


12 June 2025


Heritage Victoria
1 Spring Street
Melbourne VIC 3000

Response to Request for Further Information – P40942

Dear ,

This letter has been prepared in response to the Request for Further Information (RFI) issued by Heritage Victoria (HV), regarding heritage permit application P40942 for the Former Rechabite Hall (VHR H0575) located at 10 Little Chapel Street, Prahran (the heritage place).

1 Background

A pre-application meeting regarding a proposal at the heritage place was held with HV on 30 January 2024, and a subsequent permit application was submitted on 3 April 2025. The permit application was for the demolition, alteration, new work, and conservation work at the heritage place. An RFI letter from HV was issued on 13 May 2025, accompanied by a separate letter from Stonnington City Council outlining their heritage referral comments.

In receipt of the correspondence, Trethowan Architecture organised a post-application meeting with HV to clarify aspects of the RFI on 29 May 2025. HV's concerns are addressed through further justification for the proposal, accompanied by design refinements. They are outlined in Section 3 below. Stonnington City Council's comments are addressed in Section 4 below.

2 Reference Documents

This letter should be read in conjunction with the following documents:

- Architectural drawing set (rev no. HV02) prepared by Trethowan Architecture on 12 June 2025.
- *Reasonable or Economic Use Addendum* prepared by SC Lennon & Associates on 9 June 2025.

3 Response to HV's Comments

The following matters are explained in detail in response to HV's concerns:

1. ***The massing diagrams presented at the pre-application stage showed a stepped-back form along the northern (side) elevation. It is considered that the current design would benefit from further refinement to incorporate a similar approach.***
2. ***The changes to the 1980s portion of the building and the new upper-level addition require greater compatibility with the original 1880s structure, particularly along the northern elevation. With some modifications to the***

addition's architectural detailing, a contemporary design that appropriately references the heritage building could be achieved.

While it is recognised that the stepped-back form presented at the pre-application meeting is a more preferable heritage outcome (Figure 1), it is well established in SC Lennon's *Reasonable and Economic Use Report* submitted as part of the application, as well as their *Addendum* provided for this response that, for the project to be financially viable, it is essential for the proposed upper-level addition to the building to be permitted ***in its entirety***. As indicated in SC Lennon's feasibility study, the proposal, *in its current form*, only has a [REDACTED] Internal Rate of Return (IRR). Typically, any project with an under [REDACTED] IRR would be considered 'not worth doing'. Considering the proposal only generates a marginally acceptable return, stepping back the new upper-level addition, which results in a 17 square-metre reduction of leasable floor space, and subsequently a [REDACTED] rental income loss and a [REDACTED] IRR, would render the proposed redevelopment financially unfeasible even for a patient investor. Should this essential matter be refused or reduced, the entire project would be considered 'not worth doing' as there will not be sufficient funds to conserve and maintain the place in the long run. This would ultimately severely threaten its cultural heritage significance.

The building's northern elevation is a secondary element when compared with the more prominent western (front) elevation. When viewed from oblique angles from Carlton Street looking east, the 1980s section is only minimally visible (Figure 2). Not providing a stepped-back form in this area, therefore, has negligible visual impacts; the understanding of the heritage place's heritage significance is not detracted by the proposed work at this area.

It is acknowledged that the reskinned 1980s section is more visually prominent when viewed from Little Chapel Street looking south. While visible, views from the Little Chapel Street carpark are of secondary importance compared with those from Carlton Street and it is therefore acceptable from a heritage perspective for the proposed form to remain unchanged. That being said, various options were considered before the submission of the permit application, and design strategies were implemented to minimise visual impacts. In the current proposal's north elevation, the proportions of the reskinned 1980s section are inspired by those of original building's tower. The reskinned 1980s section and original building are adjoined by a recessed 'zone', which has a raked roof so that the original building's chimney can be read as a clearly distinctive element (Figure 3). Further, the height of the new upper level is designed to match and not exceed that of the tower, ensuring that the tower retains visual prominence.

We understand that it is HV's request for the reskinned 1980s section to have a greater compatibility with the original building through architectural detailing. This will be discussed under the response to bullet points 3 and 4 of the RFI letter below.



3. ***The detailing of the changes proposed to the 1980s building and new upper-level addition presents an opportunity to establish a more integrated relationship between the original and new elements. This could involve better interpretation of:***
 - *The levels and dimensions of the 1880s building's windows*
 - *The location of the existing string course, especially at ground level*
 - *The original parapets and detailing*
4. ***Further changes to the 1980s façade should be considered to better distinguish it from the original structure. As suggested during the pre-application stage, this could include the removal of rustication and other decorative features, rather than relying solely on repainting in a half-strength tone and the new additions.***

HV indicated in the post-application meeting that the details of the 1980s section, especially to its western (front) elevation, could be modified so that it reads as readily distinguishable from the original building. On the other hand, it is our opinion that the *Australia ICOMOS Burra Charter, 2013* (Burra Charter)'s cautious approach of *changing as much as necessary but as little as possible* should be adopted to preserve the place's overall heritage significance. This does not only apply to the original Victorian building, which is of *primary significance*, but the 1980s western (front) elevation which is of *contributory significance* as it contributes to the evolution of the building and represents an earlier heritage conservation approach. In balancing HV's concerns and the adoption of the cautious approach, design refinement has been made to some areas, for which justification is provided for areas that remain as original proposed.

Upon further review, it is agreed that repainting the 1980s section is insufficient to delineate the original and 1980s sections (Figure 4). As suggested by HV, it is now proposed to infill the grooves of the rustications at the western (front) elevation (ground level and pilasters at the corner) and apply a thin coat of render and paint to achieve a uniform wall texture (Figure 5). Additionally, the stringcourses and parapet cappings are proposed to be simplified to have a minimal, modern appearance. These interventions would result in a more distinctive visual difference between the two sections. The proposed paint colours remain the same as originally proposed. We are of the view that the above changes sufficiently address HV's concern; and because of our adoption of the cautious approach, we propose no other changes to other matters raised in dot points 3 and 4 of the RFI letter, as stated below.

There is little to no opportunity to adjust the levels and dimensions of the 1980s section's windows due to constraints regarding floor plate locations. Specifically at the western (front) elevation, the first-floor window height cannot be modified to match that of the neighbouring original windows, as it would interfere with the floor plate. Further, it is unfeasible to remove the window on the second floor as it provides the much-needed light source for the proposed Commercial Tenancy R.2-04, which otherwise only has a south-facing window.

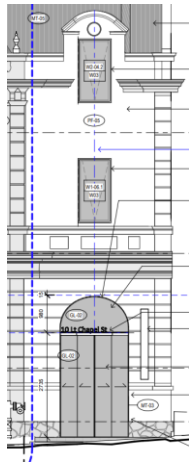


Figure 4: Extract of drawing A3-200 from HV01 set for application, proposed western (front) elevation. Source: Trethowan Architecture, 2025.

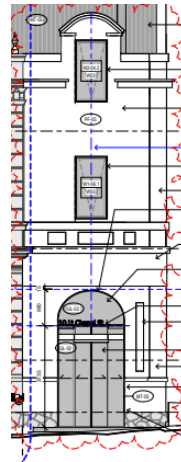


Figure 5: Extract of drawing A3-200 from HV02 set for RFI response, proposed western (front elevation). Source: Trethowan Architecture, 2025.

5. The plant equipment on the new upper floor appears to be visually intrusive in views looking south along Little Chapel Street, and may detract from the heritage presentation of the building.

The introduction of new plant equipment is important as the current HVAC provisions are insufficient, leading to a negative workplace experience in the building. The proposed upgrade would improve any future inhabitants' thermal comfort and lead to a more positive workplace experience. In designing the system, other locations for the equipment were considered however dismissed because there are no other external locations to locate the equipment as the building is built to all boundaries, and no internal locations available due to the limited space and its effect on the leasable floor area. As such, the currently proposed location is the most suitable as it does not add to the overall height of the building or impact on the building's silhouette, is set back from the street front, and does not affect the leasable floor area.

At the application stage, the equipment was proposed to be wall-mounted (Figure 6). Following HV's concerns with the proposed location of the plant in the submission, several alternatives were explored and developed. The design has since been revised to achieve a less visually impactful outcome (Figure 7). The current proposal reconfigures the installation methodology and location of the HVAC units to sit in two rows side-by-side on an elevated roof platform, with a two-metre clearance as advised by the services consultant. The equipment will largely be concealed behind the original building's ridge line when viewed from the northwestern boundary of the Little Chapel Street carpark (Figure 8). They will also be invisible from Carlton Street.



Figure 6: Extract of drawing A3-803 from HV01 set for application, proposed view from Little Chapel Street, looking south. Source: Trethowan Architecture, 2025.



Figure 7: Extract of drawing A3-803 from updated HV02 set. Proposed view from Little Chapel Street, looking south. The service equipment is largely concealed by the original building's roof ridge line and only has negligible visibility from oblique views. Source: Trethowan Architecture, 2025.



Figure 8: Extract of new drawing A3-804 from updated HV02 set. This render shows the long-range view towards the heritage site from the northwestern corner of the Little Chapel Street car park. Source: Trethowan Architecture, 2025.

4 Response to Stonnington City Council's Heritage Referral Comments

The town planner for this project and the Senior Statutory Planner (Acting) from the Stonnington City Council had a phone conversation on 19 May 2025 to discuss Council's heritage referral comments. Following the meeting, Council confirmed via email that the heritage assessment for the project is confined to HV. However, as part of this RFI response, we provide the following explanation regarding Council's comments, as follows:

C1. The building as we see it today is the product of the original nineteenth century structure along with substantial additions completed in the 1980s.

C2. These additions are sympathetic and visually neutral such that the original building's distinctive late Victorian detailing remains dominant.

C3. The building is now located on an isolated site with the carpark for Chapel on Chapel located to the north and tennis courts and park to the south.

Noted.

C4. The proposal is for a large addition which will become visually dominant when viewed from both the north and south. The iconic view along Carlton Street will be largely unaffected.

It is acknowledged that there are visual implications arising from the additional level on top of the 1980s section when viewed from the north and south (Figure 9). We contend that the proposed scheme is conservative in nature, and the single-level addition is modest and not a 'large addition'. In considering how to reduce the visual dominance of this element, without having to reduce its footprint, the use of glazing, mesh screens, and metal cladding, which have lightweight and visually permeable qualities, and contrast with the heavy and solid character of the original building, is deemed a good outcome. Furthermore, as already mentioned, the western (front) elevation remains unaffected by the addition, and the original building retains visual dominance and significance.



Figure 9: Extract of drawing A3-803 from the updated HV02 set, showing the southern elevation of the building. The proposed additional level is modest in comparison to the existing fabric. Source: Trethowan Architecture, 2025.

C5. The addition is too large, and the addition of a further level is inappropriate.


Further to dot point C4 above, it is our position that the scale of the addition is appropriate from a heritage perspective, and design strategies have been implemented to emphasise its lightness. It is reiterated that the additional level plays a crucial role in ensuring the economic viability of the development, and any floor area reduction in the scheme would render it financially unsustainable. Without the much-needed funding for redevelopment, the long-term maintenance and conservation of the wider place would be detrimentally affected.

C6. The use of the roof over the southern section of the 1980s extension as a roof terrace is also inappropriate and runs the risk of interfering with the views along Carlton Street.

The heritage place is a freestanding building located in a relatively open setting where the only nearby built structure is to its east (rear). Assuming Council's comment refers to potential visual implications of the roof terrace fronting the west (instead of south), it is asserted that the element is minimal in comparison with the rest of the building. While it presents a visual change, the element does not detrimentally affect views along Carlton Street.

5 Conclusion

In addressing HV's RFI and Council's heritage referral comments, further design refinements have been made to the proposed design, and further explanation / justification provided to inform the reasoning behind items that remain unchanged from the initial application.

It is particularly important that this RFI response highlights the cruciality of the additional level's massing at the northern elevation, where it is not stepped back as presented in the pre-application meeting. This is to do with the overall financial feasibility of the development, which is currently only at a threshold of acceptability of a  IRR. According to SC Lennon's Addendum, if this element is to be rejected or reduced, the economics of the project can no longer be justified as it is already marginal as originally submitted. The lack of new funds generated from the revitalisation of the place would undoubtedly negatively affect the long-term conservation and functionality of the place, ultimately threatening its cultural heritage significance.

In considering the long-term management of the registered place, the updated proposal strikes a delicate balance between conservation and new development. It takes the Burra Charter's recommended cautious approach in ensuring fabric and spaces of significance are sensibly handled and not left in a vulnerable state. It also ensures that future inhabitants have a more pleasant experience with the building, which eventually contributes to a better appreciation and guardianship for the place. As such, we maintain that the full, updated proposal warrants a heritage permit.

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

Yours sincerely,



Janice Yeung
Trethowan Architecture