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18 March 2025

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*Re: 655-661 Sydney Road, Brunswick
Proposed development of townhouses
Application for permit*

This letter has been prepared on behalf of the owners of the subject site at 655-661 Sydney Road and 50-52 Breese Street, Brunswick. It concerns a planning permit application for the redevelopment of part of the site with townhouses.

An external inspection of the site and its environs has been undertaken, together with a review of the relevant planning scheme provisions and Council documents. These include Clause 43.01, the Heritage Overlay provisions of the Merri-Bek Planning Scheme and Clause 43.02 (Schedule 18), Design and Development Overlay and Clause 15.03-1L, Heritage.

Our office provided a letter in support of the proposed subdivision of 655-661 Sydney Road, in November 2024, which is being assessed under planning application SP/2024/220. As seen in the figure 1 below, one of the proposed parcels, Lot 1, which fronts Sydney Road, will be divested and the other parcel, Lot 2, will be redeveloped with townhouses, along with the land at 50-52 Breese Street. The redevelopment of Lot 2, and the appropriateness of the townhouses in relation to heritage policy and other heritage considerations is the subject of this letter.

The portion of 655-661 Sydney Road that this letter relates, i.e., proposed Lot 2, is an irregular shaped parcel of land with frontages to William Street to the north, Florence Street to the south and Breese Street to the west. The property is occupied by altered, non-original fabric that form the rear elements of a c.1955 building fronting Sydney Road. Oblique aerial views from c.1960 show a double-storey envelope fronting Sydney Road, with the rear occupied by a single storey building with skillion roof. The Sands and McDougall directory of 1974 lists the site as the proposed Brunswick Markets. It is likely that the building underwent remodelling as part of the market redevelopment, with the existing rooftop carpark constructed, accessed via a ramp off William Street. The north western corner of the proposed development site (50-52 Breese Street) is currently an at grade concrete carpark.

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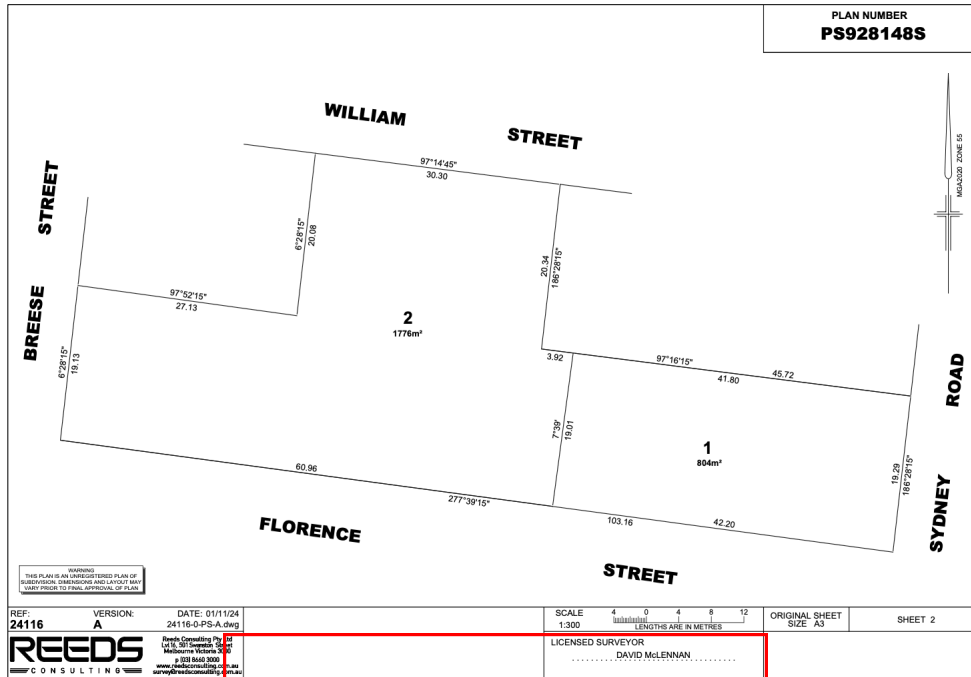


Figure 1

Extract of the proposed plan of subdivision, with the planned divested block to the east of the site being identified as lot 1. This letter relates to development on proposed lot 2, and the allotment to be made in 50-52 Breese Street.

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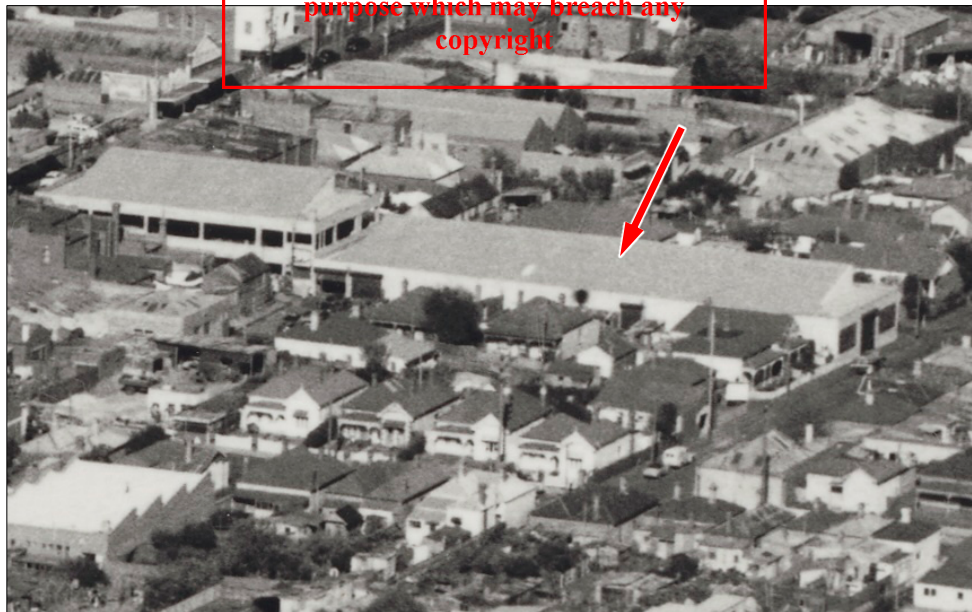


Figure 2

Oblique aerial view facing south east toward the subject site, c.1960. Noting at this time the roof top car park did not exist and houses occupied the area now known as 50-52 Breese Street. Image source: State Library of Victoria.

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Figure 3 Aerial photograph showing the subject site outlined in blue, adjacent to the Sydney Road heritage precinct.

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The portion of the site this letter relates to is subject to a Heritage Overlay control, however it is adjacent the Sydney Road Heritage Precinct (HO149). The portion of 655-661 Sydney Road (i.e., Lot 1) forms part of HO149. The site is subject to a Design and Development Overlay (DDO18) which has the following design objective relevant to heritage considerations:

- To complement the valued built form and heritage character along Sydney Road and respect the form, design and context of buildings of individual heritage significance in the precinct.

The Design and Development Overlay also encourages upper levels of new development to be designed to respect the form and design of adjacent heritage buildings.

It is proposed that western part of 655-661 Sydney Road (Lot 1) and 50-52 Breese Street, Brunswick be redeveloped with 45 townhouses of contemporary design, most of which are three storeys with a smaller number of being two storeys.

The demolition of the existing built form on the site raises no heritage concerns given it is not within the Heritage Overlay and is of no identified heritage significance.

The new townhouses will have no adverse impact on the historical character of Sydney Road on account of their substantial setback from the heritage overlay streetscape and modest height – accepting that DDO18 allows for development in excess of the proposed three storey building envelope.

It is also a relevant consideration that Breese, Florence and William Streets are heterogenous streetscapes with an increasing number of multi-storey apartment developments.

Furthermore, the interface between the proposed townhouse development and the heritage overlay curtilage has a single storey envelope, ensuring an appropriate transition in height between the built form fronting Sydney Road and the new built form. There is also a public laneway between the northern half of the site and the rear of buildings at 663-669 Sydney Road, which will provide a buffer between the three storey component of the development and the rear elements of 663-669 Sydney Road. This being said, Lot 1 fronting Sydney Road is identified as non-contributory, as is 663 Sydney Road to its immediate north, and it would be reasonable to expect future development of these properties would be within the DDO's preferred maximum height of 19 metres.

In conclusion, accepting that the site is not subject to a Heritage Overlay control, and that the Clause 15.03 heritage policy is thus not specifically applicable, the scheme has been prepared having reasonable and appropriate regard for heritage considerations. The proposal also aligns with the design objective of DDO18 that new development complements the valued built form and heritage character along Sydney Road.

Bryce Raworth Pty Ltd

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