

13 January 2025

GFM Group Pty Ltd
In its capacity as trustee of the GFM BTS Trust subtrust No. 4

To Whom it May Concern,

Re: 1-7 Waterfront Place, Port Melbourne
Proposed redevelopment
Application to amend permit

This letter has been prepared on behalf of GFM Group Pty Ltd in its capacity as trustee of the GFM BTS Trust Sub trust No. 4, in relation to the subject site at 1-7 Waterfront Place, Port Melbourne. It concerns the proposed redevelopment of the subject site with a ground, plus 9 storey mixed use building.

An external inspection of the property has been undertaken, together with a review of the application drawings prepared by Woods Bagot, and the relevant Heritage Victoria documentation. A review of the relevant sections of the Port Phillip Planning Scheme, including Clause 43.01, Heritage Overlay, Clause 15.03 Heritage and Schedule 23 to Clause 43.02, Design and Development Overlay was also completed. Reference is made to the *Port Phillip Heritage Review* (December 2021). It is intended that this letter be read in conjunction with the drawings prepared by Woods Bagot and other documents submitted in respect to this application.

The subject site is an irregular shaped parcel of land with street frontages onto Beach Street to the north, Waterfront Place to the south and the tramline reserve associated with the historic Port Melbourne Railway Station along part of its west side. The former railway line is now a tram route. At the time of lodgement of Planning Permit 490/2020, the site contained a single and double storey brick building with terra cotta tile roofs along its southern and eastern sides, which were of contemporary origin. The building was fire damaged, and part demolished, and the site was enclosed by tall hoarding. The place was of no heritage significance. It is understood that the remaining structure on the property has since been demolished.

To the west of the subject site is the route 109 tram stop and the historic, registered, Port Melbourne Railway Station, which has been converted into use as a medical centre and café. To the south-east is the beach and Port Phillip Bay, and to the south a large outdoor shipping container storage area. The surrounding urban context to the north is characterised by free-standing double-storey residential development of recent origin (Beacon Cove). To the east is a traffic roundabout with contemporary multi-storey development. Further east is a series of modern multi-storey developments between five and seven storeys.

A portion of the south west corner of the subject site is identified as being within the curtilage of VHR H0983, the Port Melbourne Railway Station, the registered building mentioned above. The portion of the subject site located within the registered curtilage does not contain any structures associated with the Port Melbourne Railway Station, but rather a curtilage of open space along the south east side of the former railway building.

With the Port Melbourne Railway Station and a curtilage of surrounding land being registered, it is also subject to an individual Heritage Overlay, HO46, under the Port Phillip Planning Scheme. This overlay however recognises that the responsible authority with regards to heritage issues and any permit application for the land is Heritage Victoria, and that Port Phillip Council may have a role as a referral body. The balance of the subject site is outside the registered curtilage and is not subject to a Heritage Overlay.

The statement of significance for the former Port Melbourne Railway Station as provided in the Victorian Heritage Register citation is as follows:

The former Port Melbourne Railway Station building is historically significant by association with the first public steam railway in Australia, and with the development and use of the Port Melbourne piers. The building played an important role in the history of the piers, in particular Station Pier, and in the social history of Melbourne through its association with the popular bay excursion trade.

The former Port Melbourne Railway Station building, which was rebuilt at a time when the function of the piers was expanding, is significant in demonstrating a critical change in the maritime activity of the Bayside area. Its significance is further enhanced by the fact that, unlike the piers, it has not been dramatically altered throughout the twentieth century.

The former Port Melbourne Railway Station building is of architectural and historical significance as a distinctive building type, that only representation within the metropolitan context of a small group of station buildings developed by the Victorian Railways Department following the 1890s depression. This significance is enhanced by the integrity of its building fabric.

The extent of registration is noted as:

All of the place shown hatched on Diagram 983 encompassing all of Lot 1 and part of Lot 2 on Plan of Subdivision 344341 and all of Crown Allotments 2026 and 2032, City of Port Melbourne, Parish of Melbourne South.



Figure 1: Plan showing the extent of registration of the former Port Melbourne Railway Station delineated by the diagonal hatching. The approximate boundaries of the subject site is outlined in red.

In addition to a portion of the subject site being within the boundaries of a registered place, the whole of the subject site is subject to DDO23 1-7 Waterfront Place Design and Development Area. The Design objectives and Design requirements contained with DDO23, that are relevant to heritage matters include:

Theme B – ‘responsive’

- To respond positively to the heritage Railway Station building
- To respond positively to the wider maritime context and heritage of the locality.

[...]

Theme E – ‘quality’

- To respect and respond to the valued maritime heritage and character of the precinct, in the design of buildings and public spaces on the site.

Design requirements B3: Railway station interface

- The scale and massing of any new development must be sensitive to the heritage rail station and must demonstrate minimal visual impact when viewed from the 109 tram terminus.
- The location and form of the new buildings must reinforce the heritage rail station as a ‘stand-alone’ building and provide a clear separation in building mass.

A permit cannot be granted to vary any of these requirements.

Design requirements B4: Maritime heritage

- Building design, materials and public art should reflect and respond to the maritime heritage and character of this location in a refined and authentic way, and avoid ‘themed’ or pastiche techniques.
- Public art must be integrated with new built form and public spaces on the site, to reflect and respond to the history, heritage and character of the location in accordance with Clause 22.06 of this planning scheme.

Proposal

It is proposed to construct a ground, plus 9 storey mixed use building on the subject site, with two basement levels. The building will comprise two separated three storey podium elements, connected via a central link at ground and first floor. The upper levels will have staggered setbacks from Waterfront Place. Elevations will have curvilinear profiles. Along Beach Road (northern side) will be two new crossovers leading toward a porte cochere, and basement access.

Retail/shop fronts are proposed for the ground floor with residential apartments on the ground floor and levels above. On the south western corner of the subject site, adjacent to the registered curtilage, a double storey building is proposed, which will contain retail activities. This double storey building will have a similar contemporary articulation to that of the main building.

The palette of materials includes clear glazing, polished concrete, form lined concrete with a wave like vertical pattern, glass reinforced concrete panels and timber look soffit linings to the porte cochere and lower level cantilevered balconies.

Discussion

While the curtilage of the registered place extends within the subject site, the proposed building envelope on the south western corner of the property has been designed to ensure development does not extend into the curtilage, and it is understood a permit from Heritage Victoria is therefore not required for building works.

Heritage Victoria does not provide development guidelines for properties that might be adjacent to a registered building. In effect key parameters for any new building on the site would be urban design requirements and other local planning policies rather than the Heritage Act. This is not, however, to say that the proposal should not be sensitive and respond appropriately to the adjacent heritage place – the potential for adverse impacts upon the registered building is still a matter that should be given due consideration. Of note, an objective of DDO23 that the site is subject to is to ensure development on the site is compatible with nearby historic built form.

The demolition of the existing built form raises no heritage concerns given it is not within the registered land, or subject to a Heritage Overlay. It is also understood Council in the past also raised no issues with regards for its demolition. The applicant has also engaged in preliminary discussions with senior officers within Heritage Victoria in relation to the amendment application. A separate application to Heritage Victoria will be lodged, which relates to landscaping and public realm permissions required within the registered area.

The proposed development setbacks, from both the adjacent registered building and Waterfront Place, overall height, form and materiality appear acceptable from a heritage perspective, bearing in mind that the development is not being directly assessed against heritage criteria. The setbacks, massing and forms are such that the new development will not overwhelm or in any other manner adversely impact upon the significance of the Railway Station.

The development closest to the registered curtilage, being in the south west corner of the site is only double storey, providing an appropriate transition in height between the single storey former railway station and the taller height of the proposed development. The three storey podium provides an additional stepping profile to the tower and established a polite scale reference at the lower levels.

With respect for DDO23 and the above guidelines, it is noted Design requirements B3: Railway station interface, are mandatory. As outlined above, Design requirement B3(1), states the scale and massing of any new development must be sensitive to the heritage railway station and must

demonstrate minimal visual impact when viewed from the 109 tram terminus. The siting and massing of the development provides a sensitive and appropriate visual separation and allows the registered building (the tram terminus), the new double storey structure and the taller built form to sit comfortably alongside one another. While the proposal will result in a contrast in scale between the heritage building and the proposed tower, it nonetheless establishes a generally sufficient and marked separation from the heritage structure, which will ensure minimal visual impact when the development is viewed from the tram terminus.

The setbacks, form and height transition ensure the former railway station will continue to read as a stand-alone building, as required by Design requirements C3 (2) of DDO23.

DDO23 (Design requirements B4) encourages materiality of new built form to reflect and respond to the maritime history of the area, without necessarily providing direct guidance on how that might be achieved. Recent multi-storey developments in the environs of the subject site typically have concrete and clear glazing as the predominate external finishes. As such, the materiality of the proposed development at 1-7 Waterfront place is in keeping with the emerging character of the area. Concrete with timber look accents can also be considered appropriately responsive to Port Melbourne's maritime history as an industrial, working port.

It is acknowledged that the new built form may be considered prominent in terms of a range of views around the site, but this is noted as an outcome that is acceptable in the circumstances, where it is understood via planning policy and the existing approval onsite (Planning Permit 490/2020/A) that a building of scale is accepted as a generally appropriate outcome for this specific site.

In the neighbouring parts of Port Melbourne, and most notable in and around Bay Street, it is possible to see substantial contrasts of scale between heritage building and new development, and such contrasts are part of the emerging character of this part of Port Melbourne. This is a character that is readily understood as being different to the more consistent low rise character found in other areas such as South Melbourne, Albert Park, Middle Park and parts of St Kilda. Contrast in scale and built form character is a marked characteristic of the immediate environs of the former Railway Station, which sits as a relatively isolated heritage building, notwithstanding the nearby presence of Station Pier.

Accepting that only the south western corner of the subject site is registered, only development within the registered curtilage requires a permit under the *Heritage Act*. The amendment application has been designed to ensure development does not impact the registered curtilage. Having regard for all the above, the amendment application is supported as a reasonable and appropriate outcome having regard for heritage considerations and Design and Development Overlay 23.

Bryce Raworth Pty Ltd