

Former Repco Factory
85-91 Burnley Street & 26-34 Doonside Street,
Richmond



Amendment C223 to the Yarra Planning Scheme
- Analysis of heritage issues

Report to Council

Revised December 2018

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1.0 Introduction

This report was commissioned by Charter Keck Cramer on behalf of the owners of the former Repco Factory at 81-95 Burnley Street and 26-34 Doonside Street, Richmond. It has been prepared in relation to Amendment C223 to the Yarra Planning Scheme. The Amendment seeks to introduce a Development Plan Overlay and allow for the rezoning of the subject site from an Industrial Zone 3 to a Mixed Use Zone. The purpose of the rezoning is to facilitate the site's redevelopment. The report comments on the potential impacts that the proposed development concept may have upon the character and significance of the heritage buildings on the subject site and heritage places within the environs of the site.

This report is a revised and updated version of the report prepared by this office in December 2017 in support of the proposed rezoning. The report has been revised to address changes to the proposed Development Plan Overlay for the site and associated Indicative Framework Plan.

Subsequent to a rezoning of the subject site, a planning application will be required for redevelopment proposals involving the heritage overlay buildings, at which time a further heritage assessment will be provided.

2.0 Sources of Information

The analysis below draws upon external inspections of the subject site and its environs, along with a review of the Yarra Heritage Overlay at Clause 43.01, local heritage policy set out under Clause 22.02, and the memorandum of advice prepared by GJM Heritage in relation to the subject site (8 March 2017). The relevant heritage studies have also been reviewed, including the [City of Yarra] *Heritage Gap Study: Review of 17 Heritage Precincts* (Context Pty Ltd, 2014), *City of Yarra Heritage Gap Study* (Graeme Butler & Assoc., 2007) and the *City of Yarra Heritage Review* (Allom Lovell & Assoc., 1998). Reference has also been made to Panel reports relating to Amendments C173 (Part 2) and C214 to the Yarra Planning Scheme.

3.0 Current Listings and Controls

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 is separately listed 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 control.

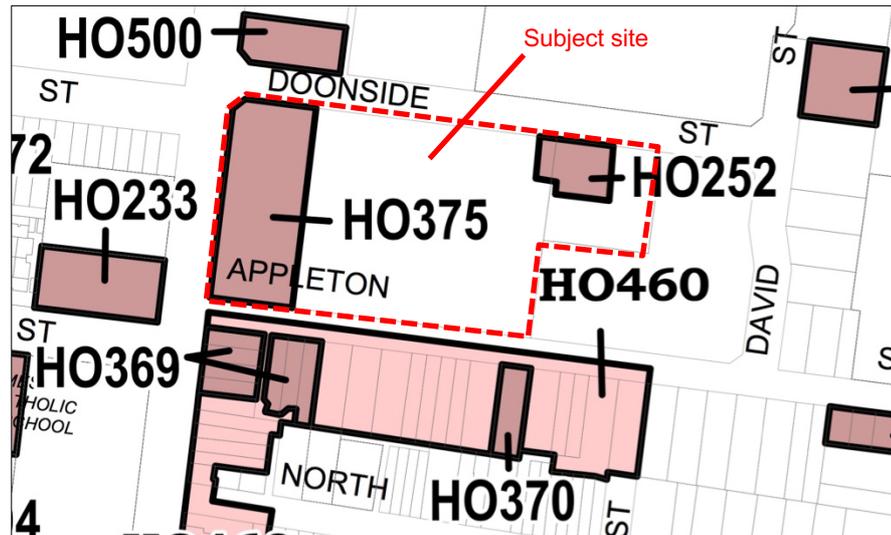


Figure 1 Heritage overlay map showing heritage overlays applying to 26 Doonside Street (HO252) and the front of the property at 81-95 Burnley Street (HO375). Note that HO500 has expired and has been removed from the written HO schedule.

The heritage overlay control at 81-95 Burnley Street was implemented in 2015 under Amendment C149 the Yarra Planning Scheme. Council had proposed to incorporate this site into a broader heritage overlay precinct as part of Amendment C173 (Part 2). The proposed Doonside Industrial Precinct (HO455) also encompassed the sites at 1-9 Doonside Street and 61-63, 65, 67 and 77-79 Burnley Street – all of which were subsequently excluded from consideration by the Panel. The Panel was of the view that the remaining properties did not constitute a precinct. To this end, the Panel ultimately recommended the amendment be abandoned in so far as it affected 81-95 Burnley Street.

Heritage overlay controls were again proposed for the Doonside Industrial Precinct under Amendment C214, with the precinct this time reduced to the buildings at 77-79 and 81-95 Burnley Street and 1-9 Doonside Street. Council ultimately resolved to abandon this amendment on the recommendations of the C214 Panel. The interim heritage overlay control applying to 77-79 Burnley Street (HO500) expired on 30 November 2017 and the site has been removed from the Schedule to the Heritage Overlay (but remains on the HO map).

South of the subject site, residential properties at 2-38 Appleton Street form part of the Yarraberg Precinct (HO460). The houses at 2-6 Appleton Street and adjoining properties at 97-103 Burnley Street are separately listed as HO369. An individual heritage overlay control applies to 24 Appleton Street (HO370).

4.0 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.

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 area took in land originally occupied by Doonside, the residence of David Mitchell (Dame Nellie Melba's father). The Doonside Estate was subdivided and offered for sale in May 1931, providing 34 lots on Burnley, Doonside, David and Appleton Streets. 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).

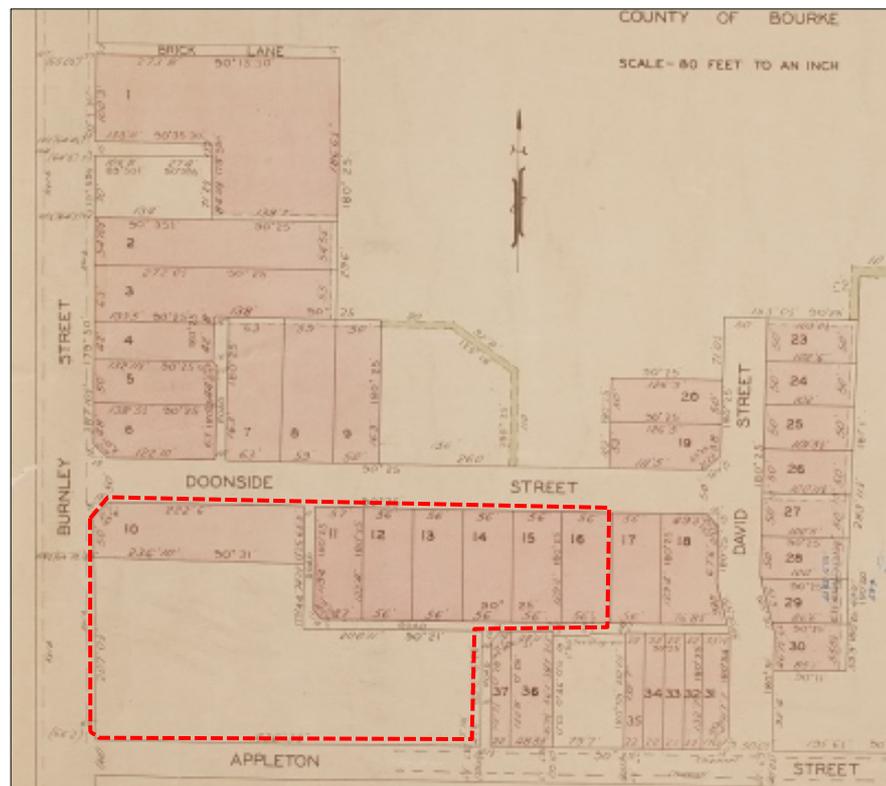


Figure 2 Part of the 1930 plan of subdivision for the Doonside Estate. Source: Yarra Ranges Regional Museum. The dashed lined marks the extent of the subject site.

In 1930, the plaster factory listed at 89-95 Burnley Street 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

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.

¹ Sands and McDougall directory, 1931.

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.

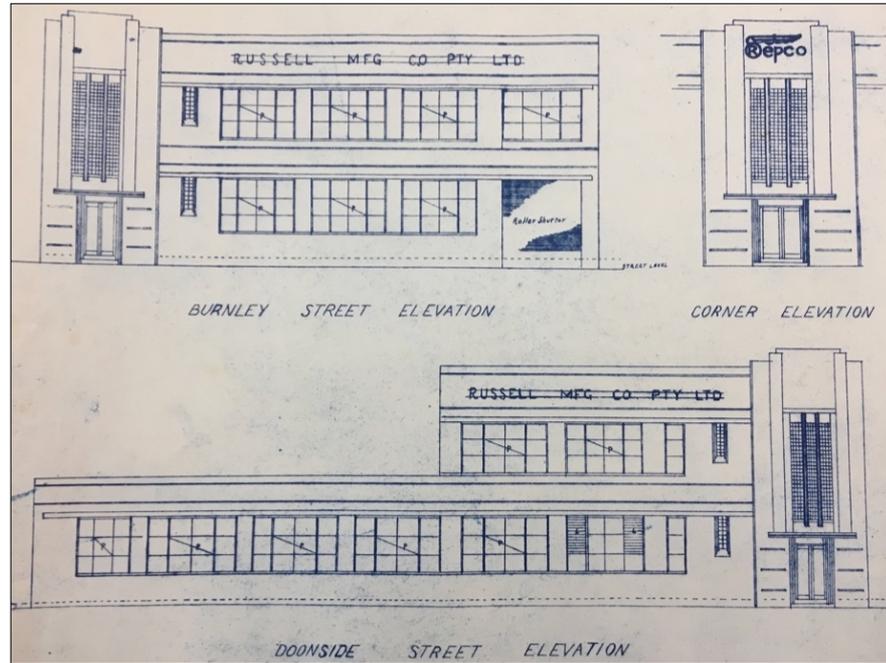


Figure 3 Undated (c1942) architectural drawings for the Repco building on the corner of Burnley and Doonside Streets. Source: Public Record Office Victoria.



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

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 (Figure 4).

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



Figure 5 *A 1957 photograph Repco building on the corner of Burnley Street and Doonside Street.
Source: 'Repco Record' (University of Melbourne Archives).*

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

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=~>

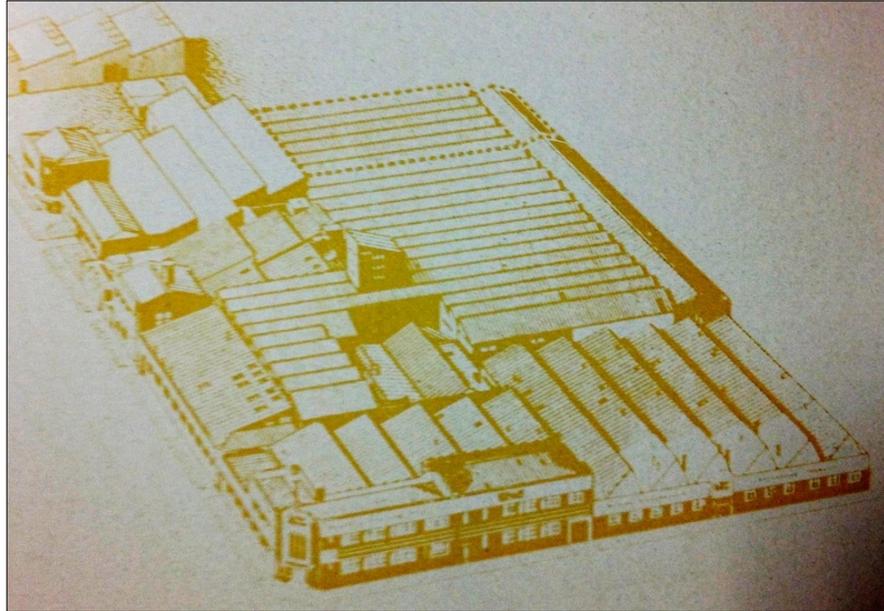


Figure 6 A c1962 illustration of the Repco/Russell factory. Source: University of Melbourne Archives.



Figure 7 A c2017 oblique aerial of the site.

5.0 Description

The subject site occupies the greater part of the block bound by Burnley Street to the west, Doonside Street to the north, David Street to the east and Appleton Street to the south. The factory complex on the site was constructed in stages from c1930 through to the late twentieth century. It is broadly intact to its mature post war state, although substantial demolition has occurred at the eastern end of the site.

The north-west corner of the site is occupied by a double-storey Moderne style building erected for Repco in 1942. It is chamfered at the corner and has no setback on both street frontages. External walls are constructed of face brick with rendered dressings and a rendered parapet concealing the roofline. There are regularly spaced multi-pane steel-framed windows on both sides, linked together by continuous projecting concrete hoods. The corner entry is surmounted by vertical glass brick windows with a rendered surround. The building exterior remains broadly intact to its 1942 state but alterations have been made which detract from its overall appearance. These alterations include:

- An upper storey addition on the Doonside Street façade with a series of narrow fixed sash windows (in contrast to the wide multi-pane steel-framed windows on the original).
- Removal of original signage from the Doonside Street and Burnley Street parapets. Early photographs show metal ribbon type signage in these locations (refer figure 5 above). It is not clear if the 'Repco' sign on the corner parapet was also removed, or if it survives behind the present 'Harry the Hirer' sign.
- Two first floor window frames on the Doonside Street façade have been removed and the openings divided into smaller windows with modern fixed sash glazing.
- Four of the ground floor windows on the Doonside Street façade have replaced by modern glass brick.
- All external wall surfaces have been overpainted a uniform blue colour (obscuring the original design of face brick with contrasting bands of render).
- The corner flagpole has been removed.

The Appleton Street corner is occupied by a single-storey building with a south facing sawtooth roof. This part of the site was occupied by a plaster factory from c1925 but the appearance of the extant building is more suggestive of a late 1930s construction date. The building has brick walls to the street boundaries with regularly spaced steel framed windows under a rendered parapet. The parapet has simple Moderne style detailing in the form of horizontal incisions, found at either end and at the corner. The stepped pediment on the Burnley Street frontage is also typical of the Moderne style. The pediment seems to have originally marked the location of the principal entry but this has been infilled with brick and windows. 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 middle portions of the site are occupied by utilitarian factory buildings of one to two storeys, typically with sawtooth roofs and overpainted brick walls. A modern tilt-up concrete building with a roof top carpark deck is located at the eastern end of the Appleton Street boundary.



Figure 8 *The 1942 former Repco building on the corner of Burnley and Doonside Streets.*



Figure 9 *The c1930s factory on the corner of Burnley and Appleton Streets.*



Figure 10 *The subject site looking east along Doonside Street.*



Figure 11 *The subject site looking west along Appleton Street. The building in the foreground is a modern concrete structure with a roof top carpark.*

A double-storey interwar Moderne style office building stands at the eastern end of the Doonside Street boundary. The office building has a parapeted façade with manganese brick walls and contrasting panels of cream brick. The curved corner has three vertical fins and a cantilevered concrete canopy above the entry. Port hole windows on the façade are typical of the Moderne style. The outline of a demolished gable roofed structure is visible on the west elevation. A sawtooth roofed factory visible to the rear of the office building in the 1945 aerial photograph has also been demolished.



Figure 12 *The c1939 interwar Moderne style office building at 26 Doonside Street.*

In terms of its context, the subject site is located in an industrial area of Richmond that was historically characterised by sawtooth roofed factories of one to two storeys. The area is currently experiencing substantial change with many of the redundant factory sites earmarked for redevelopment. A large-scale shopping centre development occurred in 2003 replacing the Vickers Ruwolt engineering works on the corner Burnley Street and Victoria Street. The shopping centre backs onto Doonside Street and is clearly visible from the subject site. The northern end of Burnley Street, and adjoining parts of Victoria Street, have also experienced intensive apartment development in recent years.

Closer to the subject site, a four-storey apartment building can be found on the opposite side of Burnley Street (ie 86 Burnley Street). Immediately east of the subject site, there is an apartment complex ranging from eight to twelve storeys in height presently under construction (36-44 Doonside Street and 27-41 Appleton Street). Also within the immediate environs of the subject site, an eleven storey apartment development has recently been completed behind an interwar factory façade (former Builders' Steel Form Supply Co., HO250, 9-11 David Street).

The subject site has an interface with a finer grain residential streetscape on Appleton Street. Notwithstanding that this streetscape 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 13 *View south along Burnley Street showing a modern apartment building opposite the subject site.*



Figure 14 *The rear of the Victoria Gardens Shopping centre as viewed from Doonside Street.*



Figure 15 *Multi-story development at 36-44 Doonside Street, abutting the east side of the subject site. The heritage building at 26 Doonside Street is visible to the right.*



Figure 16 Recently completed multi-storey development at 9-11 David Street, retaining the façade of the former Builders' Steel Form Supply Co (HO250).



Figure 17 Multi-storey development under construction on Appleton Street, east of the subject site.

6.0 Significance

The Yarra Heritage Database includes the following statement of significance for the former Russell Manufacturing/Repco Factory at 81-95 Burnley Street:

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.*

A separate statement of significance exists for the former Russell Manufacturing/Repco building at 26 Doonside Street:

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 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 ...*

Proposals for redevelopment of heritage overlay sites must also be assessed in terms of Council's Heritage Policy, Clause 22.02, the relevant sections of which are reproduced below:

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 ...*
- *Encouraging upper level additions to heritage places to be sited within the 'envelope' created by projected sight lines ...*
- *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)

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.

[...]

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.*

8.0 Analysis

As noted, Amendment C223 to the Yarra Planning Scheme seeks to rezone the subject site (from Industrial Zone 3 to a Mixed Use Zone) and introduce a Development Plan Overlay (DPO). The purpose of the rezoning and DPO is to facilitate the site's redevelopment. The development concept is schematic only at this stage and is to be adapted as required to satisfy Council heritage policy.

The proposed DPO has previously been revised (in 2017) with consideration for the March 2017 advice by GJM Heritage to include the following conditions and requirements for permits relevant to heritage consideration, as part of clause 2.2 'Heritage Impact Statement' of the proposed DPO:

A permit application must include, where relevant: '

- *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 and nearby heritage places, as identified in the conservation management plan or similar comprehensive heritage analysis prepared for the site, along with relevant heritage studies and citations.*
- *A sightline analysis and 3D modeling of the proposed development from key view points in the public realm to enable an assessment of the visual impact of the development on heritage places.*

As was also recommended by GJM, the heritage related provisions of the proposed DPO were strengthened in the 2017 revision. Specifically, the Development Plan Vision at clause 3.1 of the DPO has the following requirements relevant to heritage considerations:

- *To respect the scale and form heritage places within and adjacent to the site and 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 Indicative Framework Plan and informed by a comprehensive heritage analysis prepared for the site by a suitably qualified professional that:*
 - *articulates the significance of the heritage place, its component parts and its setting;*
 - *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.*

Further to heritage matters the proposed DPO includes the following built form guidelines, inter alia:

- *Building setbacks from street boundaries that ensure that new future development does not overwhelm the scale of the heritage buildings on the site or on heritage places 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;*
- *Minimum upper level (above podium) setbacks of:*
 - *13 metres from the Appleton Street site boundary*
 - *10 metres from the Burnley Street site boundary*
 - *8 and 5 metres from the Doonside Street site boundary*
- *Ensure new buildings are well spaced (minimum of 9 metres between building towers);*
- *Buildings setback a minimum of 10 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;*

[...]

- *Massing diagrams that model the proposed built form envelopes based on the indicative heights and setbacks;*

[...]

- *Indicative palette of building materials and architectural treatments throughout the site. 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.*
- *Indicative palette of building materials and architectural treatments throughout the site. 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 through the site and respond to heritage places through, as appropriate:*
 - *Use of lightweight materials*
 - *Simple architectural detail so as not to detract from significant elements of heritage buildings*
 - *Discouraging highly articulated facades with recessed and projecting elements*
 - *Ensuring the retention of solid built form behind retained facades and avoiding balconies behind existing openings*
 - *Providing high quality treatments to building facades facing the pedestrian lane.*

There have been no substantive changes to the heritage related provisions of proposed DPO as revised in December 2018. That is to say, the framework for establishing appropriate heritage outcomes on the site are not weakened by the DPO as currently proposed.

The revised Indicative Framework Plan (IFP) for the site also generally remains unchanged in terms of overall scale and setbacks of new development. As per previous iterations of the document, the revised IFP provides for a mix of residential, commercial and retail development with a public open space component and provision for a community/commercial facilities. The main change of heritage consequence in the revised IFP results from the pedestrian laneway being shifted further to the east.

The IFP provides for a low-rise podium expression to the street edge with a series of multi storey elements rising above. The podium is typically three storeys (8-11 metres) across most of the site but steps down to 6 metres behind the single-storey heritage facade at the corner of Burnley and Appleton Streets. The preferred maximum height for the three multi-storey buildings along the Doonside Street frontage of the site (west of the pedestrian lane) is twelve storeys (42 metres). A fourth multi-storey building to the east of the heritage building at 26 Doonside Street is eleven storeys (38.5 metres). The preferred maximum height of the multi-storey buildings on the Appleton Street frontage is seven storeys.

The front parts of the heritage building to Burnley Street would be retained along with its side elevations to Doonside and Appleton Streets (to an extent corresponding with the HO boundary). New multi-storey buildings have a 10 metre setback (above the podium) from the Burnley Street heritage façade, an 8 metre setback on the Doonside Street frontage and a 13 metre setback on the Appleton Street frontage (which is generally commensurate with the 15 metre setback recommended by GJM Heritage).

The building at the north-east corner of the site will be setback 10 metres from side and rear of the heritage building at 26 Doonside Street. The heritage building at this location would be retained as a freestanding entity with public open space to the west side exposing the principal façade to public view and more generally helping to maintain the legibility of the original building envelope. While the open space has a narrower frontage to Doonside Street as a result of the relocation of the pedestrian laneway, the square meterage of the open space has not been reduced. Furthermore, there is now a significantly improved 'public view' of this heritage buildings from the south (via the pedestrian laneway) due to the reconfigured open space now wrapping around the heritage building.

The former factory buildings on the subject site can, from a heritage perspective, sustain development of the scale proposed in the revised IFP without adverse impacts. The building heights contemplated in the plan are unchanged from the previous version of the documents. Notably, the relocation of the pedestrian laneway has provided improved heritage outcomes with multi-storey built form moving further away from the heritage building at 26 Doonside Street. The previous version of the IFP showed eight and five storey development to the south-west of heritage building

and an eleven storey element to its rear. The eight and five storey buildings have been deleted from the revised IFP and the eleven storey development has a reduced footprint, such that it no longer runs to the full width of the heritage building.

Beyond this it is noted the preferred building heights outside of the Heritage Overlay are mainly influenced by urban design requirements and other non-heritage planning policies. Within the Heritage Overlay, the relationship of new and existing built form at the street level is the key issue and this will be handled through the low-rise podium elements equivalent to the height and setbacks of the heritage façades.

GJM had recommended lower heights for the multi-storey building adjacent to the heritage building at 26 Doonside Street of five-eight storeys. It was their opinion that development of around ten-thirteen storeys would overwhelm the heritage building. Impacts on the heritage building arising from the development at the preferred height of eleven storeys will be mitigated by 10 metre (above the podium) setbacks from the heritage fabric, the use of a low rise streetwall element to establish a sympathetic scale relationship, not to mention the substantial reduction in the visual mass/footprint of new development around the heritage building resulting from revisions to the IFP. In any event, the significance of 26 Doonside Street is not dependant on it retaining a low to medium rise context. The building is identified as being of architectural/aesthetic significance as sophisticated example of the Moderne style – it can still be understood as such regardless of the height of the development on adjacent parts of the subject site.

In respect to the GJM's recommendations that setbacks should be sufficient to retain part of the Burnley Street building's industrial saw-tooth roofs as visible from the public realm, the roofs in question are neither readily visible from the public realm nor a major element in the architectural composition of the place. The roofs are not of any special significance as sawtooth roofs per se, this being a relatively common roof type. Furthermore, the statement of significance for 81-95 Burnley Street makes no reference to existing roof forms. The building is considered significant for its strong 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 unduly compromised 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.

It is acknowledged that the amendment could lead to outcomes where only the façades of the Burnley Street heritage buildings are retained, but this should not be judged inappropriate on the basis that facadism is inappropriate per se. While it has long been the aim of heritage planning to retain historic buildings to a certain depth, there are numerous approved and constructed precedent developments in heritage overlay sites in the City of Yarra and the inner metropolitan area more generally that retain only street elevations. There have also been a number of VCAT determinations that comment on such matters and discourage criticism reliant upon a pejorative use of the term 'facadism'.

In respect to the scale and setbacks of new built form behind the heritage facades, the proposal is comparable with a number of recently completed or approved developments in Yarra involving industrial heritage buildings. Notably, a precedent for this form of development already occurs within the immediate environs of the subject site - ie the recently completed development at 9-11 David Street, comprising an eleven storey apartment complex at a very modest setback from the retained façade of the former Builders' Steel Form Supply Co. (HO250). Many other developments of recent years demonstrate the capacity of low-rise industrial heritage buildings to accommodate higher built form in accordance with Council's heritage policy.

A crucial point to made in relation to heritage issues is that the majority of the site is outside of the heritage overlay, and is therefore not subject to heritage provisions of the Yarra Planning Scheme. In these circumstances the key design parameters for new development would be urban design requirements and other local planning policies rather than the heritage overlay.

That said, the City of Yarra has a planning policy whereby new development is required to respond to the scale of adjoining heritage overlay places. The Built Form and Design Policy at Clause 22.10 states that the height of new development abutting land in a heritage overlay should:

- *Adopt a façade height to the street frontage which is no higher than the adjacent building within the Heritage Overlay;*
- *Design and site taller structures so that they do not visually dominate surrounding heritage places; and*
- *Match the floor levels of the adjacent heritage building.*

The development concept for the subject site responds to the policy at Clause 22.10 by having podium elements at the street edge commensurate with the height of the Burnley Street heritage building. A low-rise podium also flanks open space around the Doonside Street heritage building with taller elements at a greater setback. The issue of whether new floors levels need to match those of the heritage buildings is addressed in the built form guidelines within the proposed DPO as follows:

- *Inter-floor heights within the heritage buildings on the site to ensure they relate to the existing floor levels and/ or fenestration patterns.*

In respect to the visual prominence of taller structures, it is a key consideration in terms of heritage impacts that the subject site is not highly sensitive to change. The built form character of this area is mixed with an emphasis on multi-level apartment buildings taking precedence. Notably, the construction of a large-scale eight-twelve storey apartment complex is well advanced on land directly abutting the east side of the subject site (ie 36-44 Doonside Street and 27-41 Appleton Street). It may reasonably be anticipated that the area will experience more intensive development of the scale and character proposed for the subject site in future.

To address the potential heritage impacts on neighbouring sites, the interwar factories surviving opposite the subject site on the north side of Doonside Street exhibit a low degree of integrity and/or low architectural and historical interest, and collectively do not possess a strong heritage character. This is borne out by Council's decision in July 2017 to abandon heritage overlay controls for these sites. Furthermore, the interim heritage overlay control applying to the interwar factory at 77-79 Burnley Street has expired. As such, there are no heritage issues arising from the development concept on the Doonside Street interface.

The existence of a residential heritage overlay precinct on the south side of Appleton Street (ie the Yarraberg Precinct) should not prevent large scale development from occurring on the north side of the street on the subject site. The proposed development would not adversely affect the integrity, significance and character of the Yarraberg Precinct even though it would alter the broader context of the area. Moreover, the context of Appleton Street is set to change dramatically with the redevelopment of 36-44 Doonside Street and 27-41 Appleton Street. The multi-storey buildings under construction on that site stand opposite single-storey dwellings within the Yarraberg Precinct.

More generally it is readily apparent that marked contrasts in scale and built form character can already be experienced in this part of Richmond. Multi-storey development can be found in close proximity to streetscapes that are predominately residential and single-storey. This situation occurs at the northern end of Burnley Street where recent multi-storey apartment developments interface with single-storey dwellings within the Cole's Paddock heritage overlay precinct (HO363).



Figure 18 The dwelling at 1 Davison Street, Richmond with multi-storey development to the rear. The dwelling is identified as an individually significant place in the Cole's Paddock heritage overlay precinct (HO363).

Finally, while the rezoning of the subject site creates a policy framework within which multi-storey development can be contemplated, it does not nullify or replace the requirement for permits under clause 43.01, at least in relation to parts of the site within the heritage overlay.

9.0 Conclusion

In conclusion, the built form outcomes anticipated in the latest revision of the Indicative Framework Plan and DPO proposed for the subject site do not create the potential for greater heritage impacts than would have arisen from the previous versions of these documents. Overall, the revisions to the Indicative Framework Plan and DPO provide improved heritage outcomes, particularly in respect to the reduction in scale of development near the heritage building at 26 Doonside Street.

It is recognised that the proposed re-zoning and future redevelopment of the site as contemplated by Amendment C223 will inevitably result in a substantial degree of change. However, this change is consistent with the emerging character of the area. The scale and location of multi-storey development in relation to the retained heritage buildings on the subject site also follows precedent established in other approved and existing developments the City of Yarra involving industrial heritage places.

Having regard for this, the proposal to rezone the subject land in order to accommodate multi-storey mixed-use development is acceptable and can be tailored in response to Council heritage policy so as not to result in adverse impacts with regard to the heritage buildings within the subject site and the other heritage places in the vicinity of the site.