



Heritage Impact Statement

Permit Application Amendment Application for
328-330 and 332-334 Clarendon Street, South Melbourne
Emerald Hill Estate (VHR H1136)

Author Trethowan Heritage
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Trethowan Heritage acknowledges the Traditional Owners of the lands on which our studio and projects are located. We pay respects to Elders past and present.

Revision	Description	Date	Issued To
1	Initial Draft	04-07-2025	Client
2	Final	27-11-2025	Client
3	RFI Revision 1	18-02-2026	Client
4	RFI Revision 2	18-05-2026	Client
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1 Introduction

1.1 Place Details

This Heritage Impact Statement (HIS) has been commissioned by Embrace Architects on behalf of WK Glen Pty Ltd as owners of the properties at 328-330 and 332-334 Clarendon Street, South Melbourne (the subject site) to accompany a heritage permit application for works comprising interior reconfiguration and alterations to a section of the façade to convert the property to new use as a hotel.

1.1.1 Address and Location Description

The subject site is part of a larger registered place, *VHR H1136 Emerald Hill Estate*, which is a block of land at South Melbourne enclosed by Dorcas Street to the north, Clarendon Street to the east, Cecil Street to the west, and Park Street to the south. The site is located at the eastern boundary of the registered place, at the southwestern corner of Clarendon and Bank Streets.

The surrounding context is commercial with Clarendon, Park, Bank and Coventry streets all supporting a range of businesses. The centre of the block comprising the registered place features civic buildings including the town hall, police station, and library. Residential development increases away from Clarendon Street. Tram route 112 runs along Clarendon Street, and tram route 1 along Park Street at the south.



Figure 1: Aerial view of the subject site (indicated in red) within the surrounding context. The boundary of the registered place is indicated in yellow. Source: Vexcel, 2026.

1.1.2 Traditional Owners Information

The subject site is located on the traditional land of the Bunurong People. Under the *Aboriginal Heritage Act 2006*, the Registered Aboriginal Party for this land is the Bunurong Land Council Aboriginal Corporation.

The registered place is not located within an area of cultural heritage sensitivity.

1.2 Project Details

Works were initially undertaken to alter the subject site for use as a restaurant (ground floor) and boutique hotel (first floor). At the time, no permit or exemption from Heritage Victoria was sought for the proposed works. As a result of these works, a stop works order was received in 2024, which led to a cease of all onsite physical works and the place made safe. Heritage Victoria at the time

advised that a detailed report of works undertaken to date, with an understanding of the before and after condition, and corresponding drawings should be provided. A report on the works undertaken without approval outlined their extent and has been used to inform which works need to be applied for under a permit or exemption application, and if any rectification works are required.

A heritage permit application P40785 was submitted in late 2025, with subsequent Requests for Further Information (RFI) from Heritage Victoria received in 2026. Following the receipt of the RFI in March 2026, an amended scheme prepared by Embrace Architects was received and a RFI response was submitted back to Heritage Victoria on 18 May 2026.

In a letter dated 26 May 2026, Heritage Victoria instructed that, due to changes to the proposed scope, a permit application amendment is to be submitted to amend the existing application, and further information is due by 22 June 2026. The following information, as requested by Heritage Victoria, is included as part of this HIS and indicated in bold below:

- *An amended Heritage Impact Statement is required that clearly describes and assesses the new proposal in greater detail. The current HIS appears to include parts of the previous scheme. The HIS should also be amended to clarify:*

1) *The difference between 'new work' and 'proposed future works to completion'.*

The section 'proposed future works to completion' has since been deleted and consolidated into various parts of Section 4: Proposal.

2) *An assessment and photographic evidence of the stages of development of the rear of the building. It appears there are rear elements that are early service wings (although it is acknowledged that the majority of the rear of the site is highly altered).*

This information is provided in Sections 3.3 and 3.4.

3) *Greater description of all of the proposed internal changes and details regarding the fireplaces, several of which appear to now be proposed for removal.*

This information is provided in Section 3.2.2. No fireplaces are proposed for removal. They are to be retained in-situ, with those exposed made good and those boxed out remain unchanged.

4) *Details of the roof top pool and its siting next to/against the existing building.*

This information is provided in Sections 4.4.2.

5) *Further assessment of the proposed new built form and the proposed new entrance at Bank Street, including how the design (materials, fenestration, massing, roofing) relates to and is sympathetic of the surrounding precinct and its heritage features.*

This information is provided in Sections 4.4.2 and 5.3.2.

6) *Indications of conservation works to occur (beyond works to the internal staircase).*

This information is provided in Section 4.3.

Additionally, Heritage Victoria also requests the following information to form part of the submission:

- *Section elevations showing the pool against the rear of the existing building.*

This information is provided on drawing TP52.

- *Relevant matters for the consideration of section 101(2)(b) of the Heritage Act 2017.*

This information is provided in the report prepared by SC Lennon and Associates and summarised in Section 5.4.2 of this HIS.



1.2.1 Site Inspection

In preparation for this submission, a site inspection was undertaken on 29 May 2026 and attended by representatives from Embrace Architects and Trethowan Heritage.

1.2.2 Client

This Heritage Impact Statement has been prepared for Embrace Architects, on behalf of WK Glen Pty Ltd.

1.3 Reference Documents

This assessment refers to the following documents:

- Architectural drawings, Revision TP02, prepared by Embrace Architects in June 2026.
- *Report on Reasonable or Economic Use* by SC Lennon and Associates, dated 18 June 2026.

1.4 Limitations

This HIS does not address matters in relation to Aboriginal cultural heritage, such as anthropology, archaeology, or history. Should advice regarding these matters be required, it is recommended to engage with a Heritage Advisor and the relevant Registered Aboriginal Party.

As proposed works are limited to the subject site only, site inspections were only undertaken in the vicinity of the site and not the entire registered place.

2 History

Until 1877, the registered place, including the subject site, was occupied for the Melbourne Protestant Orphan Asylum. Part of the land was sold under freehold for municipal buildings, and the remainder under leasehold for 50 years. As a result of this unusual arrangement, the registered place presents as a largely intact precinct of 1880s commercial, residential and civic buildings.

Sands & MacDougall postal directory records indicate that the subject site has been occupied since around 1880, although the street numbers have changed at least twice. From 1885, the northern terrace at the corner with Bank Street was occupied by a Commercial Bank of Australia branch. The bank branch is listed at this address until at least 1970, with 'flats' also listed at the address – likely to the first floor. The southern terrace at number 334 was occupied by Archibald Crofts, grocer, from around 1900 and expanded to number 332 around 1920 when it became known as Crofts Stores. The middle terrace at number 330 was occupied by a range of premises, with Arthur Stanley, jeweller, being the longest standing business.

Photographs from the 1960s and 1970s show the subject site was, at that time, occupied by a grocer (Foodland) at the south, a watchmaker to the middle, and consulting engineers to the northern terrace. Later shopfronts and awnings are evident, with the original verandahs reconstructed in the 1980s.

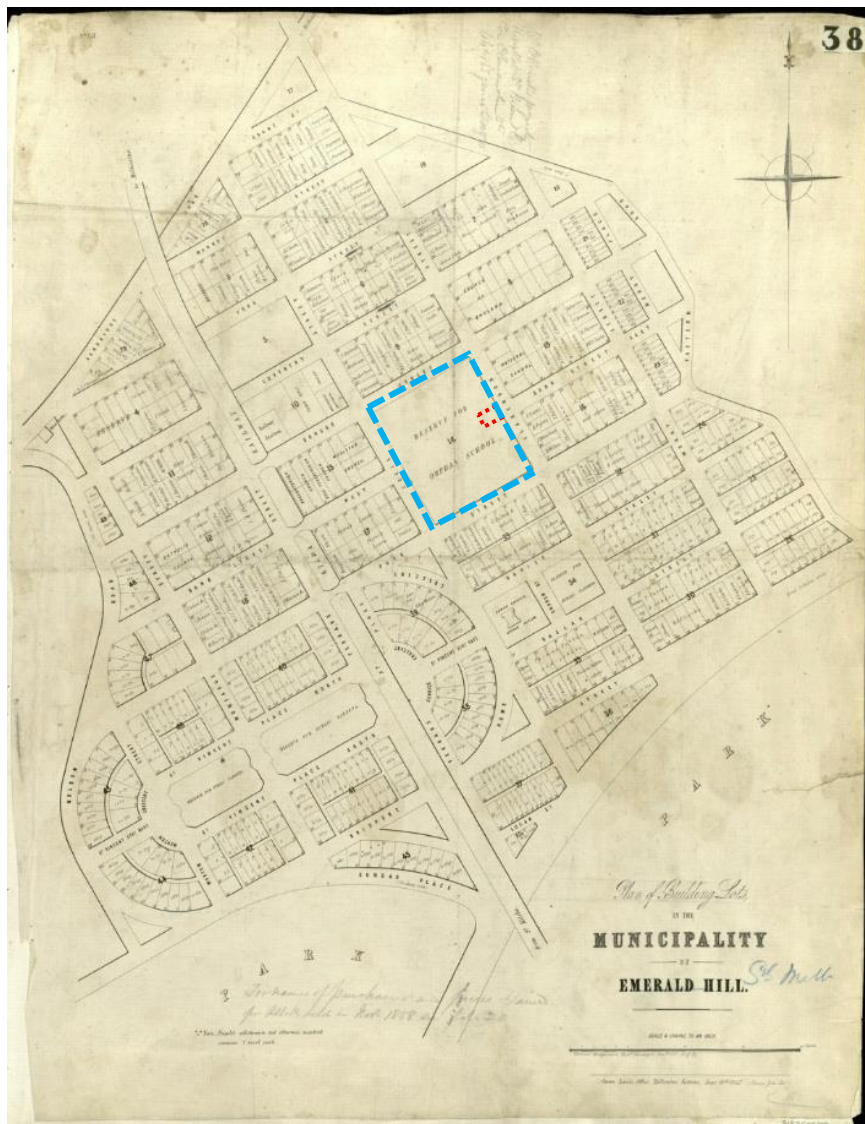


Figure 2: Plan of building lots in the Municipality of Emerald Hill, dated 1857, with the future location of the registered place indicated in blue and the subject site (approximately) in red. Source: State Library Victoria, Clement Hodgkinson District Surveyor Crown Lands Office.

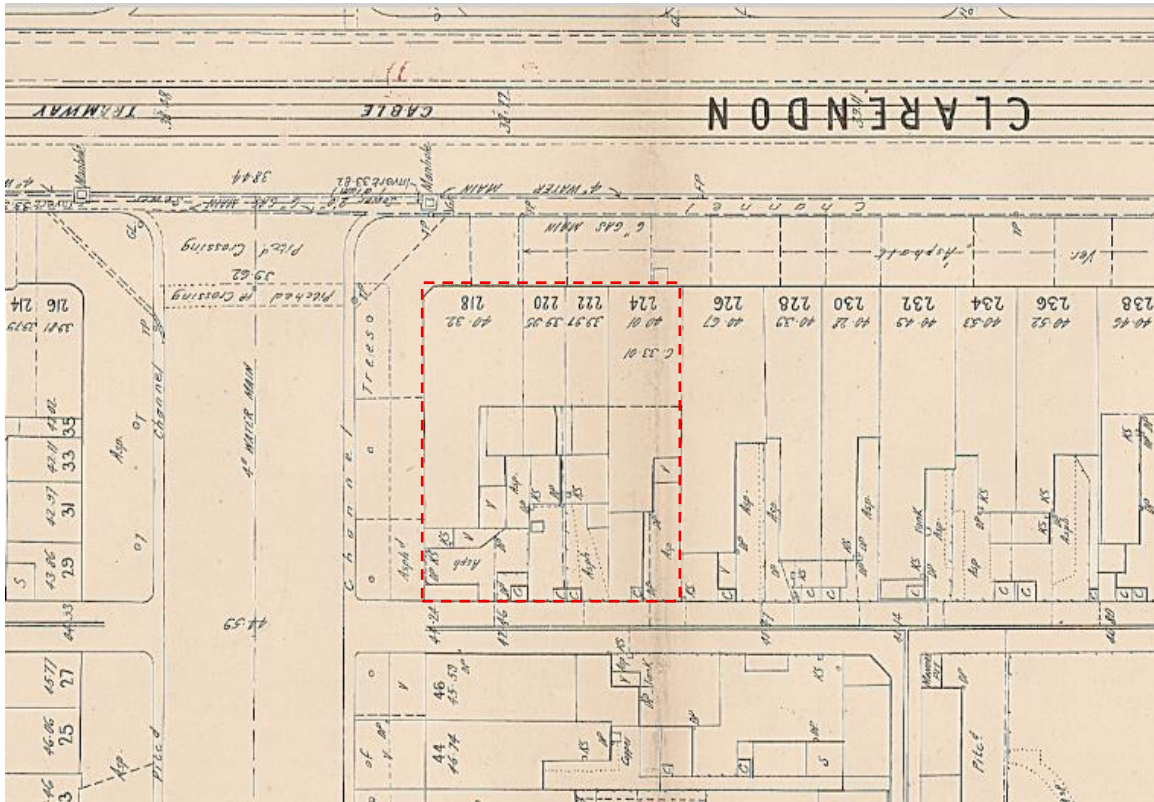


Figure 3. Corner of Bank and Clarendon Street shown in 1895 MMBW Plan. Source: State Library of Victoria.



Figure 4: The southwestern intersection of Clarendon and Bank Street, photographed by David Wood in 1888. Source: Port Phillip City Collection.



Figure 5: The northern terrace, looking along the Clarendon and Bank Streets intersection, dated 1961. Note the signage for Commercial Bank of Australia to the parapet. Source: State Library of Victoria.



Figure 6: The northern terrace, looking along the Bank Street elevation, dated 1961. Note the signage for Commercial Bank of Australia to the parapet. Source: State Library of Victoria.



Figure 7: The northern terrace, looking along the Bank Street elevation, dated 1967. Note the signage for Commercial Bank of Australia to the parapet. Source: State Library of Victoria.



Figure 8: The central and southern terraces, looking along the Clarendon Street elevation, dated 1967. Source: State Library of Victoria.



Figure 9: Views of the subject site dated 1974. Note the Foodland grocery extends across two addresses, and the corner terrace is no longer occupied by the bank. Source: State Library Victoria, Committee for Urban Action.





Figure 10: Views of the subject site from Bank Street, showing the side façade and views across the rear of the terraces from the laneway. Source: State Library Victoria, Committee for Urban Action, 1974.



Figure 11: View of Coat of Arms at the northern terrace's corner parapet, dated 1974. Source: National Archives of Australia.

3 Significance & Description

3.1 The Cultural Heritage Significance

The subject site forms part of the Emerald Hill Estate (VHR H1136) which is the registered place. The registered place is a complex of buildings within the block bounded by Dorcas, Clarendon, Park and Cecil streets in South Melbourne, and generally surrounding the South Melbourne civic precinct.

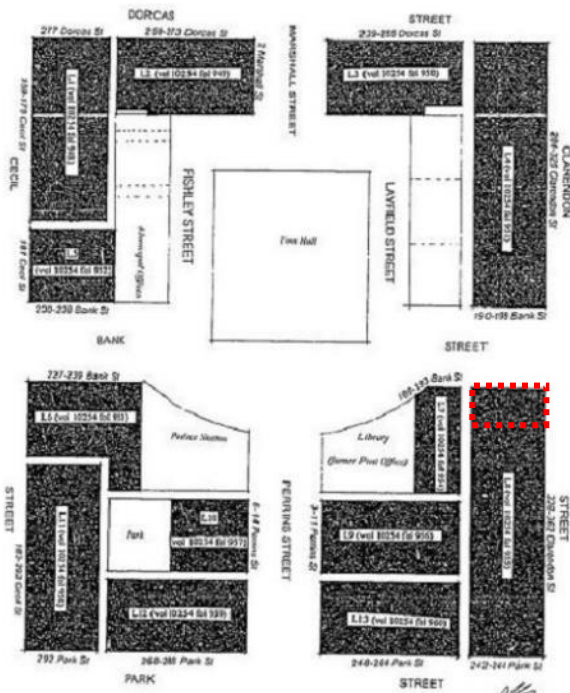


Figure 12: Plan of registered place (in black) with the subject site indicated in red. Source: Victorian Heritage Database.

3.1.1 Statement of Significance

The Statement of Significance for the registered place reads as follows:

What is significant?

The Emerald Hill Estate encompasses a block that was occupied by the Melbourne Protestant Orphan Asylum from 1855 until 1877, when it sold the freehold of part of the land for new municipal buildings and the leasehold of the remainder for a term of 50 years. This unusual method of sale has resulted in an essentially intact precinct of mainly two storey, 1880s, brick, commercial and residential buildings. The majority of buildings on the estate were purchased by the state government in 1974, some time after they had returned to the control of the by now Melbourne Family Care Organisation. Many of the shop verandahs have since been reinstated and the residences refurbished for use as public housing.

How is it significant?

Emerald Hill Estate is historically, socially and architecturally important to the State of Victoria.

Why is it significant?

The Emerald Hill Estate is historically and socially important for its extraordinary development as a leasehold rather than freehold precinct. This is a direct manifestation of its associations with the Melbourne Protestant Orphan Asylum that insisted on this form of development, thereby ensuring its survival as a unique and homogeneous precinct. The

commercial buildings in particular collectively represent an extraordinary example of an 1880s shopping precinct with a high degree of intactness unmatched in extent anywhere else in Victoria.

The Emerald Hill Estate is architecturally important as an extraordinary example of municipal planning during the 1880s boom. The symmetrical and mannered arrangement of commercial and residential blocks around a municipal precinct is unique in Victoria. While the architectural importance of the Emerald Hill Estate lies mainly in its cohesion as a precinct, the former Harcourt and Perry drapery (1885), 256-264 Park Street, is notable in its own right for its unusual Gothic treatment and its Oamaru limestone facade.

3.2 Description of the Subject Site

The subject site is across two titles – No.s 328-330 at the north and No.s 332-334 at the south – and comprises several two-storey terrace shops (**Error! Reference source not found.** and **Error! Reference source not found.**). It comprises several terrace shops along the western side of Clarendon Street, at the corner with Bank Street (**Error! Reference source not found.**). A service lane, Emerald Hill Place, abuts the site to the rear.

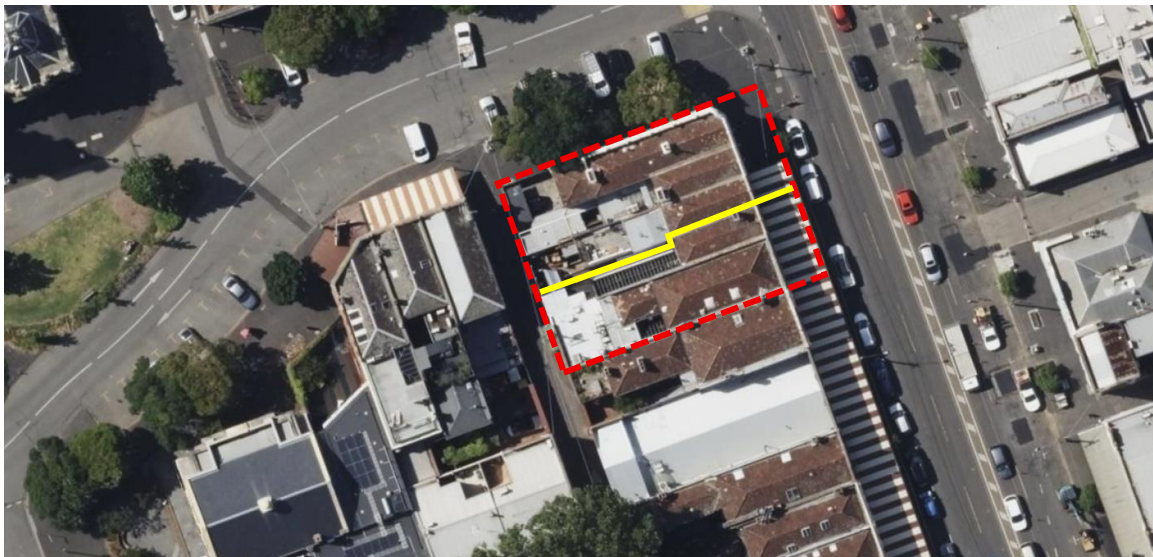


Figure 13: Aerial view of the subject site (indicated in red), which comprises several terrace shops. The yellow line indicates the title boundary. Source: Vexcel, 2026.

3.2.1 External

The east (Clarendon Street) elevation reads as three terraces, the first-floor divisions read as five premises, and the ground floor divisions create three premises (not aligned with the façade). These terraces are split across two titles, No.s 328-330 and No.s 332-334.

Externally, the southernmost terrace is plainly decorated and finished in a beige render, with later glazed shopfronts at the ground floor. The central terrace features urns to the parapet and is painted yellow with salmon pink to window surrounds at first floor, and possibly original shopfront elements at the ground floor (north end). The northernmost terrace is highly decorated with urns to the parapet, ashlar render, quoins, scallop arched moulding above openings, pilasters, and a moulded Australian coat of arms to the corner pediment. The building is finished in off-white with salmon pink details, and the decoration extends along the side elevation to Bank Street (**Error! Reference source not found.**).

The southern and central terraces have a cast iron verandah, to match the rest of the registered place. The northern terrace is unusual in the streetscape for lack of a verandah. There are open

yards to the west (rear) of the terraces. The yard in the southern terrace has a metal staircase that leads to the first floor.



Figure 14: View of the Clarendon Street (east) façade. Source: Trethowan Heritage, 2026.



Figure 15: View of the Bank Street (north) façade. Source: Trethowan Heritage, 2026.



Figure 16: View of the Bank Street (north) façade. Source: Trethowan Heritage, 2026.



Figure 17: View of the Emerald Hill Place (west) façade. Source: Trethowan Heritage, 2026.

3.2.2 Internal Ground Floor

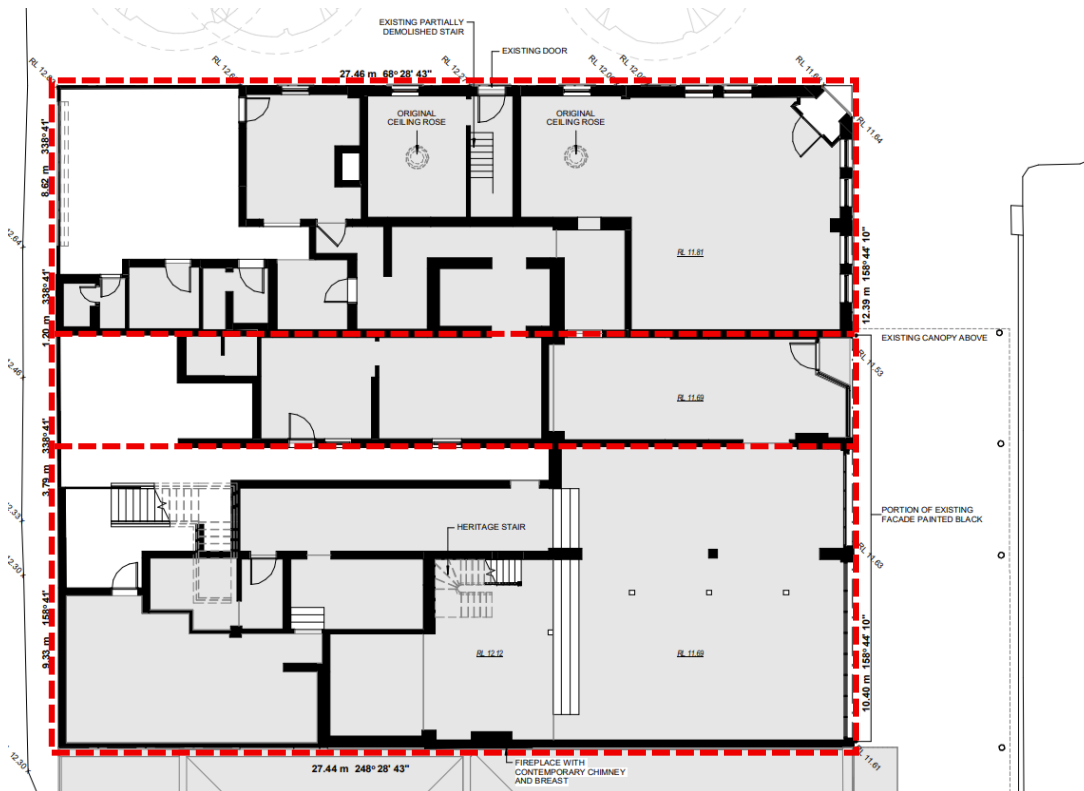


Figure 18: Existing ground floor plan showing the site being read as three terraces (north, centre, south). Source: Embrace Architects, 2026.

The ground floor reads as three terraces. The northern terrace is separated from the central terrace with no access point between the two. The northern terrace is entered from an altered northeastern corner entrance via a later glazed single swing door. The easternmost (front) room is painted in white. It has ceiling-mounted pipes and lights, sections of suspended ceilings, walls either replastered or clad with mirrors or secondary walls, and concrete floors. An opening in its west wall leads to the central rooms which comprise a stair hall with a severely dilapidated timber staircase and another room with later ceilings, exposed brick walls, and timber floor framing. The rear areas are not accessible from these spaces but require entrance from the bank street open yard. The northwestern corner room's chimney breast and fireplace had been boxed out. Other rear rooms such as toilets and storerooms are accessible via a narrow passageway. The area abutting the middle terrace are in dilapidated state, where the roof is missing, some walls partially demolished, and details of the flooring unknown due to extensive waste disposal.



Figure 19: View of the northern terrace, easternmost (front) room. Source: Trethowan Heritage, 2026.



Figure 20: View of the northern terrace, easternmost (front) room ceiling. Source: Trethowan Heritage, 2026.



Figure 21: View of northern terrace, one of the central rooms with dilapidated timber staircase. Source: Trethowan Heritage, 2026.

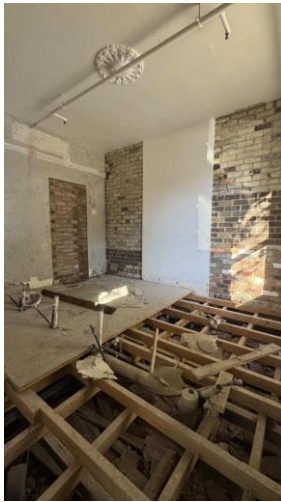


Figure 22: View of the northern terrace, one of the central rooms with no floor finish. Source: Trethowan Heritage, 2026.



Figure 23: External view of the rear of the northern terrace, with toilets and storerooms to the right. Source: Trethowan Heritage, 2026.

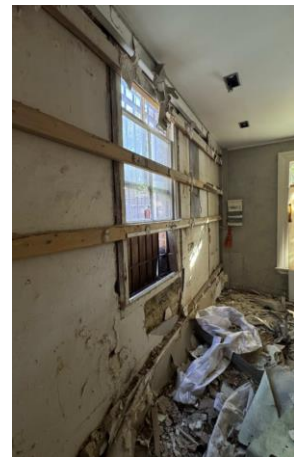


Figure 24: View of the northern terrace, rear room. Source: Trethowan Heritage, 2026.

The central terrace is entered from the in-go on Clarendon Street. It is generally painted black with partially demolished suspended ceilings. Walls are partially plastered and some demolished, exposing later steel beams and columns. Concrete flooring remains. Central and rear rooms have ceilings with shallow corncicing, pipe runs across ceilings and walls, face brick walls, and concrete floors.



Figure 25: View of the central terrace, facing the Clarendon Street in-go. Source: Trethowan Heritage, 2026.

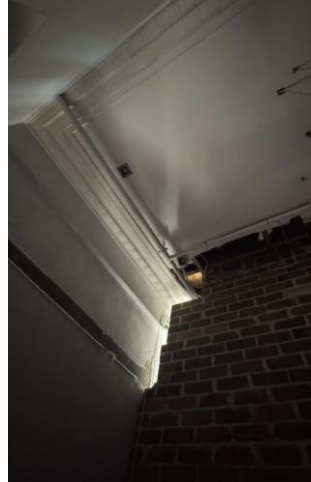


Figure 26: View of the central terrace, central room with pipe run penetrating through a face brick wall. Source: Trethowan Heritage, 2026.

The southern terrace is accessible from an opening in the central terrace. Similar to the central terrace, it generally has black-painted ceilings and later ceilings. Some wall partitions were demolished and the area supported on steel beams and columns. While the space has concrete floors, a large cavity with bracing is present in the front room, showing an excavated basement. A wall splits concrete steps into northern and southern spaces in the back. The northern space is long and narrow; it has white-painted walls and doors that connect to the rear storage areas which retains kitchen fitout. The southern space contains an original/early timber staircase and associated balustrading and skirtings, and a half-demolished kitchen area with contemporary cladding and joinery. A large section of the south wall is of exposed red bricks, with an infilled brick arch evident close to the Clarendon Street frontage. The section of the wall to the left of the concrete steps remain plastered and painted in blue. At the rear of the kitchen accessible from the northern space is another kitchen and its associated cool room and storage area, still fully furnished. This space opens out to an open yard, with a metal staircase that leads to the first floor.



Figure 27: View of the southern terrace's south wall and floor cavity. Source: Trethowan Heritage, 2026.



Figure 28: View of the southern terrace's timber staircase. Source: Trethowan Heritage, 2026.



Figure 29: View of the southern terrace, rear storage room that leads to the kitchen. Source: Trethowan Heritage, 2026.

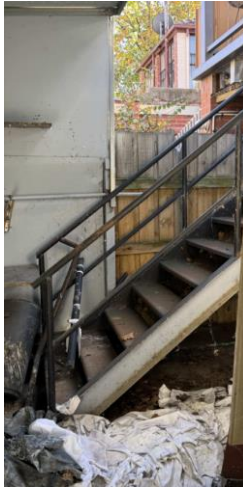


Figure 30: View of the southern terrace, rear open yard with metal staircase. Source: Trethowan Heritage, 2026.

First Floor

The first-floor divisions read as five premises. It is evident that the four premises from the north had partially undergone refurbishments in recent years, with new 'period style' ceiling roses, cornices, and skirtings installed in some areas. Ceilings and walls were painted in white, and new services had also been partially installed. Timber floors did not form part of the recent refurbishments and still remain.

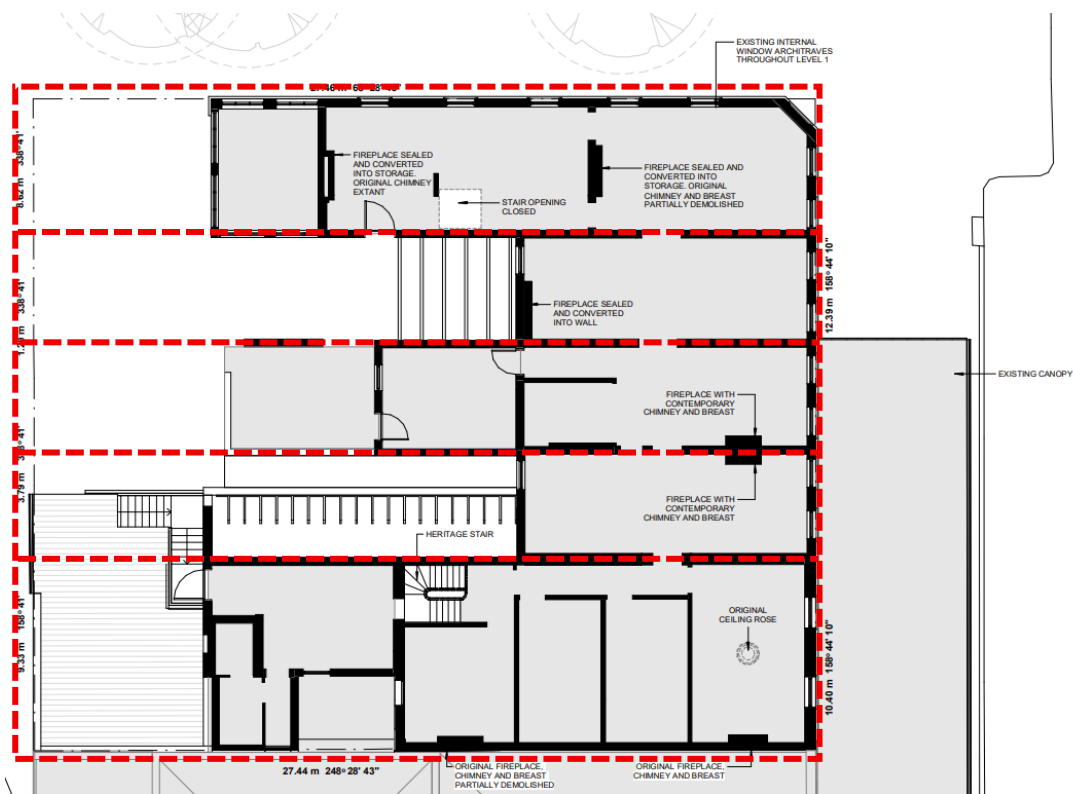


Figure 31: Existing first floor plan showing the site being read as five premises, from north to south. Source: Embrace Architects, 2026.

In the northernmost premise are two chimney breasts with fireplaces since boxed out and converted into shelves. An opening in the floor was used to access the now-semi-demolished stair on the ground floor. To the rear of this premise is a later extension with timber-lined ceilings, large casement windows, and timber floors.



Figure 32: View of the northernmost premise's front room. Source: Trethowan Heritage, 2026.



Figure 33: View of the northernmost premise's floor opening, previously a staircase connecting the ground floor. Source: Trethowan Heritage, 2026.



Figure 34: View of one of the northernmost premise's chimney breast and fireplace, now converted into shelves. Source: Trethowan Heritage, 2026.



Figure 35: View of the northernmost premise's rear room. Source: Trethowan Heritage, 2026.

The second premise from the north is simply decorated, with no cornices and simple skirtings only. It has a small ceiling rose in the rear area.

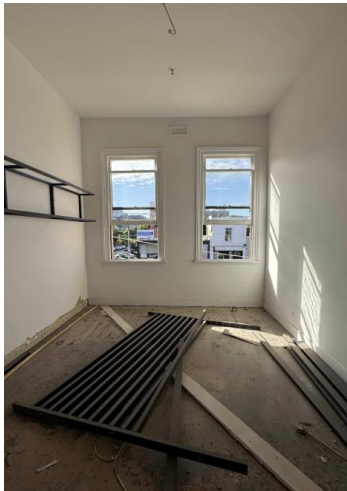


Figure 36: View of the second premise from the north. Source: Trethowan Heritage, 2026.

The third premise from the north has no cornices and simple, contemporary skirtings. However, its south wall has a boxed-out chimney breast and exposed fireplace which has been refinished. It has a rear room which had been undergoing partial refurbishment to become something that appears to be a bathroom, with timber wall cladding and concrete floors. There is a rear door that leads to an inaccessible roof deck.



Figure 37: View of the third premise from the north, exposed fireplace. Source: Trethowan Heritage, 2026.



Figure 38: View of the third premise from the north, rear room that had undergone partial refurbishment. Source: Trethowan Heritage, 2026.

The fourth premise from the north shares similarities with the third, with a boxed-out chimney breast and refinished, exposed fireplace. On its south wall, a doorway was cut out to connect to the southernmost premise, with exposed brickwork and no lintel.



Figure 39: View of the fourth premise from the north, exposed fireplace. Source: Trethowan Heritage, 2026.

The southernmost premise has a different configuration from the rest of the aforementioned spaces. The front room facing Clarendon Street has a ceiling rose, later ceiling with no cornices, wall vents, a wall mural on the north wall, deep skirtings, and a chimney breast, mantle, and fireplace. The rooms to its rear are relatively plainer and have also undergone ceiling works where skylights were cut out but retain sections of skirtings. The westernmost (rear) room has wall vents, a chimney breast, fireplace stripped of any decoration, and skirtings. All rooms are connected by a hallway which leads to the timber staircase.



Figure 40: View of the southernmost premise, front room's door opening. Source: Trethowan Heritage, 2026.



Figure 41: View of the southernmost premise, front room's exposed fireplace and mantle. Source: Trethowan Heritage, 2026.



Figure 42: View of the southernmost premise, rear room's exposed fireplace stripped of decoration. Source: Trethowan Heritage, 2026.



Figure 43: View of the timber staircase at the rear of the southernmost premise. Source: Trethowan Heritage, 2026.

Halfway through the staircase between the ground and first floors is a mezzanine level that comprises a rectangular room which was potentially used as a bathroom and kitchen. Timber flooring remains, but most wall partitions had been demolished. An emergency exit on the west wall opens out to a metal stair to the rear open yard.



Figure 44: View of the southern wall and sash window at the mezzanine floor. Source: Trethowan Heritage, 2026.



Figure 45: View of the western wall and door at the mezzanine floor. Source: Trethowan Heritage, 2026.

3.3 Integrity, Condition, and Current Use

3.3.1 Integrity

Externally, most parts of the Clarendon and Bank Street façades of the subject site remain intact. A section of the Clarendon Street ground floor façade had historically been altered to include new glazed doors and shopfront and painted black. This area of the site retains very little integrity. The rear sections of the site have been heavily altered throughout history and includes various modern additions. Specifically, the two-storey brick addition at the northwestern corner of the site that fronts Banks Street was designed to imitate the heritage building.

The internal divisions at both ground and first levels have been changed over time, altering the original layout. The front portion of the site, i.e., the heritage building, retains some evidence of original/early fabric, albeit minimal. Besides floors and some walls, some notable features include:

- Ground floor
 - Northern terrace: Two ceiling roses, a stair, and four east-facing window architraves
 - Southern terrace: A timber staircase and associated balustrade and skirting, and a chimney breast and fireplace
- First floor
 - Northernmost premise: Some internal window architraves and two boxed out fireplaces
 - Third and fourth premises from the north: One fireplace each, refinished in recent years
 - Southernmost premise: Two fireplaces, a ceiling rose, sections of skirtings, and window architraves

The rear portion of the site mostly comprises later fabric, with the exception of some walls which may potentially be original/early however cannot be confirmed due to a lack of historical evidence. They have been heavily altered throughout history and retain limited integrity as demonstrated in the following images.

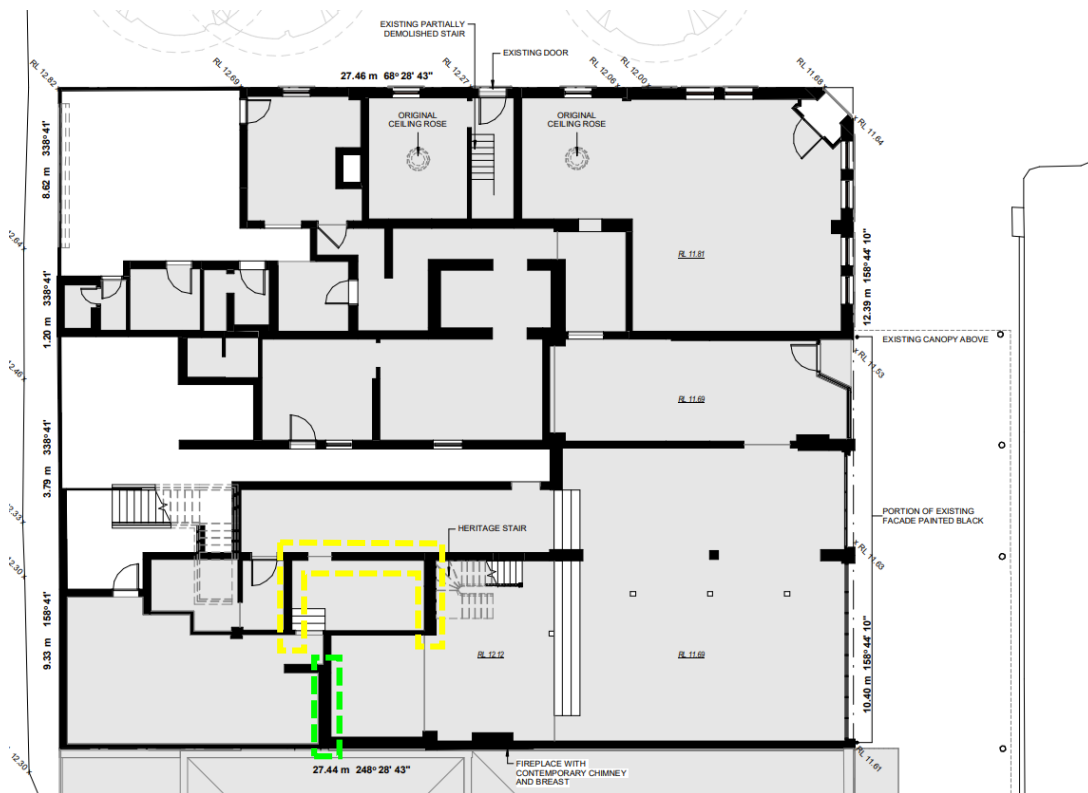


Figure 46: The yellow and green outlines in the above plan indicate walls that may potentially be original/early. This plan should be read in conjunction with the two photos below. Source: Trethowan Heritage, 2026.

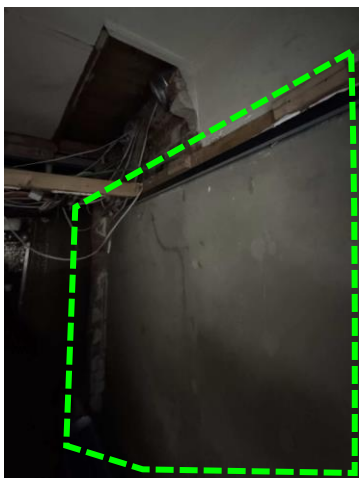


Figure 47: The wall outlined in green may potentially be original/early. It is located between the two kitchens in the southern terrace ground floor. Source: Trethowan Heritage, 2026.

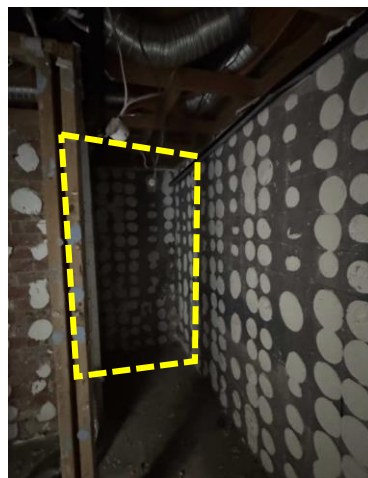


Figure 48: The wall outlined in yellow may potentially be original/early. It is located in the store room that leads to the rear kitchen on the ground floor. Source: Trethowan Heritage, 2026.

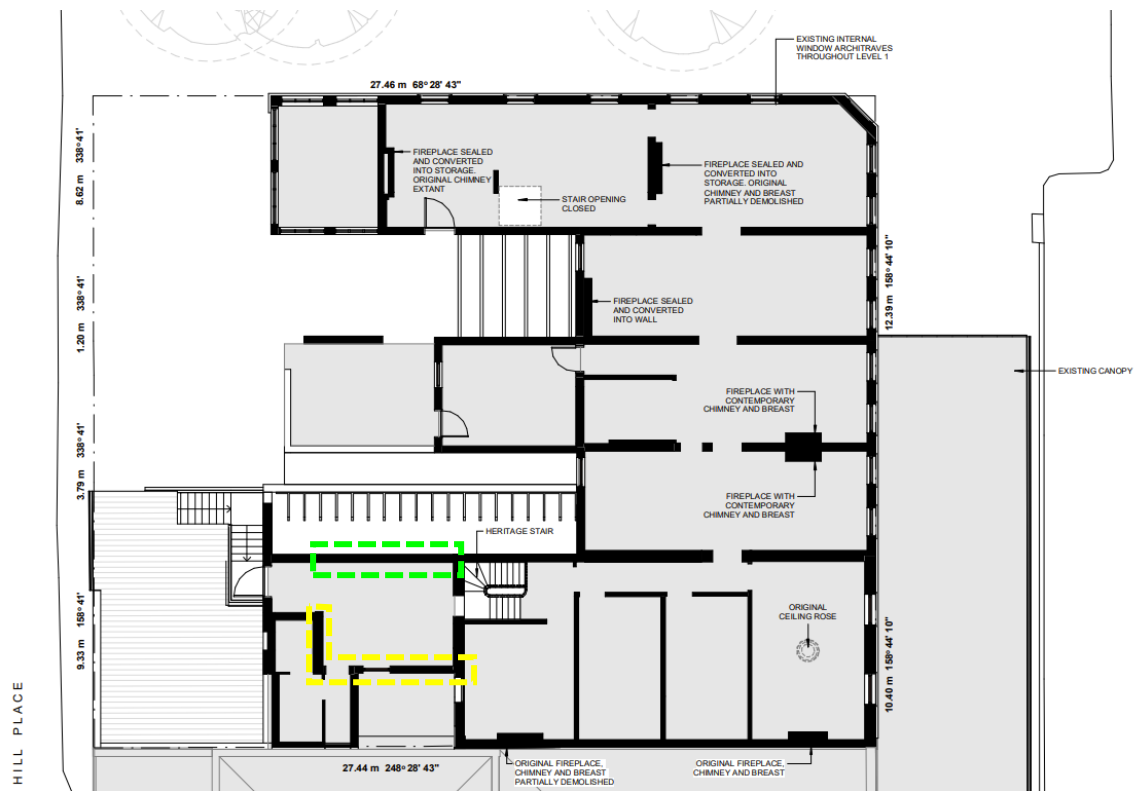


Figure 49: The yellow and green outlines in the above plan indicate walls that may potentially be original/early. This plan should be read in conjunction with the two photos below. Source: Trethowan Heritage, 2026.



Figure 50: The walls outlined in yellow may potentially be original/early. They are on the mezzanine floor. Source: Trethowan Heritage, 2026.



Figure 51: The wall outline in green may potentially be original/early. It is located on the mezzanine floor. Source: Trethowan Heritage, 2026.

3.3.2 Condition

Externally, Clarendon and Bank Street façades of the subject site is generally in good condition despite biological growth and deposits, minor damages to rendered surfaces, and minor timber rot to window frames and doors. However, the rear sections of the site are in poor and dilapidating condition due to a lack of maintenance. Water ingress, broken glass, and extensive waste disposal are observed at external areas, i.e., rear open courtyards.

Internally, the front portion of the site i.e., the heritage building, are in fair condition despite evidence of previous unauthorised works. Large cavities, half-completed works, and exposed services in walls and floors are common. Rear building sections are in poor and dilapidating condition due to a lack of maintenance. Water ingress, biological deposits, broken glass, and extensive waste disposal are observed. Some areas are inaccessible due to large pieces of waste such as furniture, the lack of floorboards, or unstable ground surfaces. Some areas on the first floor were in the process of being refurbished in recent years but works terminated. These spaces are in good condition albeit unfinished.

3.3.3 Current Use

The subject site is currently vacant.

3.4 Analysis of Significance

Overall, the exterior envelope and presentation of the subject site make a positive contribution to the significance of the wider Emerald Hill Estate, reinforcing its cohesive historic streetscape character, as described in the Statement of Significance as 'symmetrical and mannered'. Alterations to the Clarendon Street shopfronts and the later Bank Street extension that imitates heritage building's Victorian character are not considered contributory elements, as they are later elements that do not demonstrate the period of significance.

The external rear portions of the site are assessed to be non-contributory elements. These areas are readily identifiable as later additions, displaying little to no cohesive design intent. They appear to have been constructed in a piecemeal and ad-hoc manner and as such have little to no architectural merit. While some sections of brick walls may originate from the original or earlier phases of development, these have been subsumed into later alterations, making it difficult to distinguish the two. This diminishes the original/early fabric's ability to demonstrate the historical development of the place and consequently does not contribute to the overall significance of the site and the wider Emerald Hill Estate.

Internally, the front sections of the heritage building on both ground and first floors contribute to the site's significance where original fabric and evidence of original layout survive. Specifically, the timber staircase and associated balustrading and skirting, remnant ceiling roses, and fireplaces contribute to the historical character of the site. However, the rear sections are not regarded as possessing any heritage value; although some original/early fabric (i.e., sections of brick walls) may be extant, these areas have been subject to extensive modification, resulting in the loss of legibility of the original layout. There is also insufficient evidence to confirm their integrity.

3.5 Constraints and Opportunities

Constraints associated with this proposal:

- Retention of the potentially original/early rear brick walls is constrained by the extent of past alterations and the lack of visual and historical evidence demonstrating their intactness or heritage value, thus limiting their capacity to be meaningfully conserved.
- Any future development visible externally is constrained by the subject site's location within the Emerald Hill Estate heritage precinct, requiring careful consideration of its scale, form, envelope to ensure consistency with the precinct's character.

Opportunities associated with this proposal include:

- By undertaking demolition, conservation, and new works, the site's current dilapidated condition can be rectified. This would improve its presentation, functionality, and ongoing viability while supporting its identified heritage values. Particularly, the removal of any ad-hoc and unsympathetic rear additions of no heritage significance and replacing them with a single, well-considered extension would rationalise the built form and enhance the usability of the site.



- Retention and conservation of the remaining contributory heritage elements, i.e., the timber staircase with associated balustrading and skirtings, ceiling roses, and fireplaces, which continues to highlight the site's significance as part of the Emerald Hill Estate.
- Consolidation and enhancement of the Clarendon Street façade through a rationalised and integrated series of shopfronts that respects the broader streetscape character.

4 Proposal

4.1 Rationale

The overall approach and rationale for the proposed works are to complete and make good the works to convert the building into a single hotel occupancy. In doing so, various external and internal works are to be undertaken.

Externally, some areas of the Clarendon Street façade which have historically been altered would undergo minor changes while retaining the existing streetscape pattern. Internally, the heritage building is to have a new internal layout while some conservation works take place. To the rear (west) of the building, a new three-storey plus roof terrace extension is to be erected, also as a part of the hotel. The aim is to keep the addition within the heights and massing of existing predominant built form and to be visually recessive and non-dominant when viewed from around Emerald Hill including Clarendon and Bank Streets.

4.2 Demolition

Minor alterations are proposed to the Clarendon Street façade at No. 330, which seeks to remove a Victorian style timber stall riser and in-go with door, which had historically been altered but may contain remnant original/early fabric. Demolition works are also proposed to be undertaken to the rear sections of the site, including the brick and metal fencing. Specifically, the two-storey extension fronting Bank Street at the northwestern corner of the site is to be partially demolished and modified, where sections of its west and south walls removed.

Internally to the heritage building, sections of internal walls, some columns, and a derelict staircase fronting Bank Street are to be demolished.

4.3 Conservation Work

At the heritage building, conservation works are proposed to enhance the understanding of the registered place's significance. These works are listed below:

1. Clarendon and Bank Street façades are to be repainted to match existing as required.
2. Existing single swing door fronting Bank Street is to be retained and made good.
3. Ceiling roses on ground and first floors are to be retained and made good.
4. Where retained, original wall vent grilles, cornices, window and door architraves, and skirtings are to be made good.
5. Fireplaces and chimney breasts, where not already sealed, are to be retained and made good.
6. Timber staircase and associated balustrading and skirtings are to be retained and made good. As the staircase does not comply with contemporary service standards, it is not to be functional but simply serve as a decorative element. To enable this, both ends of the staircase are to be roped off, and a secondary code-compliant balustrade installed on the first-floor landing. Details of the new balustrade are discussed in Section 4.4.1 below.
7. West-facing first floor window to the south of the timber staircase is to be retained, made good, and boarded up so it remains visible from the east side.

4.4 New Work

New works are proposed to the heritage building and the rear of the subject site so to enable the new use of the site as a hotel with separate shopfronts on the ground floor facing Clarendon Street. Generally, a new three-storey plus roof terrace extension is to abut the rear (west) façade of the heritage building, with a courtyard created to separate old from new.

4.4.1 Heritage Building

Exterior

Generally, minor maintenance works are to be undertaken at all retained building façades and roofs. A new black timber fence replaces the old brick and metal fence and encloses the west site boundary and parts of the north site boundary.

The intention of alterations to the Clarendon Street façade is to improve the shopfronts to provide a contemporary street wall distinguishable as new in sympathy with the traditional shop front pattern in the broader precinct. It is proposed to construct a new infill window and lower section of infill wall at the current in-go's location. The window and wall are generally to match existing, adjacent fabric in appearance like-for-like.

At the northwestern corner of the heritage building facing Bank Street is an existing two-storey extension which is to be converted into the hotel's Entry. At its west façade, it is proposed to infill the existing door opening with bricks, create a new central opening and install new glazed sliding doors, and render and paint the façade in a light and neutral stone colour.

Immediately to the west of this extension is a new design for the existing open yard. Different from the existing layout entered via Emerald Hill Place, new entrance into the yard is via Bank Street. The yard has soft landscaping and an L-shaped footpath that leads to the hotel's Entry.

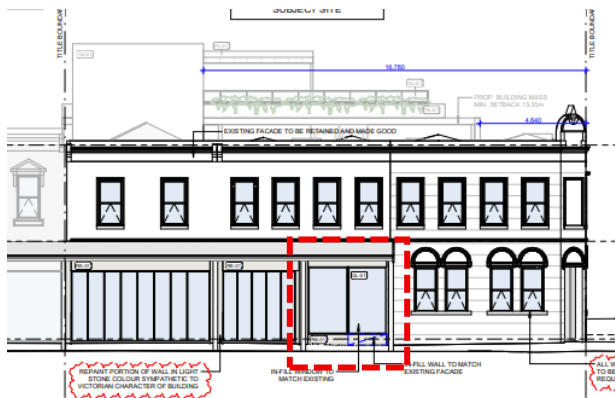


Figure 52: New infill window and lower section of infill wall to replace the current in-go on the Clarendon Street façade. Source: Embrace Architects, 2026.



Figure 53: The new hotel's Entry and adjacent open yard, entered from Bank Street. Source: Embrace Architects, 2026.

Interior

Generally, new interior fitout and infill walls are to be constructed in the heritage building. Internal ceilings and walls are to be repainted in a light and neutral colour scheme.

Ground floor spaces are generally converted into commercial tenancies. The existing Clarendon Street entrance in-go's ramp is to be levelled with the existing floor slab. To its west, a small rectangular section with Colorbond Surfmist roofing is added to the northern terrace which opens out to the new central courtyard. The hotel's Entry space utilises the existing Bank Street extension by modifying it to install glazed sliding doors central to the wall. Separately, at the southern terrace's southwestern corner, a new opening in a new wall is created to provide access to a lift which leads to the roof. The existing floor cavity near the south wall is to be sealed.

First floor spaces are generally converted into hotel rooms, two communal sitting areas, and back-of-house space. At the northernmost premise, the sitting area at the northwestern corner is to be opened up and connected to the new rear extension. At the southernmost premise, new code-compliant balustrades are to be constructed around the landing of the timber staircase. To retain the staircase's visibility, the proposed new balustrade is to be freestanding and glazed, with no fixings required to the timber balustrade.

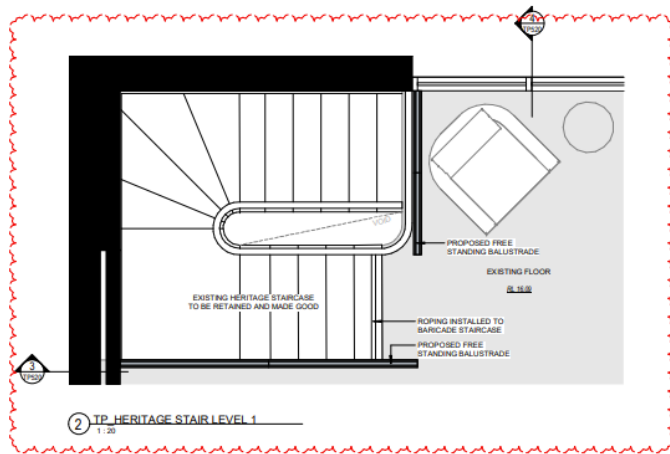


Figure 54: Plan of the new code-compliant, freestanding balustrades enclosing the timber staircase. Source: Embrace Architects, 2026.

4.4.2 New Rear Extension

The new three-storey rear extension is finished with cream-coloured brickwork, with black fencing, balustrade, and cladding. Black charred timber cladding is used on the west (rear) façade’s ground floor, and the lift and stair core on the roof level. New floor-to-ceiling window openings are proposed on the west (rear) façade of the extension. The width of each window is approximately 500mm, similar to that of the heritage building’s sash windows. Two windows are proposed side by side, and a balustrade is proposed at the bottom half of the windows. The rooftop bar has glazed balustrades and black metal framed polycarbonate panel roofing.

Internally, hotel rooms are located from ground to second floors, and a spa with changing facilities and outdoor, sheltered pools are located on the second floor. The third floor comprises a rooftop bar. The spa on the second floor is proposed to cantilever from the extension’s east façade, partially encroaching the space above the central courtyard. It abuts sections of the heritage building’s north and south walls, with the pools and planter boxes separated from the walls by new, secondary blockwork walls to ensure watertightness.

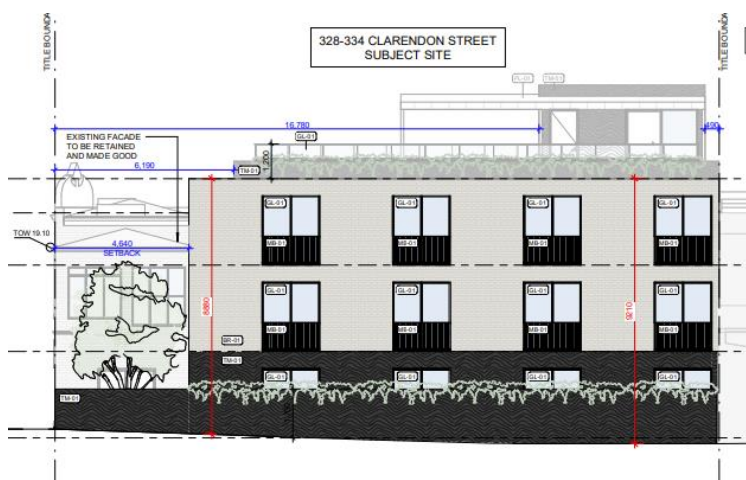


Figure 55: Proposed western façade of the subject site. Each of the new rear extension’s window is of a similar width as that of the heritage building. Source: Embrace Architects, 2026.

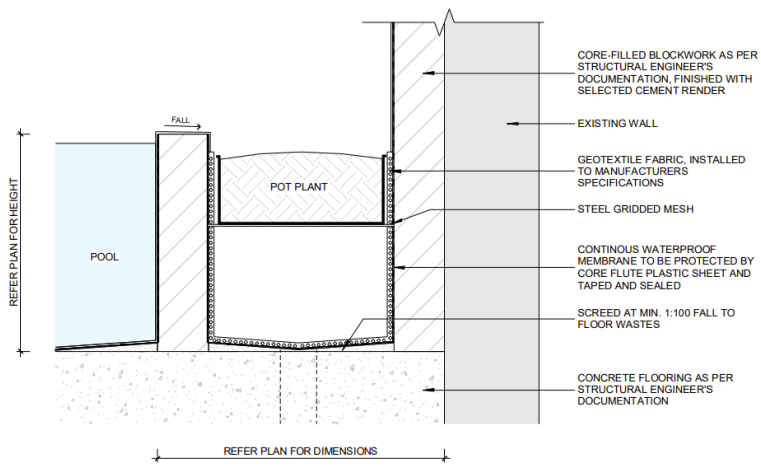


Figure 56. Detail of plan showing interface between pool and existing wall. Source: Embrace Architects, 2026.

5 Assessment

5.1 Demolition

There would be removal of an original stall riser and reconfiguration of the in-go at No. 330's Clarendon Street frontage. Although this shopfront retains some original/early fabric, namely the in-go entrance, it has been substantially altered, as have the adjoining shopfronts. As such, while there may be impacts associated with the loss of original/early fabric, the impacts are limited and demolition is supportable providing the replacement is both sympathetic and distinguishable as new.

There are generally no heritage concerns with the proposed demolition of built fabric at the rear portion of the subject site as they are later additions that do not contribute to the understanding of the site or wider registered place's significance. It is acknowledged in Section 3.3.1 that some sections of brick walls may be original/early; however, they have been obscured or modified by later accretions to the point where the distinction between earlier and later fabric is no longer legible. Though potentially original/early, these highly altered walls do not provide any positive contribution to the place's significance. It is therefore acceptable from a heritage perspective to demolish these walls.

The proposed demolition of internal fabric within the heritage building is generally supportable as it seeks to demolish fabric that had historically been heavily altered or are later elements. The staircase in the northern terrace is proposed to be demolished and may be an original/early element. However, it is currently in highly dilapidated condition and lacks sufficient historical evidence to support an accurate or truthful reconstruction. Its demolition is acceptable.

5.2 Conservation Work

It is generally a good heritage outcome to undertake conservation works to remaining original fabric within the heritage building. While very few original/early elements survive, the proposal seeks to retain and conserve these elements wherever practicable, while balancing the need to facilitate a viable and functional future of the subject site as a hotel. Specifically, the intention to undertake conservation works to points 5 to 7 in Section 4.3.

5. Chimney breasts and fireplaces, where not already sealed, are to be retained and made good.

At present, two fireplaces on the ground floor and four on the first floor are unsealed. Their conditions vary; while some had been refurbished in recent years, some had been stripped back and do not have mantles. They are generally proposed to remain exposed and made good to serve as decorative elements. This is acceptable from a heritage perspective as the fireplaces can continue to be interpreted as part of the heritage building.

On the other hand, one fireplace on the ground floor and two on the first floor had been boxed out. They will not be removed but continue to be concealed within infill walls. There are no heritage concerns with this approach as original/early fabric is retained.

6. Timber staircase and associated balustrading and skirtings are to be retained and made good.

Previously, the option to seal the original timber staircase and partially remove its balustrades was considered due to DDA non-compliance. This option has been dismissed in this proposal as it was deemed harmful to the understanding of the heritage building's significance. Instead, the current proposal seeks to retain in-situ and make good the staircase and associated elements. The staircase is to be roped off and function as a decorative element only. This is a good heritage outcome.

7. West-facing first floor window to the south of the timber staircase is to be retained, made good, and boarded up so it remains visible from the east side.

The wall to the west of the timber staircase abuts the new rear extension's service core, and as a result an original/early sash window is to be decommissioned. The window is to be boarded up on the west side of the wall so that it can remain in place and the adjacent new communal sitting area can be interpreted and understood as part of the heritage building. This is a good heritage outcome.

5.3 New Work

Overall, from a heritage perspective, the adaptive reuse of the subject site as a hotel is supported, as it would rationalise the currently vacant and derelict spaces, improve their spatial coherence, and return the heritage building to a more functional and sustainable state. It is acceptable to keep the heritage building and utilise the rear portions of the site to for a new extension. The inclusion of a courtyard space in between old and new is a good heritage outcome as this provides a clear physical break that allows the heritage building's built form to remain legible. Further, it enhances appreciation of the heritage building from within the subject site.

5.3.1 Heritage Building

Exterior

The proposed new infill window and lower section of infill wall at the current in-go's location will not further erode the Clarendon Street façade's significance as the new design is sympathetic to adjacent fabric and allows all shopfronts to be read rhythmically as a single, continuous element.

The existing two-storey extension at Bank Street is not of heritage significance, and alterations to its fabric would not result in any adverse impact on the significance of the site or the wider registered place. The proposed decommissioning of the existing narrow door opening at the side of the façade and its replacement with a new, centrally located opening represents a more logical and legible intervention. This approach improves wayfinding and arrival sequence, establishes a clear and prominent point of entry, and enhances the functionality of the ground floor by enabling its use as the hotel's primary entrance. Furthermore, the application of render and light stone-coloured paint to this façade would conceal visible inconsistencies and defects resulting from earlier poor-quality works, thereby rationalising its appearance within the broader heritage context.

There are minor visual impacts resulting from the introduction of a new entry point into the site from Bank Street as opposed to the existing Emerald Hill Place, as this creates a new opening gate in the heritage streetscape. This however is considered acceptable, as the fence adjoining the opening is in a visually recessive black colour which creates contrast with the site's more vibrantly coloured Bank Street façade. The yard comprises soft landscaping and a simple footpath which are nondescript elements and do not detract from the significance of the Bank Street façade.

Interior

Generally, new internal fitout and infill walls will not adversely impact on the significance of the heritage building as its interior has been subject to previous changes. The works will have not compromised the architectural cohesion of the broader precinct and interior works are to largely altered spaces with limited heritage value. There are no heritage concerns regarding repainting internal ceilings and walls in a light and neutral colour scheme as this provides a cohesive backdrop for the future hotel use. It is also a relatively low impact intervention that is easily reversible in the future.

On the ground floor, levelling the Clarendon Street entrance in-go's ramp with the existing floor slab is reasonable, as the ramp is no longer required, and the level change is greater than 5mm. According to the architect, a continuous, slip resistant floor finish is required as per AS 1428.1 and AS 4586 for DDA compliance. The addition of a rectangular area to the that opens out to the new courtyard provides additional floor space to support the future operation of the hotel. While this presents a change to the heritage building's envelope, this area has historically been heavily modified, and the change would not further depreciate the understanding of the building's significance to the wider Emerald Hill Estate. The use of Colorbond Surfmist roofing differentiates the new addition from the existing and is visually recessive. At the new hotel's Entry, the installation of glazed sliding doors central to the wall of the existing Bank Street extension is a good heritage outcome as it utilises the currently vacant space. There are no heritage concerns for the new wall

opening to provide lift access and the sealing of the floor cavity as these works improve the functionality of the heritage building.

On the first floor, the reconfiguration of spaces into hotel rooms is supportable. The proposed demolition of the south wall of the Bank Street extension has no heritage implications as the wall does not contribute to the significance of the site. It also serves as the link between the heritage building and the new rear extension. A new freestanding, code-compliant glazed balustrading with a transparent design allows the timber staircase to remain visible while addressing DDA concerns. This is a good heritage outcome.

5.3.2 New Rear Extension

There would be some minor visual impact around the entry point into the new hotel, where the entrance into the yard connects to the hotel's Entry via a new fence on Bank Street. However, this entrance has a minimalistic design and is clearly legible as a contemporary addition. It is visually subservient to the more elaborately detailed entrances into the heritage building so it would not dominate or detract from the building or its heritage context.

The new rear extension adopts a minimal, contemporary design that is visually recessive and complementary to the heritage building and its surroundings. It adopts a simple rectilinear form and flat roof. While acknowledged that it is taller than the heritage building due to the inclusion of the rooftop bar and lift pop-up, the form as a whole is visually recessive, and effectively consolidates the extension into a single entity; it is a significant improvement from the existing built fabric at the same location which lacks any architectural cohesion. Furthermore the rooftop bar and lift pop-up are sufficiently set back from the Clarendon and Bank Streets façades; they are not visible from Clarendon Street and have limited visibility from Bank Street.

The proposed use of cream-coloured brickwork references the Victorian tradition of warm, light-toned external finishes, while also reflecting the prevalent masonry materiality characteristic of Emerald Hill Estate. While the use of black for cladding, balustrading, and detailing is not typical of Victorian buildings, the contrast between light walls and darker accents is a restrained and contemporary interpretation that remains sympathetic to the established character. This approach allows the extension to be clearly read as a contemporary interpretation of the heritage building, while remaining a visually recessive backdrop for the heritage building and wider heritage streetscape.

The proportion of west façade windows is sympathetic to the established proportions heritage building's sash windows. This creates a consistent rhythm across the elevation that echoes the design of the Clarendon and Bank Street façades. By arranging paired windows to form wider openings of approximately 1000mm, increased natural light and clearer views are allowed. It also maintains a sense of order while ensuring the extension to read as a contemporary interpretation of the heritage building.

The second-floor spa abuts sections of the heritage building's north and south walls. Noting that there are concerns with waterproofing, secondary blockwork walls are used to separate the new structure from the heritage building.

5.4 Why the Proposal Should Be Supported

5.4.1 Matters which the Executive Director is to consider under s101(2)

In support of the proposed change of use to a boutique wellness hotel incorporating spa facilities, SC Lennon & Associates have prepared a Report on Reasonable or Economic Use for consideration by Heritage Victoria on issues relating to 'reasonable or economic use' arising from Section 101 of the *Heritage Act 2017*.

At a high level, the report concludes that, from a reasonable use perspective, the proposed use of the subject site as a hotel is consistent with its historic use as a grocery store, flats, and other retail and commercial services. On the other hand, from an economic use perspective, the proposed use of the site as a hotel is supported by increasing market demands.¹ The total net operating income

¹ *Report on Reasonable or Economic Use*, iii.

represents a [REDACTED] return on the investment.² This would generate income to support the future conservation and maintenance of the heritage fabric. If the proposal were to be refused and without a cohesive commercial concept, tenancies are likely to be re-leased for small-scale retail or service activities. This would generate a return of [REDACTED], indicating that there may not be sufficient and stable income to support the building's future conservation and maintenance.³

5.4.2 Matters which the Executive Director may consider under s101(3)

As demolition and new works are proposed for the subject site, which forms part of a wider registered place, there are visual impacts associated with works that are visible externally. Specifically, the new rear extension can be seen from oblique angles from Bank Street. To mitigate impacts, neutral colours of cream, light stone, and black have been selected so that the extension reads as a backdrop to the more vibrant Victorian buildings in the immediate surroundings.

Due to the natural fall of Bank Street, with the subject site positioned at a relatively low point in the streetscape, the proposed rear extension does not present as overly dominant when viewed in context. The sloping topography visually moderates the perceived height of the new built form, allowing it to sit comfortably within the established scale of neighbouring buildings. As such, the proposed height and form are considered acceptable and do not detract from the character or visual coherence of the area.



Figure 57: View to the west (rear) façade of the subject site, from South Melbourne Town Hall. Source: Google Street View, 2026.



Figure 58: Mock-up image of the same view from South Melbourne Town Hall. Source: Embrace Architects, 2026.



Figure 59: View to the north (side) façade of the subject site, from the intersection of Clarendon and Bank Streets. Source: Google Street View, 2026.



Figure 60: Mock-up image of the same view from the intersection of Clarendon and Bank Streets. Source: Embrace Architects, 2026.

² Report on Reasonable or Economic Use, iv.

³ Report on Reasonable or Economic Use, v.

6 Conclusion

In summary, the subject site's proposed change of use to a boutique wellness hotel incorporating spa facilities is acceptable, as it makes use of a currently vacant and derelict building by giving it a new use. While there are minor impacts resulting from the alteration of a stall riser and in-go fronting Clarendon Street, this is acceptable from a heritage perspective because the fabric has been altered throughout history and the replacement design is more sympathetic to the adjacent shopfronts. While some original/early wall sections may be removed as part of the demolition and new works to the rear portions of the site, these works are acceptable because the site's rear portions have been significantly altered to a point where original/early and later fabric are no longer clearly distinguishable, and do not contribute to the understanding of the site and the wider Emerald Hill Estate's significance.

Internally, works are proposed to be undertaken for spaces that have historically been modified and have limited heritage value. Conservation works are also proposed to be undertaken, so that some of the most distinctive remaining original/early elements can be enjoyed by future building users. Some removal of original fabric may be necessary to achieve the conversion to new use, but these interventions will be intelligible as new within the context of the original Victorian buildings.

It is acknowledged that the proposed new rear extension presents a larger building envelope than the existing built fabric at the same location. However, it seeks to consolidate the otherwise non-contributory later additions that display little to no cohesive design intent. The design of the new extension is only partially visible from the public domain when viewed from oblique angles, and, due to its predominant cream-coloured brick materiality and secondary, black-coloured accents, serves as a light and neutral backdrop that does not negatively affect the visual dominance of the heritage buildings in the streetscape. Overall, it is sensitively designed to be a visually subservient, quiet addition that complements the site and would not adversely impact the significance of the wider registered place.

From an economic use perspective, SC Lennon & Associates establishes that the total net operating income would be vastly improved when comparing the proposed hotel use with previous small-scale retail or service use. This provides the much-needed funds to support the heritage building's future conservation and maintenance.

Overall, the proposal represents a sensitive approach to reuse an otherwise vacant heritage building. This secures its long-term conservation and functionality. While some original fabric would be impacted, these impacts are limited and appropriately justified, while design responses are sympathetic and well-considered. Together with the positive economic use reasoning, the proposal continues to support the site and the wider Emerald Hill Estate such that the development presents an acceptable balance between conservation and adaptation.

Wurundjeri Country
Level 2, 696 Bourke St
Melbourne Victoria 3000
T 03 9421 5448
www.trethowan.com.au