Bryce
Raworth
CONSERVATION | HERITAGE

22 October 2026

Ann Gove
Heritage Victoria
GPO Box 2392
Melbourne VIC 3001

Re: Petersville Factory Administration Building, 254-294 Wellington Road, Mulgrave (H2394)
P41443 - Response to RFI

This letter has been prepared on behalf of the permit applicant in relation to the Request for Information (RFI) dated 22 September 2026. A response is also provided to the submission from the City of Monash, per the RFI dated 11 September 2026.

It is intended that this letter be read in conjunction with the following documents:

- Amended architectural drawings, Revision C (Idle Architecture Studio)
- Feature and level survey (Lyssna Group Pty Ltd)
- NCC Upgrades and Heritage Response
- Punthill Apartment Hotels Developers Brief, Issue D March 2024.
- Letter from Robyn McCann, Commercial Property Manager LiveStay (23 October 2023)
- Schedule of Conservation Works (Bryce Raworth Pty Ltd, October 2024)
- 276-294 Wellington Road Mulgrave Regulatory Report (SWA Consulting, 11 December 2025)

Matters raised in the RFI are addressed follows.

<u>General</u>

- *Demonstration of how the proposal responds to current building regulations and accessibility requirements, supported by relevant compliance documentation (e.g. building surveyor, fire safety and accessibility assessments).*

Building code compliance and access requirements are address in the attached report prepared by SWA Building Surveyors.

- *Evidence that alternative layouts, configurations and design options have been investigated, and that the preferred scheme represents the least heritage-impactful solution while achieving the required functional, operational and regulatory outcomes.*

Alternative layouts and design options have been explored, as shown in the attached file. Revisions include:

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- Reorientation of the passageway.
- Optimisation of room layouts to align with the existing window arrangement

Refer to TP 08.01 – Alternative Layout Appendix A.

Roofs and Windows

- *The proposal indicates that most of existing window frames will be replaced to achieve ESD and acoustic performance requirements, with new aluminium frames designed to match the original configuration and colour. Please advise whether alternate solutions to full replacement has been explored including:*
  - *Whether replacement of the existing glazing with acoustic laminated safety or low-emissivity (low-e) glazing glass (approximately 6-7 mm thick) within the existing timber window frames, together with comprehensive draught-proofing, could achieve the required levels, particularly in terms of thermal and acoustic performance, and visual impact.*
  - *Whether the incorporation or retention of operable timber sashes within the existing window assemblies has been investigated as the preferred conservation outcome, and if not, provide justification for why this approach is not feasible.*
  - *Why replacement of the existing timber windows with aluminium-framed windows is necessary, and why less intrusive conservation options have been discounted*

The Punthill design brief (as attached) requires new double-glazed aluminium framed windows to achieve a satisfactory thermal and acoustic performance, low maintenance standards and conformity across all Punthill hotel locations. As discussed in the attached NCC upgrades document, windows and doors will need to be replaced to meet the thermal, safety and waterproofing requirements of the NNC. This cannot be achieved by retention of the existing timber window frames and retrofitting new glazing. Additionally, it would not be possible to obtain a builder's warranty for the existing windows, noting also that many of the frames have rotted out.

New window details will be selected to match existing profiles as closely as practicable. Replication of the window proportions, colour and opening rhythm will reduce visual impacts and preserve the overall façade composition. Refer drawings TP 04.01–04.03 and TP 06.11.

Administration Wing

- *How privacy screens will integrate with existing window openings, glazing, and façade elements.*

The architects has updated the documentation to show how privacy screens integrate with the existing window openings, glazing and façade elements, showing also their location between rooms, below the first-floor slab overhang and behind the existing columns. Refer to TP 06.06 – Facade Details Sheet 1.

- *A revised design with increased retention of the existing first floor masonry fabric. A clear justification is required to support alterations to the southern elevation façade glazing, window arrangements, and brickwork.*

The first floor brick wall at the western end of the rear elevation cannot be retained in full because the existing configuration with a high set window is not suitable for the hotel rooms. The sill height needs to be lowered to provide amenity and daylight that is expected of a hotel room. This can be achieved with the removal of a relatively small extent of the masonry fabric.

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- *Investigate an alternative lift location that would allow retention of the existing foyer opening. If this is not possible, the application must provide a rationale for this.*

The architects have prepared alternative ground and first-floor layout sketches, investigating a relocated lift that retains the existing foyer opening. The sketches show the proposed lift position on both levels, associated circulation changes and reconfiguration of the ground-floor reception, seating and luggage storage areas. Refer to TP 08.02 – Alternative lift changes Appendix B. The hotel operator considers this design to be a problematic solution as the lift is not easily visible from the reception. The ground floor layout moves the bag store a significant distance from the reception. The first-floor design compromises the conference room layout. The benefits in improved functionality offset the minor impacts resulting from the change to the foyer opening. Further to this, maintaining the original opening is not critical to the architectural significance of the foyer. The retention of the original door opening is not integral to an appreciation of the original foyer design. Its placement does not appear to be dictated by an overall consideration of the spatial composition of the foyer, as evidence by the fact that it is not located on axis with the opening on the door on the opposite side of the foyer.

- *Why retention of the original first-floor office areas has not been incorporated into the proposed design, including consideration of alternative layouts that retain these significant spaces. This was included in feedback following the pre-application meeting*

Options for the retention and reuse of the first floor office areas have been explored but this cannot be achieved whilst also meeting the accommodation requirements of the hotel operator. The layout and small size of the offices does not offer any potential to be adapted to other uses to support the hotel operation. The first floor office area is not readily demonstrative of the state heritage places of the places and retention would fatally compromise a scheme for adaptive reuse with an overall positive outcome in respect to providing a compatible long term use with new design that is sympathetic to the valued post war modernist architectural character of the place.

<u>Office Wing</u>

- *Further exploration of retaining the existing corridor arrangements, including corridor width, highlight windows, and original circulation configuration, or a rationale as to why it can't be retained. It is preferable that the corridors are retained where possible.*

The original design intent of a central corridor through the office wing has been retained. However, retention of the existing corridor walls and highlight windows is not considered suitable due to the acoustic requirements associated with the proposed hotel use. The existing openings within the corridor walls are also not compatible with the proposed room layouts. Once the new openings required to provide access to the hotel rooms are introduced, only limited sections of the existing walls would remain. The proposed approach retains the original corridor alignment and circulation intent while adapting the walls to meet the functional and acoustic requirements of the new use.

Consideration was given to including highlight windows in the corridor, but it was determined that they would not provide a meaningful contribution to the heritage values of the space, and would also compromise the fire rating requirements and acoustic performance between hotels rooms and the corridor. If highlight windows were provided, they could not have clear or even semi-transparent glazing but would need to be blacked out to avoid light intrusion into hotel rooms, in addition to needing intrusive sprinkler protection.

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It should also be recognised that the corridor forms part of a less significant rear wing - noting that the Executive Director's recommendation to the Heritage Council in respect to the registration of the place specifically identified the office and amenities wings as being of contributory significance, with the front double storey wing being of primary significance.

The corridor does not provide important evidence of the original use of the place as the offices of the Peters ice cream factory, other than having a utilitarian purpose of providing access to office spaces and linking the front administration wing with the rear amenities wing. This aspect of the original planning will be recovered through reinstatement of a new corridor on the same alignment. In addition to retaining the original corridor alignment, the original character of this space will be refenced in a stripped floor cover. This could be supplemented by other interpretative devices.

Staff Amenities Wing

- *Further exploration of retaining the rear timber windows and door openings to the northern elevation of the staff canteen area within the eastern portion of the amenities wing or a rationale as to why they can't be retained.*

The architects have prepared elevations and façade details showing how the proposed glazing and sliding doors respond to the original door openings and maintain the rhythm and proportions of the heritage façade. Perforated privacy vinyl film has been introduced to selected glazing to provide privacy while allowing outward views. White aluminium frames match the size, general configuration and colour of the existing windows. Refer to TP 04-02 – Heritage Building Elevations Sheet 2 and TP 06.06 – Facade Details Sheet 1.

Revised Documentation

The following additional information and revised documentation is required to allow full assessment of the application:

- *Revised demolition plans that clearly identify all proposed demolition works. The current plans do not adequately illustrate the full extent of demolition, including the proposed roof replacement works referenced in the cost estimate.*

Architectural drawings has clarified the extent of roof retention and replacement. Roofs identified for retention will undergo repairs and maintenance as required. Deteriorated roof sheeting identified for replacement will be replaced on a like-for-like basis to match the existing profile and appearance. Refer to TP 01.02 – Existing / Demo Level 01 Floor Plan, TP 04.01 – Heritage Building Elevations Sheet 1 and TP 04.02 – Heritage Building Elevations Sheet 2.Additional notes to be added to the drawings confirming the following: TP 04.02 – Heritage Building Elevations Sheet 2.

Additional notations have been added to the drawings confirming the following:

- Administration Wing – Curved Roof: Existing roof to be retained and not replaced. Necessary repairs and maintenance to the existing roof are to be undertaken as required.
- Staff Amenities Wing & Office Wing – Flat Roofs: Existing roof sheeting to be replaced on a like-for-like basis due to deterioration of the existing roofing. New roof sheeting is to match the existing profile and appearance.

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- *Details of the proposed driveway treatment, including materials, finishes, and construction methodology.*

Architectural drawings have shown the proposed driveway materials, surface finish and construction methodology, comprising hot-mix asphalt over a compacted crushed-rock base and prepared, compacted subgrade, with an appropriate bituminous prime/tack coat and grading to stormwater drainage points. Pavement thicknesses, compaction requirements and edge restraints are to the civil engineer's details. Refer to TP 01.11 – Proposed Ground Floor Site Plan.

- *Details of all proposed fencing, including location, height, materials, finishes, and design.*

Architectural drawings shown the proposed fencing location, height, materials, finish and design, supported by a reference image. Refer to TP 01.11 – Proposed Ground Floor Site Plan.

- *Location, design, and installation details of air-conditioning units servicing the apartments, together with an assessment of their impact on significant heritage fabric.*

A/C units are clearly located on the roof plan and shown on the elevations of the new wing. The location on the roof of the new building envelope with perimeter screening avoids the adverse visual and physical impacts of installing new plant on the heritage buildings.

- *Building sections for each wing, illustrating the relationship between existing and proposed works.*

The updated architectural drawing set shows new sections through the south, middle and north wings illustrating the relationship between the existing building fabric and proposed works. Red hatching identifies demolition, while green hatching identifies new works, with annotations identifying existing elements to be retained and restored. Refer to TP 05.02 – Heritage Building Sections Sheet 2 and TP 05.03 – Heritage Building Sections Sheet 3.

- *Revised elevations accurately depicting the existing façade. It is noted that the entrance glazing and the glazing to the first floor have not been correctly represented in the submitted drawings. The revised drawings should accurately reflect the existing wave-form glazing pattern, mullion arrangement, and associated detailing.*

The plans are depicted as accurately as possible and have been derived from the attached survey. There are discrepancies of 20-30mm in some cases, but it is understood that is is related to the building tolerances of construction at the time. Refer to attached Feature & Level Survey for 276–294 Wellington Road, Mulgrave prepared by Lyssna Group Pty Ltd.

- *Details of proposed privacy screens, including height, materials, design, fixing method, and relationship to existing windows and glazing.*

The updated architectural drawings show privacy screen details with proposed height, dimensions, materials, perforation pattern, supporting structure and fixing method. Refer to TP 06.05 – Privacy Screen and Pergola Details and TP 06.06 – Facade Details Sheet 1

- *Details of all proposed external structures, including pergolas, decks, and the like.*

Refer to TP 01.11 – Proposed Ground Floor Site Plan, TP 01.12 – Proposed Ground Floor Plan and TP 06.05 – Privacy Screen and Pergola Details.

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- *Further clarification regarding the proposed NCC compliance upgrades, including the specific upgrades required, the justification for each upgrade, and the extent of their impact on significant heritage fabric.*
- *Demonstrate that the proposed compliance measures have been carefully considered and designed to avoid or minimise impacts on the cultural heritage significance of the place.*

A schedule of proposed NCC compliance upgrades is provided, identifying each upgrade, its justification and relevant drawing references and commentary on heritage impacts. Refer to file NCC Heritage Upgrades RFI Response.

- *A schedule of conservation works based on the current condition of the building and the proposed scope of works, identifying repair, conservation, and replacement works to significant heritage fabric.*

A schedule of conservation works is attached to this letter.

Please also provide further justification demonstrating that the proposed works are necessary to facilitate the adaptive reuse of the place as a hotel while minimising impacts on its heritage significance. Your application has included limited information addressing s101(2)(b) of the Act. This is a mandatory requirement and requires the Executive Director to consider the extent to which the application, if refused, would affect the reasonable or economic use of the registered place. If you do not wish to provide further information regarding reasonable or economic use, you must advise of this prior to the date below otherwise your permit application will lapse. Further guidance can be found in the Heritage Victoria Policy Reasonable or economic use. Relevant matters for the consideration of section 101(2)(b) of the Heritage Act 2017 This should include:

- *Justification for the proposed apartment yield and layout, including evidence that the number of apartments is necessary to support the ongoing viability of the place. Heritage Victoria would support consideration of additional accommodation with the new central wing extending further west, if this approach reduces pressure for intervention within the significant heritage buildings and assists in minimising impacts on original fabric.*

The owner of the registered place has entered into an Agreement for Lease (AFL) with Punthill Apartments which defines the terms and conditions for a future lease Agreement that becomes binding upon completion of the works and occupancy by the hotel lessee. The AFL defines the room numbers, type and layout in accordance with Punthill design guidelines. In summary, the permit applicant is required to provide:

(a) 52 Apartments being:
- 7 studio apartments
- 2 one bedromm, 1 bathroom apartments
- 38 two bedroom, 2 bathroom twin key apartments,

Comprising 92 keys, which are:
- 46 studio keys
- 41 one bedroom keys; and
- 5 two bedroom keys

a) Not less than 52 car spaces

b) The additional areas

The additional areas are defined as:

- The reception and lobby areas
- Conference facilities
- Gymnasium facilities
- Guest pantry / grab and go
- Staff room and staff office
- Guest laundry

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- Chemical / wet store
- PABX communications room
- Bulk storage and receiving area
- Waste room
- Luggage store
- Main linen store ‘ linen chute
- Linen storage areas, and
- Other storage areas on each floor

There are various other requirements in the lease, and the preliminary design drawings that form part of the lease are reflected in the application drawings. Punthill also require compliance with their standard design document ‘Punthill Apartment Hotels Developers Brief’ Issue D March 2024. The hotel operator’s requirements for minimum room numbers necessary to ensure an economically viable development of the registered place are affirmed in the letter from their Commercial Property & Asset Manager, provided with this RFI response. π

The AFL allows for minor variation from specific lease and design obligations, however, Punthill operate in a competitive commercial environment, and the completed building works are required to be in line with their business model requirements. To that end, the AFL represent the minimum requirements for a viable economic use of the place. Refusal of a permit or conditions that would reduce the available floor area (eg by seeking retention of the first floor office partitions) would adversely impact the economic use of the registered place.

The proposal will facilitate an economically sustainable use of the place in the medium to long term, mitigating the possibility of continual proposed changes to the significant fabric for other new uses. Heritage Victoria’s guidance document on reasonable or economic use anticipates that an economically sustainable use may be one which requires more substantial change, and which in turn provides an intensity of use to generate income to fund ongoing and future conservation and maintenance works. The proposal aims to achieve this objective by allowing for the adaptive reuse of the place by an experienced hotel operator, with a scheme that adheres to proven business models. The proposal does require substantial change in terms of replacement of existing window frames and extensive internal refurbishment but this is not a change that diminishes the valued post war modernist architectural character.

To meet the obligations of the AFL, there is a requirement to provide specific room numbers/mix, and sizes, and to comply with the Developers Brief. If these requirements cannot be achieved, the AFL is not binding on the parties and the project will collapse. The permit applicant does not have an alternative development strategy and I note that previous developers have failed to achieve a commercially viable use for the heritage buildings. No interest has been received from any other parties with respect to leasing the registered building for use commercial office space or indeed any other use.

In terms of efforts to minimize interventions to significant fabric, various options to meet the hotel operator’s accommodation requirements within a new building envelope have been explored. The only viable option is the provision of additional rooms to the west courtyard. That said, the realignment of the west boundary only leaves enough width for emergency egress from the hotel rooms – ie extending the footprint of the new hotel wing is not achievable and would also erode open space that (a) provides evidence of the original courtyard and (b) makes an important contribution to the amenity of hotel rooms.

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Redesigning the new wing as a double storey envelope would have a detrimental impact by visually overwhelming the single-storey rear wings of the heritage building and competing for attention with the front double-storey wing. Alternatively, construction of new building to the east courtyard would erase evidence of the original site layout and its provision of open space.

City of Monash Submission

Council submit that the changes to the landscaped front setback to accommodate additional carparking are inappropriate and will impact the cultural heritage significance of the registered place. In raising this concern, Council have drawn attention to part of the statement of significance that describes '*the setting of the building with its generous setback from Wellington Road, curved driveway and surrounding landscape*' as well as the '*prominent siting alongside a major road in a landscape setting*'. This aspect of the place will not change as a result of the proposal.

The Administration Building will retain its prominence to Wellington Road with the generous setback retaining a substantial proportion of soft landscaping. Existing mature trees are also retained and complimented by new plantings.

As discussed in the Heritage Impact Statement, the western end of the driveway has already been closed off and the original horseshoe driveway configuration cannot be reinstated because of traffic safety management. It is also the case that the proposed realignment of the driveway is consistent with the driveway layout of the approved scheme. No new information has come to light to suggest that this aspect of the previous permit decision should be revisited. Further discussion on the changes to the front setback is provided on pages 28 and 29 of the Heritage Impact Statement.

Council also raised concerns in respect to the prominence of the water meter and fire booster cabinet. The cabinet has been relocated as a substantial setback from the Wellington Road frontage, east of the heritage façade. The water meter is a small scale and will have no adverse visual impact. Screening to the water meter is shown on the updated drawings.

To conclude, I trust that this letter and the supporting documents have satisfactorily addressed issues raised in the RFI and have been useful in confirming that the scheme will not result in an unacceptable heritage outcome.

Regards

Martin Turnor
Associate Director
Bryce Raworth Pty Ltd

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