

8 September 2026

Heritage Victoria
GPO Box 2392
Melbourne VIC 3001

Re: 48 Howe Crescent, South Melbourne – Hazelwood Terrace
Permit Application P42434 - Proposed partial demolition, alterations and additions

This letter has been prepared on behalf of the permit applicant, the owners of 48 Howe Crescent, South Melbourne. It is in relation to a Request for Further Information from Heritage Victoria in a letter dated 22 July 2026.

The RFI sought additional information in relation to the proposed demolition of the original rear wing, internal alterations to the main envelope (including stair removal and room configurations) and for further information to enable assessment against economic and reasonable use. Heritage Victoria have also suggested amendments to the window articulation proposed for the primary envelope and requested further information pertaining to how plumbing, drainage, ventilation and other services will be introduced to two new ensuites. The additional information required is discussed below.

Proposed Rear Wing Demolition

As outlined in the Heritage Impact Statement by our office, submitted in relation to the application, while the wing proposed for demolition comprises a part of the original footprint, it has been subject to alterations. The rear wing is of conventional construction, lacking the fine detail of the front of the building. It would originally have had a typical utilitarian service wing character but now has altered windows and a double sliding door inserted at ground level providing access to the side courtyard (refer figures 3-5 below). The rear roof plane was also altered when the c.2000s addition was constructed. Further to this, it is noted that historic aerials suggest two chimneys were removed between the 1940s and 1970s (refer figures 1 and 2 below). The rear wing now presents as a hybrid design.

The rear wing is also very modest in scale, with the roof ridge at the same height as the eaves to the primary envelope, it cannot be readily seen from the public realm – minor glimpses are available via Howe Crescent given the setback of 49 Howe Crescent to the south and particularly when deciduous trees along the shared boundary between 48 and 49 have no leaves.

The Statement of Significance for Hazelwood Terrace is solely concerned with the heritage values of the facade: *'The traditionally planned Victorian Italianate style terrace is enhanced with classically detailed entry portico, continuous balustraded first floor balcony and contrasting parapet and enframed pedimented windows ... The continuous terrace row façade, plainly reminiscent of earlier British planning traditions, forms part of an identifiable Howe Crescent streetscape. Hazelwood Terrace façade is intact and of high integrity'*.

The primary envelope of this Victorian terrace is being retained and its contribution within the group of terraces, as well as the broader Howe Street streetscape will remain undiminished. While acknowledging the whole of the place is registered, the demolition of the rear wing will not have an unacceptable adverse impact upon the identified significance of the place.

Of relevance to the matter of complete demolition of the rear wing are examples that can be found at St Vincents Place, a registered precinct to the west of the subject site. It is noted the Statement of Significance for 47 Howe Crescent (the central dwelling within the terrace group) was updated in 2004 and it also comments that Hazelwood Terrace is a part of the St Vincent Place Precinct. St Vincents Place was laid out in 1857, with development starting soon after. A variety of building stock has been constructed over the past 160 years along St Vincents Place, though development largely encompasses Victorian building stock i.e., of a similar age to Hazelwood Terrace. Aerial photographs indicate many dwellings along St Vincents Place North and South appear to have had their original rear wings demolished in full (for example, 2-14, 11, 19, 29, 77, 26, 28, 32, 62, 74 and 76) with the integrity of the precinct not adversely impacted.

Interior Works

With respect for the alterations to the interior, it is firstly noted that Hazelwood Terrace is not on the register because of its interior. The interior fabric, to both the primary envelope and rear wing has been altered, and similar to the whole of the rear wing, the interiors are unremarkable in character. The Statement of Significance clearly outlines the facade to the primary envelope is the important fabric on the site which contributes to the character of Hazelwood Terrace as a whole.

The Statement of Significance also highlights the interiors have been sympathetically altered, which they have, and thus there is capacity for the interiors to undergo further sympathetic alterations, including as discussed below, the staircase to be removed and for a new staircase to be detailed appropriately.

Staircase demolition

The requirement for a new staircase revolves around managing the standard of previous alterations, awkward floor levels, the desire for the applicants to live in the home on a long-term basis and providing an accessible living arrangement. These factors feed into a reasonable use argument.

Item 17 of Heritage Victoria's Guidance for Reasonable or economic use states '*Refusal to issue a permit for upgrading facilities to bring them to contemporary or safe standards may affect the reasonable use of a place. For example, updating kitchens, bathrooms, access provisions or other necessary infrastructure or services required to meet current regulations or legislation*'.

The applicants would like to live in the house on a long-term basis and the scheme, as proposed will enable ease of access to the upper level and create a contemporary flow between the retained front envelope and the proposed new rear wing. The current stairs in the main envelope are steep and narrow and the changing levels to the upper floor does not provide easy access to occupants to a modern living standard. The change in floor levels is illustrated at figure 6 below.

If a permit was to be refused, then the ongoing and reasonable use of the dwelling for the applicants will be impacted. While the house could continue to function as a residence, modifying the stairs and floor layout to meet modern living demands and standards is an appropriate outcome to provide reasonable ongoing use. As mentioned above, the interiors are unremarkable in character, and the main envelope has the capacity to be altered to facilitate modern living standards without compromising the integrity of the external envelopes.

Also relevant to this point is Article 6.2 and 6.3 of the Burra Charter, which states, '*Policy for managing a place must be based on an understanding of its cultural significance*' (6.2) and '*Policy development should also include consideration of other factors affecting the future of a place such as the owner's needs, resources, external constraints and its physical condition*' (6.3). While the proposed changes are not policy development, the articles do assist with guiding change, or assessing how change is treated. The physical condition of the dwelling, along with the owner's needs have been factors to influence the current scheme, which is appropriate.

It is also understood that 46 Howe Crescent, within the same group of terraces has had its main stair altered when the rear addition was constructed. Altering the stair has improved access to the upper level and enhanced internal amenity through modernisation. It could be argued the works to that dwelling, with the complete demolition of the rear wing and internal alterations has not had an adverse impact upon the character and presentation of the primary terrace envelope.

Floor plan layout

The RFI highlighted concerns regarding the proposed alterations to the original floor plan layout and the introduction of two new ensuites within the primary envelope. As outlined above, the internal fabric of the dwelling, and the room scale, is not the basis for the place's registration. While plumbing, drainage, ventilation etc will be required to new wet areas, the interior fabric to be altered is not original. Having said this, the fireplace to each room at both ground and first floor is being retained, and features such as cornices, skirting boards and ceiling roses can reasonably be replicated in the new spaces, creating sympathetic change.

Further to this, the architects have provided a schematic plan for each floor, understood to have been submitted as part of this RFI response. The aim is to internalise the new bathroom services, where possible, running services through joinery from first floor and through new partition walls at ground floor to ensure they are not visible from the public realm. These connections would then connect to existing drainage and sewerage pipes. A ground floor extractor fan will vent via a discreet grille to the south. At first floor a ceiling extractor fan will vent to the roof via a small roof exhaust fan, which will not be visible from the public realm.

Going back to the Statement of Significance for 47 Howe Crescent, it reiterates the external fabric of the front envelope is the element of primary significance of the property. With the Statement of Significance for No. 47 identifying Hazelwood Terrace as a part of the St Vincent Place Precinct, it is also noted there are no permit requirements for internal works to dwellings in the St Vincents Precinct, given it is the external character of the primary envelopes that address the street that are architecturally, historically and aesthetically important.

A similar approach should be taken for the subject site, whereby the interiors are of limited significance, while the external envelope fronting Howe Crescent should be considered the element of primary significance. This is not to suggest that only the facade is worth keeping. It is important that the interiors of the primary envelope are retained to a level of integrity that allows for the place's original Victorian era residential character to be appreciated and the proposal achieves that core objective.

New Window Design

An updated elevation drawing and proposed render have been provided as part of the RFI response. It is understood awning windows will be inset within a contemporary metal shroud. The finish matches the proposed finish of the new upper level addition and identifies them as the contemporary element while also being complementary in scale, materiality and colour to the existing painted finish.

Conservation Works

Conservation works proposed include repairing existing window frames, or replacement like for like (if required). As referenced in the RFI, Heritage Victoria have acknowledged that the dwelling is in a good condition and at this stage wholesale conservation works are not recommended. Any works could reasonably be expected to be managed as part of future maintenance.

In conclusion, we hope the above information and additional drawing detail clarifies issues raised in the RFI, and also affirms that the proposed works will not harm the significance of the place.

Please let contact our office if you have any further queries.

Bryce Raworth Pty Ltd



Figure 1 Extract of oblique aerial image from 1940s, with a red arrow highlighting the subject site. It appears at least two chimneys were associated with the rear wing.



Figure 2 Extract of aerial image from 1972, with a red arrow highlighting the subject site. The rear chimneys appear to have been demolished by this time, and there is no associated fireplace internally.



Figure 3 Altered window at ground level to the rear of the primary envelope. Modern connections (water, sewerage, electrical etc) are also evident attached to the rear wing.



Figure 4 Altered window at ground level within the rear wing.



Figure 5 Modern double sliding door providing access from the original rear wing to the side courtyard.



Figure 6 View from within the primary envelope looking toward the top of the main stairs, with additional steps between the primary envelope and the rear wing. Further stairs within the c.2000 additions can be seen in the distance.