

13 July 2026

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Principal, Heritage Permits
Heritage Victoria
Department of Transport & Planning

Re: Former Wesleyan Church, 340-350 Sydney Road, Brunswick (VHR H1144)
Permit Application P42205

This letter was prepared on behalf of the permit applicant. It responds to issues raised in the RFI dated 13/04/26, as well as the submission from the City of Merri-bek.

In respect to the City of Merri-bek submission, the Council officer recommended that the proposal be supported subject to the deletion of the carparking in the front setback and restoration of landscaping. In the first instance, it is noted that Council issued a planning permit in 2023 for the adaptive reuse of the church including carparking in the front setback (MPS/2022/764/A). No concerns were raised at that time in respect to the carparking. That aside, the front setback has been used for vehicle parking for around 40 years. It is a longstanding aspect of the site's presentation to the public realm – which is to undergo improvement with new landscaping works to soften the appearance of the front setback and to help screen carparking.

Further information has been sought on the reasonable or economic use of the registered building as follows:

Under s101(2)(b) of the Heritage Act 2017, the Executive Director, Heritage Victoria must consider the extent to which refusal of the application would affect the reasonable and economic use of the place. This matter has not been sufficiently addressed and should be responded to in detail. The HIS states that retention of the raked floor and timber pews significantly constrains adaptive reuse, and that a commercial decision has been made to introduce office use. Please provide a detailed response justifying why retaining the exposed raked floor with pews in situ would render the proposal unviable, particularly given that this would limit practical office use to less than half of the internal floor area. This matter has not been sufficiently addressed and should be responded to in detail

Impacts on economic use are addressed below, but in the first instance it should be noted that the design has been amended so that the new platform floor is separated from the north and south wall of the nave and given a curved plan form to the east side. This will reveal more of the original floor and better integrate the new structure with the original radial geometry of the pews.

The retention of the exposed raked floor and fixed pews in situ has been carefully considered in the context of the site's cultural heritage significance and the objectives of the *Heritage Act 2017*. It is concluded, however, that their ongoing retention would render the proposal unviable and would undermine the long-term conservation of the place by preventing a sustainable and compliant adaptive reuse. Evidence on the impacts on the economic use of the place are also provided in the attached letter prepared by Nelson Alexander (dated 10 July 2026).

1. Impact on Functional and Lettable Floor Area

Retention of the raked floor and pews would limit practical office use to less than a Quarter of the internal floor area, due to the steeply sloping floor geometry and the fixed, non-adaptable seating layout. Large portions of the space would be unsuitable for any form of standard workplace occupation, including workstations, meeting rooms, back-of-house functions, or shared amenities.

This degree of spatial inefficiency results in an exceptionally low net lettable area, well below what is required to support a viable office use. As a consequence, the building would be unlikely to attract tenants at rents sufficient to offset:

- *The cost of heritage-sensitive refurbishment*
- *Mandatory building and fire safety upgrades*
- *Accessibility and services compliance*
- *Ongoing conservation and maintenance obligations*

Without the ability to realise a reasonable proportion of usable floor area, the proposal cannot deliver an economically sustainable outcome.

2. Constraints on Adaptive Reuse Objectives

Heritage Victoria policy recognises that adaptive reuse is essential to the ongoing conservation of historic places, particularly where original uses are no longer viable. Retention of the raked floor and pews effectively precludes meaningful adaptation of the volume for a contemporary office use by preventing the creation of level, flexible floor plates.

Modern office accommodation requires spaces that can accommodate evolving tenant needs, ergonomic requirements, and flexible planning. The raked floor and fixed pews impose a permanent spatial configuration that is incompatible with these requirements. This significantly reduces the adaptability of the place and conflicts with the principle of facilitating a viable new use that ensures continued occupation and care.

3. Accessibility and Regulatory Compliance

Retention of the raked floor presents substantial challenges in achieving compliance with the National Construction Code and the Disability Discrimination Act 1992. The sloping floor, stepped levels, and fixed seating prevent equitable access across the space and would necessitate complex and intrusive interventions—such as extensive ramps, platforms, balustrades, and lift structures—to approximate compliance.

These interventions would:

- *Further reduce already limited usable floor space*

- *Introduce visually intrusive elements within the main volume*
- *Risk greater impact on significant fabric than a considered floor rationalisation*
- *Still deliver a compromised accessibility outcome*

As such, retention of the raked floor does not represent a reasonable or conservation-led approach to achieving compliance.

4. Building Services and Fire Safety Implications

The raked floor and pew layout also severely constrain the installation of essential building services, including HVAC distribution, fire detection and suppression systems, power and data infrastructure, and compliant egress routes. Designing these systems around a sloping floor and fixed seating increases technical complexity and cost while delivering inferior performance and reduced safety outcomes.

Achieving compliance under these conditions would require disproportionate expenditure relative to the usable space gained, further eroding the economic viability of the proposal.

5. Long-Term Conservation Outcomes

Importantly, the viability implications of retaining the raked floor and pews extend beyond short-term development considerations. An underutilised or economically unviable building poses a direct risk to its long-term conservation. Limited revenue potential reduces the capacity of future owners or occupiers to fund regular maintenance, conservation works, and appropriate heritage management.

In contrast, the proposed approach—while involving the removal or alteration of the raked floor—seeks to balance heritage values with functional necessity. The significance of the former configuration can be appropriately addressed through archival recording, interpretation, and selective retention of significant fabric, while allowing the place to accommodate a viable use that secures its future.

Conclusion

In summary, retaining the exposed raked floor and pews in situ would render the proposal unviable by:

- *Limiting practical office use to less than half of the internal floor area*
- *Preventing delivery of a flexible, market-viable adaptive reuse*
- *Compromising accessibility, building compliance, and fire safety outcomes*
- *Undermining the economic sustainability required for long-term conservation*

The proposed adaptation of the floor is therefore considered essential to achieve a sustainable and conservation-led outcome that aligns with the objectives of Heritage Victoria and the Heritage Act 2017.

Provide clear documentation addressing the following:

Design and floor intervention

Provide detailed sections of the proposed floor framing, clearly illustrating impacts on dado lines and wall fabric.

The floor framing is pushed back from the nave walls and dado. As illustrated on drawing 11, the dados are retained and exposed to view.

Clarify the impact of the proposed ramp on the existing floor, including whether it can follow the existing rake and, if not, the reasons why.

The ramp cannot follow the existing rake of the floor because it needs to achieve a DDA compliant maximum 1:14 gradient.

Where possible, retain and incorporate existing curved pew rails and the original entrance point, reflecting the radial geometry of the proposed raised floor.

The amended scheme responds to the radial geometry.

Clarify the extent of changes to key internal elements, including the pulpit, altar platform and rails, and pews in the south-east corner and address the impact of removing the raised floor adjacent to the organ.

The plans clearly show these areas are to remain. The raised step adjacent to the organ is a critical to access the toilet block and is a minor modification that will not adversely impact significant fabric – notwithstanding this is not the original organ. As noted in the heritage impact statement, the organ was rebuilt in 1942.

Submit a comprehensive schedule of all original or early joinery proposed for removal, including photographs, current locations, reasons for removal, and the proposed outcome for each item (e.g. on-site storage, off-site storage, relocation, or demolition).

The only items nominated for removal are the central pews located within the area of the raised floor.

In particular, clarify the treatment of timber pews not proposed for retention, including whether those at the rear wall can remain in situ if the new floor level is set below them.

The existing rear bench seat with storage below is to be retained.

Provide justification and detailed design for the proposed single-storey rear addition (toilets and store), including the width of the store opening and the existing store dimensions and height

The single storey rear addition is necessary to accommodate basic amenities without which the building could not function. The footprint is dictated by requirements for provision of toilet/bathroom facilities. It is a modest, architecturally low-key element, that gives rise to no heritage concerns. Extending out to the boundary line does not close off key views to the church.

Provide details of the proposed new doorway within the existing arched niche in the east wall, including confirmation of floor levels.

The details of the proposed new doorway within the existing arched niche are straightforward in that the doorway is created by removing brick infill illustrated on drawing 9.

Documentation and detail, please provide the following:

Engineering Documentation

Refer attached construction methodology and documentation by E&G Altai Consulting Engineers.

Fully dimensioned plans, elevations, including internal elevations and sections.

The plans, elevations (external and internal) and sections provide critical dimensions necessary to understand the potential heritage impacts. The extent of the dimensions and level of detail is more generally commensurate with that normally expected at the permit application stage.

Detailed drawings of any changes to existing openings and doors.

No changes to existing openings and doors apart from compliant hardware.

Details of all new handrails, gates, fencing, and floor construction.

Refer drawing sheets 9 and 12.

Full details of mechanical services (heating and cooling), lighting, and other building services, including assessment of heritage impacts.

The proposal will generally rely on existing lighting/electrical services. Heating/cooling units are shown on drawing 10. New plumbing services required for the toilets are contained within the proposed addition where they will not have any heritage impact. Full details of mechanical services can be provided when construction ready drawings are submitted for endorsement, per longstanding standard practice for Heritage Victoria permit applications.

Finishes schedule, ensuring new works (including toilets) reflect the existing material palette.

The proposed toilet block addition is of rendered brick construction with a dark grey finish providing a visually recessive outcome. This is similar to the award winning scheme for the adaptive reuse of St George's Uniting Church, St Kilda (P32267), whereby toilets and changing rooms were provided in a separate, dark coloured building of simple contemporary design – albeit in that instance the new building was clearly visible from the primary frontage to Chapel Street.



Former St Georges Uniting Church, converted into a performing arts centre with a modern/dark metal clad toilets and change rooms visible to the right.

Information on any conservation works proposed as part of the current scope.

No conservation works are proposed. The church has been subject to a comprehensive program of conservation works carried out under the auspices of the VSBA.

Martin Turnor

Bryce Raworth Pty Ltd