



24 March 2025


Heritage Victoria
1 Lonsdale Street
Melbourne VIC 3000

P40103 - RFI Response - Kardinia House, 1 Riverview Terrace, Belmont (H0337)



This letter has been prepared in response to a Request for Further Information (RFI) issued by Heritage Victoria (HV) on 23 January 2025. The RFI relates to an active permit application (P40103) for Kardinia House, 1 Riverview Terrace, Belmont (Geelong), VHR H0337. An extension was granted for the RFI response, which is due 24 March 2025.

Following receipt of the RFI, we arranged a follow up meeting with HV and Geelong Council on 12 February to discuss the approach to work and the requested information. This letter outlines the additional information and material provided to address the RFI, as well as matters discussed in the meeting on 12 February. Of note, the proposed staging of works was discussed, namely the intention to separate the subdivision and new townhouse development from works to Kardinia House. It was initially intended to apply for separate permits reflecting the staging of proposed works. However, it was recommended by HV to include all works into a single, staged permit. This approach has been considered and found to be a sound approach provided the staging of work, and any related conditions, is carefully managed. As such, the RFI response package includes an outline of the proposed staging of work, with reasoning, and a suggested approach to permit conditions for HV's consideration.

This letter should be read in conjunction with supporting material responding to the RFI, as follows:

- Amended Heritage Impact Statement (HIS), prepared by Trethowan Architecture, 24 March 2025.
- Staging diagram, prepared by Plus Architecture
- Report on the economic use justification, prepared by Fathom, dated 24 March 2025.
- Sequencing diagram, prepared by Trethowan Architecture
- Schedule of conservation works, prepared by Trethowan Architecture, March 2025.
- Plan of subdivision with VHR boundary overlaid, prepared by Trethowan Architecture, March 2025.
- Report on the History, Significance, and Condition of Kardinia House, prepared by Trethowan Architecture, 24 March 2025.
- Proposed permit conditions (without prejudice), prepared by Trethowan Architecture 24 March 2025.
- Letter addressing age of trees to be removed, prepared by Implexa, dated 14 February 2025.
- Landscaping Package, prepared by Arcadia, 21 March 2025.

- Town Planning Package, prepared by Plus Architecture in March 2025 including Architectural Drawings as follows:
 - DA1005 Kardinia House – Proposed GF Plan
 - DA1006 Kardinia House – Proposed FF Plan
 - DA1008 Kardinia House – Proposed Elevations 01
 - DA1009 Kardinia House – Proposed Elevations 02
 - DA100 Ground Floor Plan
 - DA101 First Floor Plan
 - DA102 Roof Plan

1 Information Requested

The matters which require additional information relate to the proposed subdivision, conservation works to Kardinia House, alterations and additions to Kardinia House, landscaping, and reasonable and economic use considerations. The RFI included a summary list of information requested, this is reproduced below, with comment providing an outline of the responses prepared.

1. *Confirmation of the approval pathway sought for the subdivision component of the application.*

The subdivision component is being sought via a Planning Permit application with City of Greater Geelong. Pursuant to Clause 43.01-2 (Heritage Overlay – Places in the Victorian Heritage Register), a permit is required under this overlay to subdivide a heritage place which is included in the Victorian Heritage Register. *An application to subdivide a heritage place which is included in the Victorian Heritage Register must be referred to the relevant referral authority under Section 55 of the Act in accordance with Clause 66 of this scheme.* Accordingly, the subdivision application will be referred to Heritage Victoria.

2. *A response to the comments regarding subdivision boundaries, including updated proposed plans of subdivision and drawings should changes be made. This should include, but not be limited to:*
 - a. *Discussion related to how the proposed subdivision boundaries have been determined in response to the cultural heritage significance of the registered place.*

The proposed subdivision boundary at the north of the site has been realigned in response to feedback from HV and further review of historical evidence. Aerial photography from the 1920s corroborates documentary recordings that the place included a range of landscape types at the northern area between the house and the river. Photographs (Figure 1) show a clearly that the house was separated from the river by an avenue of trees following the former driveway running east-west, with additional trees clustered at the northwest. The area in front of the house was a productive landscape with evidence of division, by fences, into different uses. The floodplain area had, therefore, an agriculturally function that is no longer evident at the place.

The proposed subdivision has been revised and is aligned in accordance with the former north-south fence line evident in the 1920s photos (Figure 2). The screening trees aligned with the circular driveway and northwest corner of the site are not proposed to be reinstated. However, this line is interpreted through the subdivision line angling towards the west at the northern part of the site (Figure 3).

The former driveway and avenue of trees extending to the east cannot be reinstated as the land to the east is no longer part of the place.



Figure 1: Aerial views of Kardinia House and surrounding Belmont Common areas, dated 1925. Source: State Library Victoria.



Figure 2: Zoomed in extracts of the above images. The fences are indicated in red, and line of screening trees is shown in green. The current extent of the site aligns roughly with the eastern fence / red line. Source: State Library Victoria, edited by Trethowan Architecture.

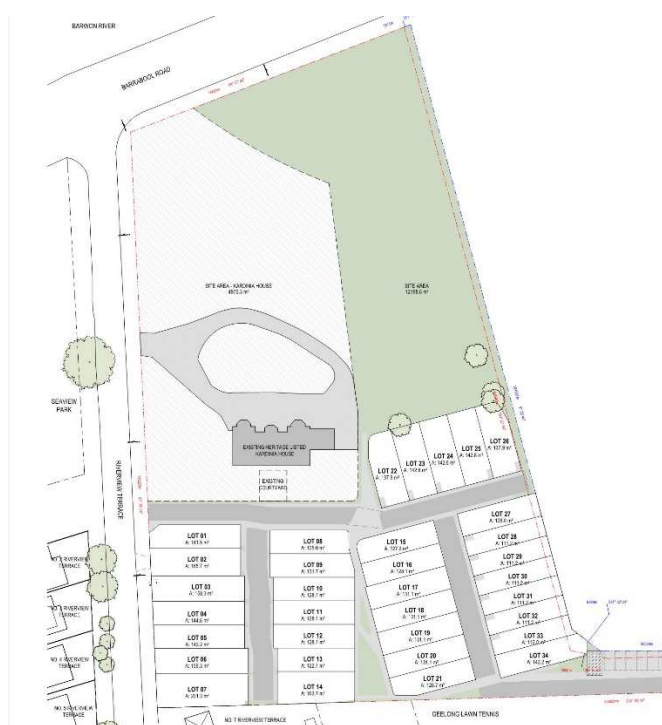


Figure 3: Proposed subdivision line, indicated by the boundary of green / hatched areas. Source: Plus Architecture, 2025.

- b. *Readjustment of the southern boundary in response to comment above. Should no additional space be provided to the rear of Kardinia House in lot 1, documentation to demonstrate that sufficient space is provided for its return to a private residential dwelling in a contemporary context.*

The southern boundary has been marginally adjusted and services for the townhouses relocated so as not to encroach into Kardinia House's lot. Substantial provision of additional space has not been provided, and further documentation justifying this is provided in the economic use justification report, prepared by Fathom.

In summary, the space provided at the rear of Kardinia House has been determined to strike a balance between adequate redevelopment and avoiding an overdevelopment which would be a financial risk. If fewer townhouses are provided for sale then the balance of project funds needs to be found through additional sale price for Kardinia House. However, there is a risk that development to the house could price it out of the market, given real estate conditions for both Belmont and Geelong more broadly. This is a risk to both the broader redevelopment of the site, and to the ongoing sustainable management of Kardinia House which would be best served by occupation.

- c. *Information related to how the heritage place would be managed as a whole. This may include discussion of common property and owners corporations that are proposed. Consideration of how the historic relationships between features on the site, the topography and historic division of the place.*

Following subdivision, Kardinia House and the proposed townhouses to the south would be managed separately. The townhouses will be managed by Common Property, and Kardinia House as a private residence. Both parcels will have common Design Guidelines related to landscaping registered on title (S173).

It is requested that details of the Design Guidelines be managed through permit conditions.

- d. *How the development is proposed to be staged and/or the sale of lots in relation to the proposed subdivision.*

Further discussion of the staging of proposed works is outlined at section 2, below. In summary, the proposed staging of works is as follows:

Stage 1: demolition and specific conservation works to Kardinia House. Subdivision into two lots. Development and sale of townhouses at south of site. Construction of the new townhouses will likely commence before the subdivision into two lots. However, the subdivision will need to have occurred before completion of townhouse construction.

Stage 2: works to Kardinia House including alterations, additions and conservation / repair.

3. *Proposed plan of subdivision with the VHR registered boundary overlaid with heritage features shown.*

Please refer to attached subdivision diagram, prepared by Trethowan Architecture.

4. *A full existing conditions assessment of Kardinia House prepared by a heritage consultant.*

A condition survey and assessment was carried out by Trethowan Architecture as part of the preparation of the Conservation Management Plan (CMP). A report on the History, Significance, and Condition of Kardinia House has been prepared based on the CMP, and is included as part of this RFI response.

5. *Drawings documenting the scope of conservation work proposed, prepared by a heritage consultant and based on investigations and analysis of Kardinia House. This must include but not be limited to further investigations by the heritage consultant to confirm water ingress; retaining and stabilising original materials and architectural features like brickwork, timber, and decorative elements; treatment of damp areas; paint work; reinstating lost or*

damaged elements (including after demolition), such as windows, doors, verandahs, or roofing features, based on historical evidence; restoring the roof and verandah to its original form, including materials, structure, and features, where alterations have occurred.

It is requested that drawings detailing the scope of conservation works be provided through permit conditions as part of Stage 1 works (please refer to Section 2, below). Note that the only works allocated to Stage 2 are those which it is not feasible or reasonable to be done at Stage 1 because of construction limitation such as the requirement to erect scaffolding. Further discussion on the staging and application of permit conditions is included in the attached without prejudice suggested permit conditions document.

6. *Costings for the conservation works based solely on the conservation drawing set referenced above. It is noted that a 20% contingency fee should be accounted for, given any permit issued would likely include a Bank Guarantee to secure the value of the conservation works plus contingency.*

As with item 5, above, it is requested that conservation costings and the Bank Guarantee be provided through permit conditions. Prior to the subdivision into two lots proposed as part of Stage 1 works. Refer also to the attached proposed permit conditions document.

7. *A response as to why alterations and additions to Kardinia House to support its return to a private residence are not proposed as part of this application. Alternatively you may wish to add this to the application.*

Alterations and additions to Kardinia House have been added to this permit application. Please refer to updated architectural drawings, prepared by Plus Architecture and Amended Heritage Impact Statement, prepared by Trethowan Architecture, included as part of this response.

This was generally discussed with HV on 12 February.

8. *Further information is sought on the floor plans of Kardinia House showing the sequence of alterations and additions made, especially to the rear wings. This should be a sequence plan identifying both significant and non-significant fabric and dates of construction.*

Please refer to diagram included as part of this response, prepared by Trethowan Architecture.

9. *A response to comments made above regarding landscaping, and confirmation of any tree removals.*

No landscaping works are proposed to the north of Kardinia House as part of this application except for fencing. Hard landscaping related to the redevelopment of Kardinia House, as part of Stage 2 works, is indicated in the architectural drawings, prepared by Plus Architecture.

The subdivision boundary alignment has been positioned to reflect the former landscape pattern of the place (refer to point 2(a) above).

It is confirmed that no trees are proposed for removal forward (north) of Kardinia House. A demolition plan is included in the architectural and landscape sets.

10. *Should tree removals be proposed, an arborist report on these trees. Confirmation as to the heritage status of the tree is also required.*

As noted above, no trees are proposed for removal forward (north) of Kardinia House. Trees to be removed from the southern part of the site have been assessed as being not significant and ranging in age from 10-30 years. Refer to the attached letter from Implexa.

11. *Updated high level Landscape Plans provided need to provide details of the restoration of historical landscape elements such as gardens, pathways, and plantings, while managing vegetation to maintain the property's character; surface treatments; existing trees; indication of planting species consistent with the historic landscape.*

No work to the landscaping north of the house is proposed, except for the subdivision fence.

12. *Documentation is required to support the reasonable and economic use case presented in the Heritage Impact Statement. This should include but not be limited to a detailed breakdown of costs involved in heritage conservation works, construction and other associated expenses. Should no changes be made to increase the rear setback on Lot 1 from Kardinia House, you will be required to demonstrate why Townhouse 1 and Townhouse 8 and/or the driveway in that location are essential to the delivery of the project.*

Additional justification and evidence of the reasonable and economic use case is included as part of this RFI response. In line with the comments at item 1(b), above, removal of two townhouses will impact the financial viability of the project as it will have negligible impact on construction costs while reducing the return. The financial shortfall would then need to be made through the sale of Kardinia House, or through reducing the scope of work proposed. Given current, and expected, market conditions in Belmont, and Geelong more broadly, the anticipated sale price for Kardinia House would not make up that shortfall. Therefore the entire project, including positive conservation works at Kardinia House, is at risk.

Financial information has been included in the economic use justification report, prepared by fathom and included in this RFI response. This information is 'commercial in confidence' and must not be made publicly available such as during any advertising period.

This matter was discussed with HV on February 12 and was generally favourably received.

13. *Should changes be made to the proposal, revised architectural and landscape drawings, a revised Heritage Impact Statement and a revised plan of subdivision.*

Updated architectural drawings, prepared by Plus Architecture, are included as part of this RFI response.

14. *A response to the referral response received from the City of Greater Geelong dated 23 December 2024.*

City of Greater Geelong's heritage referral advice (prepared by David Rowe) focuses on the planning permit requirements for the proposed subdivision, given that HV is the Determining Referral Authority for heritage matters.

The referral advice notes that submission of the CMP is required under Clause 43.01. This will be managed through the planning permit process, and the CMP is not included in this RFI response.

Other matters raised in the referral advice relate to the subdivision, schedule of conservation works, demolition, new townhouses, landscaping and archaeological potential. These matters are to be managed through the heritage permit process, and responses to the majority of points raised are included in this RFI response package.

As discussed at section 2, below, matters related to conservation works, and the design details of any new work, are proposed to be managed through permit conditions. It is noted that no comment has been made regarding the archaeological potential at the site. This is not our area of expertise and we would defer to HV's opinion and requirements for any archaeological work. Should archaeological investigation be required, we would expect that could be addressed through Stage 1 permit conditions.

2 Staged Permit & Conditions Approach

The current application proposes subdivision of the site into two lots to enable Kardinia House to be retained on a reduced lot, and the development of the remaining land (south of Kardinia House) for new townhouses. The subdivision, development and sale of the townhouses would then fund the next stage comprising conservation works and additions to Kardinia House so it could be reinstated as a private dwelling and sold. It was HV's recommendation that these works be considered as a whole, so that the cumulative impacts and balance of positive outcomes could be fully understood. As such, the second stage works of conservation and additions to Kardinia House has been included in the application. However, due to construction programming and funding streams the project still needs to be undertaken in a staged manner.

The following section outlines the proposed staging of works and suggests an approach to permit conditions which would enable progress while also providing HV with assurance that a positive outcome will be achieved. It is requested that permit conditions are prepared with this staging in mind and that proposed conditions be discussed before any permit is issued. A flow chart describing the staging is at Figure 4. Further discussion is included in the attached proposed permit conditions report, and it is requested that the conditions be discussed further with HV prior to any permit being issued.

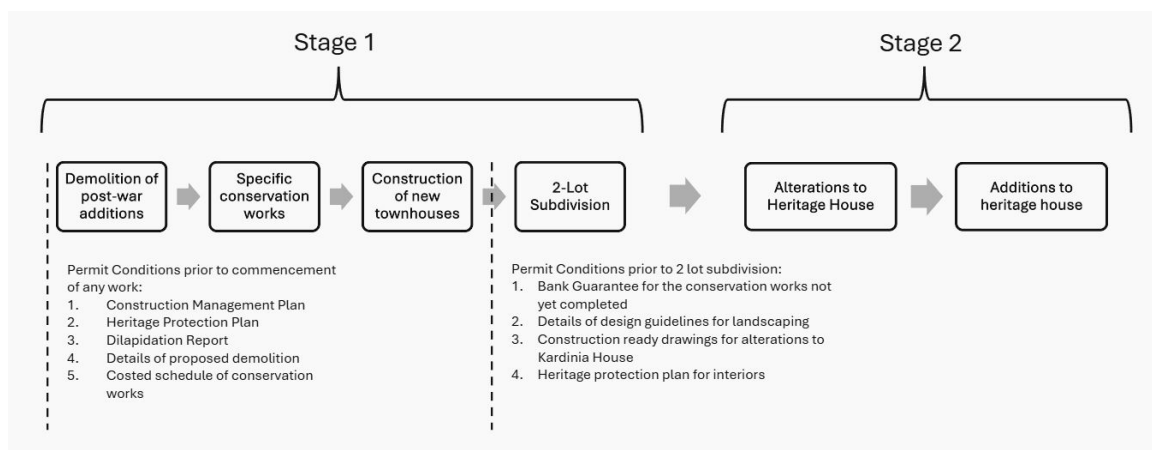


Figure 4: Flow chart of proposed staging of works and application of permit conditions. Source: Fathom.

2.1 Stage 1

Proposed stage 1 works include:

1. Subdivision
2. Demolition of later additions to Kardinia House
3. Specific conservation works to Kardinia House (refer to conservation works schedule, prepared by Trethowan Architecture)
4. Construction of new townhouses (and associated infrastructure and services) to the south of Kardinia House

Completion of Stage 1 works will enable the sale of townhouses which will then fund the works at Stage 2. It is important, therefore, that the works are carried out in the proposed order to ensure adequate funding streams are available for the second stage of work. It is requested that, for this stage, permit conditions do not require any work to Kardinia House beyond the proposed. Suggested conditions at this stage include, but are not limited to:

- Permit period of validity should reflect the anticipated timeframe for these works, given they are extensive and staged. It is anticipated that the works will take 24 months to commence works, and 36 months to complete.

- A construction management plan including a sequencing plan, and details of temporary and enabling works (prior to commencement of any work).
- A heritage protection plan for the exterior of Kardinia House (prior to commencement of any work).
- Dilapidation report and photographic survey of Kardinia House including later additions, landscape and setting, to record its condition prior to works (prior to demolition work).
- Details of proposed demolition including drawings, methodology, and plan for salvage and storage of material where possible (prior to demolition work).
- Proposal for management of the place following subdivision.
- Prior to subdivision of the land into two lots, a Bank Guarantee is to be provided equal to the estimated cost of the conservation works, plus a 20% contingency.

2.2 Stage 2

Proposed stage 2 works include:

1. Conservation and restoration of Kardinia House, broken into:
 - a. Repairs and restoration of existing building.
 - b. Reconstruction of missing elements.
 - c. Final finishes (external and internal) such as painting.
2. Alterations to Kardinia House to return it to a private residential offering. This includes alterations to the kitchen and addition of new bathrooms.
3. Additions to Kardinia House to provide adequate amenity for a contemporary home. Works include new living spaces to the rear (south), new garage, swimming pool and associated hard and soft landscaping.

Conditions related to this stage may include, but not be limited to the below. Some of these conditions may require information be provided 'prior to commencement of new work', but it is important that the carrying out of works not be constrained. As such, it is requested that a bank guarantee be applied (as a Stage 1 condition) to ensure conservation works are undertaken, rather than requiring they are carried out prior to commencement of any new work.

- Details of Design Guidelines related to landscaping, common to both parcels being Kardinia House and the townhouses.
- Costed schedule of conservation and restoration works, including methodology.
- Conservation and restoration works drawings.
- Bank guarantee for the cost of conservation works (plus 20% contingency).
- Construction-ready drawings of alterations and additions to Kardinia House.
- Construction-ready drawings of hard landscaping such as driveway, swimming pool, fences and the like.
- Heritage protection plan for interiors.
- Completion report, with an assessment of the extent to which works were carried out in accordance with good heritage practice. This should reference the dilapidation report prepared at Stage 1.
- At the completion of all works to Kardinia House, and satisfactory submission of the completion report, the bank guarantee should be released to its provider.

All other standard conditions are expected to be applied, including notifying Heritage Victoria of commencement and completion of works, and provision for minor changes to the approved works.

3 Summary & Conclusion

Following receipt of the RFI, and further discussion with HV, the team has revised the scope and details of the application to respond to concerns and provide more detail. The later stages of work, related to Kardinia House, have been included in the scheme and the project can be managed under a staged permit / conditions approach. It was originally intended to apply for a separate permit for the later works. This new approach enables the cumulative impacts, and balance of heritage benefits, to be assessed and managed as a whole. Details and analysis of the considerations are included in the supporting documents submitted as part of this RFI response.

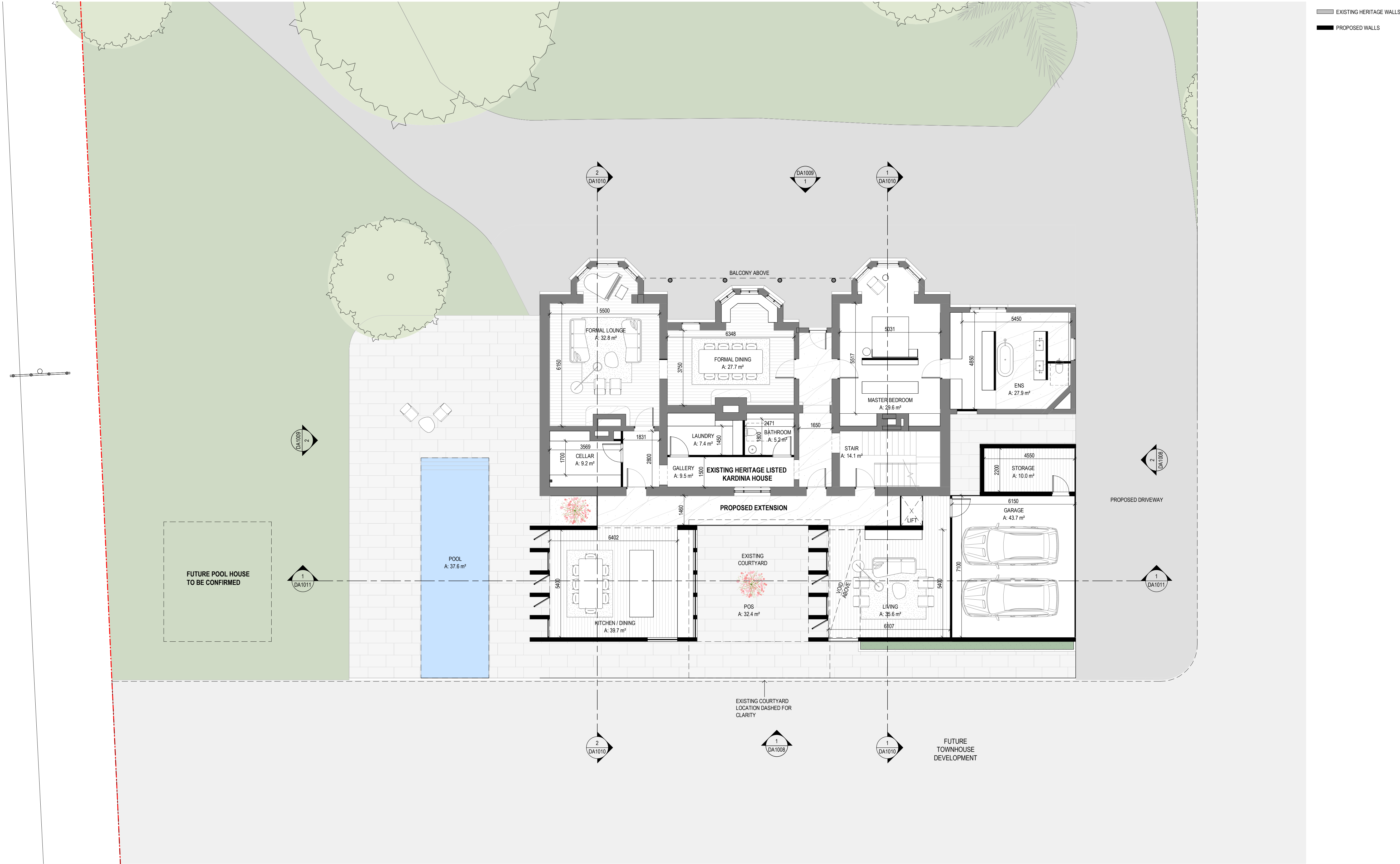
Further information has been provided on the approach to the subdivision, and with regard to the economic use justification for the works. These matters strike a delicate balance between enabling redevelopment of the site, and ensuring a positive outcome for Kardinia House on a reduced lot. The successful delivery of a restored Kardinia House, returned to residential use, depends on the success of the new townhouse development. The application outlines a feasible pathway to achieve this, and should be supported on the basis of a net positive heritage outcome.

Should you wish to clarify any aspect of this letter please do not hesitate to contact the undersigned.

Yours sincerely,



Claire Miller
Trethowan Architecture



1 GROUND LEVEL KARDINIA HOUSE
SCALE 1:100 @A1

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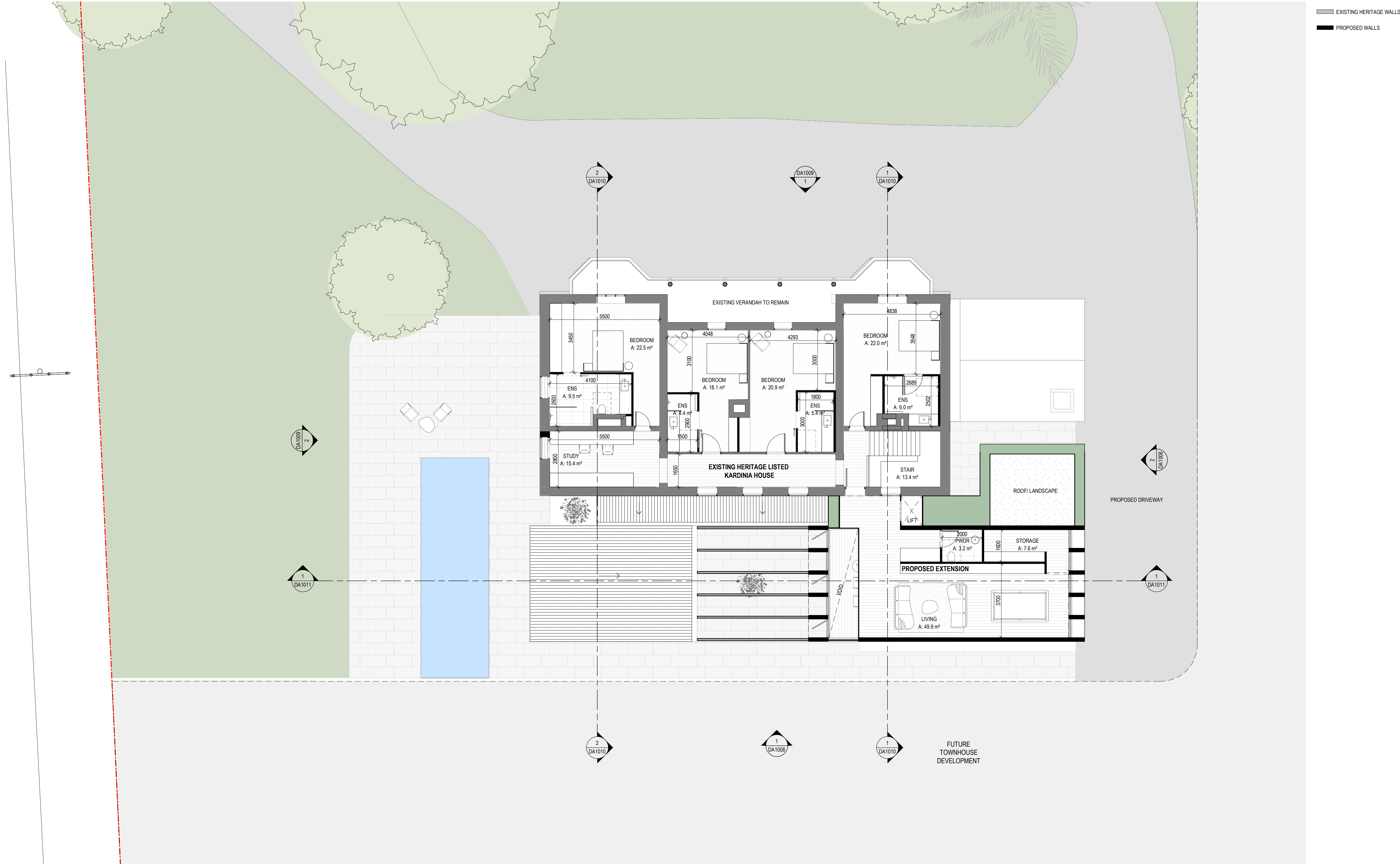
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DRAWING TITLE		CLIENT NAME		NORTH 
KARDINIA HOUSE - PROPOSED GF PLAN		FATHOM GROUP		
PROJECT RIVERVIEW 1 RIVERVIEW TERRACE, BELMONT 3216		DRAWN Author	CHECKED Checker	
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1 LEVEL 1 KARDINIA HOUSE
SCALE: 1:100 @A1

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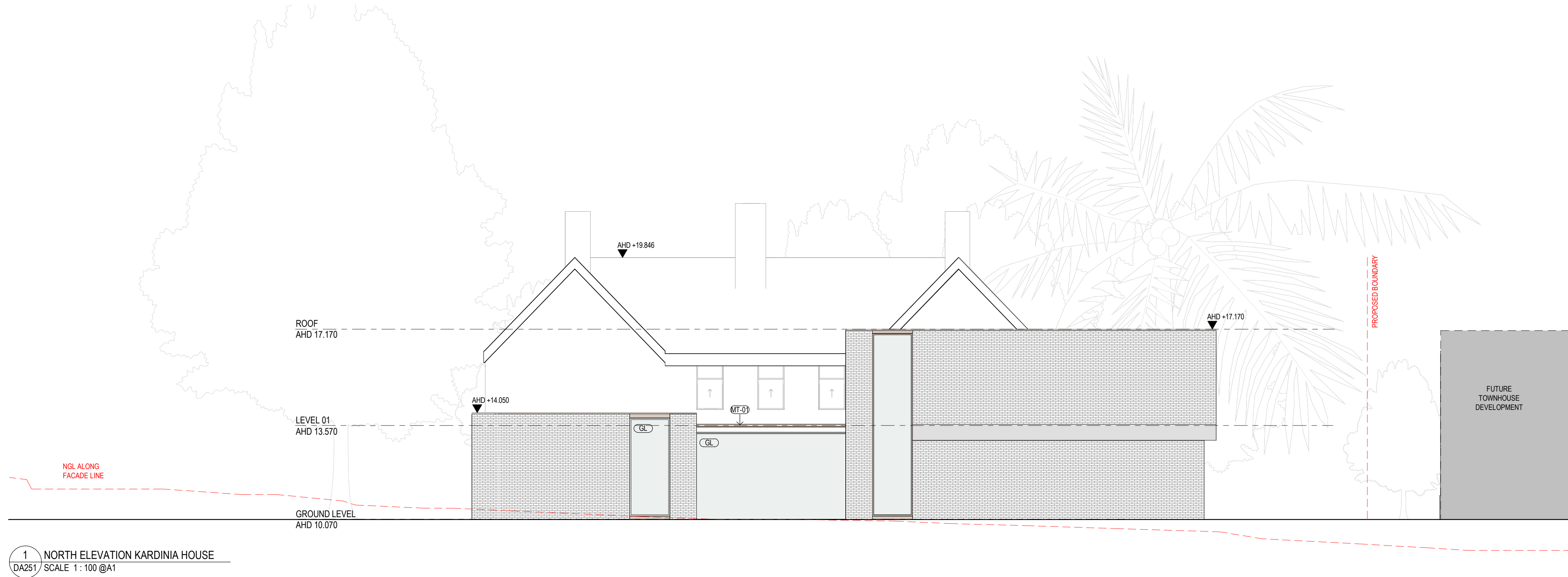
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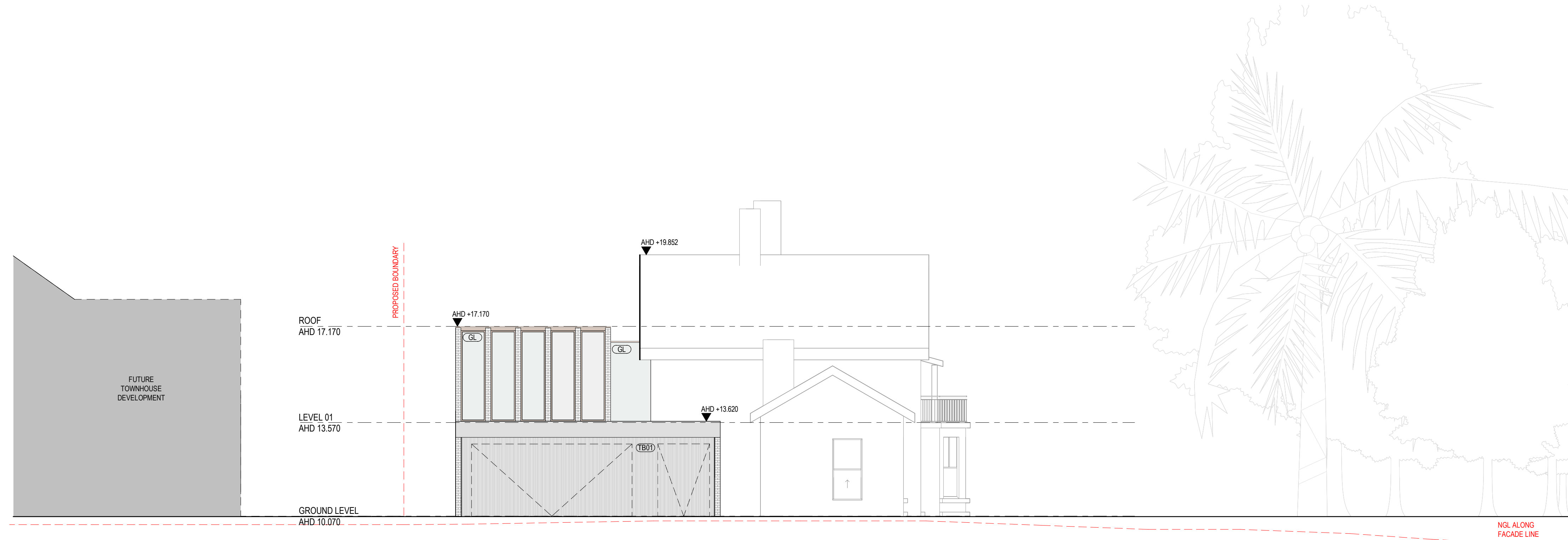
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PROJECT NO. 13280		DRAWING NO. DA1006		1

NOT FOR CONSTRUCTION
TOWN PLANNING



1 NORTH ELEVATION KARDINIA HOUSE
DA251 / SCALE 1 : 100 @A1



2 EAST ELEVATION KARDINIA HOUSE
DA250 / SCALE 1 : 100 @A1

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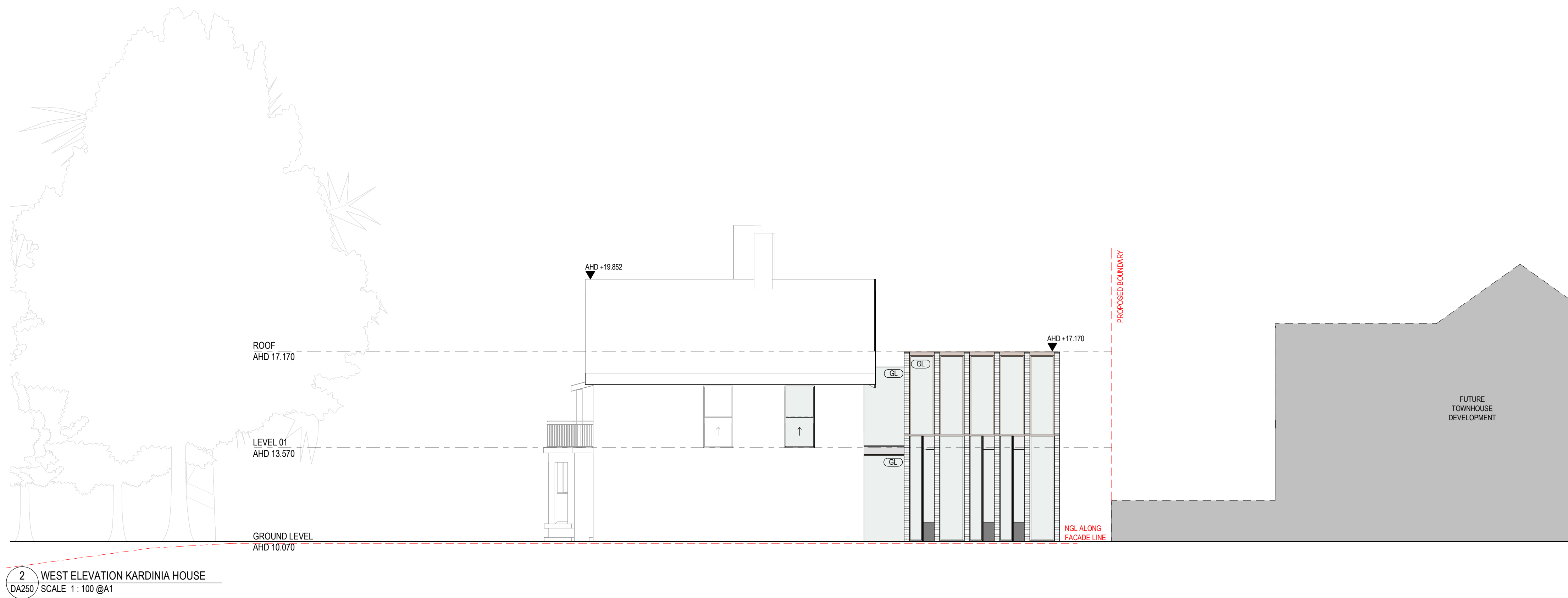
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DRAWING TITLE		CLIENT NAME		NORTH
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NOT FOR CONSTRUCTION

TOWN PLANNING

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DRAWING TITLE		CLIENT NAME		NORTH
KARDINIA HOUSE - PROPOSED ELEVATIONS 02		FATHOM GROUP		
PROJECT		DRAWN	CHECKED	REVISION
RIVERVIEW		Author	Checker	
1 RIVERVIEW TERRACE, BELMONT 3216		SCALE	1:100 @ A1 SIZE	
		XXXXXXX		
PROJECT NO.		DRAWING NO.		
13280		DA1009		

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