

# Expert Witness Statement to Panel

Amendment C387 to the  
Melbourne Planning Scheme

269-275 William Street, Melbourne

Prepared under instruction from Glossop Town Planning  
August 2021

Bryce Raworth  
Conservation Consultant and Architectural Historian



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## 1.0 Introduction

1. This statement of evidence has been prepared under instruction from Glossop Town Planning on behalf of the owner of the property at 269-275 William Street, Melbourne. It comments on heritage considerations associated with Amendment C387 to the Melbourne Planning Scheme, which proposes to implement the recommendations of the *Hoddle Grid Heritage Review July 2020* and apply the Heritage Overlay to 133 individual places, revise the boundary of four existing individual Heritage Overlays and apply the Heritage Overlay to five precincts including extending one precinct.
2. Amendment C387, as regards to the subject site, proposes to introduce an individual Heritage Overlay control. My instructions are to prepare an expert report considering the heritage significance of the subject property and the appropriateness of the proposed overlay.
3. This statement was prepared with assistance from Martin Turnor of my office. The views expressed are my own.
4. I note that there is no private or business relationship between myself and the party(s) for whom this report is prepared other than that associated with the preparation of this statement and advice on heritage issues associated with both Amendment C387.

## 2.0 Sources of Information

5. This statement is informed by an external inspection of the subject building at 269-275 William Street along with a review of the documentation associated with Amendment C387, including the exhibited *Hoddle Grid Heritage Review* (Context Pty Ltd & GJM Heritage, 2020) and the *Summary of Submissions and Management Responses* (18 May 2021). Other documents referred to include:
  - *MELMO: Modernist Architecture in Melbourne* (Robin Grow, 2021).
  - *The Victorian Heritage Register Criteria and Threshold Guidelines* (Updated 3 December 2020).
  - *Australia Modern* (Hannah Lewi & Philip Goad, 2019).
  - *Planning Practice Note 1: Applying the Heritage Overlay* (August 2018).
  - *Guildford and Hardware Laneways Heritage Study* (Lovell Chen, 2017).
  - Panel Report - Nillumbik Planning Scheme Amendment C100 (26 March 2015).
  - *Melbourne's Marvellous Modernism: A Comparative Analysis of Post-War Modern Architecture in Melbourne's CBD* (National Trust of Australia (Victoria), 2014).
  - *The Encyclopedia of Australian Architecture* (Philip Goad & Julie Willis eds., 2011).
  - *Melbourne Architecture* (Philip Goad, 2009).
  - *Tall Buildings: Australian Business Going Up 1945-1970* (Jennifer Taylor, 2001).
  - *Australian Architecture since 1960* (Jennifer Taylor, 1990).

- *Central City Heritage Study Review* (Philip Goad, Miles Lewis, Alan Mayne, Bryce Raworth & Jeff Turnbull, 1993).
- *Central Activities District Conservation Study* (Graeme Butler, 1985).

### 3.0 Author Qualifications

6. A statement of my qualifications and experience with respect to urban conservation issues is appended to this report. Note that I have provided expert witness evidence on similar matters before Panels Victoria, the VCAT, the Heritage Council and the Building Appeals Board on numerous occasions in the past, and have been retained in such matters variously by municipal councils, owners, developers and objectors to planning proposals.

### 4.0 Declaration

7. 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 Panel.

A handwritten signature in black ink, appearing to read 'B. Raworth'.

BRYCE RAWORTH

## 5.0 History and Description

8. A double-storey villa was built on the subject site in c1865 as the residence (and presumably surgery) of a Doctor Cutts.<sup>1</sup> It was used as a boarding house for the first half of the twentieth century and as the Queen Victoria Hospital nurses' home from c1950.<sup>2</sup>



Figure 1      *The Victorian villa that originally occupied the subject site, 1920. Source: State Library Victoria.*

9. In May 1971 an application for a building permit was lodged with the City of Melbourne seeking to redevelop the subject site with a fourteen-storey office building at an estimated cost of \$1,500,000.<sup>3</sup> The building was erected as the headquarters of Brick & Pipe Industries Ltd, Victoria's largest brick manufacturer at that time, subsequently named Nubrik House (after the company's main brand). It was designed by architectural firm Buchan, Laird & Buchan and constructed by A V Jennings. More than 500,000 bricks were used in the construction of the building, using what was at the time a newly developed brick conveying system.<sup>4</sup> Reinforced concrete slab floors were supported by load bearing brick piers (left exposed internally as a decorative feature) concealed externally by brick veneer panels expressed as vertical piers with glazing between. It is understood that the load bearing brick piers were only used at the perimeter of the building, and that the floor slabs were supported internally by reinforced concrete columns and beams.<sup>5</sup>

<sup>1</sup> National Trust of Australia (Victoria) Database. File B0113.

<sup>2</sup> Sands & McDougall Directories.

<sup>3</sup> City of Melbourne Building Application Index. No. 42113.

<sup>4</sup> *The Age*, 18 December 1972, p.14.

<sup>5</sup> *Hoddle Grid Heritage Review*, p.1280.

10. Nubrik House was officially opened on 18 December 1972.<sup>6</sup> *The Age* newspaper reported that the building was:  
  
... expected to lead to a new trend in multi-storey office buildings in Australia because of the brick technique. It is claimed to be simpler and more efficient in construction and sound economically.<sup>7</sup>
11. The architects were reported to have worked in close co-operation with Brick and & Pipe Industries' research laboratories and with the Brick Development Research Institute at the University of Melbourne to maintain quality control.<sup>8</sup> Brick & Pipe Industries Ltd occupied the first two floors and their various brick products were on display in the foyer. An open public area was provided at the foyer entrance at street level, but this has been partly enclosed with a modern glazed entrance.
12. A rooftop apartment was added in 1997 and the cantilevered awning has been extended to the Little Lonsdale Street frontage with a curving plan format (it originally only projected out to William Street). The building is otherwise intact externally, apart from externally located air-conditioning units.



Figure 2 (left)

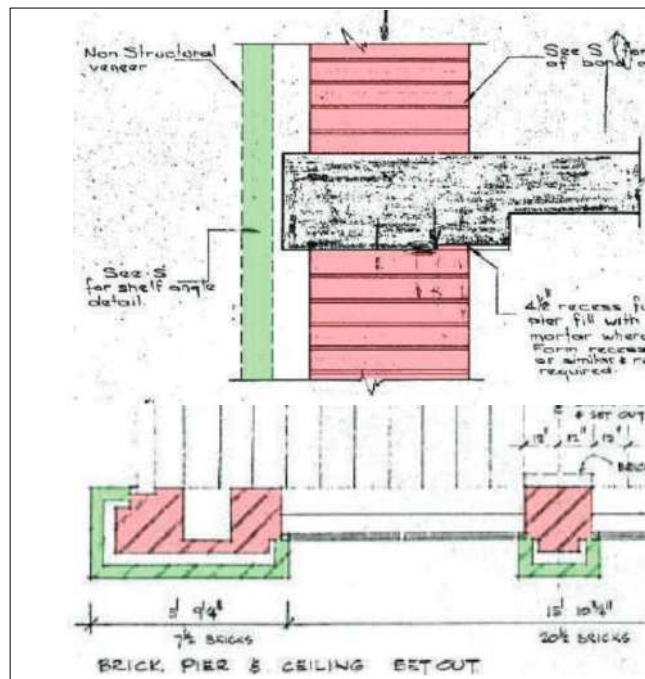


Figure 3 (right)

Nubrik House, 1975. Source: *The Bulletin*

Construction details for Nubrik House showing load bearing masonry piers (shaded red) and non-structural brick facing (shaded green). Source: Reproduced from the Hoddle Grid Heritage Review.

<sup>6</sup> *The Age*, 18 December 1972, p.13.

<sup>7</sup> *The Age*, 18 December 1972, p.13.

<sup>8</sup> *The Age*, 18 December 1972, p.13.





Figure 4 (left) The subject building viewed from William Street.  
Figure 5 (right) The building viewed from Little Lonsdale Street.



Figure 6 The corner entry with non-original doors/glazing and awning.

## 6.0 Heritage Listings

13. An interim Heritage Overlay control (HO1378) has been applied to the subject building with an expiry date of 29 May 2022. As noted, Amendment C387 to the Melbourne Planning Scheme seeks to apply a Heritage Overlay on a permanent basis. No external paint controls, internal alteration controls or tree controls would apply under the proposed Heritage Overlay.
14. The subject building is not included on the Victorian Heritage Register, nor has it been classified by the National Trust of Australia (Victoria). It was not graded in the *Central Activities District Conservation Study (1985)* and *Central City Heritage Study Review (1993)*.

## 7.0 Proposed Statement of Significance

15. The citation for the subject building, as included within the *Hoddle Grid Heritage Review*, provides the following statement of significance:

*What is significant?*

*Nubrik House at 269-275 William Street, Melbourne, completed in 1972 to a design by Buchan, Laird & Buchan, is significant.*

*Elements that contribute to the significance of the place include (but are not limited to):*

- *Original building form and scale;*
- *Original configuration of vertical panels of brickwork separating vertical bands of aluminium framed glass, with opaque panels alternating with clear glazed windows at each floor level, offset by sheer walls of face brickwork to the William Street and Alsop Lane facades; and*
- *Original aluminium framed windows.*

*Later additions made to the forecourt are not significant.*

*How it is significant?*

*Nubrik House at 269-275 William Street is of historical, representative and aesthetic significance to the City of Melbourne.*

*What is significant?*

*Nubrik House, designed by Buchan, Laird & Buchan and constructed by A V Jennings Industries Australia Ltd, is historically significant for the evidence it provides of Melbourne's postwar development and rapid growth of corporate architecture of the 1950s-70s. Its development reflected the expansion of large national and international companies opting for construction and naming rights of new city office buildings as a form of promotion and fund investment. Nubrik House was constructed as the national headquarters for Brick & Pipe Industries Ltd, Victoria's biggest brick makers, and one of Australia's largest brick manufacturers. The building was named after the company's main brand, Nubrik.*



*The building is distinguished by the extensive and prominent use of brick in the building's construction to promote the products of the building's original owner, Brick & Pipe Industries Ltd. (Criterion A)*

*Nubrik House is significant as a highly intact example of a Post-War Modernist commercial building constructed during the postwar period that utilised a reinforced concrete frame. This framing allowed for a variety of design approaches to the non-loadbearing façades. During the late 1960s and beyond, the style developed with a more eclectic use of materials and forms, combining glazed panels with solid sections to achieve a less repetitive, more distinctive and robust aesthetic. The principal façades of Nubrik House to both Little Lonsdale Street and William Street are demonstrative of this tendency, combining glazed panels with solid masonry sections. (Criterion D)*

*Nubrik House is of aesthetic significance for its distinctive design that adopted robust brick piers as one of the main design elements. While the structural masonry was used internally and designed to be exposed in the interior, the exterior design of Nubrik House consciously emphasised the unconventional use of high vertical panels of brickwork to give the appearance of supporting the building, although the external brickwork was actually supported by the internal reinforced concrete frame. While the brick piers appear to be loadbearing, they are a non-structural veneer, concealing an interior structure that is an unusual composite of a reinforced concrete column and slab frame supported on its perimeter by sections of loadbearing brickwork. Designed by Buchan, Laird & Buchan for Brick & Pipe Industries Ltd, Victoria's biggest brick manufacturer at the time, the subject building is distinguished by its design solution that consciously utilised bricks, the main product of the company, to promote this material, and in a way that visually suggests it is fulfilling a structural role. (Criterion E)*

## 8.0 Discussion

16. A submission was made to Council on behalf of the owner of the subject site in opposition to the Heritage Overlay control proposed under Amendment C387. Matters raised in the submission are itemised in Council's *Summary of Submissions and Management Response* as follows:

- *We disagree that the Subject Land and the building contained on it (Nubrik House) portray sufficient qualities to warrant heritage protection when assessed against the three criteria identified (historical, architectural and representative). While the external integrity of the building is relatively intact above ground floor, we are of the view that the historical, architectural, and representative significance of Nubrik House has been overstated in the citation to the point that heritage protection is not warranted or made out with respect to the recognised criteria*
- *Historically, the extent to which 271 William Street encapsulates Melbourne's 'postwar' style of architecture is questioned. The citation for 271 William Street claims that the building is 'historically significant for the evidence it provides of Melbourne's postwar development and rapid growth of corporate architecture of the 1950s-70s'.*

*The term 'Melbourne's postwar corporate architecture' is, however, more typically associated with the multi-storey development that resulted from the economic prosperity and technological advancements of the 1950s and 1960s. It is far less associated with development of the 1970s.*

- The relatively modest scale and unremarkable architectural expression of Nubrik House does not render it a strong example of the type of architecture produced by the postwar economic and construction boom. This, coupled with the fact that Nubrik House was constructed in 1972, weakens its historical significance.*
- As a representative work, Nubrik House is not generally considered to be one of Buchan, Laird and Buchan's more accomplished postwar works. There are many other more aesthetically refined examples of the firm's work. Notably, while Buchan, Laird and Buchan's work throughout the modernist and post-war periods is explored in detail in the Encyclopedia of Australian Architecture, Nubrik House is not one of the numerous buildings discussed in that. The building is noted with a data sheet in Melbourne's Marvellous Modernism, however, it is not identified in any way as an important building, but simply as an example of the 'expressed structure' mode of the period. Further the entry for Nubrik House was presented under the misconception that the building was of 'loadbearing brick construction' which has subsequently been discovered to be false further diluting any representative qualities*
- Aesthetically, Nubrik House is fairly typical of commercial architecture of the late 1960s and early 1970s in its 'robust' character. As a 'standard' commercial development of that period, it is altogether unremarkable in its overall architectural expression, particularly in comparison with the numerous other examples of Buchan, Laird and Buchan works.*
- Nubrik House is also neither remarkable nor unusual in the broader context of postwar commercial architecture in Melbourne. Relevantly, the Subject Land was not graded as a heritage building in either the 1985 Central Activities District Conservation Study or the 1993 Central City Heritage Study Review. This lack of recognition in previous studies or relevant reference books is indicative of the subject building's low heritage value, especially in comparison to other buildings of this era and style.*

The submission was referred to the City of Melbourne's heritage consultant GJM Heritage, and their response were reaffirmed by Council as follows:

- Management agrees with GJM's response that the assessment of 269-275 William Street (Nubrik House) was undertaken in accordance with Planning Practice Note 1: Applying the Heritage Overlay. The place has been assessed against the Heritage Criteria set out in the Practice Note and it is considered that the place meets the threshold for the application of an Individual Heritage Overlay as demonstrated in the exhibited heritage citation and Statement of Significance.*
- Management agrees with GJM's response that the Postwar Thematic History undertaken as part of the HGHR (and provided in the place citation under historical context) clearly establishes the historical importance of postwar development in the Hoddle Grid and provides a robust basis for the assessment of the heritage significance of this place type.*

- Management agrees with GJM's response that the assertion that the building is a 'standard commercial development of the period' is disputed. As outlined in the exhibited heritage citation and Statement of Significance, the building is a highly intact representative example of a Post-War Modernist commercial building (Criterion D) with a distinctive architectural expression that utilised the company's brick products in the design of its façade (Criterion E).
- Management agrees with GJM's response that the building has not been identified as being significant on the basis of its association or connection with architects, Buchan, Laird & Buchan (Criterion H). As demonstrated in the Statement of Significance for the place, it is considered to be of historic significance (Criterion A) for its association with the postwar building boom, of representative significance (Criterion D) as an intact representative example of a Post-War Modernist commercial building and of aesthetic significance (Criterion E) as a building that "... is distinguished by its design solution that consciously utilised bricks, the main products of the company, to promote this material...". The building is one of a number of CBD buildings that were completed by Buchan, Laird & Buchan in the postwar period and forms part of the firm's extensive body of work.
- Management agrees with GJM's response that the Hoddle Grid Heritage Review is the most comprehensive review of heritage buildings within the Hoddle Grid since the 1990s. The majority of current Heritage Overlays within the Hoddle Grid therefore arise from heritage studies undertaken in the 1980s and 1990s. Given the timeframe that has elapsed since then – now more than 20 years – it is reasonable to expect that public and professional recognition of heritage has changed over this time and the assessment of heritage values may warrant reconsideration.
- This is particularly relevant to the assessment of the postwar places considered in the Hoddle Grid Heritage Review (dating to the period 1945 to 1975). In comparison with nineteenth and early twentieth century buildings, very few postwar buildings have been identified through previous heritage studies undertaken within the City of Melbourne. Given that it is the passing of time that allows the enduring cultural heritage values of a place or object to be rigorously and objectively assessed, it is unsurprising that heritage studies undertaken in the 1980s and 1990s 'overlooked' some buildings dating to the 1960s and 1970s as sufficient time had not elapsed to be able to undertake a meaningful assessment of such places.
- Management agrees with GJM's response that the subject building is one of a number of postwar places that have been assessed as part of a comprehensive review undertaken to address this gap. The Review provides sufficient justification to substantiate the significance of the place and the building warrants the application of an individual Heritage Overlay.
- Management agrees with GJM's response that the assessment of the subject property is consistent with the approach adopted by Lovell Chen Heritage Gradings Review and the place warrants an individual Heritage Overlay as recommended. The City of Melbourne Heritage Gradings Review (2016), undertaken by Lovell Chen, comprised a review of the City of Melbourne heritage grading system and recommendations for phasing out the former alphabetical property gradings (A-D) to a new system utilising significant and contributory gradings.

*This approach was supported by the VPP Practice Note Applying the Heritage Overlay, which recommends against the use of 'letter gradings'. The approach to the gradings review was explained as follows:*

*The majority of current gradings were attributed during heritage studies undertaken in the 1980s and 1990s. Given the timeframe which has elapsed, it is reasonable to assume that some gradings are out of date...Instances where this could occur include where the intactness and appearance of a place or property has changed. It could also occur where the assessment of heritage value warrants reconsideration. For example, heritage places of the interwar and post-war period are now generally more highly valued in heritage terms than they typically were in the 1980s. Early properties, such as those from the 1850s-1870s are also increasingly more highly valued due to recognition of their rarity. Intact terrace rows, even rows of very modest workers cottages, are another heritage place type more highly valued due to maintaining their original external form with little visible change.*

*Other examples of places deserving of a higher level grading include those with important histories, or places with recognised social values.*

17. In terms of whether the subject building can be categorised as postwar, it is accepted that the postwar era does not have a precisely defined timeframe with a universally agreed end-point. The National Trust's 2014 report *Melbourne's Marvellous Modernism* has a date range of 1945-1975 and the recently published book *MELMO: Modernist Architecture in Melbourne* includes some discussion on architectural trends of the 1970s. On the other hand, 1970 is seen as a 'turning point' in Jennifer Taylor's *Tall Buildings: Australian Business Going Up: 1945-1970* [a key reference document for the development of multi-storey buildings in post war Australia].<sup>9</sup> The *Pictorial Guide to Identifying Australian Architecture* [one of the standard source books for Australian architectural history] defines the postwar period as c1940-c1960. This notwithstanding, I do not believe that subject building is a fine or notable example of a postwar office building sufficient to warrant a site-specific heritage control.
18. It is apparent that the subject building has not been identified as significant on the basis of its association with architects Buchan, Laird & Buchan. That said, it is noted that the subject building is not mentioned in the entry for Buchan, Laird & Buchan in the *Encyclopedia of Australian Architecture*, and is notably absent in relation to the discussion on the office buildings of the 1960s and 1970s for which the firm gained 'particular prominence'.<sup>10</sup>

<sup>9</sup> Jennifer Taylor, *Tall Buildings: Australian Business Going Up: 1945-1970*, 16.

<sup>10</sup> Julie Willis, 'Buchan, Laird & Buchan' in *Encyclopedia of Australian Architecture*, p. 111.

19. With further reference to Council's response to submissions, I agree that public and professional recognition of post-1945 built heritage has advanced since the heritage studies of the 1980s and 1990s, and that some hitherto overlooked postwar places may warrant reconsideration. This is not to suggest that buildings of the 1960s and 1970s were entirely overlooked in the past heritage studies of the City of Melbourne. Nor is it the case that 'very few' post war buildings were identified in those studies.
20. The 1985 study halted 'comprehensive assessment' at buildings less than 25 years old (ie c1960) with the exception of award winning buildings.<sup>11</sup> While not a thorough, all-encompassing survey of post war buildings, the 1985 study recognised that buildings of the 1960s and 1970s could be of heritage value. The study was also prescient in identifying a number of post 1960s buildings that are now on the Victorian Heritage Register, including Eagle House, 473 Burke Street (1970-71), the former BHP House, 130-148 William Street (1969-72), the former Hoyts Cinema, 134-144 Bourke Street (1966-69) and Total House, 170-190 Russell Street (1964-65).
21. The 1985 study also identified (as B grade places) the AMP Building/St James Building, 527-555 Bourke Street (1965-69), Royal Insurance Building, 430-444 Collins Street (1962-65) the former Young Women's Christian Association, 489-499 Elizabeth Street (1973-75) and the former Hoyts Mid-City Cinemas, 194-200 Bourke Street (1969-70). To that end, the 1985 study remains a useful guide to notable modernist buildings in the Melbourne CBD. The subsequent 1993 *Central City Heritage Study* sought to address gaps in the 1985 study by placing an emphasis on the 'critical appreciation of post war building stock dating between 1956 and 1974, which had not been formally assessed as part of the 1985 study'.<sup>12</sup> This resulted in several post war modernist buildings being nominated for planning scheme protections, inter alia, the former BHP Building, the Total Building, the Hoyts Cinema Complex, Eagle House, Coates Building, Royal Insurance Group Building and Gilbert Court.
22. As noted in Council's response to submissions, the subject building has been assessed in the *Hoddle Grid Heritage Review* using the criteria for heritage places listed in *Practice Note 1: Applying the Heritage Overlay* (August 2018). Practice Note 1 only provides general guidance on application of the heritage criteria and its limited usefulness was recognised in the Heritage Council's *State of Heritage Review: Local Heritage 2020*. That report identifies the need to update the practice note and create local threshold guidelines, similar to those used for State Heritage.<sup>13</sup>
23. In order to achieve a more forensic approach to both criteria and thresholds, consideration can be given to the *Victorian Heritage Register Criteria and Threshold Guidelines* (endorsed by the Heritage Council 6 December 2012, reviewed and updated 3 December 2020).

<sup>11</sup> *Melbourne Central Activities District Conservation Study*, p.2.

<sup>12</sup> *Tall Buildings: Australian Business Going Up: 1945-1970*, p.111.

<sup>13</sup> Heritage Council of Victoria *State of Heritage Review: Local Heritage 2020*, p. 47.

24. Accepting that the Heritage Council guidelines were prepared to assist in determining whether a place is of state significance, the methodology for applying the heritage criteria is transposable to the assessment of places of local significance and has been used for past planning scheme amendments (eg Nillumbik Amendment C100, pp.12-28).
25. The Heritage Council guidelines make it apparent in the first instance that a place should be assessed against a basic test for satisfying any given criteria, but then having met that basic test, it should be assessed against a test for determining state level significance. Paraphrasing the Heritage Council guidelines, the first basic test for satisfying Criterion A (historical significance) in a local context would be as follows:

*The place/object has a CLEAR ASSOCIATION with an event, phase, period, process, function, movement, custom or way of life in [Melbourne's] cultural history.*

*The association of the place/object to the event, phase, etc IS EVIDENT in the physical fabric of the place/object and/or in documentary resources or oral history.*

*The EVENT, PHASE, etc is of HISTORICAL IMPORTANCE, having made a strong or influential contribution to [Melbourne].*
26. Criterion A is likely to be satisfied if all of the above requisites are met, and it can be demonstrated that the *'The place/object allows the clear association with the event, phase, etc, of historical importance to be UNDERSTOOD BETTER THAN MOST OTHER PLACES OR OBJECTS [in Melbourne] WITH SUBSTANTIALLY THE SAME ASSOCIATION'* (caps as per the Heritage Council document).
27. The place's association with the Melbourne's postwar building boom is not understood better than most other places with the same association. The subject building demonstrates postwar office tower development in the CBD only in a generic sense insofar as it is a multi-storey office building from the early 1970s in a modern idiom. Any sizable postwar office building in Melbourne can be said to reflect the economic circumstances and CBD development of the period, but this is not to say they would all meet Criterion A.
28. The place's association with Brick and Pipe Industries Ltd is not readily understood in the absence of the original company signage. While the building was intended as a showcase for the company's products, the extensive use of face brick cladding was not distinctive or unusual for a high rise building of the era.
29. There were earlier (and larger) multi-storey buildings in Melbourne which have face brick as the predominant cladding material, including the 18 storey former RACV Building, 123 Queen Street (1959-1961), the 17 storey former Houston Building at 184-192 Queen Street (1964-65), the 15 storey Lonsdale Exchange, 447-553 Lonsdale Street (1969) and the 10 storey



former State Savings Bank of Victoria at 233-243 Queen Street (1967-68) [all proposed for Heritage Overlay controls under Amendment C387].

30. Historical associations with Brick and Pipe Industries are better demonstrated in the main brick pit and factory which still operates at Craigieburn Road, Wollert (under the name Austral Bricks) or the former Standard Brickworks in Box Hill, which was taken over by Brick & Pipe Industries in 1966 (listed on the Victorian Heritage Register, H0720).
31. To addresses matters of architectural significance, and again paraphrasing *Victorian Heritage Register Criteria and Threshold Guidelines*, the basic test for determining if Criterion D (representative significance) is met at a [local] level of significance is as follows:

*The place/object is a NOTABLE EXAMPLE of the class in Victoria (refer to Reference Tool D).*

32. Reference Tool D defines a 'notable example' of a class as follows:
  - **A fine example** – the place/object displays a large number or range of characteristics that is typical of the class; the place/object displays characteristics that are of a higher quality or historical relevance than are typical of places/objects in the class; or the place/object displays the principal characteristics of the class in a way that allows the class to be easily understood/appreciated.
  - **A highly intact example** – the place/object displays characteristics of the class that remain mostly unchanged from the historically important period of development or use of the place/object.
  - **An influential example** – the place/object contains physical characteristics of design, technology or materials that were copied in subsequent places/objects of the class (direct physical influence), or other places/objects were created, altered or used in response to the characteristics of this place/object.
  - **A pivotal example** – the place/object encapsulates a key evolutionary stage in the development of the class.
33. The subject building may be largely intact externally, but it is not a fine, influential, or pivotal example of a post war multi-storey office building in a local context. To quote the statement of significance, the subject building has been assessed as meeting Criterion D as:

*... a highly intact example of a Post-War Modernist commercial building constructed during the postwar period that utilised a reinforced concrete frame. This framing allowed for a variety of design approaches to the non-loadbearing façades. During the late 1960s and beyond, the style developed with a more eclectic use of materials and forms, combining glazed panels with solid sections to achieve a less repetitive, more distinctive and robust aesthetic. The principal façades of Nubrik House to both Little Lonsdale Street and William Street are demonstrative of this tendency, combining glazed panels with solid masonry sections.*

34. The above only serves to demonstrate that the subject building is unremarkable in demonstrating an approach to multi-storey office design that was well established by the early 1970s, using glazed façade elements in combination with a robust, masonry expression.

As such, the subject building does not encapsulate a key evolutionary stage in the design of high-rise buildings – ie it is not pivotal.

35. Preceding the subject building by over 10 years, the former RACV building at 123 Queen Street (1961) made extensive use of face brick cladding – it was not load bearing, but neither is the external brick skin to subject building. There are also the examples of the former AMP Building, 54-60 Market Street (1964-66), the 13 storey Embank House, 319-325 Collins Street (1965), and (in Parkville) the eleven storey Raymond Priestly Building at the University of Melbourne (1969) - all originally designed with strongly expressed vertical elements in face brick to the full height of the façade.



Figure 7 (left)

*A c1961 photograph of the RACV Building, 123 Queen Street (1961). The main façade above the podium is clad in brown brick. Source: National Library of Australia.*

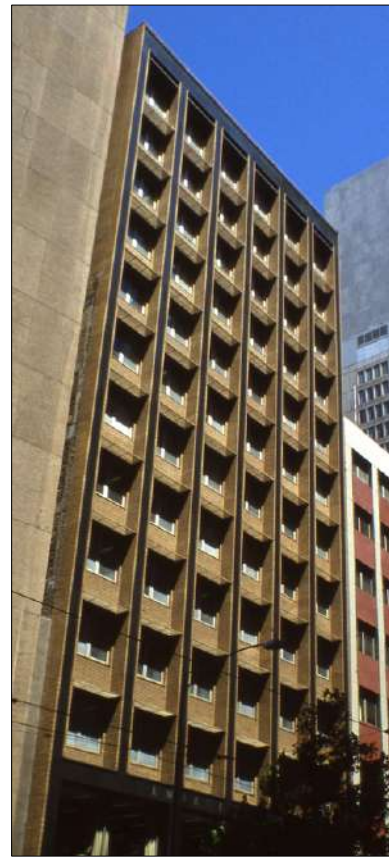


Figure 8 (right)

*A 1985 photograph of Embank House 319-325 Collins Street (1965). It was originally clad in face brick with strongly expressed vertical elements (now rendered over). Source: City of Melbourne Library.*



Figure 9 (left) A 1968 photograph of the AMP Society Building, 54-60 Market (Bates Smart McCutcheon, 1964-66). The expressed vertical piers are face brick (the façade has since been clad over). Source: National Library of Australia.



Figure 10 (right) Raymond Priestly Building, University of Melbourne (Architects Douglas Alexndra and Raymond Berg in association with Rae Featherstone, 1969). The building is not subject to a Heritage Overlay.

36. As reported in The Age in December 1972, Nubrik House was 'expected to lead to a new trend in multi-storey office buildings'. To the best of my knowledge, its construction method was not emulated in any subsequent high-rise buildings in Melbourne – to paraphrase Reference Tool D, the subject building was not influential in terms of its design characteristics and technology. The generous use of bricks in the construction of Nubrik House was presumably only made economical because the bricks were supplied by the building owner.
37. That the subject building reached 13 storeys with use of load bearing brickwork to its structural piers is hardly a remarkable achievement for the 1970s (notwithstanding that the building used relied upon reinforced concrete columns for structural support). The (long since demolished) Australia Property Investment Company Building on the corner of Elizabeth Street and Flinders Lane was completed in 1889 with brick walls reaching 12 storeys (an estimated height of 47 metres). Nubrik House is not much taller at 50.4 metres.<sup>14</sup>
38. Over 80 years before Nubrik House was completed, the Monadnock Building in Chicago reached 16 storeys with load bearing masonry walls. Tellingly, major additions to the Monadnock were commenced shortly after its c1893 completion using a steel frame with a thin brick veneer, costing 15% less than the all-masonry structure and providing 15% more lettable floor space - thereby demonstrating the main disadvantages of load bearing brick construction for multi-storey buildings.

<sup>14</sup> <https://www.emporis.com/buildings/150148/271-william-street-melbourne-australia>



Figure 11 (left)

*A 1910 postcard of the Monadnock Building, Chicago (1891-93). Source: Wikipedia.*

Figure 12 (right)

*Australia Property Investment Company Building, Elizabeth Street, c1889. Source: State Library of Victoria.*

39. The citation for the subject building provides a wide-ranging list of comparative examples of postwar office buildings in the Melbourne CBD, including five places currently on the Victorian Heritage Register, as well as 33 other sites proposed for Heritage Overlay controls under Amendment C387. The significance of those places has not been tested at Panel, and as such they do not establish a benchmark an individual Heritage Overlay control. Furthermore, the places listed in the comparative analysis encompass a broad range of approaches to the design of postwar office buildings and are of varying architectural quality. There is little by way of analysis to demonstrate that the subject building displays design characteristics that are of a higher quality or stronger historical relevance than demonstrated by typical contemporaneous office buildings.
40. A useful comparison can be made with the former Scottish Amicable Building, 128-146 Queen Street. An individual Heritage Overlay control was applied to that site in 2019 via Amendment C271 to the Melbourne Planning Scheme. Built in 1964-65 to designs by acclaimed postwar architects Yuncken Freeman, the former Scottish Amicable Building was assessed by Lovell Chen as being of historical and aesthetic/architectural significance to the City of Melbourne.<sup>15</sup> The subject building is by comparison a less architecturally sophisticated design.

<sup>15</sup> Lovell Chen, *Guildford and Hardware Laneways Heritage Study*, Appendix B.





Figure 13 (left) A 1965 photograph of the then newly completed Scottish Amicable Building, 128-146 Queen Street. Source: National Library of Australia.

Figure 14 (right) 2019 photograph of 128-146 Queen Street.

41. The Scottish Amicable Building has recently been demolished under permit (on the basis of its poor facade condition) but this does not render it invalid as a benchmark for locally significant post war office buildings.
42. It is also instructive to compare the subject building with sites that were identified in the *Hoddle Grid Heritage Review* but not progressed for further assessment. Included in this category is the Perpetual Trustees offices at 50 Queen Street, a 15 storey building completed in 1972 (the same year as the subject building) and featuring *robust brick piers as one of the main design elements* (to quote the statement of significance for the subject building).
43. The Perpetual Trustees offices has some modifications to the lower levels but the integrity to its original design remains high. The *Hoddle Grid Heritage Review* offers the following explanation for its exclusion from further assessment:
  - *Does not have a readily discernible architectural character.*
  - *Potential Contributory significance in a precinct.*
  - *Does not warrant individual Heritage Overlay.*
44. The subject building does not have a more readily discernible architectural character and is likewise unworthy of an individual Heritage Overlay control.

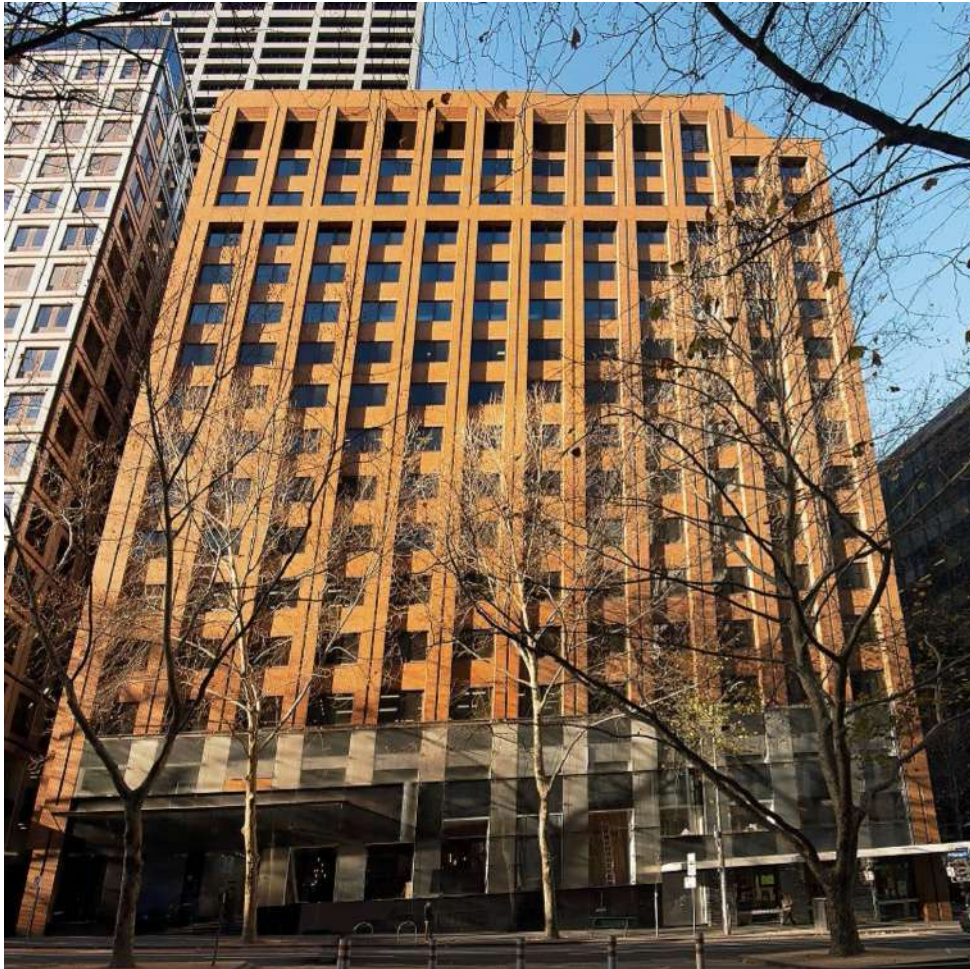


Figure 15      *The Perpetual Trustees building at 50 Queen Street, Melbourne (1972).*

45. In addition to Criterion A and D, the subject site has been assessed as meeting Criterion E – ie exhibiting particular aesthetic characteristics. To again make use of the Heritage Council guidelines for criteria and thresholds, Criterion E is likely to be satisfied [at a local level] only if all of the following requisites are met:

*The aesthetic characteristics are APPRECIATED OR VALUED by the wider community or an appropriately-related discipline as evidenced, for example, by:*

- *CRITICAL RECOGNITION of the aesthetic characteristics of the place/object within a relevant art, design, architectural or related discipline as an outstanding example within [Melbourne]; or*
- *wide public ACKNOWLEDGEMENT OF EXCEPTIONAL MERIT in [Melbourne] in medium such as songs, poetry, literature, painting, sculpture, publications, print media etc.*



46. The Heritage Council guidelines also provide a series of exclusions for Criterion E. A place unlikely to meet the criterion at a [local] level if any of the following condition apply:

<b>XE1</b>	<b>Lacks distinctiveness</b>	<i>The place/object has aesthetic qualities but they do not exceed those of the general class to which the place/object belongs</i>
<b>XE2</b>	<b>Poor, indirect or unproven recognition</b>	<i>The aesthetic qualities of the place/object have only received limited public or disciplinary recognition (as appropriate).</i>
<b>XE3</b>	<b>Degraded aesthetic qualities</b>	<i>The aesthetic characteristics of the place/object have been irreversibly degraded through changes to the fabric of the place/object, changes to the setting of the place/object; or the degraded condition of significant elements of the place/object (in some instances).</i>
<b>XE4</b>	<b>No clearly definable aesthetic characteristics</b>	<i>Being “pretty” or “attractive” or popular is insufficient for the purposes of satisfying this criterion.</i>

47. A review of journals indicates that the subject building has not received any critical recognition in the form of an architectural award, and no evidence has been provided that it is otherwise held in esteem by the wider public. To that end, the subject building would not pass the basic test for determining whether Criterion E is met at a local level.
48. Nubrik House was the subject of a lengthy feature article published in *The Age* newspaper at the time of its official opening in December 1972, but the tone of the article is self-promotional – this is typical of the laudatory newspaper reporting of new buildings of the time, and cannot be taken as evidence of critical acclaim.
49. In terms of more recent publications, there is no mention of the subject building in any of the following key reference documents for post war modernist architecture in Melbourne: *Tall Buildings: Australian Business Going Up: 1945-1970* (Jennifer Taylor, 2001), *Australian Architecture Since 1960* (Jennifer Taylor, 1986), *Melbourne Architecture* (Philip Goad, 2009), *Australia Modern* (Hannah Lewi & Philip Goad, 2019) and *MELMO: Modernist Architecture in Melbourne* (Robin Grow, 2020).
50. As already noted, the subject building is not listed in the entry for its architects - Buchan Laird & Buchan – in the *Encyclopedia of Australian Architecture*.
51. The subject building is included in the 2008 *Survey of Post-War Built Heritage in Victoria: Stage One*, indicating that the authors of that study considered it to be of potential state significance:

*This thirteen-storey office block, built as the headquarters for a brick manufacturer, was described at the time as “Australia’s tallest structural brick building”. As such, it was*

*probably the first multi-storey loadbearing masonry building to be erected in the Melbourne CBD since at least the early twentieth century.*<sup>16</sup>

52. The comments above are reproduced almost verbatim in the entry for the subject building in the National Trust's *Melbourne's Marvellous Modernism: A Comparative Analysis of Post-War Modern Architecture in Melbourne's CBD 1955-1975*. The National Trust survey incorrectly states that the subject building is graded C – it is ungraded. Leaving that minor error aside, it can reasonably be said that many of the postwar buildings listed in the 2008 survey are not of state significance – the subject building being one such example (the *Hoddle Grid Heritage Review* has assessed the building as locally significant). Moreover, the use of a long-outmoded construction method (ie load bearing brickwork) hardly seems the basis for significance, notwithstanding that the visible brickwork is, in fact, non-structural.
53. Having regard for the above, it can reasonably be said that the subject building has received 'limited public or disciplinary recognition' as per the exclusion guidelines for Criterion E referenced above. That is to say, the subject building does not satisfy a local significance threshold in terms of Criterion E. Nor does it meet the other Criteria relied upon by the *Hoddle Grid Heritage Review*.

## 9.0 Conclusion

54. In conclusion, the former Nubrik House at 269-275 William Street is not of sufficient representative (architectural), historical or aesthetic significance to warrant a Heritage Overlay control as proposed by Amendment C387 to the Melbourne Planning Scheme.
55. The case for a Heritage Overlay control rests largely on the subject building having some load bearing brickwork – this is not in and of itself significant for a post war building other than demonstrating the use of a method of construction that was outmoded within the CBD.
56. To be identified as a place of local significance sufficient to warrant application of the Heritage Overlay, a place should meet one or more of the recognised heritage criteria to a degree that meets a threshold level of local significance. This is to say, the criteria in question should be met not just in a simple or generic manner, but to a degree that is better than many or most other examples at a local level, or to a degree that is comparable to other examples that are subject to the Heritage Overlay. The subject site does not achieve this benchmark.

<sup>16</sup> Heritage Alliance, *Survey of Post War Built Heritage in Victoria*, p.265.

# Bryce Raworth

CONSERVATION | HERITAGE

## BRYCE RAWORTH

M. ARCH., B. A. (HONS), ICCROM (ARCH)

Bryce Raworth has worked with issues relating to heritage and conservation since the mid-1980s, and has specialised in this area since establishing his own consultant practice in 1991. **Bryce Raworth Pty Ltd, Conservation • Heritage**, provides a range of heritage services, including the assessment of the significance of particular sites, preparation of conservation analyses and management plans, design and/or restoration advice for interventions into significant buildings, and detailed advice regarding the resolution of technical problems relating to deteriorating or damaged building fabric.

From 2004-2011 Raworth was a member of the Official Establishments Trust, which advises on the conservation and improvement of Admiralty House and Kirribilli House in Sydney and Government House and The Lodge in Canberra. As a member of the former Historic Buildings Council in Victoria, sitting on the Council's permit, planning and community relations committees, Raworth has been involved with the registration and permit processes for many registered historic buildings. In 1996 he was appointed an alternate member of the new Heritage Council, the successor the Historic Buildings Council, and in 1998 was made a full member.

At present he provides regular advice to architects and private owners on technical, architectural and planning issues relative to the conservation and adaptation of historic buildings, and is occasionally called upon to provide expert advice before the VCAT. He is currently the conservation consultant for the cities of Frankston, Kingston and Stonnington, and is a member of the Advisory Board to the Australian Centre for Architectural History, Urban and Cultural Heritage, University of Melbourne (ACAHUCH).

With respect to historic precincts, the company has provided detailed advice towards the resolution of heritage issues along the Upfield railway line. The company is currently contributing to redevelopment plans for the former Coburg Prisons Complex (comprising Pentridge Prison and the Metropolitan Prison) and the former Albion Explosives Factory, Maribyrnong. In 1993 Bryce Raworth led a consultant team which reviewed the City of Melbourne's conservation data and controls for the CBD, and in 1997 **Bryce Raworth Pty Ltd** revised the former City of South Melbourne Conservation Study with respect to the area within the present City of Melbourne. The firm prepares documentation for significant heritage places and areas in the City of Stonnington on an ongoing basis.

In recent years **Bryce Raworth Pty Ltd** has also provided documentation and advice during construction on the restoration of a number of key registered and heritage overlay buildings, including the Ebenezer Mission church and outbuildings, Antwerp; the former MMTB Building, Bourke Street West, Melbourne; the former Martin & Pleasance Building, 178 Collins Street, Melbourne; the former Uniting Church, Howe Crescent, South Melbourne; Heide I & II, Heide Museum of Modern Art, Bulleen; Melbourne Grammar School, South Yarra; various guard towers and other buildings, Pentridge Prison, Coburg; and Coriylue Homestead, Curlewis.

**BRYCE RAWORTH**  
M. ARCH., B. A. (HONS), ICCROM (ARCH)

Professional Status:	Conservation Consultant and Architectural Historian
Current Positions:	Conservation Consultant to the cities of Kingston, Frankston and Stonnington
Organisation Membership:	Australian Institute of Architects VPELA (Victorian Planning and Environmental Law Association)
Professional Experience:	<p>independent practice as conservation consultant and architectural historian from January 1991 (ongoing). Services include: identification and assessment of the significance of sites and complexes; preparation of guidelines regarding the safeguarding of significant sites; provision of technical, design and planning advice to architects, owners and government on issues relating to the conservation of sites of cultural significance; expert witness advice on conservation issues before the VCAT</p> <p>member, Historic Buildings Council (architectural historian's chair) 1993-1996; member, Heritage Council (architect's chair) 1998-2002</p> <p>conservation consultant to the cities of Brighton, Northcote and Sandringham (1989 only), Essendon, Hawthorn and Kew (1989-1994), Melbourne (1992-2009) and Prahran (1992-1994)</p> <p>established the Metropolitan Heritage Advisory Service on behalf of the Ministry for Planning &amp; Environment - this service was offered to the cities of Brighton, Essendon, Hawthorn, Kew, Northcote and Sandringham in 1989-90</p>
Studies:	<p>Certificate of Architectural Conservation, ICCROM (International Centre for the Study of the Preservation and the Restoration of Cultural Property at Rome), 1994</p> <p>Master of Architecture by thesis, University of Melbourne, 1993 (thesis: A Question of Style: Domestic Architecture in Melbourne, 1919-1942)</p> <p>B. Architecture (First Class Honours), University of Melbourne, 1986</p> <p>B. Arts (Second Class Honours, Division A), University of Melbourne, 1986</p>
Committee Membership:	<p>Member of Advisory Board, ACAHUCH (Australian Centre for Architectural History, Urban and Cultural Heritage, University of Melbourne)</p> <p>Twentieth Century Buildings Committee, National Trust of Australia (Victoria), 1990-1994 (Chairman 1992-1993)</p> <p>RAIA Jury, Conservation Category, 1995, 1996, 1998 and 2001 Awards (Chairman 1996 &amp; 1998)</p>
Awarded:	<p>Henry and Rachel Ackman Travelling Scholarship in Architecture, 1987-88</p> <p>JG Knight Award, conservation of Heide 1, Royal Australian Institute of Architects, Victorian Chapter, 2003</p> <p>Lachlan Macquarie Award for heritage (commendation), conservation of Heide 1, Royal Australian Institute of Architects National Award program, 2003</p> <p>Award for Heritage Architecture, conservation of Coriyule Homestead, Australian Institute of Architects, Victorian Chapter, 2015</p> <p>Award for Heritage Architecture, conservation of Coriyule Homestead, Australian Institute of Architects, National Awards, 2015</p> <p>Award for Heritage Architecture, conservation of Coriyule Homestead, Australian Institute of Architects, National Awards, 2015.</p>