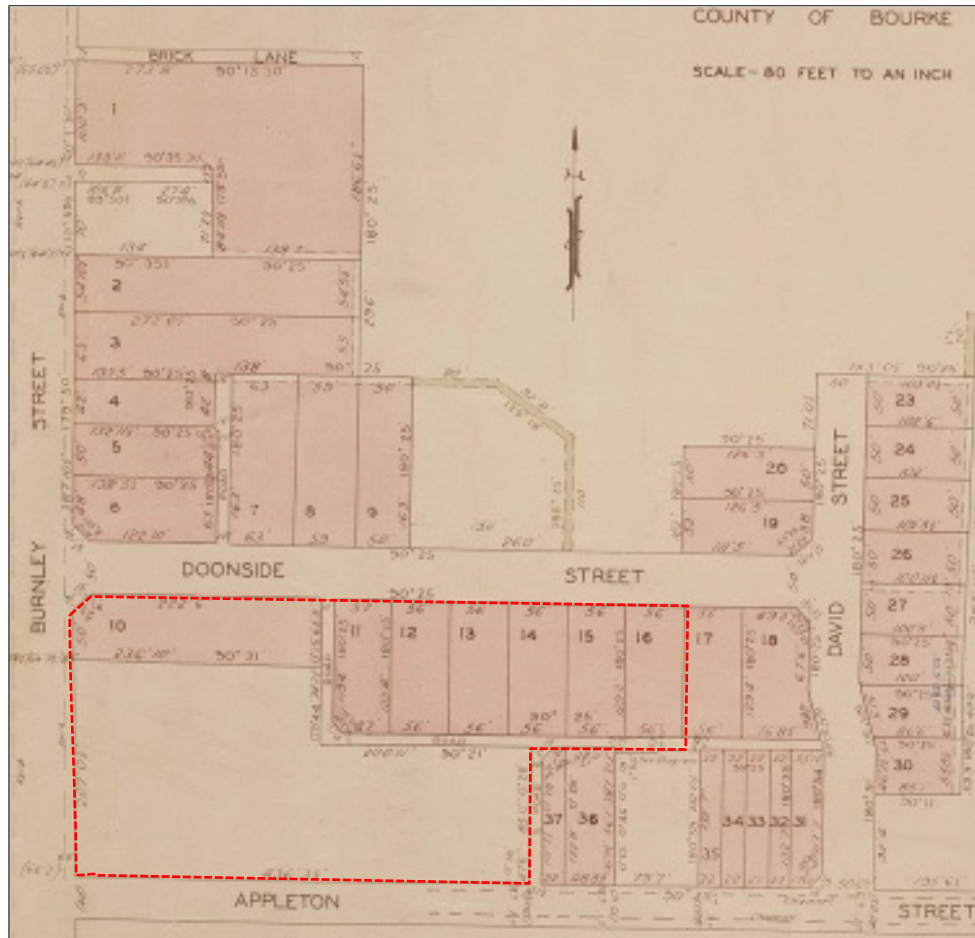


Figure 2 Part of the 1930 plan of subdivision for the Doonside Estate. The dashed lined marks the extent of the subject site. Source: Yarra Ranges Regional Museum.

Predating the Doonside Estate subdivision, a fibrous plaster factory was built c1925 on the north-east corner of Burnley Street and Appleton Street (first listed as in Sands and McDougall Directory as 89-95 Burnley Street). In 1930, the plaster factory was taken over by Russell Manufacturing Co. Pty Ltd, a firm allied with Repco. Established in 1926 as the Replacement Parts Co. (later abbreviated to become 'Repco') the company distributed automotive spare parts and accessories, stocking its own products and those of other firms. Russell Manufacturing are first listed at 89-95 Burnley Street in the 1931 Sands and McDougall directory. East of the factory, Appleton Street remained a residential streetscape.¹

1 Sands and McDougall directory, 1931.

Repco reportedly selected the Burnley Street site because it was bound on three sides by roads and could accommodate a reasonably straight and uninterrupted production sequence.² The foundry buildings were open sided according to a 1933 description:

*...climatic conditions are such that no glazing is necessary for the shops, nor is there need for heating, whilst obviously, ventilation is automatic. The main foundry shop, which is 100 feet by 200 ft, is divided into two main bays, wherein the two main products, pistons and rings are self contained units...*³

Around 1939, Repco/Russell Manufacturing constructed a double-storey office and laboratory building at present day 26 Doonside Street.⁴ In March 1942, the company purchased additional land and expanded northwards along Burnley Street towards the Doonside Street corner.⁵ A new building erected on this site in the same year was described in a contemporary advertisement:

*Repco is closely associated with Australia's war effort on the industrial front and is engaged in producing its quota of munitions and war equipment as well as a steady flow of automotive parts for essential services. To meet the extra strain placed on the manufacturing division, a new plant and extension of its foundry were completed...*⁶

During the Second World War, Russell Manufacturing supplied the United States Army with pistons and piston rings.⁷ To meet wartime demand Repco acquired additional foundry floorspace in 1943, measuring 40 ft by 132 ft (12.2m x 40.2m).⁸ Also in 1943, residences at 5 and 7 Appleton Street disappear from Sands and McDougall directories. These sites were presumably absorbed into the expanding Russell factory.

A 1945 aerial photograph shows factory buildings encompassing almost all of the subject site apart from the eastern end of the Appleton Street boundary where a small number residences remained.

2 'A Modern Australian Foundry', in *Foundry Trade Journal*, September 7, 1933, p.129. Repco Ltd company records, University of Melbourne.

3 Ibid.

4 Allom Lovell & Assoc., *City of Yarra Heritage Review: Building Citations*, p.122.

5 Repco Company records, University of Melbourne Archives.

6 Sands and McDougall Directory, 1943, p. a58.

7 Repco Company records, University of Melbourne Archives.

8 Repco Company records, University of Melbourne Archives.

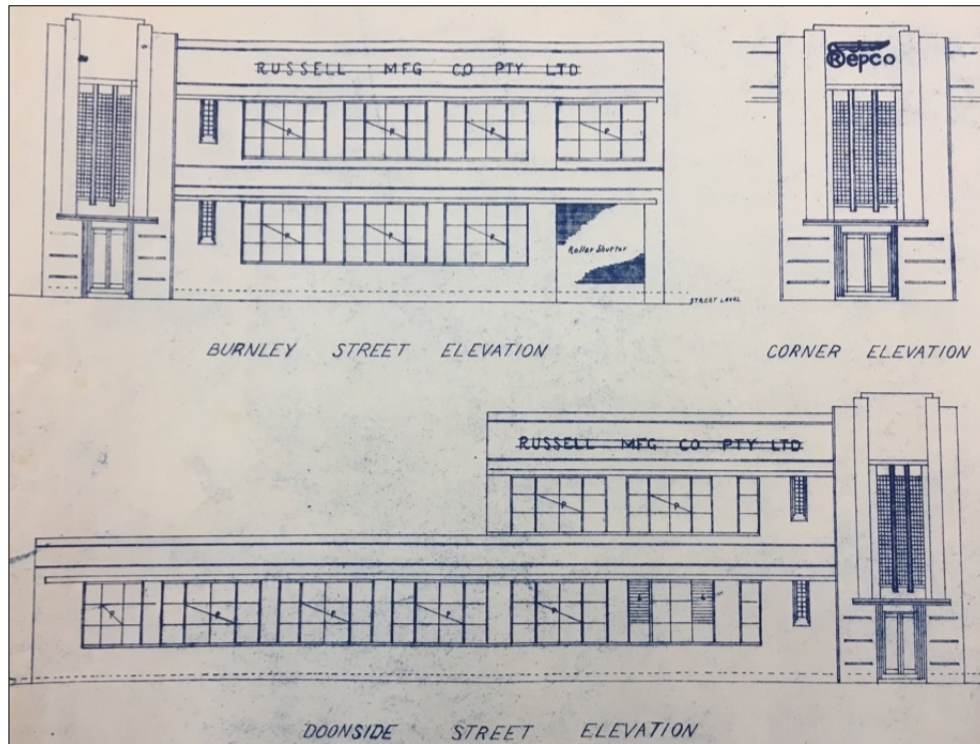


Figure 3 Undated (c1942) architectural drawings for the Recco building on the corner of Burnley and Doonside Streets. Source: Public Record Office Victoria.



Figure 4 A 1945 aerial photograph showing the Recco factory with large scale industrial development to its north (the subject site is indicated by a dashed line). Source: University of Melbourne Library.

In the post war years Repco steadily increased its business, thriving on its manufacture of parts for the Holden motor car. By 1958, the Russell factory had expanded further east along Appleton Street to take over sites at no.13 and 15. From 1962, Sands and McDougall directories list a Russell Manufacturing storage facility at 21-27 Appleton Street.⁹

Repco moved into high-performance engine construction in the 1960s in association with Formula 1 driver Jack Brabham. They developed a new V8 engine for Brabham, which had its first successful testing at the Burnley Street factory in March 1965.¹⁰ The following year, Brabham won the French, British, Dutch and German Grands Prix and World Formula One Driver's Championship. Around the same time the production of the Repco-Brabham engine was relocated from Richmond to another Repco facility at Maidstone.¹¹

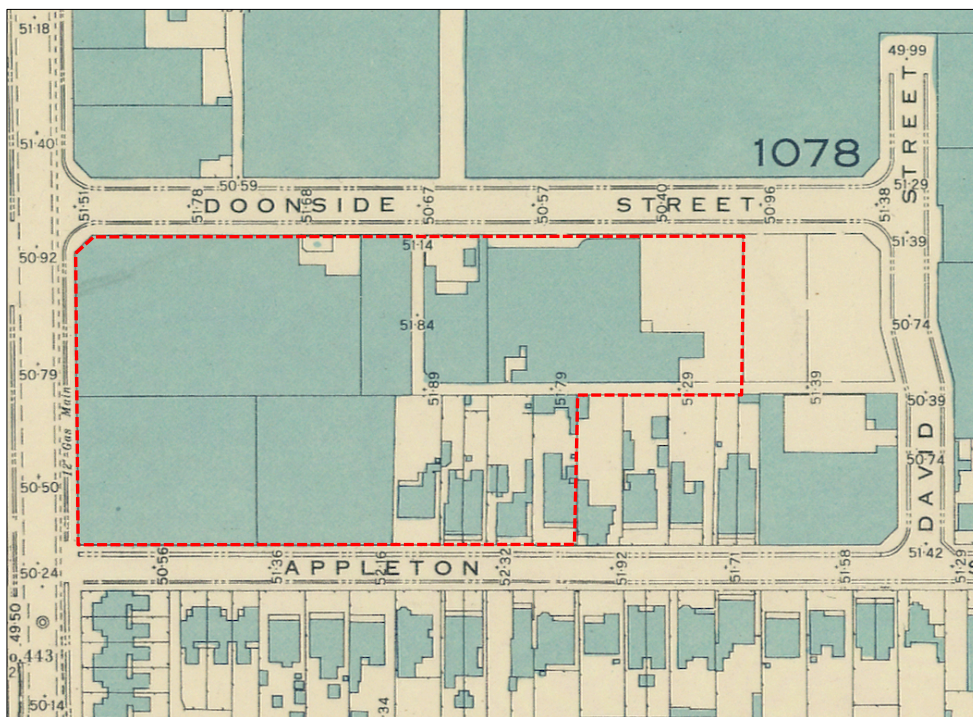


Figure 5 Extract from a 1950 MMBW plan showing most of the subject site developed with factory buildings but with five modest dwellings remaining on the Appleton Street frontage. Source: State Library of Victoria.

⁹ Sands and McDougall Directory, 1962.

¹⁰ www.motorsportsalmanac.com/mastuff/articles/RN_020310.pdf

¹¹ <http://repco.com.au/CA2571B70016E7AE/page/About+Us?OpenDocument&1=06-About+Us~&2=~&3=~>



Figure 6 A 1957 photograph Repco building on the corner of Burnley Street and Doonside Street. Source: 'Repco Record' (University of Melbourne Archives).

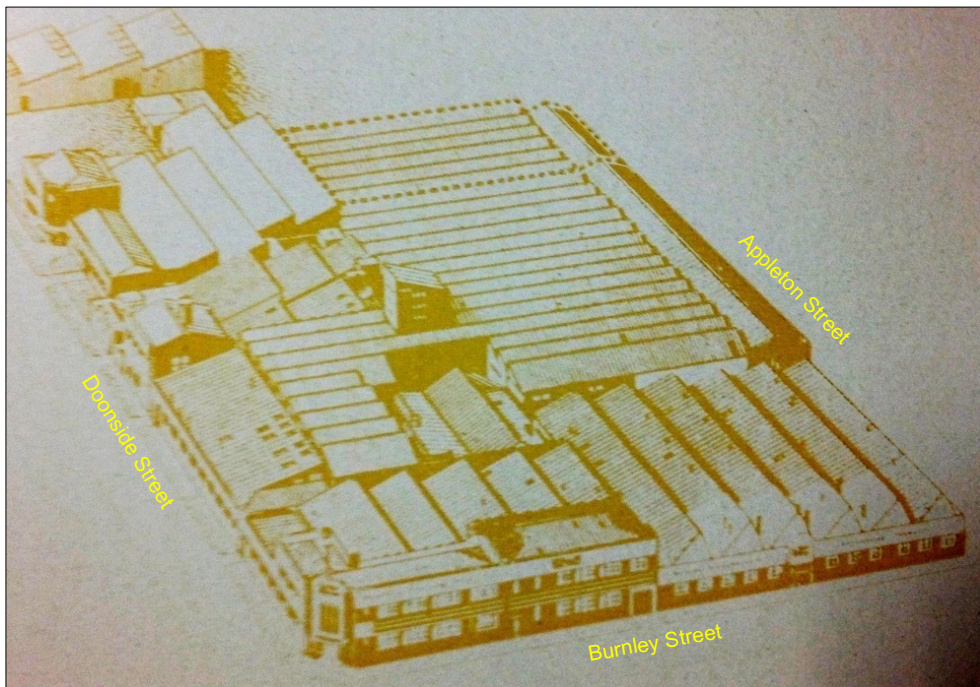


Figure 7 A c1962 illustration of the Repco factory complex. Source: University of Melbourne Archives.

4.0 Description

The subject site comprises a large parcel of land bound by Burnley Street to the west, Doonside Street to the north, Appleton Street to the south and recent multi-storey apartment development to the east. The site is, in part, occupied by the former Repco factory complex, which was constructed in stages from c1930 through to the late twentieth century.

The principal double-storey Moderne style building on the corner of Burnley and Doonside Streets was built for Repco in 1942. It has face brick walls and regularly spaced multi-pane steel framed windows with continuous concrete hoods providing a strong horizontal emphasis, counterposed by the vertical glass block windows above the corner entry.

The 1942 Repco building remains broadly intact in terms of its external form, but it has undergone various unsympathetic alterations. The alterations include an upper storey addition on the Doonside Street façade, removal of original signage, replacement of some original window frames and overpainting brickwork.

The southern end of the Burnley Street frontage (on the corner of Appleton Street) is occupied by a c1930s single-storey factory building with a saw tooth roof. It has face brick walls to the street boundaries with regularly spaced steel framed windows under a rendered parapet. The parapet has simple interwar Moderne style detailing in the form of horizontal incisions. The stepped pediment on the Burnley Street frontage is also characteristic of the interwar Moderne style. The street façade appears to remain largely intact to its interwar state but all the walls and rendered surfaces have been painted over and the Burnley Street entrance has been infilled. There is also a plainly designed first floor addition on the Burnley Street frontage (abutting the southern end of the 1942 double storey building).

The former Repco complex also includes a double-storey interwar Moderne style office building at 26 Doonside Street. This building has a parapeted facade with manganese and cream brick walls. The curved corner is surrounded by rendered vertical fins and a cantilevered concrete canopy above the entry. Port hole windows on the facade are typical of the Moderne style.

The balance of the site is occupied by a series of utilitarian factory buildings of one to two storeys, typically with sawtooth roofs and overpainted brick walls. There is also a modern tilt-up concrete building with a roof top carpark deck at the eastern end of the Appleton Street boundary.



Figure 8 The former Repco/Russell Manufacturing building on the corner of Burnley and Doonside Streets.



Figure 9 The Burnley Street façade.



Figure 10 *Interwar Moderne style former Repco building on the corner of Burnley and Appleton Streets.*



Figure 11 *The Appleton Street frontage to the subject site showing modern tilt up concrete building with multi-storey development on the adjacent site in the background.*



Figure 12 The Doonside Street frontage of the subject site looking east.



Figure 13 The former Repco building at 26 Doonside Street, located at the eastern end of the subject site.

In terms of its context, the subject site is located in a part of Richmond that was historically characterised by factories and warehouses of one to two storeys, but which is currently experiencing substantial change with a number of multi storey apartment buildings completed or approved for construction on redundant industrial sites.

The north side of Doonside Street, opposite the subject site, retains single and double-storey interwar industrial buildings (77 Burnley Street & 1 Doonside Street) and a large parcel of vacant land currently used as a carpark. The Victoria Gardens shopping centre backs onto the carpark.

The land to the immediate east of the subject site has been redeveloped with an apartment complex ranging from eight to thirteen storeys in height (36-44 Doonside Street and 27-41 Appleton Street). Further to the east, the single-storey façade of the former Builders' Steel Form Supply Co. was retained and incorporated into a multi-storey development (9-11 David Street).

The subject site also interfaces with a fine grain residential streetscape on the south side of Appleton Street. Notwithstanding that it is partially included in a Heritage Overlay precinct, Appleton Street does not present as a homogenous or highly intact heritage environment. The south side of the street contains a relatively diverse mix of late-Victorian, Edwardian and interwar residences in varying states of intactness, along with double storey infill at 14/14A Appleton Street and some architecturally non-descript single-storey post war workshops further to the east.



Figure 14 *View from the Burnley Street looking east along Appleton Street. The subject site is to the left.*



Figure 15 Double-storey interwar former factories on the north side of Doonside Street, opposite the subject site.



Figure 16 Carpark on the north side of Doonside Street, opposite the subject site. The Victoria Gardens shopping centre is visible behind the carpark.



Figure 17 *Recent multi-storey development at the eastern end of Appleton Street.*



Figure 18 *Multi-storey development at 9-11 David Street incorporating the single-storey façade of the Builders' Steel Form Supply Co.*

5.0 Heritage Listings

The land at 81-95 Burnley Street is partially covered by a site-specific heritage overlay HO375 – ‘Russell Manufacturing Pty Ltd later Repco’. The heritage overlay encompasses the pre-1945 office building and factory to a depth of 34 metres from the Burnley Street frontage. The former Repco Offices at 26 Doonside Street (at the rear of the subject site) is listed separately on the Heritage Overlay schedule as HO252. External paint controls apply to both HO252 and HO375 but there are no internal alteration controls or tree controls. The balance of the subject site has no Heritage Overlay controls.

South of the subject site, the residential properties at 8-38 Appleton Street form part of the Yarraberg Precinct (HO460). Separate Heritage overlays apply to the dwellings at 2-6 Appleton Street (HO374) and adjoining properties at 97-103 Burnley Street (HO369). An individual heritage overlay control applies to 24 Appleton Street (HO370).

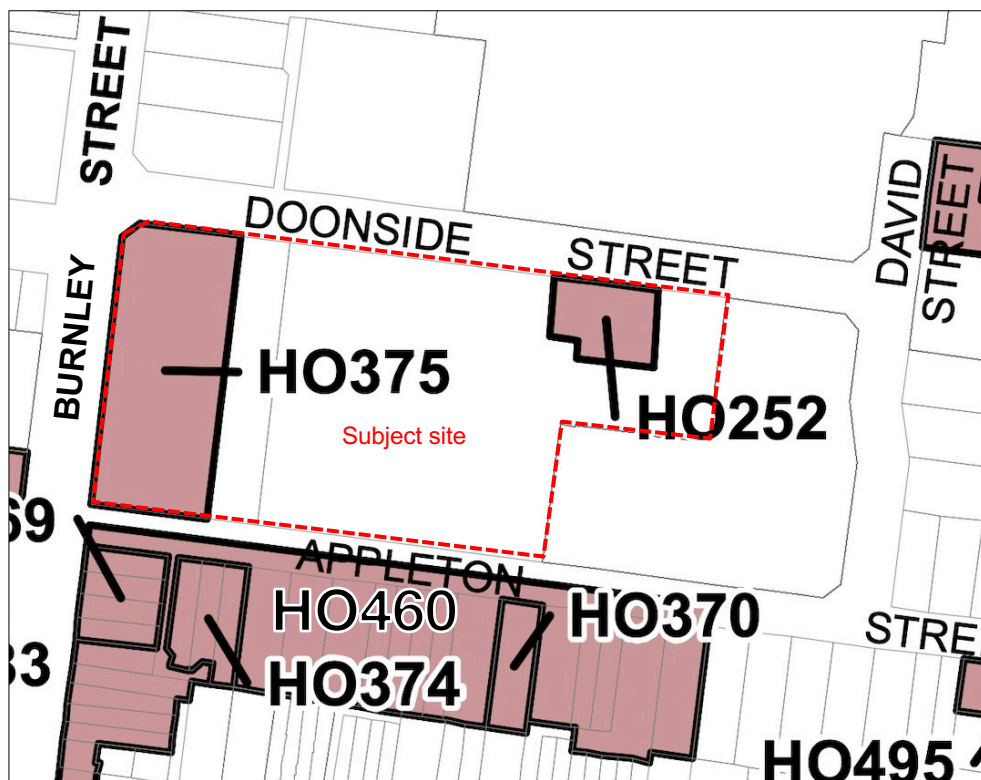


Figure 19 Map showing individual Heritage Overlay controls applying to 26 Doonside Street (HO252) and the front part of 81-95 Burnley Street (HO375).

6.0 Statements of Significance

The statements of significance for the buildings at 81-95 Burnley Street and 26 Doonside Street are reproduced below.

81-95 Burnley Street (HO375):

What is significant?

The Russell Manufacturing Company Pty Ltd (later Repco) building at 81-95 Burnley Street, Richmond is significant to the extent of the pre-1945 fabric. Built in stages for the Russell Manufacturing Company Pty Ltd, the brick (overpainted) building has a strong Moderne styling, with horizontal banding on the main elevations.

Post-1945 alterations and additions to the building are not significant.

How is it significant?

The Russell Manufacturing Company Pty Ltd (later Repco) building is aesthetically and historically significant to the locality of Richmond and the City of Yarra.

Why is it significant?

The Russell Manufacturing Company Pty Ltd (later Repco) building is aesthetically significant (Criterion E):

- *for its strong Moderne styling as ideally presented on a corner site.*
- *for the relationship with the significant Moderne style former Repco Building at 26 Doonside Street (HO256).*

The Russell Manufacturing Company Pty Ltd (later Repco) building is historically significant (Criteria A & H):

- *as tangible evidence of the large factories built during the interwar period when Richmond became a centre of manufacturing in Victoria.*
- *for the association with the successful motor spare parts firm of Russell Manufacturing Company Pty Ltd.*

26 Doonside Street (HO252):

What is significant?

The building, built c.1939 as an office and laboratories for the Russell Manufacturing Co., which later became Repco at 26 Doonside Street, Richmond is significant. It is a two storey Moderne style bichromatic brick building. It is approximately square in plan, with a curved corner at the northwest. The building is oriented north-west, and the composition of the main panels of brickwork is approximately symmetrical about a diagonal axis which runs through the corner entrance, which has a cantilevered concrete canopy. The north and west elevations are of face manganese brick, whilst large panels of cream brick give the appearance of wrapping around this, leaving a vertical strip of dark brown brick above the entrance. This corner element is decorated with a narrower vertical strip of horizontally-striped tapestry brickwork, and surmounted by three white painted vertical concrete fins. The north elevation features two bands of windows, each comprising three panels of multi-paned steel-framed windows with manganese brick spandrels and sills.

These windows turn the corner to the east elevation; to their right are two vertically placed circular windows, probably to a staircase. The west wall of the building was once attached to a single-storey building which has since been demolished, with the exception of part of the front wall and cream brick parapet which adjoins No. 26.

How is it significant?

The former Repco office and laboratory building at 26 Doonside Street, Richmond, is of local architectural significance of the City of Yarra.

Why is it significant?

It is architecturally and aesthetically significant as a particularly sophisticated example of a small building in the Moderne style, which exhibits an interesting composition of a limited palette of materials. It is thus distinctive for a building of its size and type. The demolition of other adjacent buildings has increased the aesthetic contribution of this building to an otherwise architecturally undistinguished industrial streetscape. (Criteria D & E)

7.0 Significance of Individual Elements

As noted, the subject site is covered by a Heritage Overlay to the extent of the Moderne style office/factory building at 81-95 Burnley Street (to a depth 34 metres) and the Moderne style building at 26 Doonside Street.

Within the heritage overlay curtilage, there is some variation in the degree of significance of different constituent elements. These may be categorised using a three-tiered classification system that divides the fabric into that which is of primary significance, that which is of secondary significance, and that which is of little/no significance.

Elements and spaces of primary significance are those that contribute in a fundamental way to an understanding of the significance of the site and are predominantly intact in form and fabric to the significant phase of the site's development.

Elements deemed to be of primary significance include:

- The Moderne style street facades to main factory/office building to the extent of their original pre 1945 form and fabric.
- The double storey Moderne style facade to 26 Doonside Street (including the east and west elevations).
- The unpainted face brickwork to 26 Doonside Street.

Elements and spaces of secondary significance are of a contributory nature in understanding the overall significance of the site. While they contribute to understanding the history and significance of the place, they are not of individual distinction with regard to the original plan form, fabric or function. They may not be completely intact to their original construction and form.

Elements of secondary significance include:

- Sawtooth roofs behind the principal street facades [for their ability to demonstrate the original industrial character of the place] but accepting that these roofs are largely concealed in views from the street and are not integral to the heritage character of the place.

Elements of little or no significance contribute little or nothing to an overall understanding of the significance of the site, and which post-date the identified period(s) of significance or which may be so heavily altered as to have lost whatever significance they originally had.

Elements of little or no significance include:

- All post war fabric (eg upper storey additions to Doonside and Burnley Streets, external paint finishes, modern signage and non-original windows/doors).
- The single-storey brick wall with modern garage door abutting the west side of 26 Doonside Street.
- All hard and soft landscape elements.
- All interiors (noting that internal alteration controls do not apply to the site).

8.0 Heritage Overlay

As noted above, heritage overlay controls apply to two discrete areas of the subject site. These parts of the site are therefore subject to the provisions of Clause 43.01 of the Yarra Planning Scheme, the Heritage Overlay. The schedule specifies that there are external paint controls but no internal alteration controls or tree controls under this overlay. The purpose of the heritage overlay 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, as appropriate:

- *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 the schedule to this overlay), heritage study and any applicable conservation policy.*
- *Any applicable heritage design guideline 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 and 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.*
- *Whether the proposed subdivision will adversely affect the significance of the heritage place.*
- *Whether the proposed subdivision may result in development which will adversely affect the significance, character or appearance of the heritage place.*
- *Whether the proposed sign will adversely affect the significance, character or appearance of the heritage place.*
- *Whether the lopping or development will adversely affect the health, appearance or significance of the tree.*
- *Whether the location, style, size, colour and materials of the proposed solar energy system will adversely affect the significance, character or appearance of the heritage place.*

Proposals for redevelopment of heritage overlay sites must also be assessed in terms of Clause 22.02 – Development Guidelines for Sites Subject to the Heritage Overlay. Inter alia, Clause 22.02 has the following objectives:

- *To conserve the historic fabric and maintain the integrity of places of cultural heritage significance.*
- *To retain significant view lines to, and vistas of, heritage places.*
- *To preserve the scale and pattern of streetscapes in heritage places.*
- *To encourage the preservation, maintenance, restoration and where appropriate, reconstruction of heritage places.*
- *To ensure the adaptation of heritage places is consistent with the principles of good conservation practice.*
- *To ensure that additions and new works to a heritage place respect the significance of the place. To encourage the retention of ‘individually significant’ and ‘contributory’ heritage places.*

Clause 22.02 also provides the following policies the relevant to the current application:

22.02-5.1

Demolition Removal of Part of a Heritage Place or Contributory Elements

Encourage the removal of inappropriate alterations, additions and works that detract from the cultural significance of the place.

Generally discourage the demolition of part of an individually significant or contributory building or removal of contributory elements unless:

- *That part of the heritage place has been changed beyond recognition of its original or subsequent contributory character(s).*

- For a contributory building:
 - that part is not visible from the street frontage (other than a laneway), abutting park or public open space, and the main building form including roof form is maintained; or
 - the removal of the part would not adversely affect the contribution of the building to the heritage place.
- For individually significant building or works, it can be demonstrated that the removal of part of the building or works does not negatively affect the significance of the place.

[...]

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.

Minimise the visibility of new additions by:

- Locating ground level additions and any higher elements towards the rear of the site.
- Encouraging ground level additions to contributory buildings to be sited within the 'envelope' created by projected sight lines (see Figure 1)
- Encouraging upper level additions to heritage places to be sited within the 'envelope' created by projected sight lines (for Contributory buildings refer to Figure 2 and for Individually significant buildings refer to Figure 3).
- Encouraging additions to individually significant places to, as far as possible, be concealed by existing heritage fabric when viewed from the front street and to read as secondary elements when viewed from any other adjoining street.

Discourage elements which detract from the heritage fabric or are not contemporary with the era of the building such as unroofed or open upper level decks or balconies, reflective glass, glass balustrades and pedestrian entrance canopies.

[...]

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

[...]

Industrial, Commercial and Retail Heritage Place or Contributory Elements

Encourage new upper level additions and works to:

- Respect the scale and form of the existing heritage place or contributory elements to the heritage place by being set back from the lower built form elements. Each higher element should be set further back from lower heritage built forms.
- Incorporate treatments which make them less apparent.

[...]

22.02-7 Decision Guidelines

Before deciding on an application the responsible authority will consider:

- Whether there should be an archival recording of the original building or fabric on the site.
- The heritage significance of the place or element as cited in the relevant Statement of Significance or Building Citation.

9.0 Development Plan Overlay

In addition to the Heritage Overlay, a Development Plan Overlay has been applied to the subject site (DPO15). The DPO include the following permit conditions relevant to heritage matters:

For development of parts of the site within the Heritage Overlay a condition that requires:

- The engagement of a suitably qualified person to:
 - Prepare a schedule of conservation works for the retained facades of the heritage buildings at 81-95 Burnley Street and the exterior form of the heritage building at 26-34 Doonside Street, including time frames for each action to the Responsible Authority's satisfaction;
 - Undertake archival recordings of the heritage buildings (81-95 Burnley Street and 26-34 Doonside Street) to the responsible authority's satisfaction prior to any demolition on the site; and
 - Prepare a heritage maintenance plan defining the ongoing cyclical repair and maintenance for the retained facades of the heritage buildings at 81-95 Burnley Street and the exterior form of the heritage building at 26-34 Doonside Street to the responsible authority's satisfaction.
- The permit holder to implement the conservation works and heritage management plan to the satisfaction of the responsible authority within the time frames provided.

It is a requirement of the DPO that a Heritage Impact Statement be prepared as follows:

- A Heritage Impact Statement prepared by a suitably qualified professional that assesses the impact of the proposed development on the heritage values of the heritage place.

- *A sightline analysis and 3D modelling of the proposed development from key view points in the public realm to enable an assessment of the visual impact of the development on the heritage places within the site.*

The DPO also requires that the Development Plan be in accordance with the vision for heritage sites:

- *To respect the scale and form of heritage places within and adjacent to the site.*
- *To provide for the conservation of heritage places within the site.*
- *To provide for the sensitive adaptive re-use of heritage buildings in accordance with the Comprehensive Heritage Analysis referred to in Clause 4.2 of this schedule.*
 - *describes the relationship between the heritage place and any neighbouring or adjacent heritage place/s; and*
 - *establishes principles for managing the significance of the heritage place and its relationship with its surroundings.*

Additionally, the Development Plan is to include the following built form guidelines to assist in the implementation of the vision:

- *Maximum building heights and envelopes responding to the site context;*
- *Building setbacks from street boundaries that ensure that new future development does not overwhelm the scale of the heritage buildings on the site and presents acceptably to lower scale buildings in the vicinity of the site, including dwellings on the south side of Appleton Street;*
- *Building setbacks from the facades of 81-95 Burnley Street that ensure the heritage building can be understood as having a three dimensional form;*
- *Preferred minimum upper level (above podium) setbacks of:*
 - *13 metres from the Appleton Street site boundary.*
 - *8 metres from the Burnley Street site boundary.*
 - *8 and 5 metres from the Doonside Street site boundary.*
 - *9m from habitable room windows or balconies of the Embassy building directly to the east and south*
- *Ensure new buildings are well spaced (preferred minimum 9 metres between buildings above podium);*
- *Buildings set back a minimum of 8 metres (above podium) from the heritage building at 26-34 Doonside Street;*
- *Inter-floor heights within the heritage buildings on the site to ensure they relate to the existing floor levels and/or fenestration patterns;*
- *Ensure the retention of key heritage fabric of:*
 - *the Appleton Street, Burnley Street and Doonside Street elevations of 81-95 Burnley Street (former Repco Factory) for the extent of the building within in heritage overlay; and*
 - *external form of 21 Doonside Street (former Repco Offices and Laboratories), while allowing for adaptive reuse.*
- *Active frontages to Burnley Street, Doonside Street, open space and the pedestrian lane, as appropriate;*
- *The design and use of materials must be respectful of the industrial heritage of the site and its surrounds to the north and east, as well as to the residential heritage to the south.*
- *Provide for high quality architecture and spaces throughout the site and respond to heritage places through, as appropriate [inter alia]:*

- *use contemporary architectural detail which complements and responds to the significant elements of the heritage buildings*
- *avoid highly articulated facades above retained heritage buildings,*
- *ensure there is solid built form behind retained facades and avoid balconies behind existing openings.*

10.0 Proposal

The Development Plan for the subject site proposes a mix of residential and commercial uses, along with public open space and pedestrian routes. New built form generally has a low rise podium expression to the street edges with a series of multi storey elements rising above.

The facades of the Burnley Street heritage building are to be retained and provided with new internal spaces for commercial uses. An upper storey addition is proposed for single-storey heritage façade at the corner of Burnley and Appleton Street. An apartment tower (Building A) sits behind the heritage façade with an 8 metre setback from Burnley and Doonside Streets and 11 metres setback from Appleton Street. Building A reaches an overall height of 49.6-metres and steps down in height to the south to create a low-rise interface with the existing one-two storey residential heritage overlay streetscape opposite the subject site.

The heritage building at 26 Doonside Street is to be retained with new public open space to its west and south west and a double-storey podium to its east and south. The podium is setback from the front and rear of the heritage building with the point of connection limited to a small-scale atrium structure that does not fully envelop the sides and rear and thus allows for the building to be read as a three dimensional entity. An apartment tower (Building C) rises above the podium with an 8 metre setback to the side and rear of the heritage building, and an overall height of 40.3 metres. It takes the curved forms of the interwar Moderne style heritage building as its design inspiration.

The central part of the subject site (outside of the Heritage Overlay) is to be developed with a 55.9 metre tall apartment tower with a curvilinear plan form (Building C) and a podium/streetwall reinforcing the height datum of the double-storey Burnley Street heritage façade. A smaller scale townhouse block (Building D) addresses the Appleton Street boundary with an 11 metre high streetwall and upper levels at a 13 metre setback (rising to a height of 25.4 metres).

The Development Plan also proposes a network of pedestrian lanes through the site, using bricks salvaged from demolition works as a paving material. The laneways create open space that physical separates the heritage facades from new podium elements whilst also breaking down the overall sense of scale and mass of new development.

11.0 Discussion

The Development Plan has generally been prepared in accordance with the Development Plan Overlay, most notably in terms of the objective of retaining significant heritage fabric identified in the DPO, ie: the external form of the former Repco building at 21 Doonside Street and the street elevations of former Repco offices and factory at 81-95 Burnley Street (to the extent of the Heritage Overlay).

New built form is to be respectful of the scale and form of heritage buildings within and adjacent to the site. A key design strategy is the use of podiums that maintain a streetwall height commensurate with the double-storey heritage facades. The Development Plan also prescribes a range of materials and finishes for new buildings and landscape elements that respond to the industrial heritage character of existing buildings and their predominate face brick materiality.

As per the DPO, multi-storey elements have 8 metre setbacks from the double-storey heritage facades to Doonside and Burnley Streets. It is recognised that the proposed 11 metre upper level setback of the Building A tower from the Appleton Street frontage is less than the (13 metre) setback sought by the DPO. This does not give rise to adverse or unacceptable heritage impacts, or otherwise create the potential for new built form to visual dominate the retained heritage façade or the heritage overlay streetscape on the south side of Appleton Street. The 2 metre difference in the upper level setback to Appleton Street represents a fairly minor departure from the DPO and does not bring about a pronounced change in built form outcomes given the relatively low height of the Building A tower at its southern end. The step down in the height of Building A, in combination with the 11 metre setback provides an appropriate transition to the low scale heritage fabric on Appleton Street.

Building A also includes a first floor addition in part with no setback from Appleton Street heritage façade, whereas the DPO shows a consistent five metre setback in the same location. The potential impacts of this aspect of the proposed Development Plan are mitigated by the upper level setback or 'indent' provided at the corner of Appleton and Burnley Street – this will help to maintain the legibility of the single-storey heritage façade and its visual prominence at the exposed corner location.

Furthermore, there are precedents to demonstrate that single level additions can be built at no or minimal setback from a retained heritage façade without being visually dominant or creating a situation where the host building is overwhelmed. This can be achieved by the use of a visually lightweight and visually recessive architectural expression for new works.

At the more sensitive interface with Appleton Street the proposed building heights accord with the DPO. In instances where the proposed building heights and upper level setbacks differ from the built form guidelines of the DPO, it should be noted that these are *preferred* outcomes. The proposed Development Plan meets the requirements of the DPO that it be *generally* in accordance with the Indicative Framework Plan.

This notwithstanding, the building heights proposed by the Development Plan are not significantly taller than those of the DPO, only being an additional 1.8 metres in the case of Building C. Building A is 7.6 metres taller than the height preferred for this part of the site, but its uppermost levels have a relatively small 'footprint' on account of the setbacks increasing as the building gains height. As such, the additional height to Building A does not result in a substantially greater visual bulk.

The DPO is predicated on the fundamental premise that the subject site is capable of accommodating large scale multi-storey development proximate to the heritage facades. Accepting this, the question of maximum building heights is largely a matter to be determined by non-heritage planning considerations, such as overshadowing, amenity and urban design.

In terms of changes to the fabric of the Heritage Overlay buildings, the Development Plan anticipates the removal of existing roofs behind the Burnley Street façade. The roofs to the double-storey component are entirely concealed by parapets and adopt a generic hipped form that does not contribute to the place's interwar Moderne heritage character or otherwise help to explain the original use of the building. The sawtooth roofs behind the single-storey façade on the corner of Burnley and Appleton Street are evidently related to the original use of the place as a factory but they are mostly concealed in views from street level.

The existing saw-tooth roofs are neither readily visible from the public realm nor a major element in the architectural composition of the place. Furthermore, the statement of significance for 81-95 Burnley Street makes no reference to existing roof forms. The building is considered to be significant for its strong interwar Moderne style, its relationship to the other Repco building at 26 Doonside Street, as tangible evidence of large factories built during the interwar period, and for the association with Russell Manufacturing (a company affiliated with Repco). These aspects of significance will not be diminished by the removal of the sawtooth roofs. The significance of the building primarily resides in the street facades and to that extent retention of the facades as proposed is deemed appropriate.

Accepting that the Burnley Street heritage building would be retained only to the extent of its street facades, this should not be judged inappropriate on the basis that facadism is inappropriate per se.

Clause 22.02 does not make any specific reference to facadism being something that is to be avoided, and there are many approved and constructed precedent developments in the City of Yarra that retain only the heritage facades – one example in the immediate environs of the subject site being the former Builders' Steel Form Supply Co. at 9-11 David Street (HO250). Also in the City of Yarra, the former MacRoberston's Confectionary factory garage on the corner of Gore and Johnston Street was retained as a façade only with a multi-storey envelope to its rear. Facadism has also been found to be an appropriate outcome in respect to the redevelopment of certain sites on the Victorian Heritage Register, notably the former Dimmey's store, Swan Street Richmond (VHR 2100).

Further to this issue, the DPO does not rule of the removal of existing fabric behind the heritage facades but instead seeks to mitigate the perception of a facadist outcome by ensuring that there is *'solid built form behind the retained facades'*. The Development Plan responds to this directive by providing enclosed and roofed over space behind the retained Burnley Street heritage façade. The smaller heritage building at 26 Doonside Street is retained 'in the round' albeit with a visually discrete atrium structure connection to the new built form to its rear and side.

In addition to the built form guidelines of DPO15, and as already noted, applications for redevelopment of the heritage building will still need to address the local heritage policies at Clause 22.02. Under Clause 22.02, applications that involve substantial demolition of built form in the heritage overlay curtilages will need to demonstrate that the works will not negatively affect the significance of the place.

Clause 22.02 recognises that industrial heritage buildings are generally not as sensitive to upper level additions as might be the case for residential heritage places. Upper level additions to industrial places are not required to be contained within a sightline envelope, as per residential buildings, nor does Clause 22.02 specify minimum setbacks for additions. Upper level additions to industrial buildings are encouraged to respect the scale and form of the existing heritage place and to incorporate treatments that make the additions less apparent. The principles laid out in Clause 22.02-5.7 also call for the external architectural treatment of any new building envelope to be visually respectful of its heritage context. The Development Plan anticipates such outcomes.

12.0 Conclusion

In conclusion, the proposed Development Plan has been prepared with careful regard for character and setting of the heritage buildings on the subject site. Impacts on adjacent heritage overlay places have also been taken into consideration.

The industrial history of the subject site is celebrated through the retention of significant heritage fabric and also in the indicative palette of building materials and architectural treatments throughout. The key objectives of the Development Plan Overlay are met in terms of respecting the scale and form of the heritage buildings and establishing a firm basis for managing the significance of the site and its relationship with its surroundings.

In addition to having been prepared in general accordance with the relevant DPO, the Development Plan follows precedent established by other completed and approved developments the City of Yarra involving industrial heritage places in respect to the extent of retention of heritage fabric and the height and upper level setbacks of new built form.

