

Heritage Impact Statement

464–466 St Kilda Road, Melbourne
28 April 2026



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1.0 Introduction

This Heritage Impact Statement has been prepared at the request of Cox Architects, on behalf of the owner of the subject site at 464 St Kilda Road Melbourne.

The site is associated with current permit (Planning Permit No. 909/2020) for a previous development scheme. The present application is for a different proposal that seeks to provide a mixed-use development including multi-storey residential apartments on the site.

This report assesses the significance of the existing built form on the site, and the contribution it makes to the adjacent streetscapes. It comments on whether the proposed works are appropriate in character and detail, and whether the scheme is acceptable in terms of its impact upon the significance of 464 St Kilda Road, which is subject to an individual Heritage Overlay.

2.0 Sources of Information

The analysis below draws upon internal and external site visits along with a review of the relevant documents and resources including the following:

- *Heritage (Clause 15.03), Heritage Overlay and Schedule (Clause 43.01) in the Port Phillip Planning Scheme*
- *Port Phillip Heritage Review (Version 36, December 2021), prepared by Andrew Ward for the City of Port Phillip.*
- *City of Port Phillip Heritage Policy Map (December 2021)*
- Historic images (various), Trove: <https://trove.nla.gov.au/>
- Historic MMBW Plans, State Library of Victoria, <https://www.slv.vic.gov.au/>
- MapshareVic, <https://mapshare.vic.gov.au/mapsharevic/>

The report is to be read in conjunction with the drawings and documents prepared by Cox Architects and submitted with respect to this application.

3.0 History

The 1896 MMBW for this part of St Kilda Road details the built form present at that time. Although the sites are not numbered, what is now number 464 contained a large villa named 'Blenheim' and the site adjacent was vacant. More broadly St Kilda Road was largely developed with generously proportioned allotments containing Victoria villas interspersed with vacant sites.

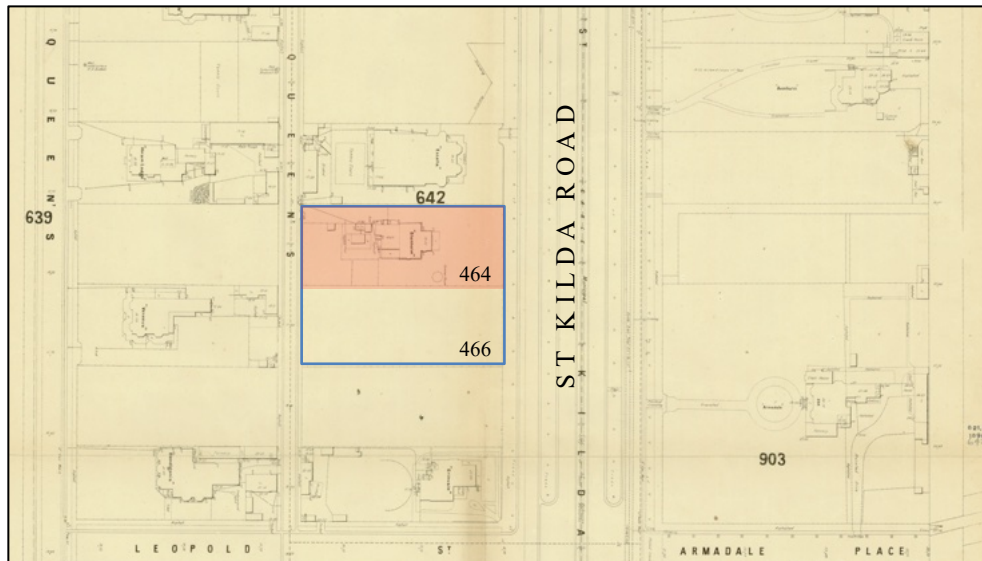


Figure 1 1896 MMBW excerpt of Detail Plan of Melbourne, showing the subject site (outlined blue) and the part associated with the original VACC site (shaded red). Source: State Library of Victoria.

By 1945 this section of St Kilda Road was complete, with the adjacent allotment containing a large villa (refer Figure 2 and 3 below).



Figure 2 c1945 aerial of St Kilda Road with the built form present on each of the sites. Source: State Library of Victoria



Figure 3 c1956 aerial extract, showing the subject site (outlined blue) and the site of the original VACC site (shaded red). The adjacent site now contains a dwelling. Source: Museums Victoria.

The Port Phillip Heritage Review includes a citation for the VACC building with the following brief history and description:

... In 1962 construction was begun on Bernard Evans and Partners' seven storey office development. The contractors T.L. Easton and Sons were the principal builders of the structure which was completed in 1965.

The VACC building has a stepped form with only the first three floors projecting towards St Kilda Road, the remaining floors being set well back. It is constructed with an expressed steel frame with accentuated verticals, between which are bronzed reflective windows with off-white spandrels. The entrance foyer retains its original staircase with marble-clad cantilevered steps. It is very unfortunate that the foyer has recently been refurbished.

The citation appears to be inaccurate insofar as other sources indicate that the VACC building was constructed in stages, beginning in 1958 with a low-rise podium element. As described in a 1957 newspaper article, the first two floors were to be built as the initial stage of a seven storey development costing £400,000.¹ The building was to be raised above ground level on 'stilts' to provide parking space for more than 100 cars – the need for car parking facilities was one of the key reasons for the VACC's decision to relocate from their existing offices in the Melbourne CBD to St Kilda Road.² It is understood that this first stage of development constituted the construction a 'new front applied to old house for officers for Victorian Automobile Chamber of Commerce, in St Kilda Road, South Melbourne. Cladding of green enamelled steel'³. This first stage is evident in the images and property services plans included below.

¹ *The Age*, 21 March 1957, p. 3.

² *The Age*, 21 March 1957, p. 3.

³ *Miles Lewis Building Index - Cross-Section 1.9.1958*, p 2

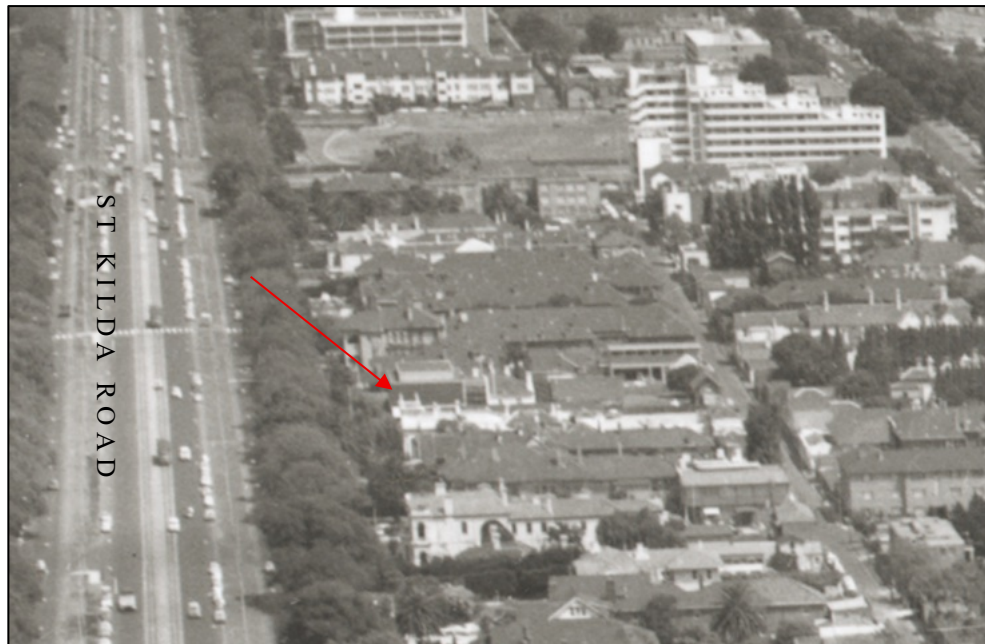


Figure 4 1964 aerial extract with the VACC building indicated by the red arrow with the original dwelling to the rear. Source: State Library of Victoria.

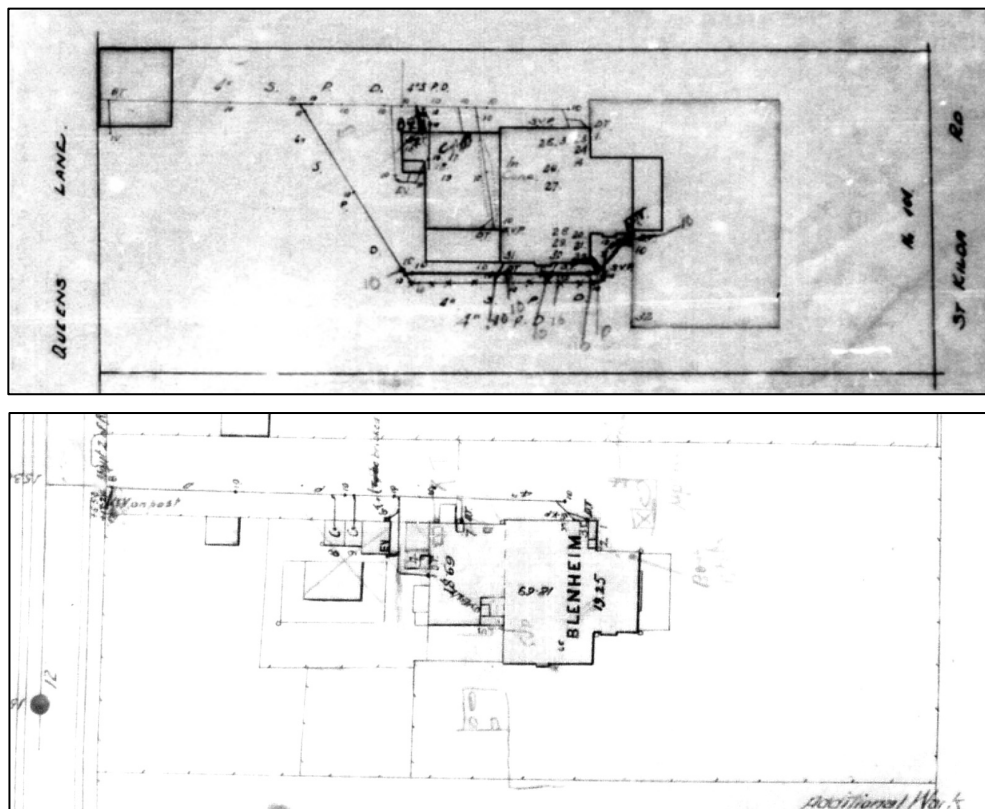


Figure 5 Comparative of the 1958 property services plan (top) with an earlier 1919 property service plan (bottom) of number 464 St Kilda Road. The later plan outlines the footprint of the new VACC building to the front of the existing dwelling with the plan submitted by Bernard Evans and Associates.



Figure 6 1958 image of the newly completed office building addition to the front of the original 'Blenheim' dwelling.

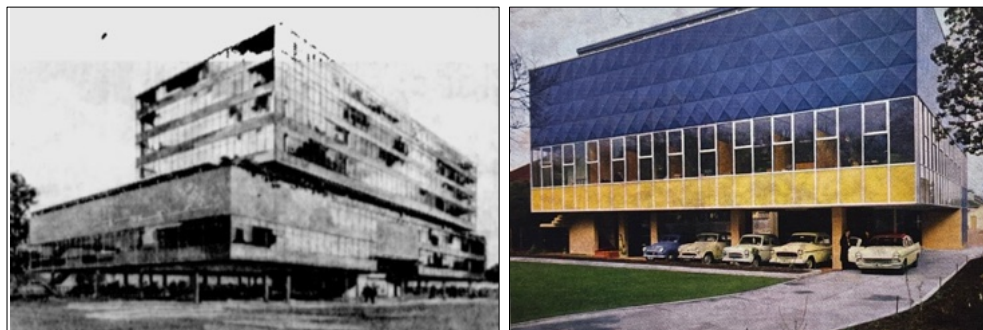


Figure 7 (left) A c1957 illustration of the planned VACC office building. Source: *The Age*.

Figure 8 (right) The first stage of VACC office building on St Kilda Road, 1958. Source: *On Solid Ground*

According to a 1958 newspaper article reporting on the opening of the VACC building, this was the first office building completed since the easing of regulations that hitherto permitted only residences and flats along St Kilda Road.⁴ Photographs of the first incarnation of the VACC building bear little resemblance to the current structure, suggesting that there were further stages of development, that either substantially remodelled and extended the existing building or it was entirely rebuilt in the 1960s. A slightly later iteration of the building is evident in a 1966 aerial (refer figure 6), by this time the villa 'Blenheim' was demolished in order to make way for the extension to the rear of the original front portion of the VACC building.

⁴ *The Age*, 4 September 1958, p. 3.

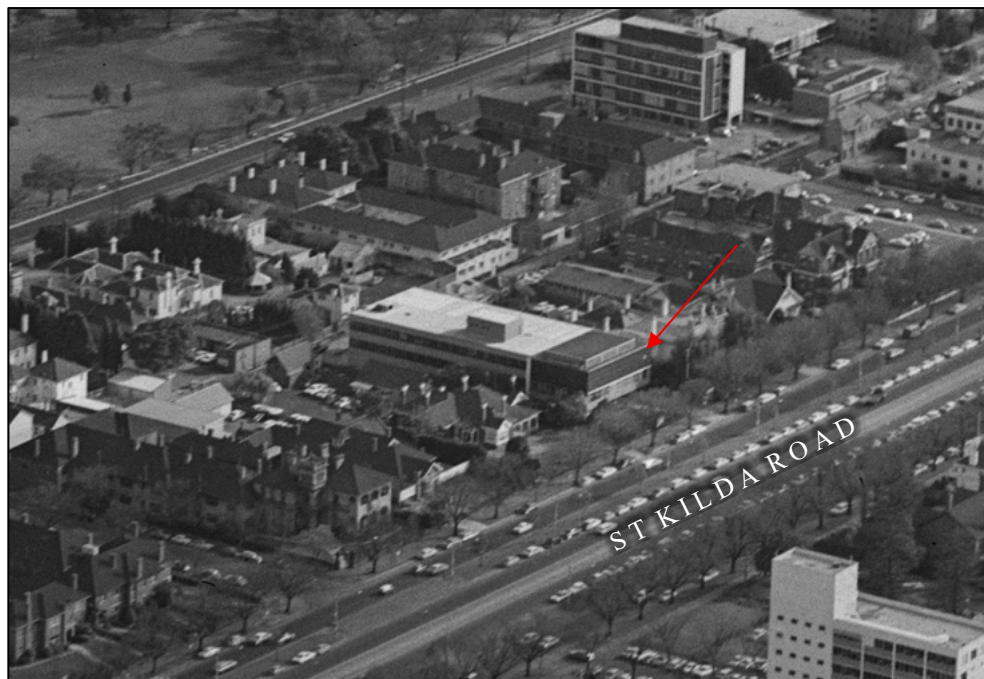


Figure 9 1966 aerial extract with the amended VACC building indicated by the red arrow. Noting that the dwelling to rear has been demolished and the built form to the rear has been constructed and the undercroft possibly filled in. Source: State Library of Victoria.

A citation for another 1960s office building in the Port Phillip Heritage Review refers to the 1958 VACC building having been demolished and replaced by the present structure in 1968-70. The newly completed VACC building was featured in the July 1970 issue of 'Architect' for its application of 'dark bronze Duranodic used to finish the aluminium spandrels and mullions.' The architects were Bernard Evans, Murphy, Berg and Hocking and the builder E.A Watts Pty Ltd.



Figure 10 July 1970 issue of 'Architect' showing the newly finished cladding to the VACC building.

In terms of the adjacent site at number 466, it is not known when the dwelling was demolished in order to make way for the larger building - noting that the last property service plan for this site was dated 1964 however the property was clearly evident in the 1966 aerial view (Figure 9 above). In any event, it seems as though the VACC building did not obtain its broader, seven storey form until c1970. Photographs taken c1970 appear to show the building in a newly completed state and information included in the property service plan file include a request for urinal flushing prepared by Bernard Evans, Murphy, Berg and Hocking with the subject 'VACC Building Extensions Stage 3' and dated 21 April 1969. Furthermore, information is provided on the various fixtures from the existing first floor to the new building basement and ground to level seven. It seems likely that the building completed in 1970 was essentially a new building across the two sites, 464 and 466 St Kilda Road, albeit it may have incorporated some internal structure from the earlier building that was confined to 464 St Kilda Road.

The VACC vacated the building after its sale in 2019.

DRAINS TO BE Laid SHOWN FULL

THIS PLAN IS ISSUED SUBJECT
THE RISK AND RESPONSIBILITY
AND OPERATION OF THE
PUMP TO RAISE THE

FIRST FLOOR EXISTING BUILDING

50. CLOSET INTL TO BE ABOLISHED.
66. BASIN. " " "
66A. WASHING MACHINE. " " "
67. BATH. " " "
68. SHOWER. " " "
70.71. SINKS. " " "

89. PHOTOGRAPHIC SINK 1ST FLOOR EXISTING BUILDING TO BE MOVED TO 7TH FLOOR OF NEW BUILDING.

LIST OF ADDITIONAL FIXTURES.

FLOOR	CLOSET INTL	URINAL INTL	LAV BASIN	BATH	SHOWER	TEA SINK	SINK	BAR SINK	POT SINK	C
BASEMENT										
GROUND	NO FIXTURES									
FIRST	101-101.12	102-104	105-105.1			106				
SECOND	118-119	131-133	141-141.1 154-156.1			148	143-152		153	
THIRD	157-167.300	168-170	171-172.201		299	178-181				
FOURTH	182-192.294	193-195	196-198.2			203-296	297			
FIFTH	207-217	218-220	221-227			228	293			
SIXTH	231-241	242-244	245-251			252				
SEVENTH	255-265	264	265-276	277	278-281		282-284	285-286	287-288	
EIGHTH (ROOF)	NO FIXTURES									
TOTAL	78-79	19	64	1	5	6	7	2	3	
FIXTURE NOS 190, 205, OBTAINED										

Figure 11 Information included in the property service file detail the existing and new fittings and fixtures.



Figure 12 (left) The VACC building, c1970-71. Source: State Library of Victoria.

Figure 13 (right) Current photograph of the VACC Building.

4.0 Description

The subject site is a rectangular double allotment located on the west side of St Kilda Road, between Arthur and Leopold Streets. It extends to Queens Lane to the west, affording two street frontages. Although the site is inclusive of two allotments (number 464 and 466), it presents as a singular site to St Kilda Road and is known as number 464.

464 St Kilda Road contains a postwar modernist office building, originally constructed for the Victorian Automobile Chamber of Commerce (VACC) as noted above.



Figure 14 Recent aerial photograph, with the subject site outlined red.

The building remains intact externally to its c1970 state other than having had a small area of glazing removed to create a balcony as well as the addition of a modest single-level roof top structure. The front setback has been re-landscaped and the original fountain removed.

The broader urban context around the site is primarily multi-level commercial development. That said, adjacent to the north at 462 St Kilda Road is a remanent portion of an original St Kilda Road villa known as 'the willows'. Surrounding the villa to the rear and side is a c1970s townhouse development. Adjacent to the south at 468 St Kilda Road is a multi-storey modern development.

St Kilda Road is a broad, multi-lane, tree-lined street with separate bike lanes, central tram line and wide footpaths. Queens Road largely features the rear access to the multi-storey developments that front onto Queens Road. Overall, the broader context is not considered to be a sensitive heritage environment.



Figure 15 View of the St Kilda Road elevation of the VACC building.



Figure 16 Detailed view of the entrance to the VACC building.



Figure 17 Northern facade of the VACC building as seen from Queens Lane.



Figure 18 Interface with the adjacent site 'The Willows'.



Figure 19 *Oblique northern view of the VACC building (far left) with the surrounding modern multi-storey developments.*



Figure 20 *The subject site (far right) sitting amongst taller built form along the southern end of St Kilda Road, viewed looking south.*

5.0 Significance & Heritage Controls

The VACC building is subject to an individual heritage control, listed as HO307 in the Schedule to the Heritage Overlay of the Port Phillip Planning Scheme. External paint controls apply to the building but there are no internal alteration controls or tree controls. The statement of significance for the building as given in the Port Phillip Heritage Review is as follows:

The VACC building is of significance as one of the first commercial buildings to be built along St Kilda Road. Its use of expressed steel and bronzed glazing are early examples of distinctive elements that were to be repeated through Melbourne. The significance of the building has been greatly reduced by the recent refurbishment of the entrance foyer.

The adjoining section of St Kilda Road is included on the Victorian Heritage Register (VHR H2359). The former residence to the immediate north of the site, known as 'The Willows', is also included on the Victorian Heritage Register (VHR H0096).

The site is identified as significant in the *City of Port Phillip Heritage Policy Map* (see figure 15) This is in the context of Councils three tier grading system defined as follows:

Significant heritage places

Includes buildings and surrounds that are individually important places of either State, regional or local heritage significance, or are places that, together within an identified area, are part of the significance of a Heritage Overlay. These places are included in a Heritage Overlay either as an area or as an individually listed heritage place.

Contributory heritage places

Includes buildings and surrounds that are representative heritage places of local significance which contribute to the significance of the Heritage Overlay area. They may have been considerably altered but have the potential to be conserved. They are included in a Heritage Overlay.

Non-contributory properties

These are buildings that are neither significant nor contributory. They are included in a Heritage Overlay, however any new development on these sites may impact on the significance of the Heritage Overlay, and should therefore consider the heritage characteristics of any adjoining heritage place and the streetscape as covered in this policy.



Figure 21 (left) Extract from the Port Phillip Heritage Policy Map showing the subject site shaded red to indicate a significant grading. Note that only half the subject site is shaded red – this is presumed to be a mapping error.

Figure 22 (right) Heritage Overlay map showing HO307 applied to the whole of the subject site. The extent of registration for the Willows and St Kilda Road is shaded orange. Source: VicPlan.

6.0 Heritage Policy Provisions

As the site is subject to an individual Heritage Overlay, it is subject to the provisions of *Clause 43.01, Heritage Overlay*. The purpose of *Clause 43.01* 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, (only relevant points noted):

- *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 heritage study and any applicable conservation policy.*
- *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 or 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.*

Council heritage policy at *Clause 15.03-1L Heritage* has the following relevant objectives and specific policies:

Policy application

This policy applies to all land within a Heritage Overlay.

Strategies

General

Conserve and enhance Significant and Contributory buildings as identified in the incorporated document in Schedule to Clause 72.04 'City of Port Phillip Heritage Policy Map'.

Conservation of heritage places and new development are guided by the statement of significance, the urban context and any relevant documentary or physical evidence.

Encourage high quality, contemporary design responses for new development that respects and complements the heritage place by using a contextual approach that:

- *Responds to and reinforces the contributory features of the heritage place, including:*
 - *Building height, scale, massing and form.*
 - *Roof form and materials.*
 - *Siting, orientation and setbacks.*
 - *Fenestration and proportion of solid and void features.*
 - *Details, colours, materials and finishes.*
- *Conserves and enhances the setting and views of heritage places.*

Maintain the integrity and intactness of heritage places.

Conserve and enhance the significant historic character, intactness and integrity of streetscapes within heritage precincts including:

- *The layering and diversity of historic styles and character where this contributes to the significance of the precinct.*
- *The consistency of historic styles and character where this contributes to the significance of the precinct.*

Avoid development that would result in the incremental or complete loss of significance of a heritage place by:

- *Demolishing or removing a building or feature identified as Significant or Contributory in the incorporated document in Schedule to Clause 72.04 'City of Port Phillip Heritage Policy Map'.*
- *Altering, concealing or removing a feature, detail, material or finish that contributes to the significance of the heritage place.*
- *Distorting or obscuring the significance of the heritage place by using historic styles and detail where these previously did not exist.*

Demolition and relocation

Prioritise the conservation, restoration or adaption of a heritage place over demolition.

Discourage the complete demolition of any building or feature that contributes to the significance of a heritage place unless the building or feature is structurally unsound and the defects cannot be rectified.

Avoid demolition where it would result in the retention of only the facade and/or external walls of a Significant or Contributory building.

Support demolition of part of a Significant or Contributory building or feature if it will not adversely impact upon the significance of the place and any of the following apply:

- *It will remove an addition or accretion that detracts from the significance of the place.*
- *It is associated with an accurate replacement, or reconstruction of the place.*
- *It will allow an historic use to continue.*
- *It will facilitate a new use that will support the conservation of the building.*

[...]

Conservation

Prioritise the maintenance and repair, rather than replacement of features, details, materials or finishes that contribute to the significance of heritage places.

Encourage accurate like for like replacement of features, details, materials or finishes that contribute to the significance of heritage places if they are damaged and cannot be repaired or are missing.

Encourage the accurate restoration or reconstruction of heritage places to a known earlier state, particularly publicly visible features such as:

- *Verandahs, balconies and awnings.*
- *Doors and windows.*
- *Wall materials and details.*
- *Roof materials and details.*
- *Shopfronts.*
- *Chimneys.*
- *Front fences.*
- *Historic signage.*

[...]

Encourage the conservation of alterations and additions where they contribute to the significance of the place.

Conserve original colour schemes and ensure new colour schemes are appropriate to the architectural style of the building where external paint controls are triggered.

Discourage the painting of originally unpainted surfaces.

For buildings originally used for commercial or industrial purposes, encourage conservation of features such as equipment, machinery or signage that provide evidence of the original use.

Alterations

Discourage alterations to:

- *Contributory fabric, the principal facade, roof or any walls or surfaces visible from the public realm including a side street or laneway for Significant and Contributory places.*

- Any feature, detail, material or finish specified in the statement of significance for Significant places.

Support alterations to visible or contributory fabric of Significant or Contributory places if it will not adversely impact upon the significance of the place and any of the following apply:

- It will allow an historic use to continue.
- It will facilitate a new use that will support the conservation of the building.
- It will improve the environmental performance of the building.

Additions

[...]

Support additions to commercial and industrial buildings that are set back a minimum depth of the primary roof form (commercial buildings) or two structural bays (industrial buildings) to retain original or early fabric including the principal facade/s and roof features, and which:

- respect the scale and massing of the existing heritage building or streetscape; and
- maintain the prominence of the heritage features of the building or streetscape and do not detract from, or visually dominate, the heritage building or streetscape; and
- are visually recessive against the heritage fabric.

Additions to buildings situated on corner sites (including to a laneway) should respond to the host building and the heritage character of both the primary street and side street or lane.

New buildings

Support new buildings that respect and complement Significant and Contributory buildings in relation to form, scale, massing, siting, details and materiality.

[...]

Roof terraces and roof decks

Encourage roof terrace and roof decks to be sited so that they are concealed when viewed from the street and, when on a corner, from the side street (excluding a laneway).

Ensure that roof terraces and roof decks are set back from chimneys, parapets and other roof features, for example roof lanterns.

[...]

Policy guidelines

Consider as relevant:

Additions

[...]

Containing additions to a commercial heritage place within a sightline taken from across the street (Figure 23)

For additions higher than one storey, having the same or greater side setbacks than those of the host building.

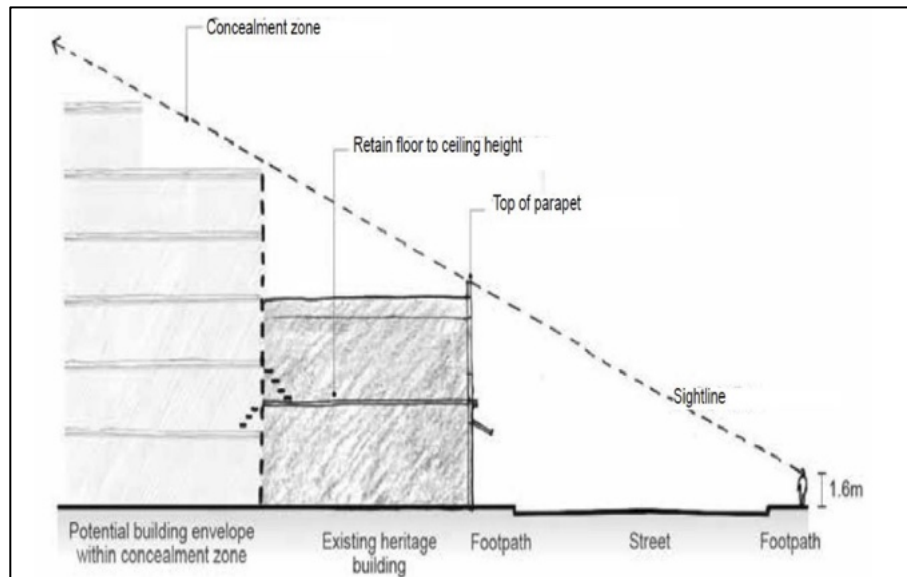


Figure 23 Sightline for an addition to a two-storey commercial heritage place.

The site is also subject to two Design and Development Overlays – Schedule 13 (DDO13) and Schedule 26-5A (DDO26-5A). DDO13 relates to the view lines to the Shrine of Remembrance. DDO 26-5A is a sub precinct within Schedule 26: St Kilda Road North Precinct. The following relevant policy requirements have been abridged from the Schedule 26 to the DDO:

Precinct-wide objectives

General

To provide for the future development of the St Kilda Road North Precinct, as a Precinct integrated with its urban and landscape surrounds.

To ensure development is environmentally sustainable.

To ensure development does not dominate or obstruct view corridors to key landmark and civic buildings, including the Shrine of Remembrance.

To encourage building design that minimises adverse amenity impacts upon residential properties, Albert Park Reserve, the Shrine of Remembrance and other open space, streets and public places in the area as a result of overshadowing, wind tunnelling or visual bulk.

[...]

Sub-precinct 5 – St Kilda Road south of Kings Way

The following requirements apply to development in Sub-Precinct 5:

- *Development should be generally in accordance with Map 6 of this schedule.*
- *On St Kilda Road a landscape setback of 13.7 metres must be provided to St Kilda Road. A permit may not be granted to construct a building or construct or carry out works which are not in accordance with this requirement unless allowed by clause 2.3 of this schedule.*

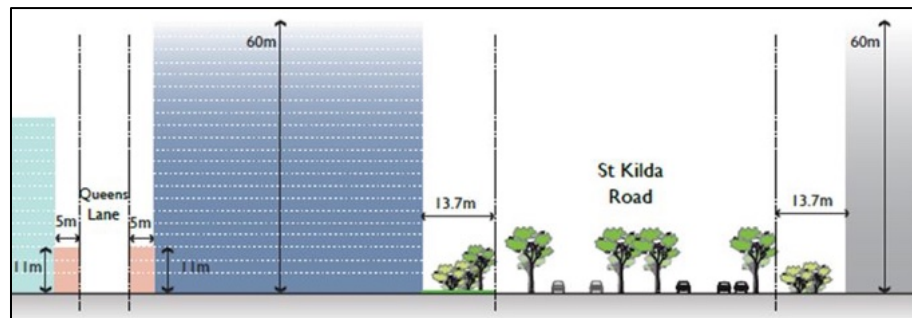


Figure 24 Cross Section AA – built form and setback requirements for sub-precinct 5.

Sub-precinct 5A

A landscape setback of 4.5 metres should be provided to Arthur Street, Leopold Street, Louise Street and Hanna Street

A landscape setback of 3 metres should be provided to Kings Way.

Development fronting and abutting Queens Lane should:

- be built to the Queens Lane boundary; and
- within 5 metres of Queens Lane not exceed a height of 11 metres.

Development beyond the landscape setbacks and the Queens Lane height limit identified above must not exceed a height of 65 metres AHD. A permit may not be granted to construct a building or construct or carry out works which are not in accordance with this requirement unless allowed by clause 2.3 of this schedule.

7.0 Current Planning Permit

By way of background a permit was issued for development of the site in February 2022, with an amended permit and endorsed plans approved in March 2023 (Planning Permit No. 909/2020). The approval provided for the demolition and reconstruction of the existing 8-storey heritage office building (with new materials and some dimensional changes), and construction of an additional 8-storey upper floor, creating a total of 16 storeys.

The permit did not include any conditions regulating the extent to which the new fabric should either exactly replicate or otherwise deviate from the original fabric. The endorsed drawings similarly provide very little detail in relation to accurate reconstruction and the like.

In short, it is apparent that the permit did not provide for a conservation outcome per se, but rather for full demolition and for an interpretive design response in a completely new building.

8.0 Proposed Works

The current proposal is for demolition of the VACC Building and construction of an 18 storey (ground to level 17, with 2 basement levels) mixed used development. The existing three storey podium will be carefully dismantled and in large part reconstructed to its postwar modernist external appearance using salvaged original façade elements where practicable.

A 15 level tower will be erected atop the podium, adopting a sculptural 'butterfly' plan form with chamfered corners that has been carefully designed to optimise occupant amenity and provide for an efficient layout relying on a single, central core.

The tower is expressed with expressed horizontal members, resulting in an overall form and façade articulation that aligns with, and responds sensitively to, the postwar modernist expression of the reconstructed heritage podium.

9.0 Discussion

From a heritage perspective, there are two separate considerations in relation to the proposal – firstly, the extent of demolition and secondly the impacts of the proposed new works on the significance of the place.

Demolition

The current permit allows for the complete demolition of the existing built form. While the present proposal includes the demolition of the tower above, it retains and reinstates the front of the podium and is thus an improved outcome with regard to conservation practice.

The proposed demolition of the balance of the subject building is a consideration in terms of heritage policy, but the present proposal is brought forward with the proposition that the extent of demolition of original fabric that is presently contemplated is less than that approved under the existing permit, as noted above.

While the previous approval has some merit in providing an interpretive response to a building that has inherent condition and compliance issues, it does not represent a Burra Charter compliant response. By contrast, while the present application acknowledges the condition and compliance issues arising with regard to the existing heritage place and its structure, it seeks to address them through retaining and reinstating some of the original fabric, i.e. the front of the podium, such that the heritage place will not be completely lost. This represents a preferred outcome having regard to the Burra Charter and its clear emphasis upon the retention and conservation of original, significant fabric.

With regard to the *'demolition of the tower element, which will be replaced with a new tower with a completely different form, materiality and detailing'*, it is accepted that this is fundamental to the present proposal. However, this aspect of the demolition has arisen as a direct consequence of the shift from a commercial use of the site to a proposed residential use. As was outlined in the heritage memorandum that formed part of the pre-application package, the broad floor plates of the existing upper floors to the former VACC building are not appropriate for residential use. Moreover, the introduction of openable windows and balconies to these levels, elements necessary for residential adaptation, would adversely affect the commercial appearance of these levels.

In this context, the retention of the podium form and fabric, and replacement of the upper levels, is deemed an appropriate response having regard for considerations that include heritage but are not restricted to heritage alone.

New Works

The overall development proposal will result in a change to the setting in which the retained portion of the VACC building is viewed and appreciated, an outcome which is anticipated and endorsed by the approved permit and the DDO. The design intent seeks to incorporate the retained and reconstructed fabric into the larger development in a manner that emphasises the heritage building in the overall architectural composition, allows for its clear legibility and provides an appropriately compatible setting. The impacts of the new development on the significance of the retained and reconstructed portion of the building relate primarily to its direct lower-level interfaces with the heritage fabric, with the overall height of the broader scheme considered to be more of an urban planning issue.

While the present proposal does not seek to reinstate the set back upper levels of the existing VACC heritage building, it proposes a high-quality residential tower above the three storey podium that has architectural merit and provides a high level of apartment amenity. The podium façade can be reinstated with a closed, corporate character as a result of locating the entry and community facilities (ie non-residential activities) in the associated interiors.

The contemporary residential character of the proposed tower is differentiated from the 1960s corporate character of the VACC building, but the two components are nonetheless designed to complement one another. This is more readily apparent as a result of the changes that have most recently been introduced to the scheme.

It is acknowledged that the requirement for the amended tower design is due to the approved commercial use being no longer viable for the site. It is believed that a residential redevelopment will be viable, and this is an alternative use and outcome that is, in many planning respects, encouraged both within St Kilda Road and the broader inner metropolitan area at the present moment. Furthermore, it is understood that due to the requirements associated with habitable/liveable spaces as opposed to commercial offices the ability to adapt the approved design to provide adequate light, ventilation and balcony space for residential apartments would transform and adversely impact the sleek commercial envelope that characterises both the existing building and the approved scheme. The limited heritage merits of the existing permit would be fundamentally undermined and compromised through the introduction of openable windows, balconies, measures to introduce light deeper into the relatively deep floor plates, and the like.

As noted, the approved development involved the full demolition and reconstruction of the existing 8 storey heritage façade (with new materials and some dimensional changes), and construction of an additional 8 storey upper envelope. The present scheme proposes a different solution for the site, with the dismantling and off-site conservation of the original metal fabric of the podium to the extent that it is visible from the street, to be reinstated within the development podium envelope. While this would represent a form of facadism, it would be facadism that at least conserves and reinstates original fabric to the most prominent part of the building. The permit applicant's engineers, Webber Design (Consulting Engineers), have confirmed the viability of this approach in a letter dated 16 April 2025.

While not exactly similar, the former Yuncken Freeman offices at 407-411 King Street, Melbourne, a significant building in the Melbourne Planning scheme, was recently dismantled and reconstructed as part of the works that included a tower rising above this reconstructed podium element. It is recognised that the building was only two storeys and did not originally have a tower, however it shares strong points of comparison with the present proposal in terms of the careful reinstatement of original fabric of the 1960s as a podium element to a new tower. The two buildings, ie the former VACC building and the former Yuncken Freeman offices, share a common corporate postwar modernist architectural language and character representative of the 1960s.



Figure 25 (left) Yuncken Freeman Offices as originally constructed, 1970. Source: State Library of Victoria.
Figure 26 (right) Reconstructed/restored podium at 407-411 King Street, May 2025.



Figure 27 (left) Yuncken Freeman Offices as originally constructed, 1970. Source: State Library of Victoria.
Figure 28 (right) Current photograph of the completed development at 407-411 King Street.

The development scheme is considered to have limited potential impacts on the significance of nearby heritage buildings. The adjoining thoroughfare of St Kilda Road is included on the Victorian Heritage Register (VHR H2359), as is the former residence to the immediate north of the site, known as 'The Willows' (VHR H0096). The proposed development will not result in any adverse impact to either of these registered places. St Kilda Road itself is already adjoined by numerous tall buildings, and to that extent the proposal will be neutral in impact. Similarly, 'The Willows' is already found in a mixed environment of residential and commercial buildings, and the present proposal will not result in impacts on its setting that are not already inherent to the existing VACC Building and the broader St Kilda Road context.

Conclusion

Having regard for the matters set out above, the present proposal can be seen to strike an appropriate balance in terms of a whole of planning outcome, with a degree of conservation (rather than interpretation with new fabric only) and a mixed-use building of fine architectural value and substantial amenity. On the one hand this represents a truer response to the conservation policies of the planning scheme, and on the other it provides for a superior architectural outcome and a viable use that speak to the notion of net community benefit. On this basis is considered acceptable with regard to heritage considerations and planning provisions that touch upon heritage matters.