

Bryce  
Raworth  
CONSERVATION | HERITAGE

# Heritage Impact Statement

40 Alma Road, St Kilda

Application for permit – Proposed works  
July 2024



[bryceraworth.com.au](http://bryceraworth.com.au)

246 Albert Road  
South Melbourne VIC 3205  
+61 3 9525 4299  
[info@bryceraworth.com.au](mailto:info@bryceraworth.com.au)

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## 1.0 Introduction

This report in relation to 40 Alma Road, St Kilda, was prepared on behalf of the permit applicant, the owners of the subject site. The report is to be read in conjunction with amended drawings (dated 2 July 2024) in relation to VCAT proceeding P1630/2023. This assessment relates to a proposal for internal works and minor external works on the subject land to enable the conversion from apartments into a rooming house.

This report assesses the significance of the existing built form on the land and the contribution it makes to the surrounding streetscape and the broader heritage overlay precinct. It then comments on whether the proposed works are appropriate in character and detail, and whether it is acceptable in terms of its impacts upon the graded building and the character and significance of the heritage overlay area.

## 2.0 Sources of Information

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

- *City of Port Phillip Heritage Planning Scheme- Clause 43.01 Heritage Overlay; Heritage Policy Clause 22.04.*
- *Port Phillip Heritage Review*, City of Port Phillip, December 2021, Version 36.
- *City of Port Phillip Heritage Policy Map*, December 2021.
- Notice of Decision to Refuse to Grant a Permit, City of Port Phillip, 18 December 2023
- City of Port Phillip, Planning Officer Report, 14 December 2023.
- State Library Victoria, as cited.
- University of Melbourne library, as cited.
- MMBW plans, State Library of Victoria, <https://www.slv.vic.gov.au>
- *Sands & McDougall Directories*, State Library of Victoria, <https://www.slv.vic.gov.au>

It is noted that this application has already been through the Council planning process. On 18 December 2023, Council issued a Notice of Decision to Refuse to Grant a Permit, citing two reasons for the refusal. Neither of these reasons related to heritage considerations.

The report has been prepared by Bryce Raworth Pty Ltd, and is to be read in conjunction with the amended drawings and other documents prepared by Next Architects Pty Ltd and submitted with respect to this VCAT application.



### 3.0 The Site and Context

The subject site comprises a largely rectangular parcel of land on the north west corner of Alma Road and Charnwood Crescent, St Kilda. Occupying the property are two buildings: a double storey Victorian mansion at a setback from Alma Road, with a three storey early 1960s apartment building constructed in front and to its side.

The former mansion was designed by architects Crouch and Wilson and built in 1868-69 for David Rosenthal.<sup>1</sup> It has a substantial two storey stuccoed brick envelope with a symmetrical front facade featuring columns and corner piers. Canted bay windows with full length double sashes are present to the facade. Rosenthal owned the property until the mid 1870s when it was purchased by John Finlay and renamed *Shirley*.<sup>2</sup>

The 1897 MMBW detail plan highlights that *Shirley* was on a slightly larger allotment than present today, set behind a semi-circular carriage drive with a stable complex to the rear. The rear of the building extended further north than what is present today, with a verandah along its eastern side. By 1945 an updated MMBW detail plan shows the property had been subdivided, with the stable complex demolished and the south west corner occupied by a new envelope. The rear wing to the mansion has subsequently been demolished.

The second building on the property is a set of three storey face brick flats constructed between 1960 and 1965<sup>3</sup>. These flats are sited to the front of, and partly to the side of the former mansion, largely obscuring views to the former mansion from Alma Road. While the apartment building obscures the former mansion in primary views, its construction appears to have had limited physical impact on the former mansion, with only minor portions of the apartment building impacting the eastern elevation of the former mansion. The rear of the former mansion is visible in views from the north east along Charnwood Crescent.

The property is enclosed from Alma Street by a low face brick retaining wall with tall hedges planted directly behind. A timber paling fence constructed in the past 12 years encloses the eastern boundary along Charnwood Crescent. A carpark is located to the rear of the property, accessed via a narrow bluestone laneway on the western side of 38 Alma Street. The MMBW detail plans depict this bluestone laneway, so it is likely the laneway has always provided an access point.

Alma Road, between St Kilda Road/Nepean Highway to the west and Crimea Street to the east, comprises a mix of late 19<sup>th</sup> and early 20<sup>th</sup> century built form, alongside mid-century apartment buildings and modern development. The southern side of Alma Road is not subject to a Heritage Overlay and contains a greater concentration of mid 20<sup>th</sup> century and modern low scale and mid-rise apartment buildings.

<sup>1</sup> *Port Phillip Heritage Review*, Citation No.2385

<sup>2</sup> *Port Phillip Heritage Review*, Citation No.2385

<sup>3</sup> *Sands and McDougall Directories*, 1960 and 1965.

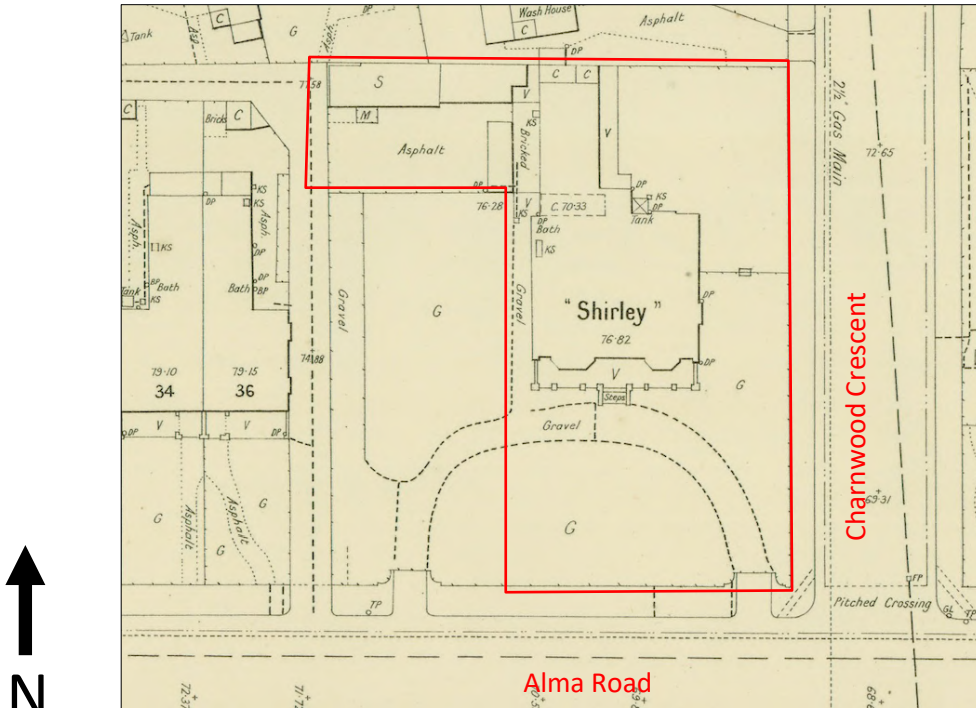


Figure 1 Extract from 1897 MMBW detail plan, with the approximate current boundaries of the subject site highlighted red.

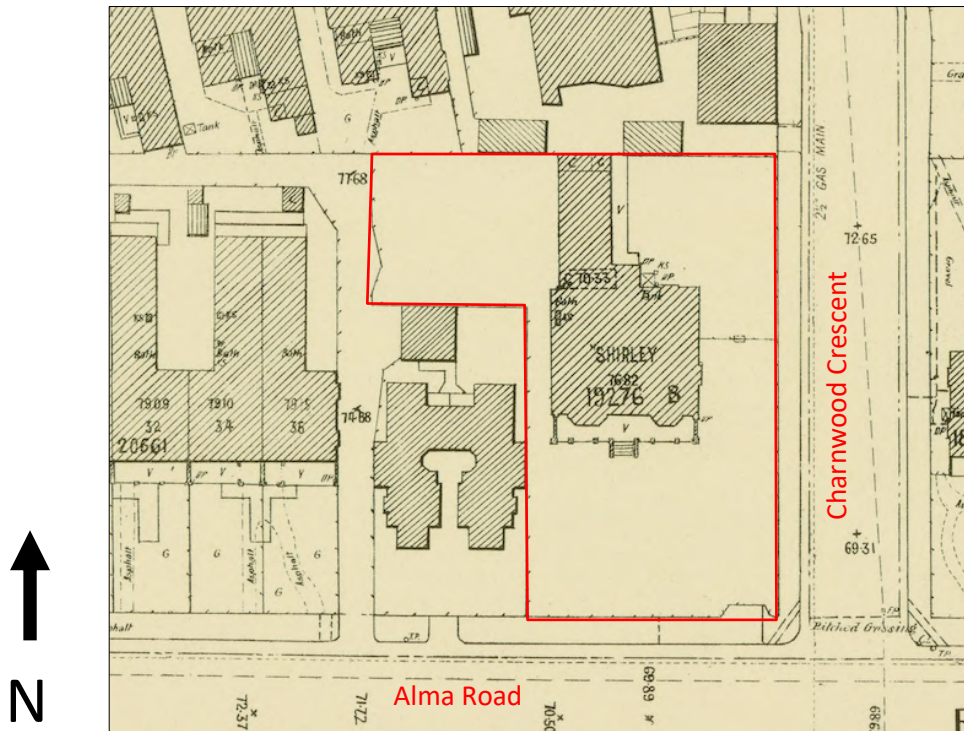


Figure 2 Extract of 1945 MMBW detail plan, with the approximate current boundaries of the subject site highlighted red.





Figure 3 *Extract of 1924 sales advertisement. Image source: University of Melbourne Library*  
<https://gallery.its.unimelb.edu.au/imu/imu.php?request=multimedia&irn=136642>



Figure 4 *The former mansion, as seen from Alma Road, c.1962. The apartment building would have been constructed shortly after this image was taken. Image source SLV <http://handle.slv.vic.gov.au/10381/4122293>.*



Figure 5 *View to the facade of the former mansion, with the apartment building constructed adjacent to its eastern side.*



Figure 6 *View of the facade, with original columns and balustrade to the upper level verandah.*





Figure 7 *Front steps to the former mansion. The steps may be early or original fabric, with non-original handrails.*



Figure 8 *Courtyard between the former mansion and the 1960s apartment building, will be converted into a courtyard.*





Figure 9 *Rear of the former mansion. As seen in the above MMBW detail plans, there was previously a rear wing connecting to this elevation.*



Figure 10 *The rear of the former mansion and the 1960s apartment building constructed on the eastern side of the property.*



Figure 11 Rear of the property as seen from Charmwood Crescent.



Figure 12 Carparking facilities at the rear of the property.





Figure 13 *The subject site, 40 Alma Road, St Kilda, as seen from the south east along Alma Road.*



Figure 14 *Opposite the property are various modern low and mid rise apartment buildings.*





## 4.0 Significance and Heritage Overlay

The property at 40 Alma Road, St Kilda is located within the St Kilda East Heritage Overlay Precinct, identified as HO6 in the schedule to the Heritage Overlay. Paint controls apply under the provisions of HO6, but internal alteration controls and tree controls do not.

The subject site is identified as a 'significant' place in the *City of Port Phillip Heritage Policy Map* (see Figure 16 below) within the St Kilda East Heritage Overlay. As is evident in the policy map below many nearby buildings are also identified as significant, with one non-contributory property to the north east. It is noted that properties opposite the subject site to the south along Alma Road are not subject to a Heritage Overlay.

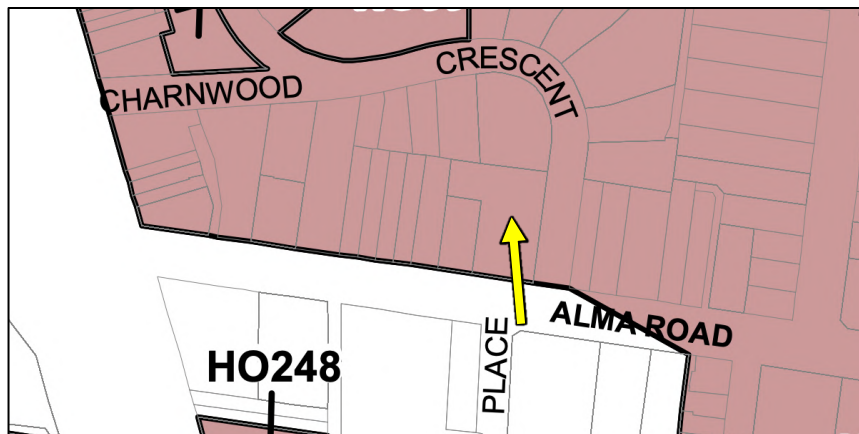


Figure 15 Extract of Heritage Overlay map showing the location of the subject site at 40 Alma Road (indicated by the yellow arrow) and its location within HO6.



Figure 16 Heritage grading map showing significant sites as shaded red, contributory sites green and non-contributory sites unshaded. 40 Alma Road is identified as significant, indicated by the yellow arrow.

The statement of significance for the St Kilda East precinct, as included in the *Port Phillip Heritage Review*, is reproduced below:

*What is Significant?*

*The St Kilda East precinct covers a large area contained in several parts with Wellington Street and Dandenong Road as its north boundary extending from St Kilda Road to Orrong Road. Development began in the 1850s and by the 1870s the area contained several mansions on large allotments, closely settled streets containing modest cottages, several private schools, as well as six churches and the St Kilda Drill Hall surrounding Alma Park. Much of the vacant land between St Kilda Road and Hotham Street was built upon during the boom of the 1880s, and successive building booms before and after World War I resulted in the development of the remaining vacant sites, as well as the redevelopment of the original mansion estates. By the end of the interwar period the precinct was almost fully developed, and the next development boom of the 1960s was characterised by the replacement of older building stock, mostly by flats, continuing the trend toward higher density living that began during the early 1900s. Primarily a residential area, the precinct also includes the eastern side of St Kilda Road, which grew to become St Kilda's premier commercial centre by the early 1900s, but declined by the 1930s and was partially destroyed by road widening in the early 1970s.*

*The precinct comprises buildings predominantly from the Victorian, Federation/Edwardian and interwar periods interspersed with a lesser number of early post-war buildings, mostly flats. Many of the houses and flats, particularly those of the interwar period, retain original front fences. The buildings within the precinct are complemented by historic infrastructure and other features such as bluestone kerb & channels, bluestone laneways, the pillar post box on the north side of Alma Road east of Chapel Street, two remnant cast iron bases of former gas street lamps, and the mature street trees (*Platanus* sp.) in Charlotte Place, Charnwood Road, Cintra Avenue, Crimea Street, Dandenong Road and Redan Street.*

*Buildings and features that contribute to the significance of the precinct are shown on the precinct map.*

*How is it Significant?*

*The St Kilda East Precinct is of local historic, aesthetic, architectural significance to the City of Port Philip.*

*Why is it Significant?*

*It is historically significant as evidence of the successive waves of growth in St Kilda from the mid nineteenth to the mid twentieth century. It demonstrates how, by the late nineteenth century, the residential areas of St Kilda had advanced as far as Hotham Street (with the outlying areas such as Shirley Grove of note as evidence of the remote subdivisions partially developed during the 1880s boom) and, following the opening of the electric tramway along Dandenong Road in 1911, had reached the easternmost municipal boundary at Orrong Road by the early twentieth century. The precinct is also significant as evidence of the rapid growth of St Kilda during the early to mid-twentieth century and the trend to higher density living during that time. This is demonstrated by the groups of Federation/Edwardian and interwar houses, and the sheer numbers of duplexes and flats, which demonstrate the importance of St Kilda to the development of apartment living in Melbourne. (Criterion A)*

*Of particular significance are buildings dating from the 1870s or earlier, which are now rare within St Kilda, and the grand mansions and villas that demonstrate how the high ground associated with Dandenong Road and Alma Road and the building of some of St Kilda's earliest churches surrounding Alma Park led to this becoming one of the most prestigious residential areas in Melbourne by the end of the nineteenth century. The presence of these*

*mansions alongside the modest cottages in nearby streets illustrates the diverse socio-economic groups that have co-existed in St Kilda since it was first settled. This is also demonstrated by the simple form and small scale of the General Baptist Church in Pakington Street that contrasts with the grand church complexes in Chapel Street and Dandenong Road. (Criteria A & G)*

*This group of churches surrounding Alma Park is significant as an expression of the status enjoyed by the churches during the nineteenth century and expresses it not only in architectural terms but also in the number of churches located within close proximity of each other. The presence of the synagogue in Charnwood Crescent as well as houses associated with prominent Jewish families recalls the long-standing presence of the Jewish community in the area. (Criteria A & G)*

*The buildings along St Kilda Road are significant as the surviving remnants of the former High Street shopping centre that was St Kilda's most important retail centre until the 1930s. (Criterion A)*

*Collectively, the duplexes and flats within the precinct are significant for their ability to demonstrate the development of multi-dwelling and flat design in Melbourne during the early to mid-twentieth century and forms part of the important collection of flats within the broader St Kilda and Elwood area. (Criteria C & D)*

*Architecturally and aesthetically, the precinct is significant for its rich and diverse collection of residential buildings. The resultant streetscapes include those that were developed at one time and are more homogeneous in character to those that represent several phases of growth and are quite diverse. The latter streetscapes that comprise a mix of late nineteenth and early twentieth century houses interspersed with interwar and post-war flats are a distinctive characteristic that distinguishes St Kilda and sets it apart from other areas within Port Phillip. (Criteria D & E)*

*Within the precinct, the following streets are of note:*

- *Dandenong Road, which is a remarkable boulevard because its very great width and landscaped plantation with rows of mature Plane trees and the central tramway reservation enriched by the row of decorative centre span poles.*
- *Chapel Street, which contains an impressive group of landmark buildings including three churches, the St Kilda Drill Hall and Astor Theatre, as well as three late nineteenth century mansions and two groups of Federation/Edwardian and interwar housing.*
- *Charnwood Crescent and Charnwood Grove, which comprise late nineteenth century houses interspersed with early twentieth century flats surrounding the landmark St Kilda Hebrew Congregation Synagogue and hall/school complex.*
- *Charnwood Road and Crimea Street, which contain a rich collection of late Victorian and interwar houses and flats including several individually notable examples, as well as the former Baptist Church in Crimea Street, and are also enhanced by the mature street trees.*
- *The highly intact and very consistent Edwardian housing in Charlotte Place & Cintra Avenue (and the intervening section of Chapel Street), Moodie Place, and along the west side of Lambeth Place.*
- *Palm Court, a very intact interwar cul-de-sac containing flats and duplexes with original front fences and garages.*



Given the subject site is identified as being significant within the St Kilda East Heritage Overlay Precinct, a citation has been produced and is provided within the *Port Phillip Heritage Review*. The Statement of Significance is reproduced below:

*What is significant?*

*'Toldara' (later 'Shirley'), designed by Crouch & Wilson and constructed in 1868-9 for David Rosenthal, at 40 Alma Road, St Kilda is significant. It is substantial two storey stuccoed brick mansion with a symmetrical front facade featuring the traditional hierarchy of classical orders used for the columns and corner piers: Tuscan for the ground floor and Corinthian above. Other 'correct' classical details are the use of heavy rustication for the ground floor, but smooth ashlar (or render ruled to resemble stone ashlar) to the first floor, urn-shaped balusters to the first-floor balcony, and a classical architrave, frieze and cornice to the parapet at the top. Other details of note include the pair of canted bay windows to the ground floor (a feature that became common for later Italianate houses), full-length double-hung sash windows, and the round-arched doorway with rusticated voussiors. The four-panelled door is likely to be original, but the Art Nouveau leadlights appear to date from c1910. At least one rendered chimney survives on the east side and the visible side and rear elevations have rendered walls with tall timber sash windows.*

*The mansion is now mostly concealed (part of the east side wall is visible from Charnwood Crescent) behind c.1960s flats, which are not significant.*

*How is it significant?*

*The former 'Toldara' (later 'Shirley') at 40 Alma Road, St Kilda is of local historic, architectural and aesthetic significance to the City of Port Phillip.*

*Why is it significant?*

*It is historically significant for its associations with the formation of the Jewish community in St Kilda during the nineteenth century and as the home of the jeweller, David Rosenthal. It is also significant as one of the early mansions in Alma Road that established its reputation as one of the most prestigious residential areas in Melbourne during the nineteenth century. (Criterion A & H)*

*It is of architectural and aesthetic significance as a fine and well-detailed example of a Renaissance Revival style villa by the prominent architects, Crouch & Wilson. While latter additions obscure the front of the mansion the remarkable Classical style façade remains highly intact. (Criteria D, E & H)*

## 5.0 Heritage Policy Provisions

As noted, the site at 40 Alma Road is located within the St Kilda East Heritage Overlay Precinct, (HO6) and is therefore subject to the provisions of Clause 43.01, the Heritage Overlay. The purpose of this overlay is as follows:

*To implement the Municipal Planning Strategy and the Planning Policy Framework.*

*To conserve and enhance heritage places of natural or cultural significance.*

*To conserve and enhance those elements which contribute to the significance of heritage places.*

*To ensure that development does not adversely affect the significance of heritage places.*

*To conserve specified heritage places by allowing a use that would otherwise be prohibited if this will demonstrably assist with the conservation of the significance of the heritage place.*

Before deciding on an application, in addition to the decision guidelines in Clause 65, the responsible authority will need to consider, (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*

The proposal must be assessed against Council's local heritage policy as set out under Clause 15.03-1L. This policy provides more detailed guidance as to the forms of development that might be appropriate in heritage overlay areas. The policy within Clause 15.03 includes the following 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 details 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 façade 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.*

*Avoid the demolition of a Significant or Contributory building unless new evidence has become available to demonstrate that the building is not of heritage significance and does not contribute to the heritage place.*

*Avoid the relocation of a building or feature that contributes to the significance of a heritage place unless a suitable new location is secured and either:*

- *The relocation is the only reasonable means of ensuring the continued existence of the building or feature and the option of retaining it in the current location is not feasible.*
- *The building or feature has a history of relocation and/or is designed for relocation.*

#### Alterations

*Discourage alterations to:*

- *Contributory fabric, the principal façade, 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.*



#### Vehicle access

*Discourage vehicle crossovers and driveways at the front of a Significant heritage place or any property within a heritage precinct where vehicle access was not historically provided for.*

*Avoid changes to existing crossovers that would impact upon the significance or setting of a heritage place.*

*Encourage vehicle access to be:*

- *From a rear laneway.*
- *For a corner property, from the side street to the rear yard of the property only if rear laneway access is not available.*

*Avoid onsite car parking in locations that would be visible from a street (other than a lane).*

#### Fencing

*Encourage conservation of fences or gates that contribute to the significance of a heritage place.*

*Ensure the height, materials, detailing and colours of front fences are appropriate to the architectural style of the heritage place.*

*Encourage a consistent approach to new fences for heritage places that form part of a related group of buildings such as an attached pair or terrace row or houses, including the reconstruction of historic fences if applicable.*

*Encourage new fences or gates for Non-contributory places to be in a simple contemporary style that complements the fences historically found in the heritage precinct.*

## 6.0 Development Proposal

It is proposed to convert the existing buildings, presently used as apartments, into a rooming house. To achieve the conversion internal and external changes need to occur.

Externally, the amended plans show it is proposed to demolish approximately 3 metres of the timber paling fence along Charnwood Crescent, toward the rear of the property. This extent of demolition will enable a DDA compliant ramp to be constructed from Charnwood Crescent to the rear of the building. Car parking bays between the 1960s apartment building and the original mansion will be removed with this area proposed to be an internal courtyard with a new landscaping scheme. New 1-metre-tall handrails will be applied to the front steps of the original mansion, along with tactiles to these steps. Two first floor bathroom windows, at the rear of the former mansion, and one to the ground floor of the eastern elevation i.e., facing Charnwood Avenue, will be frosted. Ten new mailboxes will be provided to the rear of the former mansion.

To the western side of the property, a new 2 metre high timber paling fence and gate will be installed adjacent to the 1960s buildings and one toward the rear of the former mansion. This will enable security and screen bin storage closer to Alma Road. Sections of the existing garden beds along the western side of the property will be removed.

The undercroft of the 1960s building, accessed via Charnwood Avenue will be enclosed behind a metal palisade fence and provided a pedestrian gate to enable access to undercover bike racks.

An additional three bike racks will be attached to the western wall of the 1960s apartment building within the courtyard and two bike racks provided on the eastern side of the property, between the apartment building and fence line. Three windows to the southern elevation of 1960s apartment building will be frosted and new 1-metre-tall handrails will be installed to the front steps of the apartment building, along Alma Road. Ten 4kW solar panels are proposed to be installed at a 3 degree angle on the 1960s apartment building.

The rear carpark will continue to be accessed via the bluestone laneway to the west of 38 Alma Road.

Internally a number of alterations will be made to remove redundant kitchens and bathrooms located in both the former mansion and the 1960s apartment building. The internal stairs to the former mansion will be demolished and a new stairwell constructed. Small sections of existing walls within the former mansion and the apartment building will be removed as required to reconfigure the spaces.

## 7.0 Discussion

It is noted that the application has already been through the Council planning process. On 18 December 2023, Council issued a Notice of Decision to Refuse to Grant a Permit, citing two reasons for the refusal. Neither of these reasons related to heritage considerations.

It is acknowledged that this is an unusual site for a building to be identified as significant within a heritage precinct, given the significant fabric on the property cannot be readily seen from Alma Road. The extant fabric of the heritage building that can be seen from Charnwood Crescent could be considered secondary in nature, given it is to the rear of the building.

The construction of the 1960s apartment building appears to have had limited adverse physical impact upon the retained mansion, notwithstanding its location, given it only appears to have impacted a portion of the eastern elevation.

As mentioned in the planning officer report, it is understood the application was referred to Council's Heritage Advisor for comment. Council's Heritage Advisor did not object to the proposed works, noting that the internal works did not trigger a permit under the Heritage Overlay.

It is noted that the amended drawings highlight additional changes that were not present in the decision drawings, including greater extent of internal demolition, the rear external ramp, new handrails and tactiles to the former mansion's front stairs, changes to carparking, bike rack installation solar panel installation and landscaping modifications.

The heritage policy for significant places encourages partial demolition to not adversely affect the cultural heritage significance of a place and that the extent of demolition should enable works to contribute to the long term conservation of a heritage place.

Externally, the proposed works are consistent with the heritage policy and supported on that basis. The key heritage fabric on the property, being the former mansion, will be retained to its full extent with the extent of demolition and new works required to convert this property to a rooming house relating predominately to non-original elements.

While the new handrails and tactiles to the existing front steps of the mansion are to be applied to an early and/original feature, they are a relatively minor element necessary for safety and DDA compliant access. Heritage policy supports alterations to visible or contributory fabric of a significant heritage place, *inter alia*, if it does not adversely impact upon the significance of the place, and it facilitates a new use to support the conservation of the building. The proposed introduction of these items will not adversely impact the identified significance of the former mansion and will facilitate its proposed use as a rooming house. It is supported on this basis.

It is further noted that while the proposed external works will not adversely impact upon the identified significance of the place, many of the external changes, such as the introduction of compliant handrails and tactiles, new accessible ramp, frosted windows and bike parking are readily reversible.

All internal changes are supported as the place is not subject to internal alteration controls under the Heritage Overlay. Moreover, the extent of internal demolition relates primarily to the demolition of a number of modern kitchens and bathrooms and construction of new walls to create new rooming configurations. Much of this fabric has previously been altered and, similar to many of the proposed external changes, internal works will primarily impact non-original elements.

With respect to on-site car parking arrangements, the rear car park will continue to be accessed via the bluestone laneway on the western side of 38 Alma Road, which is acceptable and supported by policy.

## 8.0 Conclusion

In conclusion, the amended development scheme for 40 Alma Road, St Kilda has been designed with due regard for the character, appearance and significance of the heritage place, with minimal intervention taking place. The scheme has been prepared with appropriate consideration for the objectives and design guidelines of the Heritage Overlay of the planning scheme as set out in Clause 43.01, as well as the associated heritage policies provided within Clause 15.03 of the Port Phillip Planning Scheme. Having regard for all the above, the proposed scheme is supported with regard to heritage considerations.