

URBIS

1-19 CLARENDON STREET, EAST MELBOURNE

Reasonable or Economic Use
Assessment

Prepared for
B.E. ARCHITECTURE
8 November 2024

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Report Number 1.0



Acknowledgement of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on.

We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years.

We pay our respects to First Nations Elders, past and present.

The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

Title: Sacred River Dreaming
Artist Hayley Pigram
Darug Nation
Sydney, NSW

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EXECUTIVE SUMMARY

The proposed development

Urbis has been commissioned by b.e. architecture to prepare a report to Heritage Victoria on issues relating to 'reasonable or economic use' arising from Section 101 of the *Heritage Act 2017* (the Act). The report is to accompany a heritage permit application (P39221) for proposed works the proposed works at St Hilda's House at 1-19 Clarendon Street.

St Hilda's House – a double-storey red brick building constructed in 1907 – occupies the southeast corner of the site. An L-shaped, two-story addition built in 1982 is located on the northern part of the site, connected to the main building by a double-story glazed walkway. This rear addition mirrors the original building's architectural style. To the west of the site lies a paved carpark.

As part of the proposed development scheme, the historic building is being restored for residential use, and the 1980s addition on the northern section of the site will be demolished and redeveloped into a private mixed-use building including office, gallery, and residential spaces.

The report demonstrates the reasonable use of the site in line with its historic, recent, and current uses and the context of its setting in East Melbourne, as well as the economic viability of its proposed development. It highlights the importance of development, including capital improvements which will ensure the site's ongoing functionality and compliance with contemporary standards, and its long-term sustainability as a single-use site retained by a single owner for the long term.

Refusal of the permit could significantly impact both the reasonable and economic use of the site. The findings support the issuance of the permit to sustain the site's heritage and economic sustainability.

Reasonable use

The proposed residential restoration represents a reasonable use of the heritage place, with there being limited viable alternatives.

Based on the consideration related to the reasonable use of the heritage place detailed in the Heritage Act, the following conclusions emerge:

- The historic use as a missionary training centre has been long redundant and the building has been adapted for a number of uses subsequently. More recently, the building was used as an office, but was vacated and is similarly no longer viable.
- Located in a premium location in close proximity to a range of amenities and public transport, residential use is considered the most reasonable use of the building. It is consistent with the surrounding context, required limited interventions to the heritage fabric and reflects a return to its original purpose – residential.
- Residential is considered the most compatible use. More recent uses such as office and other uses possible under the Commercial 1 Zone are not feasible with the building in its current state and would not deliver a sufficient return to offset the costs of remedial and restoration works required to meet safety or legislated standards. Most community uses would not represent a viable or sustainable use of the building.

Economic use

Retention of ownership by the landlord for private use will facilitate an economically sustainable use, enabling the restoration of the heritage place and minimising the potential for future development possibilities on the site.

Based on the considerations related to the economic use of the heritage place detailed in the Heritage Act, the following conclusions emerge:

- The works facilitate an economically sustainable use as the landlord/developer plans to retain and use the site for the long term, ensuring stability and reducing the likelihood of frequent alterations to the building's use.
- The extensive restoration work proposed is a significant undertaking. However, the owner is willing to invest time, money, and care into the restoration because it is being transformed into a home. These

preservation measures will ensure that the property remains in excellent condition, safeguarding its historical and conservation value well into the future.

1. INTRODUCTION

Urbis has been commissioned by b.e. architecture to prepare a report to Heritage Victoria on issues relating to 'reasonable or economic use' arising from Section 101 of the *Heritage Act 2017* (the Act). The report is to accompany a heritage permit application (P39221) for proposed works the proposed works at St Hilda's House at 1-19 Clarendon Street.

The historic building is being restored for residential use as part of a broader development plan, which also involves demolishing the 1980s addition on the northern section of the site and redeveloping this area with a new mixed-use building.

This report considers matters arising from s101(2)(b) of the Act relating to reasonable or economic use of the registered place – St Hilda's House – which states, among other factors, the Executive Director of Heritage Victoria must consider:

“The extent to which the application, if refused, would affect the reasonable or economic use of the registered place or registered object.”

Heritage Victoria Policy: Reasonable or Economic Use (made and published under s19(1)(f) of the Heritage Act 2017, June 2021).

It is noted the concepts of reasonable use and economic use are distinct and must be assessed separately. The Act also indicates that both reasonable and economic use considerations can be reviewed if they are present in relation to an application, but it is sufficient to account for either reasonable or economic use if relevant factors are only present for one. In other words, it is not necessary to demonstrate both are present for an application to be approved.

1.1. REFERENCES

The following documents are key references for understanding the site, context and assessing the reasonable or economic use:

- Heritage Impact Statement St Hilda's House 1-19 Clarendon Street East Melbourne (Urbis, dated 11/09/2024).
- Heritage Victoria Policy: Reasonable or Economic Use (made and published under s19(1)(f) of the Heritage Act 2017, June 2021).

It is intended that this report be read in conjunction with the drawing documentation prepared by b.e.architecture and other documents submitted with respect to this application.

1.2. SITE DESCRIPTION

The subject site at 1-19 Clarendon Street is located at the northwest corner of Clarendon Street and Albert Street, across from Fitzroy Gardens in East Melbourne.

St Hilda's House – a double-storey red brick building constructed in 1907 – occupies the southeast corner of the site.

An L-shaped, two-story addition built in 1982 is located on the northern part of the site, connected to the main building by a double-story glazed walkway. This rear addition mirrors the original building's architectural style.

To the west of St Hilda's House lies a paved carpark.

The subject site is included on the Victorian Heritage Register (H0481) and is identified as architecturally significant as a fine example of the Arts and Crafts style of architecture and historically significant both within the history of the Church of England and within the context of female employment at the turn of the twentieth century.



Figure 1 - Aerial photograph showing the location of the subject site at 1-19 Clarendon Street, East Melbourne, outlined in red

Source: Nearmap, 4 November 2024

Although the interiors to St Hilda's House have undergone some changes over the years, there remain a number of original features of note including some original linoleum and a number of fittings from the original bathroom.



Figure 2 – Corner tower and ground floor entrance portico of St Hilda's House

Source: Urbis



Figure 3 – 1982 addition viewed from the north

Source: Urbis



Figure 4 – The existing first floor bathroom looking west.

Source: Urbis



Figure 5 – The bathtub to the first floor bathroom.

Source: Urbis

1.3. LOCAL CONTEXT

The East Melbourne and Jolimont precinct is characterised by a blend of residential, commercial, and medical uses. Major roads such as Victoria Parade, Wellington Parade, and Hoddle Street traverse the precinct, supporting significant medical institutions including St Vincents Hospital Melbourne, and some commercial development, particularly along Victoria Parade and Clarendon Street. Office towers, apartment buildings, and terraced homes are interspersed with parks and squares like the adjacent Fitzroy Gardens, Powlett Reserve, and Darling Square.

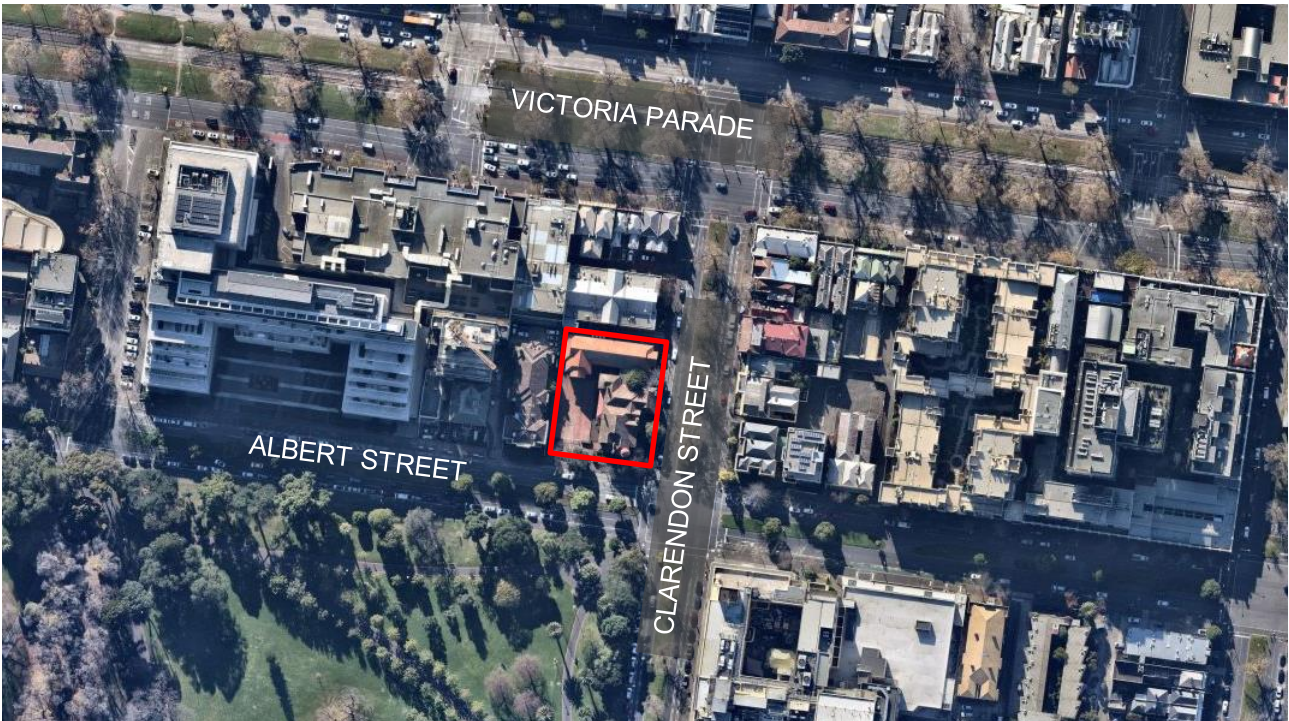


Figure 6 – Aerial photograph showing the locational context of the subject site at 1-19 Clarendon Street, East Melbourne, outlined in red

Source: Nearmap, 23 June 2024

1.4. HERITAGE CONTEXT

Unless otherwise noted, the following information is drawn from the Heritage Impact Statement prepared by Urbis (dated 11/09/2024).

1.4.1. History

St. Hilda's was built in 1907 by R S Phillips for James Griffiths. Both Griffiths and his wife were committed to Christian missionary work and in 1902, Mrs Griffiths was appointed President of the Women's Missionary Council.

Upon completion, the house opened as a Church of England Missionary Training Home for women missionaries in 1908 before being presented to the Church of England Evangelical Trust in 1919.

In the 1930s, the house changed use to become the St Hilda's Church of England Deaconess House.

In the 1960s, it was acquired by the Melbourne Metropolitan Board of Works for a proposed city ring road. The project did not proceed and in common with many large East Melbourne mansions in the 1960s, the house became a boarding house.

From 1982 until 2001, the building was the offices of Bates Smart, architects, who restored the house, retaining much of its original fabric and fittings, and added a new two-storey building to the rear of the site.

The Police Association of Victoria purchased the site in 2001 for use as their headquarters.

1.4.2. Victorian Heritage Register

St Hilda's House is included in the Victorian Heritage Register (VHR No.H0481) as a place of architectural and historical significance to the State of Victoria.

The listing covers an area of land to the corner of Clarendon and Albert Street (L1) including St Hilda's House (B1) and the 1980s addition (not identified as significant). It does not affect a narrow length of land along the west property boundary within the subject site.

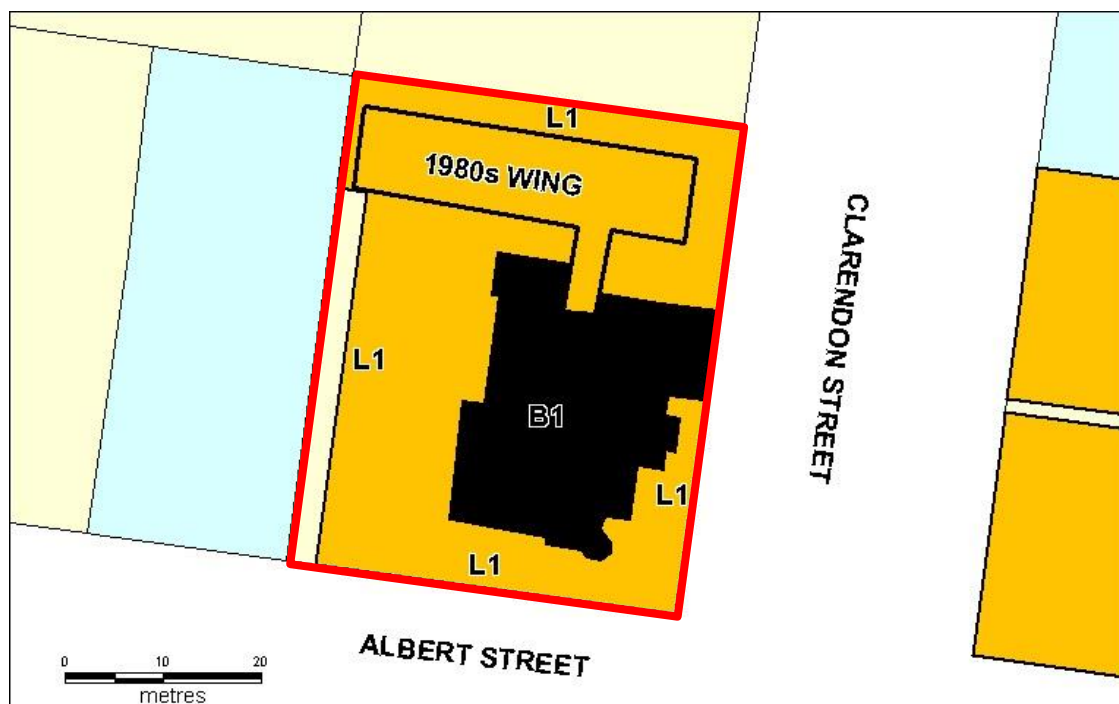


Figure 7 – Heritage map showing the subject site, outlined in red

Source: Victorian Heritage Database

The Statement of Significance for St Hilda's House, as provided in the Victorian Heritage Database, reads as follows:

What is significant?

St Hilda's was built in 1907 by R S Phillips for James Griffiths. The architects were Ward & Carleton. Griffiths had migrated to Australia in 1873 and founded the successful tea business of the same name. Both Griffiths and his wife were committed to Christian missionary work and in 1902 Mrs Griffiths was appointed President of the Women's Missionary Council. Almost immediately the house was completed it was given in trust to the Christian Missionary Society to become a Church of England Missionary Training Home.

Missionary zeal was still an important component of the Anglican faith at the turn of the twentieth century, and missionaries trained at St Hilda's could find work in many parts of Asia, as well as at Aboriginal missions in Victoria and other parts of Australia. In 1907 it seems that St Hilda's was used exclusively for training women missionaries, as a separate facility for men existed in North Melbourne. When St Hilda's was finished in 1908 the Sister-in-Charge was Miss Clara Odgers, and three women were accepted for training. Thirty-three missionaries were already working both overseas and at the Aboriginal Missions at Lake Condah and Lake Tyers.

In the 1930s the house changed use to become the St Hilda's Church of England Deaconess House. In the 1960s it was sold and converted into apartments. From 1982 until 2001 the building was an office of Bates Smart, architects. Bates Smart restored the house, retaining much of the original fabric and fittings, and researched and reproduced the original paint scheme.

St Hilda's is a two-storey house constructed of red brick relieved by panels of terra cotta with large areas of the exterior of the first floor covered in roughcast. The building possesses elements derived from the English Elizabethan, Romanesque and Norman periods of architecture. Half-timbered gables, arcading and cushion column capitals express these influences, whilst the corner tower with its flared eight sided spire and walls and the roof terracotta grotesques (e.g. eagle) are typical of the grander so-called Queen Anne style residences of the Federation period.

Internally the British Arts and Crafts movement inspired the tiled mantels, foliated leadlight patterns, fretted decorative trusswork and stained timber wainscotting. Extant elements include the linoleum floor in the hallway; the main bathroom, complete with pressed metal dado, glazed tiling, bath and washbasins; the built-in linen cupboards at the top of the rear stairs; and the stencilled Evangelical inscriptions on the walls of the dining room and reception room.

A modern two-storey rear addition with open-plan studio space is linked to the main house via a two-level glass-walled walkway. This building does not form part of the registration.

Why is it significant?

St Hilda's is architecturally significant as a fine example of the Arts and Crafts style of architecture. Its picturesque approach is a variation of the so-called Queen Anne style, which was dominated by red brick, terracotta and asymmetrical planning. Additionally, in the execution of detail, the design draws on the influence of Art-Nouveau. It is significant for its essentially intact interior, including both layout and fittings. The timber wainscotting, the robust pressed metal dado in the dining room and the coloured leadlight glass representation of plants and foliage contribute to an impressive and highly intact Arts & Crafts interior.

St Hilda's is historically significant both within the history of the Church of England and within the context of female employment at the turn of the twentieth century. As a training home for missionaries, it was one of the few places to provide vocational training for women.

2. PROPOSED DEVELOPMENT

2.1. PROPOSED WORKS

It is proposed to undertake an internal and external scheme of works to adapt St Hilda's House to residential use. The proposed scheme also involves:

- Demolition of the 1982 building to the north of the site and double-storey linking structure.
- Construction of a new freestanding four-storey building located to the north-west of the site comprising office, gallery, and residential spaces.
- Landscaping works and the creation of a new garden to replace the at grade car park.
- Construction of a basement level access off Albert Street to accommodate off-street car parking, including a small new basement area under St Hilda's House to provide access to a new internal lift and stairs.

Extensive conservation works will be undertaken to the external and internal heritage structure as part of the permit application. These include:

Internal

- Paint finish to existing wall panels (existing varnish to be removed)
- Paint finish to existing feature mould ceiling
- Repair to fireplace mantel (formal living room and formal dining room)
- Main hall staircase (balustrade compliance and reapply stain finish)
- Conserve and store damaged lino and re-use usable tiles of existing lino flooring
- Provide sub-floor ventilation under existing Baltic pine flooring
- Repair and where required replicate existing skirts, arches, cornices, wall panels throughout
- Restump existing footings and provide additional stumps and bearers if required
- Carry out internal refurbishments in a way that limits the extent of demolition works

External

- Reconstruction of the northern elevation to its original appearance (reconstruction of the veranda and balcony)
- Repairs to the terracotta faience
- Render repairs where required
- Remove and replace terracotta tiled roof where required, and repair failed flashing / capping
- Repairs to the stained-glass windows
- Repairs to the original door and window joinery
- Repair brick chimney and broken chimney capping where required
- Repair window pully systems and rotten timber frames where required

The proposed scheme includes a range of works that respect the heritage elements while ensuring the building is maintained in a way that safeguards the health and well-being of occupants. For example, the current balustrades are non-compliant and will be updated. Additionally, significant thermal performance upgrades, including replacing the window glazing and the original roof, which is in very poor condition, will greatly improve St. Hilda's energy efficiency, raising it well above its current 0.3-star rating.



Figure 8 – Proposed site plan

Source: *b.e.architecture, Architectural Pack for 1-19 Clarendon Street, East Melbourne, August 2024, HO2.*

2.2. HERITAGE IMPACT STATEMENT SUMMARY

The *Heritage Impact Statement* was prepared by Urbis (dated 11/09/2024) to assess the potential heritage impacts of the proposed development on the heritage significance of St Hilda's House. It considers that the heritage impacts of the proposed scheme on St Hilda's House are acceptable for the following reasons:

- The proposed extent of demolition to St Hilda's House has been minimised as far as possible while at the same time allowing the dwelling to be upgraded to meet modern standards of amenity. The double-storey link to the rear of the Federation building will be removed and a suite of conservation works undertaken to help ensure that St Hilda's House is restored to its original appearance as a freestanding Federation villa. All original external fabric to the Federation dwelling will be retained as part of the proposed scheme.
- Although some internal changes are required to facilitate St Hilda's House's adaptation as a single residence, the extent of proposed change has been minimised as far as possible. The changes proposed to the main rooms in the front part of the building are minor, and are appropriately respectful of the significance of the place.
- The restoration of the balcony and veranda to the northern elevation will help restore St Hilda's House to its original appearance.
- The suite of reconstruction and conservation works proposed is a positive aspect of the scheme that would help repair and conserve fabric that has otherwise been neglected for some time.
- Refusal to issue a permit would adversely affect the reasonable use of the place as it would hinder the extent to which the building could be upgraded to meet contemporary standards of amenity. Not only do the kitchen and bathroom require updating to adapt the building to its original residential use, but the current configuration of rooms towards the rear of the building is more suited to a rooming house than a single residence. Although the rooms to the rear are north-facing, most are dark, comparatively small, and ill-suited for open plan living. A degree of change is required to optimise the north facing rooms to the rear of the building and adapt the building for contemporary living.
- If there were a need to retain the existing arrangement of rooms, this would ultimately hinder the building's ongoing use and detract from the value of the property. Such an outcome is not warranted given the changes that have previously occurred in this part of the building.
- Part of the reasonable use of a heritage building also concerns its environmental performance. The advantages of conserving heritage buildings from an environmental sustainability perspective are widely recognised. Not only does such an approach conserve the embodied energy in the existing building, it also reduces the energy use associated with demolition, waste disposal and new construction. From its existing 0.3 star energy rating, significant thermal performance improvements are required for St Hilda's House to achieve a requisite 7 star energy rating. The successful adaptation of heritage buildings hinges on these matters.

The Heritage Impact Statement concludes:

“Overall, the proposed scheme is a considered response which is sensitive to the early fabric of the registered place and would not have an adverse impact on its significance. On this basis, the proposed scheme is recommended for approval from a heritage perspective.”

In line with this final statement in the Heritage Impact Statement, and consistent with the requirements of the Act, the following sections of this report identify why the proposed works and use are reasonable given the context, and from an economic perspective, necessary to ensure the ongoing use and preservation of the building.

3. REASONABLE USE

3.1. MEANING OF 'REASONABLE USE'

Heritage Victoria has published a policy on the relevant matters for the consideration of section 101(2)(b) of the *Heritage Act 2017* relating to reasonable or economic use. Regarding reasonable use the policy (in summary) contends:

Reasonable use is not affected by refusal if a place can be used without the proposed changes.

The Executive Director may consider:

- the historic, recent and current uses of the registered place or object,
- other compatible uses of the registered place or object,
- the context and setting within which the place or object is located, and
- other relevant matters.

Refusal to enable a change of use may affect reasonable use of a place to a greater extent if the historic or recent use is now obsolete, than if the historic or recent use is not obsolete.

Refusal to issue a permit for upgrading facilities to meet contemporary or safe standards may affect reasonable use.

3.2. EVALUATING REASONABLE USE

The reasonable use of the registered place in the context of the application is assessed here through responding to questions that derive from Heritage Victoria reasonable use considerations in the Act.

What is the historic, recent and current use of the registered place?

St. Hilda's has historically served various institutional and residential purposes. Initially, upon its completion in 1908, it was a Church of England Missionary Training Home for women missionaries. In the 1930s, it transitioned to the St Hilda's Church of England Deaconess House. By the 1960s, it was repurposed as a boarding house, which has left it with its current 11-bedroom configuration.

From 1982 to 2001, it served as the offices for Bates Smart, architects who restored the site and constructed the existing double--storey addition to the north of the site.

Most recently, the site was used commercially to house the headquarters of the Police Association of Victoria, with St Hilda's House and the rear building providing office space and twenty on-grade parking spaces.

The site is currently vacant and requires a range of remedial works to be completed before it can be re-occupied for any use.

What other compatible uses of the registered place may exist, considering the context and setting?

The subject site is well located, opposite the Fitzroy Gardens, just 900m from the Melbourne CBD, and with easy access to public transport via tram lines on Victoria Parade and the North Richmond Train Station. Significant amenity is within walking distance along Smith Street, Gertrude Street, and Brunswick Street as well as the CBD.

Residential use of the site is complementary in nature to the mixed-use character of the area and is well suited given the amenity and transport access provided in the area. Other potential uses include office space (which the site was previously used for) and function/gallery space.

These uses form part of the proposed redevelopment and are well suited to the site's location and size. We understand the landowner/developer is intending to retain ownership of the development and occupy the residential and non-residential spaces. In this context, these non-residential uses are considered part of the

residential amenity of the site and not considered commercial premises from which the landowner/developer would require a return from.

In considering alternative uses however, the potential return is an important consideration, given if those uses were sought on-site the landowner/developer would require a reasonable financial return from the development and accordingly would need to lease/sale the various spaces/uses.

Accordingly, we have considered the potential for other uses, focusing on those that are consistent with the applicable Commercial 1 Zone (C1Z). As per the Melbourne Planning Scheme the purpose of the C1Z is to create vibrant mixed-use commercial centres and provide for residential uses at densities complementary to the role and scale of the commercial centre.

Consideration is therefore given in the table below to the compatibility of the range of uses possible under the zone, either with or without changes to the building and noting the commerciality of each use also.

USE	COMPATIBILITY
Office	The existing condition of the site would require significant expenditure to make this an attractive office location. While a more comprehensive renovation is required including substantial internal modifications, the cost to undertake these works are not expected to be met with the required rate of rental returns. Further, with high vacancy and subsequent high incentives being offered to lease office space in both CBD and fringe markets, the rental returns are simply not commensurate with the level of expenditure required to create an attractive workplace.
Medical centre	A medical centre would have similar limitations to that of office, and also has more stringent requirements around works to ensure health, safety and patient amenity, as well as the need to facilitate the operation of specialist medical equipment. A medical centre would require substantial changes to the building.
Community use (e.g., gallery, museum)	These types of facilities are very specialised. Occupiers are not readily available, and rents paid are generally low. Consequently, the feasibility of relying on such a use to ensure an ongoing commercial return to maintain the heritage asset is generally uncertain.
Retail (shop)	Given the location of the building outside an activity centre/high street and lacking footfall, securing retail tenants would require substantial incentives and therefore unlikely to support the development's ongoing sustainability. Any retail use would require some works to the building be undertaken before occupation was possible.
Rooming house	A rooming house would require similar works to a conventional residential development but would yield a much lower and ultimately insufficient income relative to the substantial costs required to remediate the building.
Childcare centre or other education facility	Strong access and proximity to the Epworth Private Hospital is supportive of childcare or other education uses, however, given the land value and costs of remedial works, these uses are unlikely to yield the required rents for commercial viability.

Residential use appears to be the most suitable and reasonable use, consistent with the proposal.

Will refusal of the application impact the ability to upgrade facilities to meet contemporary standards?

As mentioned earlier in this section, the building is not fit for occupation by residential or commercial tenants in its current state. It does not meet current building standards, offers limited and dated facilities or amenities, the internal layout would be inefficient or inappropriate for potential users, and further works would be necessary to ensure contemporary standards are met around heating/cooling, safety standards and so on.

The reintroduction of any residential or commercial activity, whether that be conventional residential, rooming house, office, retail or otherwise, would need changes to the layout or fabric of the interior (e.g., updates to the layout and positioning of the living areas, remedial works to the flooring to suit a residential space, etc.), the addition of modern amenities for residential or commercial space (e.g., toilets, heating, cooling), and works to ensure modern safety or other regulations are met.

Refusal of the application to facilitate internal improvements to the building would not only impact the use of the building for the proposed development but would virtually eliminate the potential for the building to be

used for any other use that would be considered reasonable; ultimately resulting in the building remaining unused and continuing to deteriorate.

Are there any other relevant matters in support of the proposed use?

If the proposed mix of uses are considered reasonable (as contended here), then the proposed redevelopment will ensure restorative works are undertaken. A range of positive outcomes for the building are expected to be derived from this:

Significantly improved energy efficiency for the buildings, including improvements to floor ventilation, windowpanes with better thermal efficiency, etc.

Improved accessibility in St Hilda's House, with the addition of lift access.

Restoration of the building to its original use as a residential building.

Restoration of the car park back to greenspace, more consistent with its original recreational use as a tennis court.

Maintaining single ownership will ensure cohesive and regular maintenance of the heritage building supporting the long-term preservation of the building.

3.3. CONCLUSION ON REASONABLE USE

Based on the above considerations related to the reasonable use of the heritage place, the following conclusions emerge:

- The historic use as a missionary training centre has been long redundant and the building has been adapted for a number of uses subsequently.
- More recently, the building was used as an office but was vacated and is similarly no longer viable.
- Located in a premium location near a range of amenities and public transport, residential use is considered the most reasonable use of the building. It is consistent with the surrounding context, required limited interventions to the heritage fabric and reflects a return to its original purpose – residential.
- Residential is considered the most compatible use. More recent uses such as office and other uses possible under the Commercial 1 Zone are not feasible with the building in its current state and would not deliver a sufficient return to offset the significant conservation works, including the reconstruction of the veranda and balcony, and repairs to original features. Most community uses would not represent a viable or sustainable use of the building.

4. ECONOMIC USE

4.1. MEANING OF 'ECONOMIC USE'

Heritage Victoria has published a policy on the relevant matters for the consideration of section 101(2)(b) of the *Heritage Act 2017* relating to reasonable or economic use. With regard to economic use the policy (in summary) contends:

- The financial circumstances of the applicant or owner are irrelevant, but the feasibility of the proposed development may be relevant insofar as it relates to the viability of an ongoing use.
- The question of whether works will facilitate an economically sustainable use is relevant. An economically sustainable use could be one that can continue for the medium to long term, mitigating the possibility of continual proposed changes to the registered place or object.
- An applicant may be required to provide evidence of economic impact.
 - Economic use may be affected if refusal would limit capacity to cover the cost of:
 - conservation and maintenance of the registered place or object; and/or
 - rates and land tax directly associated with the registered place; and/or
 - capital improvements to ensure the continued use of the registered place or object, where that use contributes to its significance (including reasonable debt repayment and interest costs).

4.2. EVALUATING ECONOMIC USE

Similar to the assessment of reasonable use, the economic use of the registered place in the context of the application is assessed here through responding to questions that derive from Heritage Victoria's economic use considerations in the Act.

Will the works facilitate the establishment of an economically sustainable use?

The proposed works will allow for a sustainable use over the long term, as the landlord/developer intends to maintain use of the site for the foreseeable future, ensuring the asset's sustainability without further changes. Single ownership reduces the likelihood of frequent proposed alterations and ensures cohesive, regular maintenance of the buildings.

Will the introduction of the proposed use ensure coverage of costs related to capital improvements, conservation, maintenance, and other related costs?

The proposed extensive conservation efforts are vital, not only for immediate restoration but also for the long-term preservation of the site. These preservation measures will ensure that the property remains in excellent condition, safeguarding its historical and conservation value well into the future.

The extensive restoration work proposed is a significant financial undertaking and much of which would not be feasible without converting the building into a residential development. That is, the investment of money, time, and care in the restoration would not be possible if the building wasn't being transformed into someone's home.

The proposed works strike a balance between preserving the site's heritage and enhancing its liveability, and functionality through improving energy efficiency, and safety compliance. These improvements will enhance the site's appeal and functionality, contributing to its significance and long-term viability as a place of architectural and historical significance.

4.3. CONCLUSION ON ECONOMIC USE

Conclusions are made below in relation to the relevant considerations:

- The works facilitate an economically sustainable use as the landlord/developer plans to retain and use the site for the long term, ensuring stability and reducing the likelihood of frequent alterations to the building's use.
- The extensive restoration work proposed is a significant undertaking. However, the owner is willing to invest time, money, and care into the restoration because it is being transformed into a home. These preservation measures will ensure that the property remains in excellent condition, safeguarding its historical and conservation value well into the future.

DISCLAIMER

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