

Projekt Evolve

6th May 2026

Attn: Susan Brown

Planning Assessment Response

Planning Permit Application PP-321-2026
Subject Site: 10 Amundsen Street, Belmont

Response to Further Information Request

Proposal: Demolition of a Dwelling and Construction of a Dwelling in a Heritage Overlay

Thank you for the opportunity to respond to the further information request issued in relation to the above application.

The application has been reviewed having regard to Council's comments, the Heritage Advisor referral response and the relevant provisions of the Greater Geelong Planning Scheme. The following information and planning justification is provided in continued support of the proposal.

1. Administrative Matters

1.1 Title Plan and Restrictive Covenant

A current copy of the Certificate of Title is attached - Covenant No. 1278733 is not on the Title.

1.2 Personal Information Consent Form

An updated Application is provided.

1.3 Tree Symbols / Clause 52.37 Canopy Trees

The tree symbols previously shown within the rear shed were remnants from an earlier drawing issue and have now been removed from the amended plans.

Further, no canopy trees or boundary canopy trees are affected by this proposal.

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The vegetation previously located on the site has already been removed by the owner prior to this planning application and no further tree removal forms part of the current proposal. Accordingly, no additional permit trigger under Clause 52.37 is generated by the submitted development.

2. Existing Dwelling – Contributory Status Acknowledged

It is acknowledged that the existing post-war brick Bungalow is identified as a contributory dwelling within the Belmont Heights Heritage Area HO1908 and the planning report will be amended accordingly.

However, it is respectfully submitted that the contributory grading of a dwelling does not create an absolute prohibition on demolition.

The Heritage Overlay requires a balanced assessment of:

- the actual physical integrity and condition of the building,
- the degree to which contributory elements remain intact,
- whether meaningful long-term conservation can be practically achieved, and
- whether the replacement development can maintain or enhance the heritage character of the precinct.

This is particularly relevant where retention would result in an inefficient and compromised building outcome with limited long-term viability.

3. Exceptional Circumstances Supporting Demolition

Council's Heritage Advisor has stated that no exceptional circumstances have been provided to justify demolition. Respectfully, it is submitted that exceptional circumstances do exist in this instance.

3.1 Poor Physical Condition and Limited Adaptability of Existing Building

The existing dwelling is in poor physical condition and is not considered suitable for practical adaptive reuse or meaningful contemporary extension without substantial structural intervention.

While deterioration alone is not ordinarily a planning justification for demolition, in this case:

- the original building fabric has limited capacity to accommodate modern residential requirements,
- substantial reconstruction would be required to retain the dwelling in any functional form, and
- the cost and extent of intervention required would result in a fragmented hybrid outcome with little genuine heritage authenticity.

In practical terms, the dwelling cannot be reasonably extended and modernised in a manner that delivers a coherent long-term residential outcome without wholesale structural rebuilding.

This is not a circumstance where a sound intact contributory building is being removed for convenience alone.

3.2 Approved Extension Outcome Does Not Represent Optimal Heritage or Built Form Result

Reference has been made to Planning Permit PP-392-2021 for an extension to the existing dwelling.

While that permit demonstrates one possible pathway for redevelopment, the existence of a previous approval does not compel that it remains the only or preferred planning outcome.

Upon further detailed review of the building's condition and functional limitations, it has become clear that retention and extension of the dwelling would lead to:

- compromised internal planning,
- inefficient circulation,
- constrained ceiling relationships,
- structural complexity,
- and a visually piecemeal building outcome.

The Heritage Overlay should seek not merely the preservation of residual fabric, but an enduring built form outcome that positively contributes to the precinct over the long term.

4. Replacement Dwelling Will Maintain Heritage Significance of the Streetscape

The critical heritage issue in this matter is not simply whether demolition occurs, but whether the replacement built form will erode or maintain the contributory streetscape values of Amundsen Street.

The proposed replacement dwelling has been deliberately designed to reconstruct and retain the dominant contributory characteristics of the existing post-war bungalow presentation, including:

- the original front gabled form,
- low scale single storey street presentation,
- comparable front setback,
- sympathetic wall articulation,
- traditional roof geometry,
- and materials consistent with the established Belmont Heights post-war bungalow rhythm.

Accordingly, the visual heritage reading of the streetscape will be substantially maintained.

The proposal does not introduce an alien contemporary form or a visually disruptive redevelopment outcome.

Rather, it reproduces the very heritage attributes that Council seeks to conserve — namely the detached bungalow presentation, roof dominance, front garden setting and consistent domestic scale.

This approach ensures that the contributory reading of the precinct remains legible notwithstanding the replacement of underlying building fabric.

5. Heritage Policy Balance – Conservation Versus Practical Long-Term Outcome

Clause 15.03-1S and Clause 43.01 certainly seek the conservation of contributory heritage places.

However, the Planning Scheme does not require the rigid preservation of every contributory structure irrespective of condition, practicality or long-term outcome.

The true policy objective is the conservation and enhancement of the heritage significance of the precinct as experienced from the public realm.

In this case:

- the contributory streetscape form is being retained in appearance,
- the replacement dwelling will continue the post-war bungalow rhythm identified as significant to Belmont Heights,
- and the visual heritage continuity of Amundsen Street will not be lost.

It is respectfully submitted that the Heritage Overlay should not be interpreted so narrowly as to require retention of deteriorated physical fabric where an architecturally sympathetic replacement can achieve the same or better ongoing heritage streetscape result.

6. Garage Height / Built Form

Council's Heritage Advisor has suggested a reduction in the garage roof form.

The proposed garage height is retained as submitted due to the practical need to accommodate the owner's existing vehicles and to ensure the garage remains functionally usable.

Notwithstanding this, the garage remains visually recessive behind the reconstructed front dwelling form and does not present as the dominant streetscape element when viewed from Amundsen Street.

As such, it is not considered to adversely affect the heritage appreciation of the site.

7. Overall Planning Conclusion

This application does not seek to exploit the Heritage Overlay by removing a contributory dwelling and replacing it with an unsympathetic modern form.

Rather, the application presents:

- a site where the existing dwelling is of poor practical condition and limited adaptive potential,
- where previous retention options have proven functionally compromised,
- and where the replacement building has been specifically designed to maintain the contributory post-war bungalow presentation of the streetscape.

The heritage significance of the Belmont Heights Heritage Area lies in its consistent low-scale detached bungalow character rather than solely in the retention of every piece of original brick fabric.

That streetscape character will be retained.

Accordingly, while demolition of contributory buildings is generally discouraged, it is respectfully submitted that in this instance the proposed demolition and replacement dwelling represents a reasonable and supportable heritage planning outcome.

Council is therefore requested to continue the assessment of the application on a favourable basis.

Kind Regards,

Anthony,

Director
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