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MELBOURNE VIC 3000**

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11 November 2024


Heritage Victoria


Dear Ann,

1-19 CLARENDON STREET, EAST MELBOURNE HERITAGE PERMIT APPLICATION NO.P39221 - RFI RESPONSE

Urbis continues to act on behalf of the permit applicant b.e.architecture, in relation to heritage permit application P39221 at 1-19 Clarendon Street, East Melbourne.

We write in response to Heritage Victoria's Request for Further Information (RFI) dated 11 October 2024.

In response to this RFI, please find enclosed:

- Updated architectural drawings (dated 11/11/2024), prepared by b.e architecture (dwg pack addendum 01).
- Updated Heritage Impact Statement prepared by Urbis, dated 8 November 2024.
- Seal-a-Sash works method statement (30/10/2024).
- Adadaz report on the staioned glass windows (undated).
- Arborist report by John Patrick Landscape Architects (dated 31/07/2024).
- Letter from Bryce Raworth Conservation discussing the stencilled Evangelical inscriptions on the walls of the dining room and reception room (to be provided).
- Universal Fans report (30/10/2024).
- Reasonable and economic use report by Urbis Economics and Property (08/11/2024).

Some changes have been made to the plans in response to comments in Heritage Victoria's RFI. The changes to the application are as follows:

- The bathroom layout has been amended so the vanity remains in its current position (refer H10).
- Details of the proposed front fence design has been provided.
- Details of the proposed steel framed glazed partition to the first floor hallway has been provided.



The Heritage Impact Statement has been updated to address the matters raised in the RFI. It now includes a detailed description of all works proposed in the application, specifically to St Hilda House itself, an assessment of the potential impacts of the proposed work.

An options analysis for works that may have a detrimental impact on the cultural heritage significance of the place has also been included.

1. RFI RESPONSE

The table below provides a response to each of Heritage Victoria's RFI items.

Table 1 – RFI Response

RFI ITEM	RESPONSE AND DOCUMENT REFERENCE
1. Renders/perspective/3D views to understand the visual impact of the proposed new development, particularly from Albert Street and Clarendon Street.	A range of 3D renders have been prepared to show the impact of the proposed development in views from surrounding streets. Refer dwg pack addendum 01.
2. Updated architectural drawings to address elements not fully documented in the application set provided. This includes but is not limited to details such as: <ul style="list-style-type: none"> a. Glazed partitions to the first floor hallway. b. Skylight construction details. c. Reflected ceiling plans. d. Lighting plans. e. Servicing plans (including the proposed ducted heating or cooling) including the look, form, finish, treatment and details of services that will be visible. f. Gas conversion of fireplaces. 	The architectural document has been updated in response to all matters raised in HV's RFI. All missing information and inconsistencies have been addressed. Refer dwg pack Set 01 & 02 Rev A. We respectfully request that reflected ceiling plans, lighting plans, servicing plans and details on the gas conversion of fireplaces be provided as a condition of permit in the event a permit is granted.
3. Structural investigations and exploratory works including but not limited to: <ul style="list-style-type: none"> a. Civil drawings – investigation of stormwater drainage system etc. b. Works to address raising damp and ground levels. 	We respectfully request that this information be provided as a condition of permit in the event a permit is granted.
4. Provide schedule of window repairs and restoration advice. Explain the impact the proposed replacement of existing single glazed float	Refer schedule H65–67.

glass with thicker 6.5mm laminated glazing will have on original fabric and the many stained glass window through the building.

Restoration advice has been provided by Seal-a-Sash and Adadaz in their works method statement.

The proposed works to the windows are discussed in the updated HIS.

<p>5. Updated landscape drawings including a demolition site plan showing the location of all trees, existing plantings, fencing and plantings proposed for removal and drawings documenting new proposed landscape works, fencing and plantings.</p>	<p>Landscape plans, existing conditions, demolition and proposed conditions landscape plans have been updated to include all information requested.</p> <p>Refer HO3, HO5 and H25.</p>
<p>6. Further justification for proposed removal of mature trees supported by arborist report which also assesses the likely impact of construction/works upon all trees and their future longevity.</p>	<p>Refer to advice from by John Patrick Landscape Architects (dated 31/07/2024).</p>
<p>7. Justification to support the proposed removal of the historic linoleum.</p> <p>Advice from a materials conservator to support approach, and other options considered to replicate the richness, colour and finish of the original linoleum.</p>	<p>A report from a materials conservator regarding the prospect of repair works/ restoration to the original linoleum is pending.</p> <p>The HIS has been revised to address this matter.</p> <p>The architects had a site meeting with Andrew Thorn in August 2024, but have been unable to contact him despite calling on a weekly basis. Attempts to contact Andrew Thorn are ongoing.</p>
<p>8. Justification to support covering the stencilled Evangelical inscriptions. A report from a materials conservator specifying how this could be achieved without harm to the feature is required, including any necessary cleaning and conservation works required prior.</p>	<p>A report from a heritage professional specifying how this could be achieved without harm to the feature is being under taken, and will soon be provided as part of this RFI report.</p>
<p>9. A revised Heritage Impact Statement (HIS) to address matters raised in the RFI.</p>	<p>The HIS has been revised to address the matters raised in the RFI.</p>
<p>10. Consideration of how the proposed new development is required for the reasonable and economic use of the place. If further information regarding reasonable or</p>	<p>A reasonable and economic use report has been included as part of this RFI response.</p>



economic use is not provided, HV must be notified of this in the RFI response.

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| <p>11. A response regarding the issues raised in the submission from the City of Melbourne. CoM have questioned the proposed height and scale of the new building and how the proposed material palette, particularly how the stone cladding, responds to the Arts and Crafts character.</p> | <p>A response regarding the issues raised by the City of Melbourne is provided below. This has also been included in the updated HIS.</p> |
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Additional Issues

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| <p>12. Document the impacts of implementing a 7-Star energy rating compliance for St Hilda House.</p> | <p>It will not be possible to implement a 7-Star energy rating compliance given the significance of the site.</p> <p>Compliance measures have been balanced against the need to retain significant fabric.</p> <p>The HIS has been revised to address this matter.</p> |
| <p>13. Impacts to the original bathroom (including the pressed metal panelling) on the first floor. Preferably the vanity, pressed metal panelling and partition wall would stay in its current location.</p> | <p>The bathroom layout has been amended so the vanity and pressed metal panelling remain in their current position.</p> <p>Refer H10 (Rev A).</p> <p>The bath, bath surround and timber partition wall are to be securely stored on-site.</p> <p>The HIS has been revised to address this matter.</p> |
| <p>14. Impacts of skylights on ceilings.</p> | <p>The plasterboard will be removed and the skylight will be trimmed up as per detail shown on H32 (Rev.A).</p> <p>The HIS has been revised to address this matter.</p> |
| <p>15. The impact of the proposed secondary timber flooring on skirtings, architraves and doors.</p> | <p>Refer H64.</p> <p>The HIS has been revised to address this matter.</p> |
| <p>16. The glazed partitions to first floor hallway.</p> | <p>Refer H70.</p> <p>The HIS has been revised to address this matter.</p> |

17.	The size, scale and number of new openings proposed. Preferably openings would be rationalised to the minimum necessary, reduced to the smallest size necessary, and be more proportionate to the heritage rooms (i.e. the size of a standard single door).	Refer H69 and H70. The HIS has been revised to address this matter.
18.	Details regarding rectification of crossflow ventilation and proposed finished surface levels which appear to be above sub floor ventilation openings.	Refer H68. Universal Fans report provided.
19.	Inconsistencies between the two sets of architectural drawings. For example, the retention of original doors to the upper verandah.	Inconsistencies have been addressed. All doors to the upper verandah are to be retained. New doors and window to the ground floor north elevation noted. New stair to basement and extent of BF excavation updated in sections.
20.	Fencing details to be provided.	Front fencing details provided in H72, pool fence in Section 2 H32 (Rev.A).

2. WINDOW UPGRADES AND REPAIR

The proposed replacement of existing single glazed float glass with thicker 6.5mm laminated glazing can be achieved without discarding the original joinery, and with minimal change to the existing windows.

With respect to the double hung timber framed windows to St Hilda's House, the window sashes will be removed from their frames and retained for reuse.

The beading holding the existing glazing in place will be carefully prised off to accommodate the new laminated glazing and fixed back in place.

Glazing rebates will be deepened by 3mm to accommodate the new glass, ensuring that the original appearance of the traditional putty line is retained. Removing 3mm of timber from the glazing rebate will not affect the structural integrity of the windows, nor will it make a noticeable difference to the internal appearance, as decorative internal mouldings do not come within 3mm of the internal surface of the glass.

Pulleys, spiral balances or hinges will be serviced – or replaced only if necessary with like components – rated for the finished weight of the sashes (including any new glass and counterweight if applicable).

Counterweights will be adjusted by adding additional weight to the existing counterweight.

Sash cords will be replaced with long-life waxed cotton cord with a poly core rated for the finished weight of the sashes (including any new glass and additional counterweight). This is required as traditional all-cotton sash cord are not designed to accommodate the increased weight of the sashes and counterweights.

Staff beads and parting beads will be reused, however both will be fitted with twin-fin brush seals.

The windows will be reassembled, retaining the majority of their original fabric, and the upgrades will be virtually imperceptible.

Repair works to the stained glass windows are outlined in the accompanying report by Adadaz. As outlined in this report, several of the stained glass windows at St Hilda's House have been placed between acrylic sheets in an attempt to prevent their collapse and breakage. These issues would be addressed as part of the conservation works proposed for the stained glass windows.

Restoration advice has been provided by Seal-a-Sash in their works method statement. The proposed works to the windows are discussed in further detail the updated HIS.

Refer schedule H65–67.

3. LINOLEUM

The architect has previously met with Andrew Thorn from Artcare regarding the repairs to the terracotta faience and the potential to restore the linoleum. The report from a materials conservator regarding the prospect of repair works/restoration to the original linoleum is pending.

The architects had a site meeting with Andrew Thorn in August 2024, but have been unable to contact him despite calling on a weekly basis. Attempts to contact Andrew Thorn are ongoing.

4. LANDSCAPING

The landscaping drawings have been updated to provide all identified missing information. These now include a demolition site plan showing the location of all trees, existing plantings, fencing and plantings proposed for removal (refer H03 and H05)). They also document the proposed landscaping scheme including fencing and plantings (H25).

These drawings should be read in conjunction with the arborist's report by John Patrick Landscape Architects (dated 31/07/2024) which provides additional justification for the proposed removal of three mature trees. Eleven trees were assessed as part of this report, six of which are located on the site.

Three trees are to be removed as part of the proposed scheme: Tree 02 (*Pittosporum undulatum*), Tree 03 (*Pittosporum undulatum*), and Tree 06 (maple). Tree 05 (*Phoenix canariensis*) is to be relocated to the new garden to the west of St Hilda's House.

Trees 2, 3, and 6 have all been assessed as being of low arboricultural value. None of these three are considered worthy of retention from an arboricultural perspective.

It is important to note that none of trees proposed for removal are of historical significance. None of them appear in the aerial photographs in Figures 26 and 27, taken in 1945 and 1950-60 respectively. Nor are any trees referenced in the statement of significance of the place.

The existing palm tree (*Phoenix canariensis*) to the north of St Hilda's House is to be relocated to the western garden. This tree does not appear in the either of the aerial photographs dating from 1945 or 1950-60, and is thought to have been planted in the 1970s.

No other trees will be affected by the proposed construction works. The proposed excavation works are located outside the tree protection zones of Tree 04 and 07.

5. FENCE

The existing cyclone wire front fence is to be demolished as part of the proposed scheme and replaced with a new fence that will interpret the design of the original perimeter fence on the site. The proposed new fence will be timber framed with a corrugated steel panels to the lower section and timber lattice above. It will rise to an overall height of 1.7m (refer H72).

Early images and the original plans of the building both show that the original fence for the site rose to a height of 6 feet around the tennis court and the eastern yard to the formal dining room (Figure 21). Although the proposed fence is slightly lower than this height in these areas, it continues the detailing of the lower part of the original fence, and establishes a greater degree of visual communication between the street and the house.

The proposed perimeter fence will complement the presentation and setting of St Hilda's House, its period of construction and its character. It also interprets the original fence shown on early photographs of the place (Figure 23 and 24 in the HIS).



Figure 1 – Proposed fence along South elevation to St Hilda's House.

Source: b.e.architecture, Dwg pack addendum 01 for 1-19 Clarendon Street, East Melbourne, HO72.

Although the proposed pool to the rear of St Hilda's House is to be raised, a compliant pool fence is to be installed around the pool as shown on H09 (Rev A). This is proposed to be a simply detailed steel palisade fence. The western perimeter pool fence aligns with the western wall of the proposed family living/ craft room, well away from the windows to the north elevation. Original plans of the building show that a six foot fence once cordoned off a smaller rear service yard from the garden to the north (Figure 21). This area of the site currently contains condensers and services. The proposed pool and pool fence will have little impact on the significance of St Hilda's House.

6. BATHROOM

The bathroom layout has been revised to ensure that the vanity and pressed metal panelling remain in their existing location.

The bath and bath surround are to be securely stored on-site.

The timber partition wall cannot be retained in its current location as it would block access to the proposed laundry. This element could likewise be securely stored on-site.

Refer H10 (Rev A) for further details.

7. NEW INTERNAL OPENINGS

Openings have been rationalised to the minimum necessary, noting that St Hilda's House originally contained eleven bedrooms and this number of bedrooms is no longer required or desirable.

In most cases, openings to the original walls have been reduced to the minimum size possible. However, there are three exceptions to this: the new opening to open up the proposed hallway, the new opening to open up the Dining Room to the Kitchen, and the new opening between the Master Robe and the Dressing Room (New opening 06). Reducing these openings to the size of a standard single door would impede the functionality of these spaces. In all three cases, the openings have been punched into the existing walls to ensure that the openings are legible as contemporary interventions. As can be seen in the elevations shown in H69 and H70, the openings are proportionate to the heritage rooms.

Refer H69 and H70.

8. FINISHES

With respect to the impact of the proposed secondary timber flooring on skirtings and architraves, the skirting board and skirting block will be carefully removed and reinstated after the secondary timber flooring is installed.

Both the architraves and the doors will be removed and 10-19mm shaved off the lower edge of their bottom rail to accommodate the new timber flooring. Although this will result in a loss of original fabric, the extent is very minor and is considered acceptable given it is a means of retaining the original flooring in situ.

9. 7 STAR ENERGY RATING

As noted by GIW Consultants, it will not be possible to achieve a 7-Star energy rating compliance given the significance of the place. For example, it will not be possible to double glaze every window or pack out the existing brick walls with stud walls and insulation. The need to increase the thermal performance of the place has been balanced by the need to retain significant fabric, and it will be necessary to apply for a dispensation where fabric cannot be altered.

10. NCC COMPLIANCE

Floreancig Smith Building Surveyors identified a number of alterations that are required to meet compliance with NCC provisions, including adjusting the sloping verandahs and balustrade height to L1 verandah and terrace (H71), and works to the main staircase (H71). Where alterations are proposed, these have been designed to retain as much existing fabric as possible. Dispensations for some non-compliant elements, such as the height of the balustrade to the front porch, will be sought where changes will have an adverse impact on the significance of the place.

11. SKYLIGHTS

The shafts to the four skylights will extend through the roof space to the internal roof valley. A skylight diffuser panel will be fitted within the existing ceiling. This has been designed to provide clearance from all walls to maintain the existing square set cornices. Although some areas of the ceilings to the hallways are to be removed to accommodate the new skylights, this is a minor heritage impact that will result in a large improvement in amenity.

Details of the skylight construction details are provided in H32 (Rev.A).

12. GLAZED PARTITIONS

The glazed steel framed partition that is proposed for the first floor hallway is to be installed with the least possible impact on surrounding fabric. Although a small section of the existing skirting and cornice will be cut to either side of the hallway to accommodate the new steel frame, this is considered to be a minor impact.

Refer H70 for further details.

13. REFLECTED CEILING PLAN AND LIGHTING PLANS

In the rooms with the decorative strapped ceilings, it is proposed that the existing downlights be removed and the ceiling surfaces made good, and a new, less intrusive lighting scheme be introduced.

Beyond this, we respectfully request that a lighting plan and a reflected ceiling plan be provided as a condition of permit in the event a permit is granted.

14. SERVICES

Heating will be via a timber trench grille, similar to the existing. Air conditions grilles will be concealed within joinery units where possible.

We respectfully request that more detailed servicing plans be provided as a condition of permit in the event a permit is granted.

15. CITY OF MELBOURNE

The City of Melbourne have questioned the height and scale of the fourth storey and its view from Clarendon Street compared to the scale of St Hilda's House. They have also requested additional information on how the proposed material palette – in particular the stone cladding – responds to the 'Arts and Crafts character' of St. Hilda's House.

The generous setbacks to the new four storey building will help ensure the new built form sits comfortably in this particular context. It will form a backdrop to St Hilda's House as viewed from Albert Street, being setback behind the rear elevation of the Federation dwelling. Given that the three storey building at 246 Albert Street is setback only 4.5 metres from the front title boundary, four storey built form at the generous setback proposed is appropriately responsive not only to St Hilda's House itself, but also to the surrounding streetscapes. Coupled with the new garden setting that is proposed for the western setback, the scheme is considered an overall improvement from both a heritage and an architectural perspective. The new envelope will maintain and enhance the prominence of St Hilda's House, and will not detract from the heritage building or the East Melbourne and Jolimont Heritage Precinct (HO2).

Although the broader context surrounding St Hilda's House contains a number of highly significant heritage buildings, these are characterised by variations in scale and setback. For example, the Freemasons Hospital (166 Clarendon Street), which stands diagonally opposite St Hilda's House, is a five storey reinforced concrete building (c1936-37) designed by architects Stephenson & Meldrum (later Stephenson & Turner) in the interwar Functionalist style. This building is included in the Victorian Heritage Register as VHR No.H1972.

On the opposite (eastern) side of Clarendon Street stands Victoria House at 220 Clarendon Street, a three storey Tudor revival style building that rises to a height of three storeys hard on the Clarendon Street title boundary. Directly to the south of this building stands Clarendon Terrace (208-212 Clarendon Street), a double storey building constructed in the Victorian Free Classical style with a central giant order portico (c.1856-57). This building is included in the Victorian Heritage Register as VHR No.H0029. The double storey building at 202-206 Clarendon Street was constructed in 1856 and is also included in the Victorian Heritage Register as VHR No.H0028.

The Fitzroy Gardens are located across Albert Street to the south of the subject site. These are also included in the Victorian Heritage Register as VHR No.H1834.

To the west of St Hilda's House, at 246 Albert Street, is a three storey art deco block of flats. Beyond this are two double storey Victorian buildings at 250 and 260 Albert Street respectively. It is understood that an eight storey envelope is proposed to the rear of these buildings.

The building directly to the north of St Hilda's House, at 23 Clarendon Street, is the only non-contributory building within close proximity of the subject site.

The surrounding sections of both Albert and Clarendon streets are characterised by variation in building period, scale and character. This contrast in scale is not limited to more recent development – which in some cases rises to an overall height of approximately 14 storeys (The Eastbourne at 280 Albert Street) – but also includes some taller heritage buildings such as the aforementioned Freemasons Hospital building.

Furthermore, it is noted that the current planning controls allow for more intensive redevelopment of up to seven storey built form on the site.¹ The site is within the Schedule 20 to the Design and Development Overlay - Victoria Parade and Albert Street Area (Area 43). The provisions of DDO20-43 also specify a minimum front setback of 8 metres from the Albert Street boundary (excluding enclosed verandahs).

Although it is recognised that the heritage issues on the site fall under the provisions of the Heritage Act (2017) rather than the Planning and Environment Act (1987), it is nonetheless the case that the proposed new envelope is well under the maximum possible height allowed under the current planning controls. It is also the case that these controls have affected the context within which St Hilda's House is now viewed, with taller built forming a backdrop to the heritage building in a number of longer range views to the site. Both Albert and Clarendon streets now contain a mix of highly significant heritage places interspersed with multi-storey contemporary development. A planning permit has, for example, recently been granted for an eight storey new envelope behind the Victorian buildings at 250 and 260 Clarendon Street to the west of the site (Figure 2). The current scheme is considered a highly sympathetic response given the variation of scale that characterises its context and the development pressures arising from its desirable inner-city location.



Figure 2 – Render showing the proposed new envelope behind the Victorian buildings at 250 and 260 Clarendon Street to the west of the site.

Source: <https://250albertstreet.com.au/>.

With respect to the proposed palette of materials, one of the key preoccupations of the Arts and Crafts Movement was to emphasise the honesty of materials. Natural materials were characteristically celebrated. Stonework, face brick, timber and other natural materials often featured heavily in Arts and

¹ No buildings may be constructed that protrude above a plane inclined at an angle of 22 degrees from a point calculated from permanent footpath level directly opposite the centre of the site frontage on the south side of Albert Street.



Crafts buildings, which were typically richly textured. In this respect, both the stone cladding and the timber shutters respond to the Arts and Crafts character of St Hilda's House.

For these reasons, the proposed design is considered to be appropriately responsive to St Hilda's House as well as the broader Albert Street and Clarendon Street streetscapes.

These setbacks will also help widen the view corridor from Clarendon Street towards the restored rear elevation of St Hilda's House.

16. CONCLUSION

We trust this information is sufficient to assist you with your continued assessment of this application.

If you have any questions or require any additional information, please do not hesitate to contact me on the below details.

Yours sincerely,

A handwritten signature in black ink, appearing to read "CB" with a flourish.

Carolynne Baker
Director

