

**APPLICATIONS FOR REVIEW P74/2013,
P398/2013, P73/2013, P401/2013,
P611/2013 & P625/2013**

PROPOSED REDEVELOPMENT OF
Former Port Phillip Woollen Mills

VICTORIAN CIVIL AND
ADMINISTRATIVE TRIBUNAL

Prepared for
Planning & Property Partners Pty Ltd

June 2013

Statement by
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Report Particulars

Authorship

This statement has been prepared by Mr Peter Lovell, Director of Lovell Chen Pty Ltd, Architects and Heritage Consultants, Level 5, 176 Wellington Parade, East Melbourne, assisted by heritage planner Ms Katherine White and research assistant, Ms Fiona Erskine. The views expressed in the statement are those of Mr Peter Lovell.

Qualifications and Experience

I have a Bachelor of Building degree from Melbourne University and have been director of the above practice, which I established with Richard Allom in 1981. Over the past 30 years I have worked in the field of building conservation and have been involved in, and responsible for, a wide range of conservation related projects. These projects include the preparation of conservation/heritage studies for the Borough of Queenscliffe, the former City of South Melbourne, the former City of Fitzroy and the former City of Port Melbourne. In addition, I have acted as heritage advisor to the Borough of Queenscliffe and the former City of South Melbourne. In the area of conservation management planning I have been responsible for the preparation of a wide range of conservation analyses and plans including those for the Melbourne Town Hall and Administration Building, the State Library and Museum, the Supreme Court of Victoria, Werribee Park, the Regent Theatre, the Bendigo Post Office, Flinders Street Station, the Old Melbourne Observatory and the Mt Buffalo Chalet. I have been responsible for the preparation of strategic planning reports for Government House, Canberra, the Melbourne Town Hall and the Supreme Court of Victoria.

In the area of building conservation works I have been involved in and directly responsible for the investigation, design and documentation of a wide range of projects including the ANZ Gothic Bank at 380 Collins Street, the Collingwood, Melbourne and Fitzroy Town Halls, the Athenaeum and Regent Theatres, Parliament House, Melbourne, Government Houses in Canberra and Perth, and the Supreme Court of Victoria Court of Appeal.

I am a member of long standing of the National Trust of Australia (Victoria), Australia ICOMOS (International Council on Monuments and Sites), and the International Institute for Conservation of Historic and Artistic Works. I am also an honorary fellow of the Royal Australian Institute of Architects.

Over the past twenty years I have appeared frequently before the former Historic Buildings Council, now the Victorian Heritage Council, and the Victorian Civil and Administrative Tribunal in relation to matters relating to conservation, adaptation and redevelopment of historic places.

Expertise to make the report

The specific expertise which I bring to this matter is in the area of the assessment of the impact of development work in a heritage context. This expertise is primarily derived from my experience in researching and assessing heritage places for the application of heritage controls at both a local and state level, in the formulation and review of guidelines for the implementation of such controls, in the application of heritage controls to projects undertaken by Lovell Chen and other architects and in the testing of those controls by way of Victorian Heritage Council and Victorian Civil and Administrative Tribunal review.

Relationship to Applicant

My office is currently engaged in providing heritage consulting advice to N P Development Pty Ltd, the owners of the site, in relation to archaeological and development issues.

Instructions

This statement has been prepared for Planning & Property Partners Pty Ltd on behalf of N P Development Pty Ltd. Material relevant to this matter was provided by Planning & Property Partners Pty Ltd. My instructions are as follows:

Your instructions are to provide your independent expert views in respect of the following matters:

A peer review of the work of Bryce Raworth in respect of the Oriental Hotel;

Your views in respect of the conservation worth/practicalities and other associated considerations (e.g. views expressed by Ms Lardner and others) in respect of the Oriental Hotel;

Your views in respect of the replacement building for the Oriental site (Lot 2) and your views in respect of the proposed street works for stage 1 (which are part of the Lot 2 application), as well as the proposed built form for lots 1 and 3 (inclusive of alternate lot 3 scheme) respectively.¹

Declaration

In submitting this report I declare that I have made all the inquiries that I believe are desirable and appropriate and that no matters of significance which I regard as relevant have to my knowledge been withheld from the Tribunal.



Peter Lovell

¹ Nick Sutton, Planning & Property Partners Pty Ltd, email to Peter Lovell, 21 May 2013.

Introduction

1. I have been asked by Planning & Property Partners Pty Ltd on behalf of NP Development Pty Ltd to provide expert evidence in relation to the heritage issues associated with Stage 1A of the proposed redevelopment of the former Port Phillip Woollen Mills, Williamstown. This has included an assessment of the proposed new works as well as a review of the following reports:
 - Former Oriental Hotel, Proposed Demolition and Redevelopment – Heritage Issues, Bryce Raworth Pty Ltd for Urbis on behalf of owners, June 2012;
 - Heritage Report Oriental Hotel, Lesley Alves & Associates for Hobsons Bay City Council, June 2012;
 - Proposed Demolition Former Oriental Hotel, peer review, HLCD Pty Ltd for Hobsons Bay City Council February 2013.
2. The site of the former Woollen Mills comprises a number of properties located to the south-east of the main Williamstown central business district. It is generally bounded by Nelson Place (north), Kanowna Street (east), Cecil and Aitken streets (south) and Ann Street (west). The Stage 1A area of the site comprises disused industrial buildings and land, as well as the former Oriental Hotel on the corner of Ann Street and Nelson Place.
3. The Stage 1A works are the subject of four planning permit applications to the City of Hobsons Bay, each relating to one numbered 'Lot' of the site. For clarity they are broadly itemised below along with the corresponding Proceeding numbers (see also Figure 1)
 - Lot 1. (Proceedings P74/2013 & P398/2013);
 - Oriental Hotel, Lot 2 (Proceeding P625/2013);
 - Lot 3 Option A (Proceeding P611/2013); and
 - Lot 3 Option B (Proceedings P73/2013 and P401/2013).
4. In addressing the heritage issues I have visited the subject site and the surrounding area and have considered the impact of the proposed works in terms of the relevant heritage provisions of the Hobsons Bay Planning Scheme, including Council heritage policies and guidelines. Additionally I have knowledge of the site from research and assessment work undertaken by my office on behalf of the City of Hobsons Bay in relation to the Ministerial Advisory Committee appointed to advise on planning and urban design issues as related to redevelopment of the former Port Phillip Woollen Mills site (Advisory Report 10 May 2011).
5. Further, I was involved in the preparation of a preliminary appraisal of heritage issues associated with the proposed demolition of the former Oriental Hotel, on behalf of the applicant, in April 2012 (refer Appendix A). At that time I inspected the hotel internally and externally. I have not been able to reinspect the building internally in the course of preparation of this evidence due to the severely dilapidated condition of the building.
6. In preparing this statement I have referred to the following documentation prepared by SJB Architects dated June 2012:
 - Architectural proposal, Lot 1: 7-15 Ann Street, 53 & 55 Waterline Place, Williamstown;
 - Architectural proposal, Lot 2: 55 Nelson Place Williamstown;
 - Architectural proposal, Lot 3A: 35 Nelson Place Williamstown;
 - Architectural proposal, Lot 3B: 33-34 Nelson Place, 32-42 Waterline Place.



Figure 1 The locations of the three lots are shown in red, with new streets outlined in black (not to scale).

Source: www.land.vic.gov.au

I have also referred to the following documents, amongst others:

- Landscape Architecture Design Report prepared by Tract Consultants, dated 16 August 2012;
- Hobsons Bay City Council (HBCC) Notice of Decision to Grant a Permit for Lot 1, dated 17 December 2012 and related third party review;
- HBCC Notice of Refusal to Grant a Permit for Lot 2, dated 21 February 2013;
- HBCC Notice of Refusal to Grant a Permit for Lot 3 Option A, dated 21 February 2013;
- HBCC Notice of Decision to Grant a Permit for Lot 3 Option B, dated 17 December 2012 and related third party review;
- Former Port Phillip Woollen Mills Heritage Advisor's Report, Nadia Gasparetto for Hobsons Bay City Council, November 2012;
- Statement of Grounds from objectors;
- Amendment C34 Panel Report;
- Former Port Phillip Woollen Mills Advisory Committee Report, 10 May 2011;
- BHS Consultants, Structural Condition Assessment Report of the Oriental Hotel, October 2012; and
- Aurecon, 2012 Building Condition Report: 55 Nelson Place, 22 June 2012.

Heritage considerations

7. The Stage 1A area of the former Port Phillip Woollen Mills site is included in the wider Government Survey Heritage Precinct, identified as HO8 in the Schedule to the Heritage

Overlay of the Hobsons Bay Planning Scheme (Figure 2). The statement of significance for HO8 as included in the *Hobsons Bay Heritage Study Amended 2010* is as follows:

What is significant?

The Government Survey Heritage Precinct which comprises all land included within HO8 and places individually listed in the schedule to the Heritage Overlay in the area generally bounded by Ferguson Street, Nelson Place, Kanowna Street, Morris Street, Esplanade, Giffard Street and Railway Place. It does not include land in HO68.

How is it significant?

The Government Survey Heritage Precinct is of local historic, social and aesthetic significance to the City of Hobsons Bay.

Why is it significant?

Historically, the Government Survey precinct demonstrates the most important and prosperous phase in the development of Williamstown from the mid nineteenth to early twentieth centuries, which was directly associated with the development of the port and later, influenced by the development of railways and associated industries. The early settlement of Williamstown and its importance as a port and defence facility also contributes to a broader understanding of the history of Victoria.

Socially, the Government Survey is important for its ability to assist in understanding and interpreting the life style of this isolated and close-knit community during the nineteenth century.

Aesthetically, while there are examples of unrelated postwar development within the precinct, as a whole it retains remarkably intact and cohesive groups of nineteenth and early twentieth century buildings that are an integral part of the special character of early Williamstown. Key elements include:

- The distinctive street layout based on a series of intersecting grids, which illustrate prevailing attitudes towards town planning in the nineteenth century.
- Unusual or rare early building styles and types such as the basalt houses and the timber duplex houses with no dividing wall that are characteristic of this part of Williamstown but less common elsewhere in the metropolitan area.
- The major nineteenth century community and civic buildings, many designed by noted Melbourne architects, both individually and in key groups – notably in Electra Street and the former Market Reserve.
- The unifying effect throughout the precinct of groups of predominantly Victorian and Edwardian era houses with common or similar characteristics of design, siting and scale that creates cohesive and homogeneous streetscapes. Many are externally intact and others, although altered, still retain their distinctive form and siting and hence contribute to the precinct.

- The basic nineteenth century or early street construction and the remnant mature exotic street planting found in some streets that combines with exotic planting in private gardens to reinforce and enhance the period expression of the precinct.

Not all of these elements are found in all streets within the precinct. As a consequence, there are a number of distinctive sub-precincts, which include Cecil Street, Electra Street, Esplanade, Hanmer Street, Nelson Place, Osborne Street, Pasco Street and Verdon Street that have individual citations in this Study. There is also an individual citation for Ferguson Street, which forms the northern boundary of the precinct.

8. In addition to this precinct control, the former Oriental Hotel at 55 Nelson Place (Lot 2 of the development) is individually identified as HO211. The building was identified as an E grade building in the *City of Williamstown Conservation Study (1987, revised and republished 1993)*.² Identified as being of individual local significance in the *Hobsons Bay Heritage Study Amended 2010* (a reference document at Clause 22.01), the statement of significance for the place is as follows:

What is Significant?

The former Oriental or Builders Arms Hotel, constructed c.1871, at 55 Nelson Place, Williamstown.

How is it Significant?

The former Oriental or Builders Arms Hotel at Nelson Place, Williamstown is of local historic and aesthetic significance to the City of Hobsons Bay.

Why is it Significant?

Historically, the hotel is significant as one of a number along Nelson Place in proximity to the waterfront, which demonstrates their important role in the early development of the town and the importance of Nelson Place as the commercial heart of Williamstown during the mid to late nineteenth century. It also illustrates how hotels were upgraded following changes to licensing laws during the late nineteenth century, which required hotels to have a certain number of rooms of minimum dimensions to be licensed. (AHC criteria A4 and D2)

Aesthetically, although altered, it is significant as a rare example of a three-storey corner hotel that relates to other similarly sited nineteenth century hotels in the Nelson Place and Government Survey Heritage Precincts. (AHC criteria B2 and E1)

9. The former Telegraph Hotel at 17 Ann Street (HO43) is situated immediately south of Lot 1, with a former laneway, which forms part of HO43, located to the rear (east) of both properties. The Hotel was identified as a C grade building in the *City of Williamstown Conservation Study (1987, revised and republished 1993)*. Identified as being of individual local significance in the *Hobsons Bay Heritage Study Amended 2010*, the statement of significance is as follows:

² It is noted that this document is not an incorporated or reference document in the Hobsons Bay Planning Scheme.

What is Significant?

The Telegraph Hotel (Former), constructed in 1862, at 17 Ann Street, Williamstown.

How is it Significant?

The Telegraph Hotel (Former) is of local historic, aesthetic and social significance to the City of Hobsons Bay.

Why is it Significant?

Historically and socially, it is significant as an early hotel and is representative of the development associated with the Port of Williamstown during its most prosperous period in the mid to late nineteenth century. It demonstrates how hotels were established in proximity to the commercially important waterfront and is also of interest for its associations with William Knight. (AHC criteria A4 and G1)

Aesthetically, it is significant as a traditional early hotel in both form and siting, which has been altered in detail only and occupies a prominent corner site near the Williamstown waterfront. (AHC criterion E1)

Socially, it is significant for its strong associations with the local community as a social centre and meeting place for local organizations over a long period and demonstrates the importance of hotels in the early development of port communities like Williamstown. (AHC criterion G1)

10. The citations for the above heritage places are included in Appendix B.

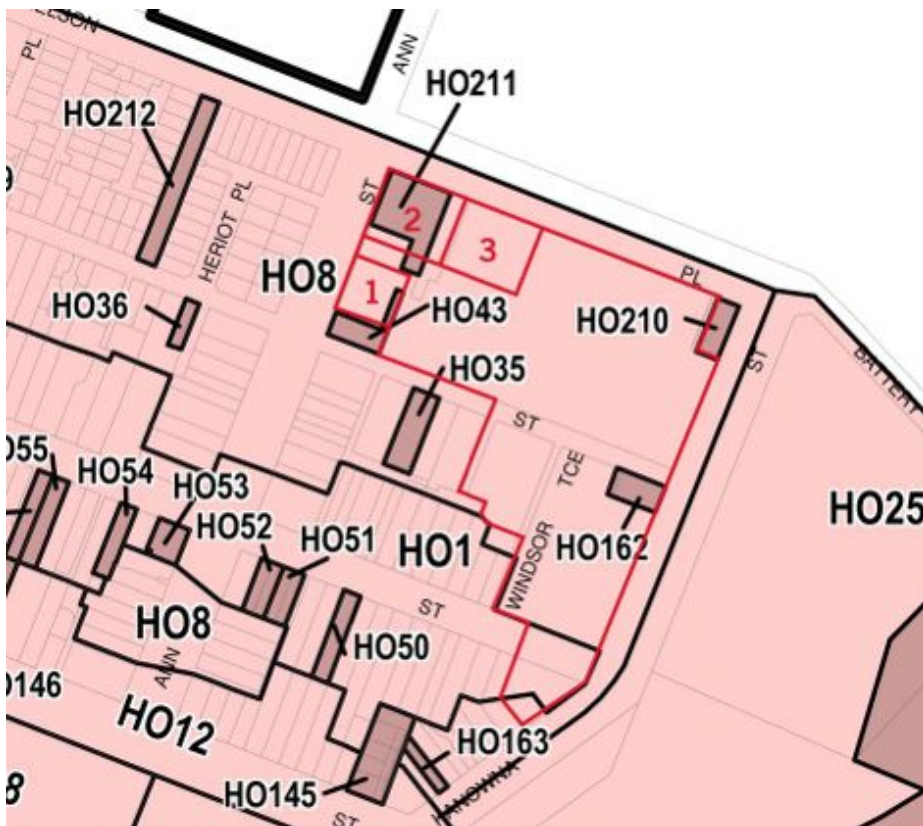


Figure 2 Lots 1, 2 and 3 within the wider Port Phillip Mills site are indicated in red. Source: Hobsons Bay Planning Scheme.

The former Oriental Hotel Historical Analysis

Construction date

11. Previous assessments of the former Oriental Hotel, conducted by Lovell Chen in April 2012 and Bryce Raworth Pty Ltd in June 2012 for the property owner, relied upon the history contained in the *Hobsons Bay Heritage Study* citation to establish its date of construction. This gave a construction date for the existing building of c.1871, following a fire which reportedly destroyed the original 1856 Barkly Arms hotel on the site.
12. Historians Lesley Alves and Louise Blake completed a history and heritage assessment of the former Oriental Hotel for Hobsons Bay City Council in June 2012. Utilising primary sources such as rate books, contemporary newspapers, maps and other images, together with secondary published works, the report concluded that the hotel was 'quite convincingly' constructed in 1854 as Cox's Family Hotel. The chief of this evidence is an 1854 lithograph of Williamstown (Figure 3) which depicts what may be a three storey building in the vicinity of the subject site.
13. Rate books, the production of which did not commence until 1858-9, do not identify Cox's Family Hotel but describe the Barkly Arms as a 15 room brick building. A search of digitised editions of the *Williamstown Chronicle* and the *Argus* has found no report of a fire destroying the premises in the 1870s.
14. HLCD Pty Ltd conducted a review of these earlier reports for Hobsons Bay City Council in February 2013. After reviewing the evidence presented by Alves, HLCD Pty concluded that 'the main built form of this hotel pre-dates 1863 when photographic evidence survives and is most likely original in form, scale and location to construction in the mid 1850s.'

Comment

15. It is recognised that this additional historical research has revealed that the hotel pre-dates the c.1871 construction date given in the heritage study citation for the place. The earliest available photographic image of Nelson Place in c.1863 (as cited in Alves, noting that Elsum dates this image to the 1870s³ see Figure 4) shows the hotel's three-storey corner form. The presence of the hotel is corroborated by the rate book entries for the years 1858-9 and 1870, which describe the Barkly Arms as a 15 or 16 room brick building. The three storey building form may be shown in the 1854 lithograph, though no additional primary information has been presented to corroborate that the Barkly Arms was a renaming of Cox's Family Hotel.
16. While a further exhaustive search of primary and other sources has not taken place in the preparation of this evidence, further examination of available information reveals some contradictory points. These include:
 - A plan produced by surveyor J Middleton (Figure 5). The exact date of this plan is unknown, however, the Public Record Office Victoria holds other field books surveyed by J Middleton which have been dated between 1854 and 1856. The plan records buildings prior to the collection of municipal rate book information which did not begin until 1858. This shows the corner site occupied by a rectangular, rather than square, building with a long narrow wing to Ann Street.
 - The research carried out by Tait⁴, while stating that the Barkly Arms Hotel was formerly Cox's Family Hotel, also states that Cox's Family Hotel was situated on

3 William Elsum, *The History of Williamstown*, 1934.

4 Bruce Tait, *Pubs of Williamstown: Historical Guide*, 2010.

the eastern side of Ann Street between the Barkly Arms and Telegraph Hotels. Additionally, Tait lists the first known licensee of the Barkly Arms Hotel as Joseph Soden from 1856-1858, contemporaneously with Henry Cox, the known licensee of Cox's Family Hotel from 1856-1857.

17. Of interest is an advertisement in the *Argus* dated 21 November 1867 which promotes the 'highly finished flat roof of the Barkly Arms Hotel' as the finest point to observe the arrival of the Duke of Edinburgh on the ship *Galatea*, further stating that 'The hotel being 53ft. high, it is consequently the most elevated situation in the colony, and commands the most extensive view of the Harbour and Bay'. The existing building does not rise to 53 feet.
18. From an examination of this evidence it can be asserted that the three storey section of the hotel was present on the site in 1858, and was likely not destroyed by fire at a later date. The three storey section may have been extant in 1854. Examination of the Licensee records held by the Public Records Office of Victoria and of early editions of the Williamstown Chronicle (not yet digitised) may be able to confirm or refute this.

Alterations

19. Regarding alterations to the former Oriental Hotel, the changes noted in the Alves report can be summarised as follows:

- 1881 - the building became known as the Oriental Hotel;
- 1886 - the hotel sustained fire damage, though the extent of this is unknown;
- Between 1886-7 and 1887-8 the rate book description of the hotel changed from 16 rooms to 22 rooms;
- 1890 - the hotel altered accommodation to provide a boxing saloon;
- 1908 - rate book describes a 20 room hotel;
- Mid 1920s renovations. The rate book description remains unchanged aside from a reduction to 19 rooms;
- 1947 - additions described by Tait, though the rate book description remains unchanged.

20. The Raworth report noted the following features and changes, summarised below:

- c.1870-75 photograph (Figure 6) shows the building without a verandah;
- 1888-9 rate book description shows an increase from 16 rooms to 24 rooms;
- 1904 photograph (Figure 8) shows a substantial cornice to the upper level, string course between ground and first floor and pediments to the street elevations. The image also shows the single storey extension along Ann Street, since demolished.
- c.1925 renovations. A 1933 photo (Figure 10) shows the pediments have been removed and small projections added to the corners of the parapet. Window hoods have been added;
- 1947 renovations which demolished the rear portion of the hotel to add new bathrooms, dining room, lounge, kitchen and servery;
- 1973 plans for drive-in bottle shop to the south side and new bistro-lounge.

21. The HLCD report provided further commentary on the alterations from an analysis of historic images, summarised as follows:

- 1863 - photograph (Figure 4) shows the hotel fenestration, pediments and absence of verandah while c.1870-75 image (Figure 6) shows the cornice and chimney placements;
- 1904 - image (Figure 8) shows pediment, cornice, string course and indicates a two tone wall treatment or colour scheme;
- 1925 - aerial photograph (Figure 9) shows roofscape and pediments;

- 1933 – image (Figure 10) illustrates that the pediment has been removed from the Nelson Place facade and small projections added;
- 1958 – aerial photograph (Figure 11) shows parapets rather than pediments to the street elevations and a single-storey wing to the eastern side fronting Nelson Place.

Comment

22. Analysis of the historic images reveal the approximate date of a number of the changes made to the hotel building. The earliest photographic images of the subject site (Figure 4 and Figure 6) show that in the 1870s the building featured a substantial cornice to its upper level with a curved pediment above. 'BARKLY ARMS' was lettered between the first and second floors and a string course located between the ground and first floor. One multi-paned window evident to the east elevation, however it is unclear if the windows to the north and west facade were similarly multi-paned at this time. The sills to the windows are squared and slightly projecting. Three corbelled chimneys are evident. Additionally, Figure 4 may show the single-storey wing to Ann Street.
23. By 1904 the Barkly Arms signage had been removed and 'ORIENTAL HOTEL' lettered on the pediment, which can just be discerned in Figure 8. At ground floor level the northernmost opening to the Ann Street facade appears as a doorway; this is currently a window. While indistinct the windows in this image present with multipane sashes.
24. By 1933 the pediment and cornice had been removed with small squared projections added to the corners of the parapet. It is unclear when the other non-original elements including the window hoods and verandah were added to the building, or when the alterations to the chimneys occurred.



Figure 3 Detail of lithograph entitled 'Williamstown, Hobsons Bay'.
Source: State Library of New South Wales.



Figure 4 Image of Nelson Place, variously dated c.1863 or 1870s.
Source: *The History of Williamstown.*

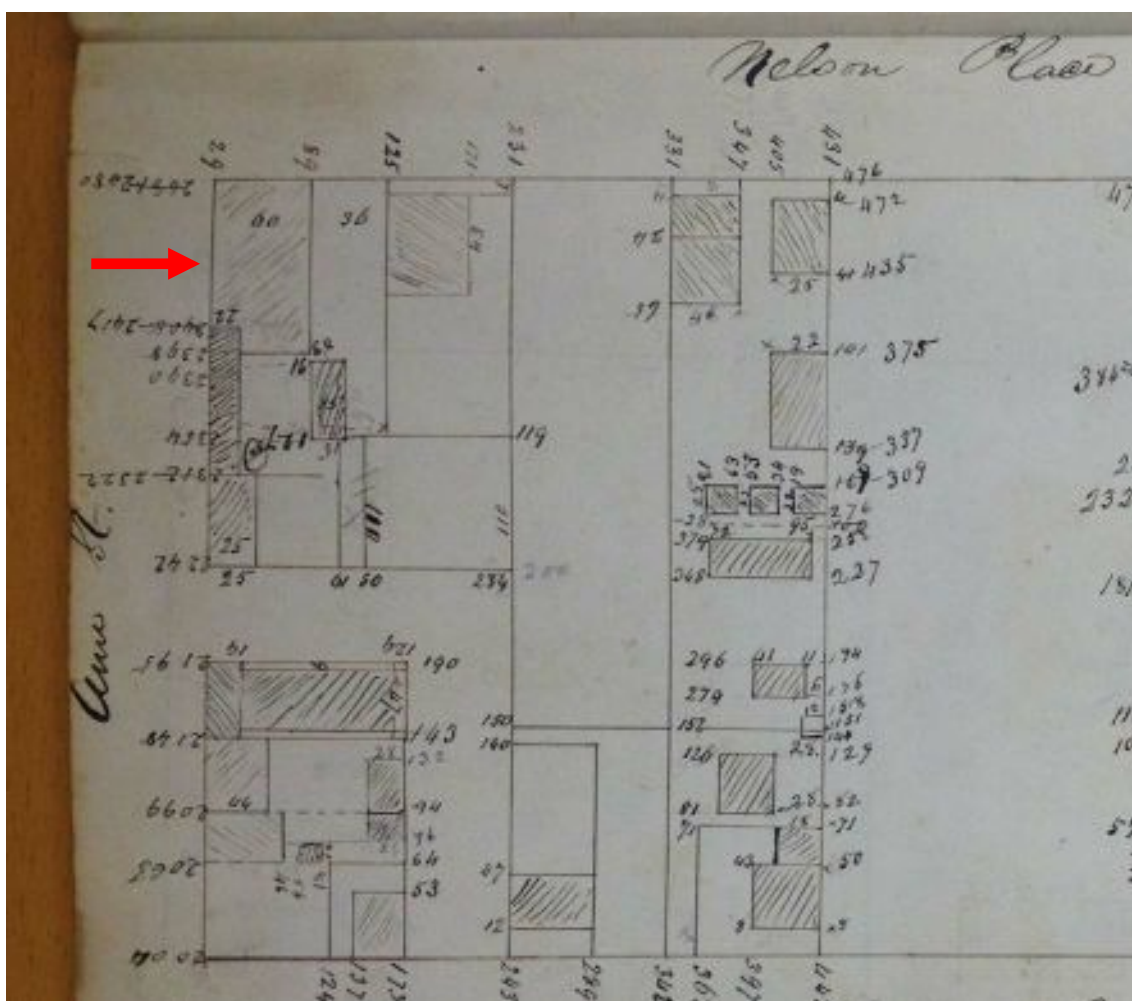


Figure 5 Surveyors field book c.1854. The subject site is at top left.
Source: VPRS 16685/P1/33, Public Records Office.



Figure 6 Detail of a view of Nelson Place, Williamstown c.1870-75, showing the subject property.
Source: State Library of New South Wales.

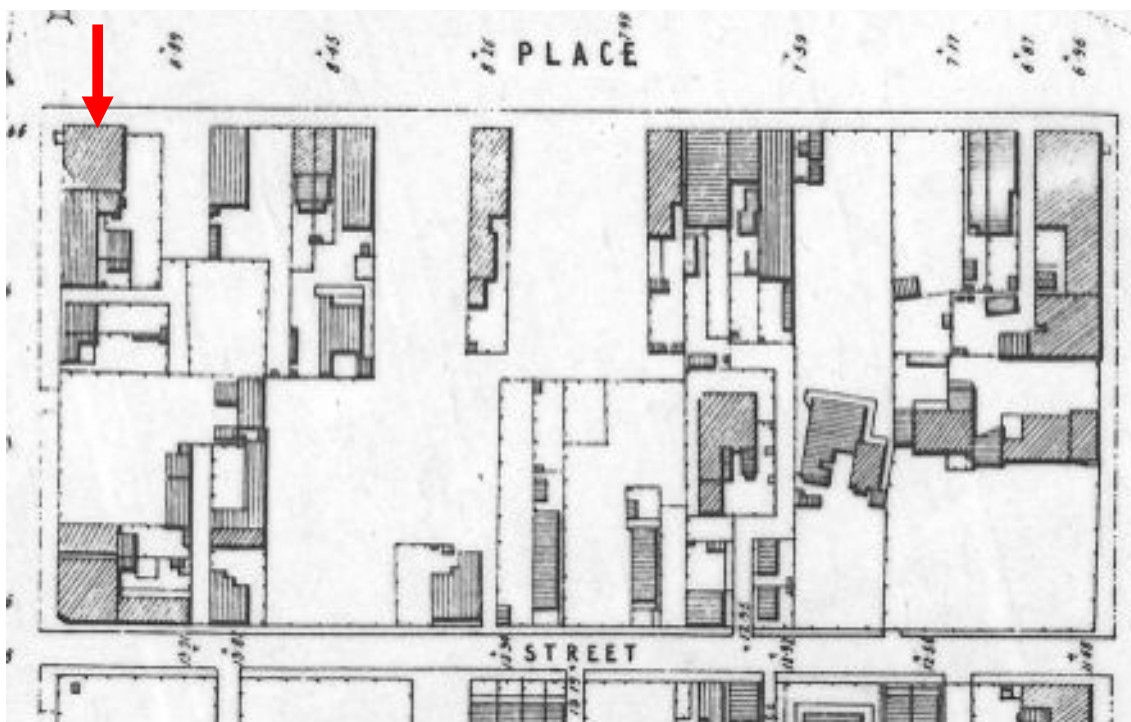


Figure 7 MMBW plan, 1894. The subject site is at top left.
Source: Lovell Chen plan collection.



Figure 8 The Ann Street elevation of the Oriental Hotel, 1904.
Source: *Williamstown Illustrated*.



Figure 9 Airspy oblique aerial photograph looking east in the c. mid-1920s.
Source: State Library of Victoria.



Figure 10 Airspy oblique aerial photograph looking south-west, 1933.
Source: State Library of Victoria.



Figure 11 Airspy oblique aerial photograph looking south-east, c.1950-60.
Source: State Library of Victoria.

Intactness/Integrity

25. The HLCD report differentiates between intactness and integrity, defining the former as the degree to which a place retains its significant fabric, and the latter as the degree to which the heritage values of the place are still evident and can be understood. The report concludes that the three storey corner building is 'substantially intact' including the roof and most fenestration, though stating that some of the Victorian decoration including the pediments and string courses has been removed. In considering the whole of the site, the report states that 'the site is not very intact to its earliest known plan form'. Regarding the building's integrity, the report states that the continuing hotel function is demonstrated most strongly in the three storey corner building, its form and location, without assigning a specific 'level' of integrity.
26. While not explicitly examining the place's intactness, the Raworth report cites the earlier evidence presented to the Amendment C34 Panel which described the hotel as a 'Victorian building that is...lacking much of its former detail'. Changes to the building fabric were summarised by Raworth as the removal of the Victorian stucco mouldings and ornamentation including the cornice, stringcourses and crowning pediments, the alteration of the chimneys, replacement of all but one of the original multi-paned double-hung windows with simpler versions, and the addition of window hoods presumably in the interwar period (Figure 12).



Figure 12 Comparison images showing where detailing removed or added.

Comment

27. Recognising the distinction made in the HLCD report between intactness (retention of significant fabric) and integrity (evidences heritage values) my assessment of the external envelope of the three storey section of this building is that it is at most a moderate level of intactness and is also of a moderate level of integrity, as considered in the context of the values ascribed in the statement of significance.
28. On the matter of intactness the building form – plan and volume – and the openings above ground are in the main intact. Beyond this the detail and decoration of the building has been modified and altered. Loss of decorative mouldings, modification of pediments, addition of hood moulds and replacement of window sashes all have altered the presentation such that any obvious referencing to the buildings nineteenth century origins has been lost. Albeit restrained in the original design it now presents as a very stripped form with few obvious cues to its early origins.
29. It would also appear that the current hipped roof form is non-original, noting the 1867 description of a flat roof as discussed at paragraph 17 above. Additionally, the current single-storey wing to Ann Street is non-original, though occupying the same location as the earlier timber wing.
30. With regard to integrity, albeit unused and altered externally, the building retains its historical associations and presents aesthetically as a three storey corner hotel.

Site Description

Lot 1

31. Lot 1 of the Stage 1A redevelopment area is located on the east side of Ann Street, between Nelson Place to the north and Aitken Street to the south. The lot is bounded by the former Telegraph Hotel to the south and new roads to be constructed to the north and east. The land is currently unoccupied, with a grassed area to the north and an at-grade bitumen car park to the south.

Lot 2

32. Lot 2 is located on the south-east corner of Ann Street and Nelson Place. As described it is occupied by the former Oriental Hotel, a three and one storey brick structure finished externally in paint to render and brick. The three storey corner block is approximately square in floor plan and comprises a public bar and associated spaces at ground level, with guest rooms above. A cellar is located in the north-west corner. Facade openings to the street include entry doors accessed from Nelson Place and Ann Street and a combination of fixed display windows and narrower windows with traditional double hung sashes. On the upper levels the facade is punctuated by regularly spaced vertical rectangular window openings which in large part retain timber window frames and sashes. Above the windows on both the first and second floor are non-original shallow projecting hood moulds with a chamfered outer edge.
33. To the south-west along Ann Street and to the north-east along Nelson Place are single storey wings, both non-original. On both street frontages a modern interpretation of a traditional timber post supported verandah has been erected. There is no evidence to indicate that such a verandah ever existed on the building.
34. Internally the hotel has a combination of brick and timber framed walls, timber floors laid on timber joists and a combination of solid plaster and lath and plaster linings. Later fibrous plaster and plasterboard linings are also in evidence. The ground floor spaces have been almost entirely stripped of any evidence of the nineteenth century

presentation and the guest rooms also evidence progressive modernisation. The main stair appears to be original, but is severely damaged and lacks a balustrade and handrail.

35. As has been noted in past reports and assessments, the condition of the building is extremely poor with evidence of long term water entry and major structural movement. The water entry and resultant timber decay has lead to internal collapse of ceilings and floors in the northern portion of the building, down to ground level. In the southern portion the major structural movement has caused the formation of extensive cracking in both external and internal walls. The cracking is such that the upper levels of the building could be regarded and unstable and unsafe to enter. The condition of the building is a result of long term neglect and is not of recent origins.
36. Lot 3 is a rectangular shaped site on the south side of Nelson Place, east of the intersection with Ann Street. The industrial building on the site is currently vacant.



Figure 13 The open grassed area which forms Lot 1.



Figure 14 The Oriental Hotel located on Lot 2.



Figure 15 View of the hotel looking north, showing the later addition.



Figure 16 Detail of the south facade showing cracking and deterioration of the rendered finish.



Figure 17 The main stair within the hotel.



Figure 18 A typical room on the upper level showing collapse of a later fibrous plaster ceiling. Water damage is such that a number of floors have rotted out.



Figure 19 Detail of wall plaster collapse. The detailing of the window sashes confirms that they date from the twentieth century.



Figure 20 View of Lot 3, Nelson Place looking east to Kanowna Street.

Development Proposal

Landscaping and roadworks

37. Stage 1A of the development of the former Port Phillip Woollen Mills site incorporates new hard and soft landscaping treatments in the public realm. New carriageways will include a new east-west road between Ann and Kanowna streets, located approximately 35 metres south of Nelson Place (Waterline Place); a new north-south road between Aitken Street and the proposed Waterline Place (Merchant Lane); and a new north-south pedestrian link between Nelson Place and the proposed Waterline Place.
38. Existing bluestone kerbs in Nelson Place and Ann Street will be made good and Scotch Elms planted in kerb outstands. Waterline Place and Merchant Lane will have asphalt carriageways with charcoal coloured concrete kerbs and native tree plantings. The pedestrian link will be paved.

New build - Lot 1

39. The proposal is for the construction of seven three-storey townhouses on the vacant site, rising to a height of approximately 10.0 metres at the centre of the Ann Street frontage.
40. Five of the dwellings address Ann Street with articulated facades, set back between 1.5 and 2.0 metres at first and second floor levels with recessed balconies. Each of these dwellings will have a double garage accessible via the new Merchant Lane, three with studio rooms above. Two dwellings will address Waterline Place with zero street setback.
41. Materials will include painted render, sections of steel, perforated metal screens, aluminium louvers and hardwood timber.

New build - Lot 2

42. The proposal is for the construction of a mixed use development of six levels plus a basement level of carparking. Retail tenancies, apartments and further carparking are located on the ground floor, while levels one through five above are residential.
43. The building will rise to a height of approximately 19.0 metres at the centre of the Waterline Place frontage.
44. The building has a prominent 'cube' form to the street corner, screened by aluminium louvers and a canopy at ground floor level. The flanking wings are recessed and differ in their materiality from the corner element, utilising precast concrete and perforated aluminium screens.

New build - Lot 3 Option A

45. The proposal is for the construction of a four-storey residential building of 51 apartments, involving the demolition of the existing ungraded industrial buildings on the site.
46. Carparking is located at basement and ground floor levels accessed from Waterline Place, with ground floor apartments and a further three levels of dwellings above, rising to a height of approximately 13.0 metres at the centre of the Nelson Place frontage.
47. The Nelson Place facade features vertical offset panels of precast concrete with windows and balconies set within. Varying setbacks of the building line and balconies create an articulated appearance to the Nelson Place (north) and Waterline Place (south) elevations while an atrium punctuates the east elevation.
48. Other materials include metal cladding, aluminium louvers and perforated screens as well as textured paint finishes.

New build - Lot 3 Option B

49. The proposal is for the construction of twelve townhouses, six addressing Nelson Place and six addressing Waterline Place. All will have a double garage with access via a central common driveway to the rear of the dwellings.
50. All townhouses fronting Waterline Place are of three levels, while four of those fronting Nelson Place are of four levels and two are of three levels. The building height thus varies, however there is a maximum of 13.0 metres at the centre of the Nelson Place frontage.
51. The ground through second floor levels are generally built to the property boundaries, with recessed fenestration and balconies providing some articulation. The third floor levels are set back approximately 4.2 metres from Nelson Place.
52. Materials are a combination of steel sections, perforated metal screens, aluminium louvers and timber.



Figure 21 Aerial image of the former Port Phillip Mills site with the approximate location of the three lots outlined.

Source: www.nearmap.com

Planning history

53. The *City of Williamstown Conservation Study* (1987, updated 1993) identified the former Oriental Hotel as an E grade building. E grade buildings were defined in this study as follows:

By their limited integrity, and relative isolation from buildings of higher integrity, represent neither individual form or style types well, nor contribute to a streetscape or precinct. They possess some period detail and thus can be recognised as belonging to a general era and may, by

restoration or renovation, achieve a viable new use and potentially may contribute more to the area's period content.

The *City of Williamstown Conservation Study* also identified a number of precincts mainly within the area to the south of Ferguson Street, as well as Ferguson Street itself and Power Street. The Study recommended that Urban Conservation controls be applied to these specific precincts. The subject property was not included in any of the conservation precincts identified in this study, nor was it identified for individual planning controls, with only sites graded A or B recommended for individual listing.

54. Despite this recommendation, Amendment 494 to the Melbourne Metropolitan Planning Scheme subsequently introduced an Urban Conservation Area No. 1 overlay control (UC1) over the whole of the municipality south of Collingwood Road, Newport and east of the railway and Victoria Street, including the whole of the former Port Phillip Woollen Mills site. Although originally intended as an interim measure, the Minister approved these controls for an indefinite period as part of the new Williamstown Planning Scheme when it took effect in February 1988. The extent of the UC1 area was carried over as Heritage Overlay Area 22 (HO22) in the new format Hobsons Bay Planning Scheme when it was approved in February 2000.
55. The *City of Williamstown Conservation Study Review* was adopted by Hobsons Bay City Council in November 2002. This Review formed part of the *Hobsons Bay Heritage Study*. The Government Survey Precinct, within which the subject property is located, was one of those identified in the Review. The Review also identified the former Oriental Hotel as a building of individual significance.
56. The Review formed the basis for Amendment C34 to the Hobsons Bay Planning Scheme. This amendment proposed to delete the existing HO22 Newport-Williamstown heritage precinct and replace it with a series of discrete heritage precincts (one of which being the Government Survey Precinct) and individual places. The amendment also proposed to add a new Design and Development Overlay to control development on sites adjacent to heritage places.
57. An independent Panel heard submissions in relation to Amendment C34 in 2003. The report of the Panel was released in April 2004. Regarding the former Oriental Hotel, the Panel stated the following:

On the basis of Mr. Raworth's evidence and the report by Wallbridge & Gilbert, supported by our own inspection, we have accepted the following as facts:

- The building's condition is extremely poor and, although no evidence was provided as to whether, or at what cost this building could be restored to a safe and habitable condition, the cost would clearly be very substantial. The assessment of this property that is provided in the *Williamstown + Newport Heritage Place Citations* as being in "good" condition is not accepted. Rather, it should read as 'poor' or 'very poor'.
- The historic, three-storeyed section of building has been substantially altered and its integrity is at best moderate or possibly poor (taking account of the single storeyed extensions). We accept Mr. Raworth's conclusion that the building presents as a "Victorian building that is lacking much of its former detail."

We note that the *Williamstown + Newport Heritage Place Citations* places much importance on the fact that the building is a rare example of a

three-storeyed hotel (one of only three in the area) and is situated on a corner site. Other Panels such as Bayside Planning Scheme Amendment C29 (Part 2) have concluded that it is not appropriate to subdivide a general category of building (e.g. Victorian multi-storeyed hotels) into a series of sub-categories such as corner/non-corner sites and number of storeys. Most buildings could be defined as rare if their general category is divided into sufficiently small sub categories. We consider it appropriate to adopt a similar view and to assess this building within the larger group of Victorian hotels.

On this basis, we conclude that the building does not meet AHC Criterion B2 – *importance in demonstrating a distinctive land use, function or design in danger of being lost, or of exceptional interest*. Because of the substantial alterations that have been made to its exterior, we also do not consider that this building satisfied AHC Criterion E1 (Importance for a community for aesthetic characteristics). Because of the building's substantial loss of integrity, together with the large number of other hotels along Nelson Place that have much greater historic integrity, we further do not consider that the building satisfies any of the following AHC Criteria

- *A4 – importance for association with developments ... which have had a significant role in the human occupation ...*
- *D2 - importance in demonstrating the principal characteristics of the range of human activities, ...including way of life, ..., land use, function, ...*

.....it is appropriate to consider the net community benefit that would be achieved by requiring the building's restoration and conservation.... without having any estimates for the cost of structural restoration of this building (which we expect would be extremely high) we consider that the retention of this building would be an unreasonable impost on the owner. Taking into account the existing loss of the building's architectural integrity, we conclude that it is most unlikely that any net community benefit would be achieved.

58. The recommendation of the Panel was that 'the building at 55 Nelson Place, Williamstown, is not of local heritage significance and should be removed from the Heritage Overlay HO173'. Despite this recommendation, the former Oriental Hotel was individually identified the Hobsons Bay Planning Scheme as HO211, as well as being included in the wider Government Survey Precinct (HO8).
59. Under the former Minister for Planning, the whole of the Port Phillip Woollen Mills site was rezoned from an Industrial 1 Zone to a Residential 1 Zone in April 2010. An Advisory Committee was also appointed to advise on planning matters relating to the redevelopment of this land. Following the release of the Advisory Committee report, the current Minister for Planning rezoned the site to a Mixed Use Zone and applied Design and Development Overlay Schedule 11. DDO11 outlines indicative heights for the development of the subject land (see Figure 25).

Assessment of heritage impact

Demolition

60. Within the Hobsons Bay Planning Scheme the issue of demolition of heritage places is addressed under Clause 22.01 Heritage Policy. Under the statement of objectives a key objective is to ensure that cultural significance is not diminished by loss of fabric which contributes to that significance, and/or inappropriate new development. As related directly to demolition the policy notes that demolition is discouraged and that it is policy to conserve heritage places and precincts by:

Discouraging the demolition of heritage places unless it can be demonstrated to the satisfaction of the Responsible Authority that the structural integrity of the heritage place has been lost;

Generally not accepting the poor condition or low integrity of a heritage place as justification for its demolition, particularly if in the opinion of the Responsible Authority the condition of the heritage place has deliberately been allowed to deteriorate;

61. In addressing demolition the Raworth Report (June 2012) notes the poor condition of the building, observations which were supported at the time by a structural engineering report, and the 'very low level of significance' of the building. With regard to the latter comment reference is made to the findings of the Hobsons Bay Planning Scheme Amendment C34 Panel (April 2004) which recommended against heritage listing. The report goes on to address comparable hotels in the area and also addresses the streetscape context. The report concludes that, 'The combination of its low intrinsic interest, its poor integrity, and the low integrity of the surrounding streetscape mean that demolition of the subject building would have a negligible impact upon the character and integrity of the broader Government Survey heritage overlay'.⁵

62. In addressing the issue of demolition the HLCD Report (February 2013) reviews both the Raworth Report and the preliminary assessment, *The former Oriental Hotel, 55 Nelson Place, Williamstown*, prepared by Lovell Chen in April 2012. In arriving at a conclusion the HLCD report addresses the following matters:

- structural condition, noting that both the June 2012 Aurecon Report and the Council commissioned BHS Consultants Report of October 2012 arrive at similar findings;
- extent of remedial works, commenting that subject to further investigation, remedial works could be undertaken which would not compromise the significance of the building and that even if requiring a high degree of fabric replacement this is to be preferred over demolition;
- cost and burden of restoration, questioning whether owner inaction has exacerbated the deterioration and can be seen as intentional neglect; the suggestion also being made that conceivably the building may have been rendered habitable with minor works when acquired in 2005.
- cost of restoration offset, indicating that the cost of restoration works to the Oriental should be considered the context of the overall development project cost and return.

⁵ Bryce Raworth, *Former Oriental Hotel, 57 Nelson Place Williamstown, Proposed Demolition and Redevelopment – Heritage Issues*, Report to Council, June 2012, p. 17.

- contribution to the precinct, noting that notwithstanding the lack of immediate context, the building remains a significant contributory element in the Government Survey heritage precinct, HO8;
- comparative analysis, noting that the hotel is one of six early hotels located in the Government Survey precinct and the earliest extant example;
- assessment of significance, providing a revised statement of significance which determines that it satisfies four heritage criteria at a local level; historical value, rarity, demonstrative of principal characteristics of early Victorian hotels, and social value.

63. The report concludes that the former Oriental Hotel is of local heritage significance and its proposed demolition is not consistent with relevant planning policy.

Comment

64. As concluded in the Lovell Chen Preliminary Assessment of April 2012 and having regard to the further historical information available with regard to the age of the building, my view remains that the former Oriental Hotel is 'a place which, even in its altered state contributes to an understanding of the development of the related heritage precinct and can be seen as of 'contributory significance' in this context'.⁶ Equally my assessment is that it is not a building which has such a distinct history or high quality aesthetic such that it warrants individual recognition.

65. It is a hotel which is one of a number of immediate post Gold Rush hotels to be erected in the area, as in other inner city suburbs, and while uncommon as related to age, cannot be elevated above others. It is a building which when constructed was restrained in external detail and the stripping away of that detail has manifestly compromised its aesthetic presentation. Accepting that such change is evident in many such buildings, the external alterations in this case are of no architectural or aesthetic merit and without value.

66. With regard to the structural condition of the building, it has been established that it is in very poor structural condition and that this condition is such that the building is unsafe to enter. While I did not view the building in 2005 and cannot comment on the nature of changes which have occurred over the past 8 years I would observe that the scale of the cracking and structural movement is such that it may well have presented over many years. Equally, my observation from internal inspection is that the extent of timber decay and failure of internal finishes would suggest that water entry has been occurring over a long period of time. Additionally, at the time of the panel hearing in relation to Amendment C34 in 2003, the Panel report noted that the 'building's condition is extremely poor' (cf. para 44).

67. The structural engineering reports and advice to date have recommended that some action must be taken with regard to the stability of the building; either the building should be demolished, or repair and refurbishment works should occur. However, this latter course of action would involve extensive work and have a commensurate cost. Dependent upon the approach taken, my expectation is that the need to achieve a high level of compliance with the Building Code of Australia would result in much of the internal fabric being replaced and some dismantling and reconstruction of the external fabric.

⁶ Lovell Chen, Preliminary Assessment, The former Oriental Hotel, 55 Nelson Place Williamstown, April 2012, p.9.

Conclusion

68. The former Oriental Hotel is a building which is of considerable age, of uncommon height and which resides as a corner marker in a manner which is emblematic of such hotel buildings of the period in which it was constructed. It is a building, which like many others in Williamstown and beyond, has an interesting history of use, ownership and occupation. It is a building which is of some social interest, as are many, in evidencing to the current community the story of early Williamstown development.
69. Beyond these attributes the building is also one which has been eroded in its external presentation by the considerable loss of original architectural detail and the modification of its presentation at ground level and as related to the attached southern wing. As a result of these changes its aesthetic and architectural value is compromised and considerably less than that which is associated with hotel buildings of a similar age in the Williamstown area. It is not a building which is readily discernable as a heritage place, accepting that it is a building which in its form and location makes a contribution to understanding the pattern of early development in the area and the Government Survey in particular.
70. Beyond the significance of the place the former Oriental Hotel is a building which is severely degraded and structurally unsound. It is a building which will require significant expenditure if to be retained. The combination of the loss of structural integrity and the eroded external presentation, combined with the relatively isolated heritage context and contributory nature of the place is such that demolition is a course of action which I believe can be supported. While it will have an impact on the Government Survey Heritage Precinct, the impact on the assessed significance of the precinct will be small.

Proposed Redevelopment

Area Context

71. The three development lots are located opposite sites which contain buildings of no heritage significance. To the north, across Nelson Place is a modern three storey office development located outside the heritage overlay area. It extends east along Nelson Place from the Ann Street corner. On the corner diagonally opposite is a large Defence Department building which rises to an equivalent height of in the order of four stories (Figure 22). To the west is a row of recently developed houses on the west side of Ann Street (Figure 23), and extending along the south side of Nelson Place, to the west of Ann Street, is a row of three level town houses (Figure 24).
72. The design approach to these developments varies but the residential developments located within Government Survey Heritage Precinct in Nelson Place and Ann Street include designs which incorporate more traditional pitched roof forms as well as those which provide a more contemporary response.



Figure 22 The Defence building on the corner of Ann Street and Nelson Place.



Figure 23 Residential development opposite the subject site in Ann Street.



Figure 24 Three level town house development in Nelson Place to the west of the site.

Relevant Planning Provisions

73. As related to heritage and the proposed redevelopment of Lots 1, 2 and 3 the relevant sections of the Hobsons Bay Planning Scheme are the *Municipal Strategic Statement Clause 21.06 Built Environment and Heritage, Local Planning Policy, Clause 22.01 Heritage Policy* and the *Decision Guidelines, Clause 43.01 Heritage Overlay* (refer Appendix C). In addition development on the site is also subject to the provisions of *Schedule 11 to the Design and Development Overlay (DDO11)*, a site specific overlay for the Former Port Phillip Woollen Mills and Surrounds. This overlay provides indicative development heights and references heritage in the design objectives and the decision guidelines (Figure 25). On the matter of height, DDO11 states under section 4.0 *Building Height* that 'Buildings should be constructed generally in accordance with indicative building heights specified in the Table to the Schedule'. In the case of Lot 1 this is 10 metres, Lot 2, 19 metres and Lot 3, 13 metres.
74. In the case of the provisions of Clauses 21.06 and 22.01, both seek to ensure, amongst other matters, that new development should not visually dominate or cause detriment to the broader heritage place, should pursue a contextual response and achieve high quality design outcomes. In the context of setting indicative heights DDO11 seeks to ensure that high quality urban design outcomes are achieved, that development is respectful of the context of the area and that the historic significance of the area is respected. The decision guidelines include the need for consideration of design excellence and whether development addresses the policies and objectives of Clause 22.01 *Heritage*.
75. A reference document required to be considered under Clause 22.01 *Heritage Policy* are the *Guidelines for Infill Development in Heritage Areas in Hobsons Bay, 2006*. While the guidelines address residential and commercial infill separately the focus is very much on sites which abut or are between existing heritage buildings. They provide little, if any guidance on sites of the scale of the Nelson Place Village redevelopment.

Development Plan Indicative Heights



Figure 25 Indicative heights for new development on the former Woollen Mills site.
Source: Hobsons Bay Planning Scheme.

Lot 1

76. The proposal for Lot 1 comprises seven townhouses made up of five individual units and a pair. The townhouses present in a terrace format and rise no higher than 10 metres. The design is stepped in plan form with the northern end townhouse rising slightly higher and projecting to the street. At the south end the townhouse is set back from the former Telegraph Hotel revealing in part the north side wall of that building. The material palette includes painted rendered finishes, timber battens, metal cladding, painted aluminium windows and door frames and aluminium louvres.

77. The overall design approach to this townhouse group is one of restraint and clarity whereby the forms are not overly elaborate and sit comfortably within the immediate context. The materiality is not unlike that to the new buildings opposite and the design devices relate to some of those in evidence in the new townhouses in Nelson Place (refer Figure 24). While in contrast to the relatively austere presentation of a building such as the former Telegraph Hotel, the proposed townhouses present respectfully and sit comfortably within the immediate context.
78. With regard to the abuttal to the former Telegraph Hotel the proposed development will in part obscure the north side wall of that building, the upper part of which has a mural painted in 2001 (Figure 26). As evidenced in the various historic images and plans the former hotel building has variously had double storey structures and open space to its north (see, for example, Figure 9 at right of image). It is only in relatively recent times that the upper part of the original bluestone wall has been rendered and painted.
79. The citation for the former hotel identifies it as a place of individual significance for reasons of historical, social and aesthetic value (refer Appendix B). The aesthetic value is associated with its prominent corner siting and its early hotel form. While the proposed development to the north will impact on the presentation of the building as viewed from that direction it will not impact on its aesthetic value or the ability to recognise its prominent corner setting. While observation of the north side wall will be restricted this will not diminish the significance of the place.
80. Having regard to the setting and context the Lot 1 design response is one which appropriately responds to the assessed significance of the heritage place and will have no adverse impact.



Figure 26 The Shenandoah mural, painted in 2001.

Lot 2

81. The proposal for Lot 2 is for a six level apartment building with a retail tenancy on the ground floor corner. The building rises to 19 metres from the footpath with a stair and plant enclosure rising above this height. The building is anchored on the Ann Street Nelson Place corner by a more solid block built out to the boundaries while the flanking wings to the south and east are set back with stepped balconies. In composition the building responds directly to the built form outcome descriptor in DDO11, which requires a 'prominent building which provides emphasis to the corner of Nelson Place and Ann Street' and which 'incorporates innovative facade articulation and limited sheer walls'.
82. As with the Lot 1 development the overall composition is one which is relatively restrained, employing a related material palette. Key to the visual presentation will be the vertical louvres to the corner block which are described as having a nickel finish but present as a mid brown in the perspective view. The visual interest of the louvres is balanced by the relative mass of the precast concrete panel forms which enclose the flanking wings.
83. As has been described this building has no immediate heritage interface and its immediate relationships are to the new contemporary built forms on the opposite corners. The primary heritage consideration is therefore one of scale and height rather than abuttal. With regard to height my previous assessment of this site was one which contemplated a new built form rising to the height of the existing hotel or slightly higher, depending upon the nature of the development in the flanking streets. My view was that the building could have a level of prominence but that it should not dominate the local context. It was a view which does not accord with the outcome descriptor for the site as described in DDO11.
84. In considering the proposal as developed my assessment is that it delivers an outcome which will present prominently and be readily observed in views up and down Nelson Place. While it is at a height which I had not contemplated in my April 2012 report it is not such that I consider that there is an adverse impact on the heritage place. Located as it is, well removed from any near-by heritage buildings, it will define and reinforce this corner of the Nelson Place Village development in a manner which is not dissimilar to that of the former hotel. In this context I believe that the proposed development for Lot 2 is an appropriate response to the site.

Lot 3 Options A and B

85. The optional proposals for Lot 3 comprise Option A, apartments, and Option B, townhouses. Both options continue the design approach and materiality of the proposed developments on Lots 1 and 2. Between the options the main point of distinction is that the apartment building presents as a more substantial block form of relatively uniform height, while the townhouse complex has greater articulation with variation in height between three and four levels. In both cases the height does not exceed the prescribed 13 metres.
86. As with Lot 2 in the absence of any heritage interface the heritage considerations in the development of this Lot are limited to ones of the manner in which the development design is considered to be compatible with the broader heritage context. Having regard to the nature of recent development in Nelson Place and the immediate context there is little to separate one option from the other in this regard. As related to vertical articulation the townhouse proposal is one which has an added level of visual interest, but both options could be readily accommodated within this section of the heritage precinct without adverse impact.

Road layout

87. In addition to creating Lots 1, 2 and 3, Stage 1A of the development also introduces a new road layout, including an east-west road (Waterline Place) between Ann and Kanowna streets (approximately 35 metres south of Nelson Place), a north-south road (Merchant Lane) between Aitken Street and the proposed Waterline Place, and a north-south pedestrian link between Nelson Place and the proposed Waterline Place.
88. The new road layout adopts a grid form which references the traditional road layout in this area of Williamstown. The new roads sit as a secondary and tertiary layer within the original primary grid. Their comparatively narrow widths and their function as service roads within the board primary system will ensure that they do not detract from an understanding of that system.
89. The new roads will not have an adverse impact on the overall appreciation of the surrounding streetscapes or the broader heritage significance of the Government Survey Precinct. The treatment of the roads and landscaping will be largely consistent with the surrounding area and will not introduce finishes (asphalt and coloured concrete kerbs) which are out of character in the broader heritage precinct.

Conclusion

90. The redevelopment of the former Port Phillip Woollen Mills site as the Nelson Place Village is a major undertaking. Whether the former Oriental Hotel is replaced or not it is a process which will transform the visual presentation of a substantial land area contained within the Government Survey Heritage Precinct.
91. As related to Lots 1, 2 and 3 the immediate area has limited direct interface with the heritage of the greater precinct and in many respects is physically quite atypical of the character of that precinct. Further to this condition, it is an area where the planning scheme contemplates and encourages a level of development which is in many respects at odds with that which might be encouraged elsewhere in the Government Survey area.
92. Under such circumstances the progressive introduction of new built form will create an entirely new quarter within the precinct. As indicated in the relevant heritage guidelines such development should be respectful and responsive, but equally can be new, innovative and interpretative. The design approach which has been adopted for this inception development on all three lots delivers such an outcome which has regard to relevant heritage considerations, but equally recognises the changing nature of the place. The new development will contrast and be recognisable as such but pursues a design direction which is already evident in Nelson Place and well beyond.
93. On the demolition of the Oriental Hotel this would be a loss to the broader precinct, but one which is modest and which circumstances justify.