

## Melbourne Amendment C387 – Hoddle Grid Heritage Review

**Evidence in Reply from Jim Gard'ner**

**19 August 2021**

Submission number: 10	In response to: <b>Evidence of Mr Bryce Raworth</b>
Address: 303-317 Collins Street	Property Name: <b>Former MLC House</b>

### Areas of disagreement

Issue (and evidence reference)	Response
Impact of changes to the forecourt Paragraph 19	The citation recognises and acknowledges the changes that have been made through the demolition of the rotunda and the erection of a low-rise 2-3 storey structure over the plaza. While previously the rotunda and plaza responds architecturally to the curved form of the tower building, it is my view that the massing, form and architectural expression of the tower above this level is not diminished by the newer podium element (refer to section 4.4 of my evidence for further discussion on this issue).
Comparable buildings excluded due to alterations at lower level Paragraphs 20 & 21	<p>The former MLC building is a substantial structure, rising to 30 storeys. The dramatic curved form of the tower remains clearly legible with the low-scale addition occupying only a small proportion of the building's overall principal elevation.</p> <p>In contrast, 458-466 Bourke Street is approximately half the height of the former MLC Building but has had more impactful alterations over a greater proportion of its principal elevation, including its spandrels replaced with fully glazed walls over the two floors above street level. This compromises its presentation to a greater extent.</p> <p>Mr Raworth notes 480-490 Collins Street was increased in height from the original nine storeys constructed in 1966 to 18 storeys in 1972. It has a dominant four-storey expressed frame structure that diminishes the legibility of the original simple tower form of the building. Again, it is my view that the new elements on this building have a substantially greater impact on the integrity and legibility of this building than is evident on the former MLC Building.</p>
Defining the postwar period	<p>My response to this issue is provided at section 6.2.1 of my initial evidence, and I remain of the view that the period 1945-1975 is appropriate.</p> <p>It is not asserted that the building represents a pivotal or influential design and it is therefore my view that it is of little importance whether the building was constructed toward the end of the period.</p>
Grading in previous studies Paragraph 25	I note Mr Raworth's agreement in respect of the appropriateness of revisiting the significance of postwar buildings. I can clarify that it is not claimed that earlier heritage studies purposefully overlooked these places, but it has been noted that comparatively few postwar buildings were identified in these earlier studies in contrast to Victorian, Edwardian and Interwar-era buildings. I maintain that this is an accurate representation of those earlier studies.

<p>Use of the Heritage Council Criteria and Thresholds Guidelines</p> <p>Paragraphs 30 &amp; 31</p>	<p>I agree with the finding of the <i>Heritage Council of Victoria State of Heritage Review: Local Heritage 2020</i> that there is a need for the creation of guidelines to provide assistance in establishing the local level threshold.</p> <p>In the absence of these, the Heritage Council's <i>The Victorian Heritage Register Criteria and Thresholds Guidelines</i> (December 2012, reviewed and updated April 2019, further reviewed and updated December 2020) (the Guidelines) are useful in guiding heritage assessments at the local level, however they are not endorsed in any way nor are they currently contained or referenced within PPN1 for use in the local heritage assessment context. It is my view that some caution needs to be exercised when using the Guidelines at the local level as the bar for reaching the State-level heritage significance threshold is clearly much higher than for reaching the local-level threshold and some of the tests within the Guidelines are less relevant – or require some modification – when applied in a local heritage context.</p> <p>As it currently stands – and in accordance with PPN1 – the test for whether a place satisfies Criterion A is whether the place demonstrates “<i>importance to the course of pattern of our cultural or natural history</i>”. In respect of establishing a threshold against this criterion, PPN1 then states (emphasis added):</p> <p style="padding-left: 40px;"><i>To apply a threshold, some comparative analysis will be required to substantiate the significance of each place. The comparative analysis should draw on other <b>similar places</b> within the study area, including those previously included in a heritage register or overlay.</i></p> <p>It is my view that the appropriate local threshold for establishing if this criterion is met is whether the place retains a sufficiently high level of integrity to clearly demonstrate a historically significant pattern or period of the municipality's local history. Unlike the State-level threshold, it is my view that the place does not need to demonstrate a historic period or pattern ‘better than most’ other places of that period, but instead to do this in a manner that is reflective of, consistent with, or comparable with other similar places. This approach is consistent with the application of the Heritage Overlay at the local level throughout Victoria over a long period.</p>
<p>Criterion A is not met</p> <p>Paragraphs 35-37</p>	<p>In my view Mr Raworth's application of the Heritage Council's Guidelines goes beyond that which is usually or appropriately applied to local heritage studies. For instance, a suburban residential dwelling or a commercial or industrial building is normally assessed based on its ability to clearly demonstrate the relevant historical themes or period <i>as well as</i> other similar places, rather than whether it does this <i>better than most</i> other similar places. While the “better than most” test is useful for establishing the higher bar of state-level historic significance, I argue that if this approach was taken in other local heritage studies a substantially smaller proportion of our heritage places would be included on the Heritage Overlay.</p> <p>It is my view that the appropriate test is whether the place has a clear association with an event or phase of historic importance, whether that association is legible through the integrity of the heritage fabric, and whether the value is demonstrated at least as well as – or in a manner that is comparable with – other similar places.</p> <p>In the case of the MLC Building, it is my view that the building retains a sufficiently high level of integrity to clearly demonstrate the key architectural and economic drivers operating in the postwar period in the City of Melbourne and that it demonstrates this value at least as well as those other buildings identified in the comparative analysis within the citation for the place.</p> <p>I note that Mr Trethowan's evidence in relation to Submissions 14 and 18 discusses the former MLC Building and provides it as an example of a building that would meet Criterion A (Trethowan evidence in relation to 457-471 Bourke Street [para. 32], 520 Collins Street [para. 31] and 457-469 Little Collins Street [para. 31]).</p>
<p>Criterion D is not met</p> <p>Paragraphs 40-42</p>	<p>I remain of the view that the former MLC Building is a fine example of a Post-war Modernist building. It demonstrates many of the key architectural devices employed during this period and is a high-rise building with dramatic curved façade, distinctive circular externally expressed lift core and terminating spire-like feature. These features can be readily understood and appreciated despite the construction of a newer podium element over the plaza.</p>

	<p>The citation makes no claim for this building to have been an ‘influential or ‘pivotal’ example. In applying the Reference Tool for Criterion D within the Guidelines, it is not necessary for all of the identified categories to be met to be considered a ‘<u>notable example</u>’. Reference Tool D reads (emphasis added):</p> <p><i>The term <u>notable example</u> is used to encompass any of the following:</i></p> <ul style="list-style-type: none"> <li>• A <u>fine example</u> ...</li> <li>• A <u>highly intact example</u> ...</li> <li>• An <u>influential example</u> ...</li> <li>• A <u>pivotal example</u>... (page. 12)</li> </ul> <p>I contend that while altered at the lower (plaza) levels, the building is a fine and highly intact example of Post-War Modernist commercial building.</p>
<p>Comparative examples</p> <p>Paragraphs 43 &amp; 44</p>	<p>The former BP House on St Kilda Road (City of Port Phillip) is appropriately recognised in the Port Phillip Planning Scheme as an individually significant place. However, its inclusion in a neighbouring municipality’s Heritage Overlay, even noting its curved plan form, has little bearing on the assessment of the former MLC Building within the City of Melbourne.</p> <p>While I agree with Mr Raworth that the Seidler-designed MLC Centre in Sydney is a more refined and accomplished work of architecture, it is located in Sydney, is included on the City of Sydney’s Local Environmental Plan, and has been assessed as being of State-level significance in the <i>Modern Movement Architecture in Central Sydney Heritage Study</i> (Tanner Kibble Denton Architects, 2019). The merits of this listing have no bearing on the matter before Panel.</p>
<p>No identification in publications</p> <p>Paragraph 46</p>	<p>I note that it is relatively rare for locally significant heritage places of any era to feature in stylistic reference documents and publication. This is in contrast with those places included on State registers or the National Heritage List which are more commonly found in architectural reference works particularly where these are innovative, seminal or influential examples.</p>
<p>Redevelopment of 128-146 Queen Street</p> <p>Paragraph 52</p>	<p>I infer from the inclusion of this material that Mr Raworth is seeking to identify some of the technical and building performance issues associated with concrete panel clad buildings of the 1960s. While such conservation issues are known and are well documented, they generally differ from building to building and may exist in one but not another. As with the example of 128-146 Queen Street, the appropriate time for considering such matters is through the planning permit process.</p>
<p>Inclusion on the Heritage Overlay is not warranted</p> <p>Paragraph 54</p>	<p>I remain of the view that 303-317 Collins Street meets Criterion A and D at the local level and should be included on the Heritage Overlay as an individual place.</p>

# Melbourne Amendment C387 – Hoddle Grid Heritage Review

Evidence in Reply from Jim Gard'ner

19 August 2021

Submission number: 12	In response to: <b>Evidence of Mr Bryce Raworth</b>
Address: 256-260 King Street	Property Name: <b>Former Paramount House</b>

## Areas of disagreement

Issue (and evidence reference)	Response
Intactness and integrity Paragraphs 26 & 28	<p>The level of ground floor alteration is considered typical of those buildings considered as part of the HGHR or already included on the Heritage Overlay. These changes however do not diminish the legibility of the overall building form or first floor to such a degree that it no longer would warrant inclusion on the Heritage Overlay (refer to section 4.4 of my initial evidence for further discussion on this issue).</p> <p>Notwithstanding the alterations identified in the HGHR assessment and Mr Raworth and Mr Trethowan's evidence, it remains my view that the integrity of the place is moderate/high, and that the values asserted in the Statement of Significance remain legible.</p> <p>While Mr Raworth's view that is that the level of intactness may be more comparable to a property identified as 'contributory' within a precinct, I note that this building has been assessed as meeting Criterion B (Rarity) for its long-standing historic use rather than as an intact example of an Interwar commercial building which could reasonably form a precinct with other similar buildings.</p>
Criterion A is not met Paragraphs 31 & 32	<p>It is my opinion that the building's historic use, which is well documented in historical sources, remains sufficiently evident in the extant fabric through its tripartite, theatre-like composition of a central element and flanking pavilions, and the employment of decorative motifs typical of those utilised in buildings constructed for the cinema and theatre industries. The design features restrained Art Deco influences and utilises abstracted classically-inspired decorative mouldings below the windows in the flanking pavilions. The tympanum of the semi-circular pediments above these windows is elaborated with cartouches/shields and stylised Rococo-like scrolls.</p> <p>While the use of symmetry and projecting and recessive elements on the façade of Interwar buildings is, as Mr Raworth states, common-place, this is also a feature of theatre design of this period and contributes to the legibility of its historic purpose. The two-storey building form and central pediment with smaller flanking pediments evident on 256-260 King Street is more typical of the theatre or cinema type than the examples provided at Figures 12 (114-122 Exhibition Street), 13 (124-130 Russell Street) and 14 (17-19 Hardware Lane) of Mr Raworth's evidence.</p> <p>'Internal Alteration Controls' are not proposed, which, in my view, is consistent with the guidance provided in PPN1.</p>
Criterion B is not met Paragraphs 35 & 36	<p>It is my view that the historical context and site history within the citation is satisfactory to demonstrate that it is of one of only a small number of places to demonstrate this historic theme within the Hoddle Grid.</p> <p>I do not agree with Mr Raworth that too many qualifiers have been used. The application of Criterion B is consistent with the intent of the Heritage Council's Guidelines with Criterion B relying on limited and reasonable qualifiers.</p> <p>While the historical connection to the heyday of early cinema might be represented in the theatres included on the Heritage Overlay (Former Palace Theatre, Bourke Street [HO500 – Bourke Hill Precinct]) or the Victorian Heritage Register (Regent Theatre, Collins Street [VHR H0690] or the</p>

	<p>Forum Theatre, Flinders Street [VHR H0438]) this building is instead associated with movie distribution and small-scale viewing, as demonstrated by its less elaborate, less customer-focussed physical expression.</p> <p>The heritage recognition of a small number of places that were principally constructed and used for the showing of motion pictures does not diminish the rare or endangered nature of the former Paramount House.</p>
<p>Comparative analysis is deficient</p> <p>Paragraphs 37 &amp; 38</p>	<p>Comparative analysis is generally more difficult with places identified as meeting Criterion B – rarity by simple virtue of the limited number of places to compare it against. In this case the comparative analysis has, correctly in my view, been undertaken both against commercial buildings of similar scale and buildings associated with the cinema industry of the Interwar period. This has demonstrated that while the place is not a notable representative example of an Interwar commercial building, it does demonstrate that the long-standing historic function for which this building was constructed is rare in the study area.</p>
<p>Inclusion on the Heritage Overlay is not warranted</p> <p>Paragraph 41</p>	<p>I remain of the view that 256-260 King Street meets Criterion A and B at the local level and should be included on the Heritage Overlay as an individual place.</p>

# Melbourne Amendment C387 – Hoddle Grid Heritage Review

Evidence in Reply from Jim Gard'ner

19 August 2021

Submission number: 12	In response to: <b>Evidence of Mr Bruce Trethowan</b>
Address: 256-260 King Street	Property Name: <b>Former Paramount House</b>

## Areas of disagreement

Issue (and evidence reference)	Response
Internal alterations Pages 3-5	The HGHR does not seek to apply 'Internal Alteration Controls' to 256-260 King Street and therefore the intactness or condition of the interior is of no relevance to the application of the Heritage Overlay to this property.
Condition Paragraph 11	<p>Internal access was not sought by me for this building and Context did not, to my knowledge, inspect the interior. The internal condition of the building and its security is a matter for the building owner to manage. Physical condition and structural integrity is not a principal consideration in an assessment of significance in accordance with PPN1 (refer to section 4.6 of my initial evidence for further discussion on this issue).</p> <p>I assume Mr Trethowan has responded to the human health and safety concerns that he has raised in accordance with his obligations as a Registered Architect, noting that these are matters to be resolved by the Municipal Building Surveyor rather than through the Planning Panel process.</p>
Level of alteration Paragraph 25	The level of ground floor alteration is typical of those buildings considered as part of the HGHR or already included on the Heritage Overlay. I remain of the view that these changes do not diminish the legibility of the overall building form or the first floor to such a degree that it no longer warrants inclusion on the Heritage Overlay (refer to section 4.4 of my initial evidence for further discussion on this issue).
Criterion A is not met Paragraph 26	<p>The heritage assessment does not attribute architectural or aesthetic value to the building beyond noting that its architectural expression is illustrative of its historical purpose. As such, Mr Trethowan's opinion that 'the building's appearance is a little austere' should not be a determinative factor in establishing whether this property satisfied Criterion A and B as proposed.</p> <p>This is a building that was purpose-built for film distribution and small-scale cinema viewing in the interwar period and remains generally intact to its period of construction. Through its physical form and documentary evidence, it therefore provides very clear and tangible to the film distribution industry.</p> <p>It remains my view that the building's historic use is evident in its extant fabric through its tripartite, theatre-like composition of a central element and flanking pavilions, and use of decorative motifs typical of those utilised in buildings constructed for the cinema and theatre industries.</p>
Comparative analysis is deficient Paragraph 27	<p>Refer to my response to Mr Raworth's evidence on p5 above.</p> <p>I note that the contextual history does reference the Regent Theatre, Collins Street and the Hoyts company.</p>
Criterion B is not met	<p>The former Paramount House does in my view represent a rare place type within the City of Melbourne.</p> <p>While the historical connection to the heyday of early cinema might be represented in the theatres included on the Heritage Overlay (Former Palace Theatre, Bourke Street [HO500 – Bourke Hill</p>

	<p>Precinct]) or the Victorian Heritage Register (Regent Theatre, Collins Street [VHR H0690], Capitol Theatre, Swanston Street [VHR H0471] or the Forum Theatre, Flinders Street [VHR H0438]), this building is associated with movie distribution as detailed in documentary sources and demonstrated by its less elaborate, less customer-focussed physical expression.</p> <p>Refer to my response to Mr Raworth's evidence on pp4 &amp; 5 above.</p>
Inclusion on the Heritage Overlay is not warranted	I remain of the view that 256-260 King Street meets Criterion A and B at the local level and should be included on the Heritage Overlay as an individual place.

# Melbourne Amendment C387 – Hoddle Grid Heritage Review

Evidence in Reply from Jim Gard'ner

19 August 2021

Submission number: 13	In response to: <b>Evidence of Ms Katherine White</b>
Address: 53-57 Lonsdale Street	Property Name: <b>Shops and residences</b>

## Areas of disagreement

Issue (and evidence reference)	Response
Date of construction Page 7	Ms White's research has provided a more definitive date of construction and therefore the citation should be updated to include this information and the Statement of Significance should be amended to identify the construction date as '1881'.
Assessment against criteria deficient Page 20	While a separate assessment against criteria is not provided within the citation, the Statement of Significance provides a statement under each of the heritage criteria that have been met as these documents are intended to be read in conjunction with each other within the HGHR. I consider the statements included under the 'Why it is significant?' to satisfactorily address the assessment against criteria.  It is my view that the assessment methodology and format of the Statement of Significance is consistent with the intent of PPN1. Further, I note the approach taken in the HGHR is consistent with that used by Ms White's practice Lovell Chen in the <i>Guildford &amp; Hardware Laneways Heritage Study</i> (2017, updated 2018).
Criterion A is met with recommended changes to the assessment against criteria Pages 21 & 22	I consider that Ms White's wording articulates the same values expressed within the Context P/L-authored citation without including reference to the ongoing legacy of Italian hospitality culture on Melbourne.  Both versions accurately articulate the place's historical significance and I have no objection to the alternative wording.
Criterion D is met with recommended changes to the assessment against criteria Page 24	Ms White's proposed articulation of Criterion D appropriately acknowledges the role of Crouch and Wilson as architects and acknowledges the presence of later shopfronts. In my view Ms White's amended assessment does fail to acknowledge that the rear wings, roof forms and chimneys remain intact and are visible from the public realm (Punch Lane).  I do not consider that Ms White's proposed wording substantially improves that prepared by Context P/L and if acknowledgement of the altered shopfronts is warranted under this criterion, then equally the intact nature of the rear wings should be noted.
Criterion H is not met Page 26	I acknowledge that there is some overlap between the assessment against Criterion A – Historical Significance and Criterion H – Associative Significance. Having said that, I consider that 53-57 Lonsdale Street has a direct and long-term association with Italian restaurateurs, a group that has made a strong and influential contribution to Melbourne. This association has, across a number of different proprietors, spanned the whole of the twentieth century. While Ms White provides examples, including those on the Victorian Heritage Register, of other places that share this association, it is clear in my view that this historical association is evident in 53-59 Lonsdale Street and this should be explicitly recognised in the Statement of Significance through the selection of Criterion H.
Significant Fabric	The Statement of Significance does list, in a comprehensive manner, the architectural elements that contribute to the heritage values of the place, and clearly states that '... later alterations made



to the street level façade, the wrought iron window baskets and single storey extensions at the rear of the site' are not significant. Ms White recommends a simplified statement which reads:

*Elements that contribute to the significance of the place include (but are not limited to) the building's original external form, materials and Italianate detailing above the shopfronts.*

Both approaches are valid and Ms White's approach arguably lessens the risk of implying an element of the building is not significant through its omission from this list.

Noting that Ms White suggests that elements which contribute to the significance of the place include "the building's original external form, materials...", she then suggests – somewhat incongruously – that original side, rear and roof fabric does not have "particular significance". I disagree with this assertion and note that the implied position of Ms White would effectively result in the protection of the façade only under the Heritage Overlay. The side, rear and roof elements are largely original historic fabric – visible from the public realm – and which, in my view, clearly contribute to the legibility and significance of this place as a largely intact Victorian-era building. Decision regarding the relative contribution of specific elements can be appropriately considered at a future time in the statutory planning context, if necessary.

In terms of Ms White's suggested wording on elements that do not contribute to the significance of the place, I recommend the following further clarification:

*Later alterations made to both the street level façade and the Punch Lane elevation, the wrought iron window baskets and the later single storey extensions at the rear of the site are not significant.*

# Melbourne Amendment C387 – Hoddle Grid Heritage Review

Evidence in Reply from Jim Gard'ner

19 August 2021

Submission number: 14	In response to: <b>Evidence of Mr Bruce Trethowan</b>
Address: <b>457-471 Bourke Street</b>	Property Name: <b>Former Dalgety House</b>

## Areas of disagreement

Issue (and evidence reference)	Response
Architectural expression Paragraph 12	<p>While the statements in Mr Trethowan's evidence are factually correct, they are not determinative as to whether or not a building might warrant inclusion on the Heritage Overlay. Office buildings that present a principal façade to the street and are not designed to contribute to the city skyline remain an important building type.</p> <p>Less significant rear and side elevations are commonly found on many, if not the majority of commercial buildings of all eras.</p>
Intactness and integrity Paragraphs 14 & 15	<p>'Internal Alteration Controls' are not proposed for this property so the loss of the Leonard French art work and changes to the lift lobby are not relevant to the consideration of whether the place should be included in the Heritage Overlay.</p> <p>The changes made to the ground floor and entry plaza are acknowledged in the HGHR citation and are common in scope and type to many that have occurred to buildings considered within this review and elsewhere within the Hoddle Grid (refer to section 4.4 of my initial evidence for further discussion on this issue).</p> <p>It remains my view that, while changes have been made to the ground floor, the former Dalgety House is of high integrity and its original form and architectural expression remains legible.</p>
Criterion A is not met Paragraphs 30 & 31	<p>It is noted that Mr Trethowan applies the Heritage Council's Guidelines to assert that the property does not meet the threshold for Criterion A at the local level. Refer to my response to Mr Raworth's evidence on p.2 of this document.</p> <p>I also note that neither the Guidelines nor PPN1 – appropriately in my view – ascribe any numerical formulae for ascertaining the maximum number of places that should be subject to heritage controls. This could lead to inappropriate assessment outcomes as there may be a greater or lesser number of a particular place type that meets the appropriate threshold. For instance, there is no predetermined number of churches or suburban houses from various periods that warrant inclusion in the Heritage Overlay. Similarly, there was no predetermined number of postwar places established as part of the HGHR prior to the assessment of individual buildings.</p> <p>In respect of former Dalgety House, documentary and physical evidence clearly demonstrates that this building was constructed in the postwar period, a period of rapid development that comprehensively changed the face of the city and which is worthy of heritage recognition. The design of the building expresses the postwar architectural movement of the time to a high standard and is a refined and well-resolved example of Post-War Modernism.</p> <p>I disagree with Mr Trethowan that the threshold should relate to the degree of change that a building may, or may not have had, on the city of skyline or its recognition as a 'landmark' or 'outstanding' building. These additional tests extend beyond the local-level threshold and fail to recognise that buildings located adjacent to other building of similar scale (such as 86-88 Collins Street [HO572], 404-406 Collins Street [Interim HO1008] or this property, amongst others) played a substantial role in reshaping central Melbourne. It is these buildings – as well as those that changed</p>

	<p>the city skyline such as 303 Collins Street (also recommended for inclusion on the Heritage Overlay through the HGHR) – that have played an important part in creating the modern city and therefore also warrant recognition on the Heritage Overlay.</p> <p>I also note that the approach of defining a number of ‘landmark’ buildings that might meet Criterion A is not, to my knowledge, an approach taken by Mr Trethowan’s practice or others in the normal course of heritage studies they undertake.</p> <p>I note Mr Trethowan expresses the view later in his evidence that:</p> <p style="padding-left: 40px;"><i>Looking at the accepted assessment criteria overall, the subject site satisfies one broad criterion (Criterion A) (para.48)</i></p> <p>It is recognised heritage practice that only one criterion needs to be met at the local level to warrant inclusion on the Heritage Overlay.</p>
<p>Criterion D is not met</p> <p>Paragraphs 40-43</p>	<p>While Mr Trethowan notes that the former Dalgety House displays a number of key characteristics of the period, he dismisses these based on the building’s ‘box-like form’ and constrained site. In contrast, I consider this to be a well-resolved and detailed building that responds to its context. The design, by respected architects, clearly demonstrates the principal characteristics of this class of place including the grid-like curtain wall and a major and minor rhythm of externally expressed structure and mullions.</p> <p>The HGHR provides a Post-War Thematic Environmental History which describes this period historically and architecturally. The term Post-War Modernism is deliberately broad to encompass the Modern architectural movement of the postwar period (1945-1975). This categorisation was chosen to avoid too narrowly defining styles which, in my view, is commonplace in <i>The Pictorial Guide to Identifying Australian Architecture</i>, a publication that I note is now more than 30 years old and was published less than 15 years after the end of the time period in question.</p> <p>I disagree that ‘Post-War Modernism’ is not a well-used term as it appears in the <i>Encyclopaedia of Australian Architecture</i> (ed. Goad, 2012, p.466) and is used in publications by DOCOMOMO and others. There is, in my view, little value in the artificial subdivision or sub-categorisation of the Post-War Modernist styles. The assessment of significance should not, in my view, be limited to a test of compliance with a person’s narrower definition of a particular sub-category of style, and note that this is highly problematic when a building employs a range of architectural devices drawn from a range of stylistic ‘sub-categories’.</p> <p>I note that in reaching his conclusion in relation Criterion D (representativeness), Mr Trethowan states that he would describe the building as being a ‘representative’ or ‘typical’ example, which I argue is part of the test to be met for Criterion D. I remain of the view that the former Dalgety House is a well-resolved and detailed example of a building that displays many of the principal characteristics of the Post-War Modernist style and can be considered a ‘fine’ representative example of the type.</p>
<p>The building is not highly intact</p> <p>Paragraph 44</p>	<p>The changes made at ground floor are common in scope and type to many that have occurred to buildings considered within this review and elsewhere within the Hoddle Grid (refer to section 4.4 of my initial evidence for further discussion on this issue).</p> <p>I agree with Mr Trethowan that the upper levels of this building retain a high degree of integrity to their original form and it is my view that the former Dalgety House remains legible as a fine and highly intact representative example of a Post-War Modernist commercial building.</p>
<p>The building is not an influential example of its type</p> <p>Paragraph 45</p>	<p>The assessment within the HGHR makes no claim that the building is a ‘influential’ example and I agree with Mr Trethowan’s assessment in this regard.</p>
<p>The building is not an pivotal example of its type</p>	<p>The assessment within the HGHR makes no claim that the building is a ‘pivotal’ example and I agree with Mr Trethowan’s assessment in this regard.</p>

Paragraph 46	
Inappropriate to include in HO for Criterion A only Paragraph 48	It is well-established practice in Australia that only one (or more) heritage criteria needs to be met at the appropriate threshold to warrant inclusion on a statutory list. I therefore question Mr Trethowan's assertion that the place does <u>not</u> warrant inclusion on the Heritage Overlay in respect of Criterion A.
Inclusion on the Heritage Overlay is not warranted	<p>I note this conclusion appears inconsistent with Mr Trethowan's assertion at paragraph 48 which states:</p> <p><i>Looking at the accepted assessment criteria overall, the subject site satisfies one broad criterion (Criterion A) of significance but no others.</i></p> <p>I remain of the view that 457-471 Bourke Street meets Criterion A and D at the local level and should be included on the Heritage Overlay as an individual place.</p>

# Melbourne Amendment C387 – Hoddle Grid Heritage Review

Evidence in Reply from Jim Gard'ner

19 August 2021

Submission number: 16	In response to: <b>Evidence of Mr John Statham</b>
Address: 25 Elizabeth Street	Property Name: <b>Former Universal House</b>

## Areas of disagreement

Issue (and evidence reference)	Response
Level of research is limited Page 15	I consider the extent of historic research and analysis of building fabric undertaken in the HGHR is appropriate and meets the standards established by PPN1 and the expectations of various Planning Panels that have considered amendments to introduce the Heritage Overlay.
Comparative Analysis is deficient Page 15	<p>For the majority of buildings identified within the HGHR constructed before 1945, the comparative analysis relies on places already included on the Heritage Overlay as a threshold for local significance has been well established through the inclusion of similar properties on the Heritage Overlay.</p> <p>Mr Statham's comment is most applicable in relation to the postwar buildings, where only a very limited number of buildings of this period were included on the Heritage Overlay. Where postwar building were included on the Heritage Overlay it was generally through their inclusion on the Victorian Heritage Register or as part of precinct where they generally fell outside the period of significance and/or the values included in the Statement of Significance. In recognition of this significant gap, the <i>Postwar Thematic Environmental History</i> was jointly prepared by Context P/L and GJM Heritage as part of the HGHR to supplement the <i>Thematic History – A History of the City of Melbourne's Urban Environment</i> (Context, 2012) and to provide a comprehensive historical context for postwar assessments.</p> <p>I consider this approach to be appropriate and consistent with the guidance within PPN1 and heritage practice more generally.</p>
No distillation of places selected within the HGHR Page 15	<p>Volume 1 of the HGHR sets out the sources for the buildings that were identified and assessed as part of the review. A total number of 532 entries were considered through the HGHR and this list was refined and assessed in two work programs (2017-2018 and 2018-2020) as described in the methodology.</p> <p>The lists of properties that were not progressed for full assessment are listed in Appendix A6 of Volume 1 of the HGHR. This illustrated list includes 26 Victorian-era (1851-1901) buildings; 21 Federation/Edwardian-era (1902-c1918) buildings; 38 Interwar (c.1919-c.1940) buildings and 49 Postwar (1945-1975) buildings. These numbers total 134 extant properties and exclude 23 properties included that were demolished. A complete list of the places assessed is provided at Appendix A7.</p> <p>I consider this approach to be appropriately rigorous and demonstrates that a substantial proportion of the buildings originally identified were not assessed as warranting inclusion on the Heritage Overlay. Further, I consider the methodology to be consistent with the guidance within PPN1 and the practice as applied by other heritage consultancies undertaking heritage studies.</p>
Criterion A generally Page 15	<p>Mr Statham's commentary discusses aspects of local historical significance which I contend are relevant considerations when assessing a place against Criterion A (historical significance).</p> <p>It is my view that Criterion A has been appropriately applied within the HGHR.</p>

Criterion D generally Page 15	<p>The HGHR has sought throughout to only identify those properties whose integrity is such that they are still legible as demonstrating the principal characteristics of their class of place. Properties of low intactness or whose integrity had been so diminished that they no longer demonstrated their class or type have not been recommended for inclusion in the Heritage Overlay.</p> <p>It is my view that Criterion D has been appropriately applied within the HGHR.</p>
Clarity of writing Pages 15 & 16	<p>I recognise that different heritage consultants and practices have varying writing styles. As noted at paragraph 47 of my initial evidence, the peer review GJM Heritage undertook of the Context P/L assessments did not seek to alter the author's voice. This can, as is the case in any collaborative exercise, result in some variation in style and language. However, this does not in my view invalidate or diminish the credibility of the recommendations of the HGHR.</p> <p>I do not understand Mr Statham's assertion that material '...of local interest only, is occasionally included at 'Why is it significant?'. The HGHR is a <u>local</u> heritage study and therefore the assessment against criteria included at 'Why it is significant?' in the citations normally, and correctly in my view, contains material of 'local interest only' as opposed to State or National-level interest or significance.</p> <p>Without Mr Statham providing detail of the specific Statements of Significance that include 'facts of little import to aspects of significance', I am unable to comment further.</p>
Status of 25 Elizabeth Street in previous studies Pages i & 10	<p>While I note Mr Statham's commentary around the potential errors in the grading of this building in a study undertaken 19 years ago, I do not consider it particularly relevant to the current assessment.</p> <p>Further, I note that according to the March 2002 draft of the <i>Review of Heritage Overlay listings in the CBD</i> that 21-33 Elizabeth Street is graded 'B' within a table of 98 properties. This table, which is included on pages 5 and 6 of the draft document is entitled 'Final list to be refined in consultation with Phillip Priest and John Statham'. Unless this draft is incorrect, it would suggest that – contrary to his written evidence – Mr Statham did have a role in the evaluation and decision-making process in the study.</p> <p>As indicated in section 4.2 of my initial evidence, and consistent with the position articulated by Mr Statham's practice, Lovell Chen, in the <i>City of Melbourne Heritage Gradings Review</i> (2016), I consider it is appropriate for the HGHR to consider afresh places previously graded C, D or E (or for that matter A or B graded buildings).</p>
Criterion A is not met Intactness and integrity Pages 17 & 18	<p>In my view this building retains a sufficient level of integrity in its historic form and architectural detailing to clearly reflect its important 'boom' phase of development.</p>
Criterion A is not met Association with the Hordern family Page 18	<p>As discussed in my initial evidence at section 5.37, on receiving the submission from Peregrine Corporation I recommended changes be made to better reflect the importance (or otherwise) of the connection between the Hordern family and 25 Elizabeth Street. I do not consider that this connection is now being overstated nor do I consider that mentioning the original owner or developer of a property conflates this fact with the assessment that the property demonstrates the importance of retail and warehousing during the boom of the 1880s.</p> <p>It is my view that the assessment against Criterion A should not be read as Mr Statham asserts '...that associations with Celia Hordern 'clearly demonstrates this important phase of the development in the city', but rather the property was built for Ms Hordern <u>and</u> the extant building 'clearly demonstrates this important phase of the development in the city'.</p> <p>I note Mr Statham's extensive discussion on the Hordern family at pages 18-24 and the family tree provided at page 25, but do not believe this provides any evidence on why Criterion A is not met. Further, the Statement of Significance does not assert that Criterion H (Associative Significance) is met in relation to the Hordern family or any other individual or group.</p>

<p>Criterion A is not met</p> <p>Association with architect William Salway</p> <p>Pages 26 &amp; 27</p>	<p>The design of the building by William Salway is a matter of uncontested historical fact; however, no assertion is made that Criterion H (associative significance) is met for this building in respect of this association.</p> <p>It is my view that it is appropriate for the designer, architect or building owner to be acknowledged in the articulation of Criterion A and that this is common practice for citations prepared by most heritage practices.</p> <p>In relation to the three adjacent buildings at 17-19 Elizabeth Street, 21-23 Elizabeth Street and 25 Elizabeth Street having also been designed by Salway, Mr Statham agrees that this is unusual. This relationship of three buildings designed by the same architect, of similar form, for similar purposes and over a short period of time (1885-1890) helps demonstrate that these properties have a clear association with – and demonstrate – Melbourne’s retail boom of this period. While noting the 1925 remodelling of 17-19 Elizabeth Street and the alterations to the façade of 25 Elizabeth Street, I consider the articulation of Criterion A within the Statement of Significance to be appropriate.</p> <p>While PPN1 does not provide guidance in relation to the minimum size of precincts, it is my view that three buildings would be at the limit of what might be considered a ‘precinct’.</p> <p>In my view, each of the three buildings meet the threshold for local heritage significance in their own right, however it is also appropriate to acknowledge relevant shared historic details between them, being that they were all designed by Salway .</p>
<p>Criterion D is not met</p> <p>Class of place</p> <p>Pages 29 &amp; 30</p>	<p>It is my view that through the historical description, the comparative analysis and the Statement of Significance it is clear that the class of place is ‘a building associated with Melbourne’s retail development during the boom years of the 1880s’.</p> <p>It appears to me that Mr Statham is holding the HGHR to a higher standard than perhaps his own practice applies to similar work. For example, the Statement of Significance for 337-339 La Trobe Street (HO1208) prepared as part of the <i>Guildford and Hardware Lane Study</i> (Lovell Chen, 2016) provides only limited assessment against Criterion D, that reads:</p> <p><i>The building is additionally a good representative example of a warehouse, and a rare red brick building of this age in this area of La Trobe Street. (Criterion D)</i></p> <p>In this instance, the class ‘warehouse’ is very broad and is only implicitly limited by the material ‘red brick’. By contrast, it is my view that the class of place under consideration for 25 Elizabeth Street is more clearly defined.</p>
<p>Criterion D is not met</p> <p>Level of alteration</p> <p>Page 31</p>	<p>Mr Statham provides a comprehensive analysis of the changes made to the façade of 25 Elizabeth Street, and I largely concur with his detailed list of changes. Mr Statham also helpfully provides an architectural drawing that recreates the likely architectural detailing that has been lost based on oblique photographs that pre-date the 1960s works.</p> <p>It was the extent and nature of these changes that informed my advice to the City of Melbourne to amend the proposed Statement of Significance for 25 Elizabeth Street to remove Criterion E (aesthetic significance). It remains my view however that the building demonstrates its 1880s origins through:</p> <ul style="list-style-type: none"> <li>• the intact parapet, entablature, pilasters, cornice mouldings at the upper level;</li> <li>• the historic form of the window openings and joinery; and</li> <li>• the elaborate and flamboyant mannered pilasters on the north and south boundary walls.</li> </ul> <p>It is my view that the form, fenestration patterns and a substantial proportion of the Mannered Classical detailing remains.</p> <p>In relation to the changes made a ground floor, these are as articulated in the HGHR commonplace. Refer to section 4.4 of my initial evidence for further discussion on this matter.</p> <p>I think it unlikely that even the lay observer would mistake this building for one constructed in the 1960s or 1970s as Mr Statham suggests. In my view, the extensive Classically-inspired detailing remaining on the building renders it legible as a retail and warehouse building of the 1880s that</p>

	<p>has, I acknowledge, undergone later alteration. I do not consider that it requires ‘...detailed observation and a practiced eye’ to understand the origins of this building.</p> <p>I remain of the view that, although altered, the late-Victorian form, fenestration patterns and a substantial proportion of the building’s decorative devices and moulding remain legible. 25 Elizabeth Street, in my view demonstrates the principal characteristics of this class of building, being a building associated with Melbourne’s retail development during the boom years of the 1880s.</p>
<p>Comparative analysis is deficient</p> <p>Pages 33 &amp; 34</p>	<p>I consider the level of comparative analysis undertaken to be appropriate and reflective of that required by PPN1. While I acknowledge that the other examples discussed are more highly intact, it is my view that 25 Elizabeth Street has an equal level of historical significance to these examples, and is similarly legible as a representative example of this class of place.</p>
<p>Conclusion</p> <p>Page 35</p>	<p>While acknowledging the level of change to the decorative elements of the façade, I remain of the view that 25 Elizabeth Street meets Criterion A and D and a local level and warrants inclusion on the Heritage Overlay.</p>



# Melbourne Amendment C387 – Hoddle Grid Heritage Review

Evidence in Reply from Jim Gard'ner

19 August 2021

Submission number: 18	In response to: Evidence of Mr Bruce Trethowan
Address: 516-520 Collins Street	Property Name: 520 Collins Street

## Areas of disagreement

Issue (and evidence reference)	Response
Alterations currently underway to the ground floor and plaza Paragraph 14	The previous changes made to the ground floor as well as those proposed through planning permit TP-2018-1057/B are noted and the works were observed in my inspection in July 2021. The changes being undertaken to the ground floor and plaza, while further altering the building at this level, are common in scope and type to many that have occurred to buildings considered within this review and elsewhere within the Hoddle Grid (refer to section 4.4 of my initial evidence for further discussion on this issue).
Criterion A is not met Paragraphs 29-32	<p>Refer to my response to Mr Raworth's evidence on p.2 of this document in respect of the Guidelines and the "better than most" test for Criterion A.</p> <p>Refer to my response to Mr Trethowan's evidence on pp.10 -11 of this document in respect of quantifying the number of places to include in the Heritage Overlay and the need to meet tests of being a 'landmark' or 'outstanding' building.</p> <p>In respect of 520 Collins Street, documentary and physical evidence clearly demonstrates that this building was constructed in the postwar period, a period of rapid development that comprehensively changed the face of the city and is worthy of heritage recognition. The design of the building expresses the postwar architectural movement of the time to a high standard and is a refined and well-resolved examples of Post-War Modernism.</p> <p>At paragraph 32 Mr Trethowan states 'The subject site falls within this general section of streets and as such <b>its significance under Criterion A is justified</b>, nevertheless, the application of Criterion A remains very broad.' [emphasis added]. He then asserts that '...it would be inappropriate to designate a building as significant solely on the basis of this criterion', this is in my view inconsistent with recognised heritage practice that only one criterion needs to be met at the local level to warrant inclusion on the Heritage Overlay.</p>
Criterion D is not met The building is not a fine example Paragraph 38	<p>The lack of a three-dimensional presentation should not be a determinative factor in considering whether or not to include the building within the Heritage Overlay. The typology of a slab-like cuboid block located between other buildings of similar scale is typical of Melbourne's CBD (particularly along Collins and Queen streets) in this period and it remains my view that this is a good representative example of this building form. Many, if not the majority, of Victorian, Edwardian and Interwar-period commercial buildings that are included on the Heritage Overlay do not present as a three-dimensional form and are built cheek by jowl, often against buildings of similar height.</p> <p>I agree the alterations to the ground floor reduce the intactness of the building, and note that this level of change is commensurate with other buildings of its period and type. These changes however do not diminish the legibility of the building form or its highly intact upper levels to such a degree that it no longer would warrant inclusion on the Heritage Overlay (refer to section 4.4 of my initial evidence for further discussion on this issue).</p> <p>The rear of the building, as is commonplace for buildings built to their side boundaries, is of more utilitarian design. This however does not diminish the Collins Street presentation that displays</p>

	<p>many of the principal characteristics of this building type through its tripartite arrangement of lower level (ground and car park), repetitive tower element and expressed capping element with dentil-like embellishments. The ribbon windows and continuous spandrel panels which terminate with a projecting flourish demonstrate a well resolved design.</p> <p>Refer to my response to Mr Trethowan's evidence on p11 of this document in respect of the use of the term 'Post-War Modernist Style' to capture this architectural typology.</p>
<p>Criterion D is not met</p> <p>The building is not highly intact</p> <p>Paragraph 43</p>	<p>The changes currently underway to the ground floor are common in scope and type to many that have occurred to buildings considered within this review and elsewhere within the Hoddle Grid (refer to section 4.4 of my initial evidence for further discussion on this issue).</p> <p>I consider that the upper levels of this building retain a high degree of integrity to their original form and 520 Collins Street remains legible as a fine and highly intact representative example of a Post-War Modernist commercial building.</p>
<p>Inclusion on the Heritage Overlay is not warranted</p> <p>Paragraph 48</p>	<p>I note this conclusion appears inconsistent with Mr Trethowan's assertion at paragraph 32 which states '...as such its significance under Criterion A is justified'.</p> <p>I remain of the view that 520 Collins Street meets Criterion A and D at the local level and should be included on the Heritage Overlay as an individual place.</p>

# Melbourne Amendment C387 – Hoddle Grid Heritage Review

Evidence in Reply from Jim Gard'ner

19 August 2021

Submission number: 18	In response to: Evidence of Ms Kate Gray
Address: 516-520 Collins Street	Property Name: 520 Collins Street

## Areas of disagreement

Issue (and evidence reference)	Response
Criterion A is not met Paragraphs 56-59	<p>I agree with Ms Gray that there is a clear association between 520 Collins Street and the postwar building boom, and that this building was constructed at the end of this historic phase. Further, I agree that these associations are 'general rather than specific' (para. 57) as is the case for the majority of properties included on the Heritage Overlay which satisfy Criterion A.</p> <p>I also agree with Ms Gray that the 'key issue is the importance of the historical association, and a relevant question is whether the subject building is associated with or able to reflect strongly on important historical themes of this period'. In this regard it is my view that the location, form and architectural expression of this building allows it to clearly demonstrate and strongly reflect the key development themes of this time. These historical associations are legible through the high level of intactness and integrity of this building as well as its well-resolved architectural expression.</p> <p>I note that Ms Gray agrees that 'the building clearly was delivered to a scale and standard in line with the expectations for the central city'. To demonstrate this important period the building does not, in my view, need '...to have been designed as an expression of corporate branding where the building is seen as expressive of the owner/client's aspirations...'. Office buildings speculatively built with the intention of leasing to third parties also formed an important part of this period of postwar growth and demonstrated the high demand for businesses of all sizes to be located in the CBD.</p>
Criterion D is not met Paragraphs 68, 69 & 85-88	<p>The HGHR, and in particular the Post-War Thematic Environmental History, acknowledges the diversity of Post-War Modernist architectural expression. The HGHR deliberately did not attempt to compartmentalise the complex array of styles within this period of the Modern Movement exactly for the reason noted by Ms Gray when she states that "in reality individual buildings were notable for the degree of experimentation and variety rather than their consistency". The places recommended for inclusion in the HGHR all demonstrate the successful integration of a range of stylistic devices and architectural expression from this period of the Modern Movement. While I note Ms Gray's characterisations of the examples she discusses, I do not agree with all the stylistic labels she applies to all of these.</p> <p>Further, I do not consider that the 'class' or 'place type' – being 'Modernist buildings within the Hoddle Grid constructed between 1945 and 1975' – is too broad to establish local significance, and is certainly no broader than 'Victorian-era houses in Carlton' or 'Interwar commercial development in Boroondara', for instance.</p> <p>It is my view that the assessment and citation for 520 Collins Street, and the other places included within the HGHR, appropriately addresses the important aspects of the class of place and its architectural or design merit.</p> <p>In response to Ms Gray's specific concerns at paragraph 88 of her evidence, I provide the following comments:</p>

	<ul style="list-style-type: none"> <li>• The HGHR is the first comprehensive heritage review of the Hoddle Grid since the 1990s and it is therefore not surprising a number of places have not previously been identified – refer to section 4.1 of my initial evidence.</li> <li>• <i>Melbourne’s Marvellous Modernism</i> was used as a key source in the preparation of the HGHR, however we have undertaken this thematic review from first principles by undertaking a street-by-street survey. A number of buildings not previously identified in earlier studies or surveys were therefore considered as part of the HGHR.</li> <li>• Whether this building is late or early in the survey period is of little import in my view. The period was selected to accord with the third quarter of the twentieth century, predating the rise of Post-Modern architectural movement. Brutalism as an architectural expression is only found in a very small number of buildings in Melbourne compared with the mainstream Modern Movement.</li> <li>• We acknowledge that after extensive research by GJM, Mr Trethowan and Ms Gray that no named architect has been identified. The identification of a ‘notable’ architect is not a determining factor in meeting the heritage criteria, and it is evident that an architect of some skill was involved in the design of this building.</li> <li>• 520 Collins Street is an example of a developer-built building for a commercial rental market. It does not need to have been considered ‘of note’ at the time to successfully demonstrate this period or class of place.</li> <li>• While not unique to this building, the aspects of the design articulated in the Statement of Significance are clearly typical of this class of place and buildings of this period designed in a Modernist style. The citation does not claim that these features are ‘innovative’ or represent a ‘pivotal’ example of this style. The curved spandrel ends is a distinctive feature of this building but the assessment did not turn on the presence (or otherwise) of this architectural device.</li> </ul>
<p>Lack of commentary in Comparative Analysis</p> <p>Paragraphs 74 &amp; 77</p>	<p>Refer to my response to Mr Statham’s evidence on p13 of this document in respect of the comparative analysis for postwar places.</p> <p>The level of comparative analysis provided within the HGHR is, in my view, appropriate and not dissimilar to that provided by Ms Gray’s practice Lovell Chen in the <i>Guildford &amp; Hardware Laneways Heritage Study</i> (2017, updated 2018).</p>
<p>Impact of Alterations</p> <p>Paragraphs 81 &amp; 82</p>	<p>Both the Benchmarking Tool developed at an early stage of the HGHR and my statement of evidence at section 4.4 recognise that it is commonplace for the ground floor of buildings of all periods to be altered within Melbourne’s CBD.</p> <p>While I agree with Ms Gray that the way in which buildings of the postwar period engage with the ground is often a key feature of the design, changes to these elements frequently do not diminish the legibility of the overall design as whole. In many cases the overall design intent – whether that be a plaza and tower form, a podium and tower, a ground level loggia or being built to the street boundary – remains legible even following alterations as the lower level.</p> <p>The previous changes made to the ground floor of 520 Collins Street, as well as those proposed through planning permit TP-2018-1057/B are noted and the works were observed in my inspection in July 2021. The changes being undertaken to the ground floor and plaza, while further altering the building at this level, will not in my view diminish the integrity of the building to such a degree that it no longer warrants inclusion on the Heritage Overlay.</p> <p>I note Ms Gray agrees that “...the building is intact above ground level, accepting the change in colour to the concrete fins in the car park” (para. 84). I consider that the upper levels of this building retain a high degree of integrity to their original form and 516-520 Collins Street remains legible as a fine and highly intact representative example of a Post-War Modernist commercial building.</p>

<p>Inclusion on the Heritage Overlay is not warranted</p> <p>Paragraph 92</p>	<p>I remain of the view that 520 Collins Street meets Criteria A and D at the local level and should be included on the Heritage Overlay as an individual place.</p>
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# Melbourne Amendment C387 – Hoddle Grid Heritage Review

Evidence in Reply from Jim Gard'ner

19 August 2021

Submission number: 20	In response to: <b>Evidence of Mr Peter Andrew Barrett</b>
Address: 111-129 Queen Street	Property Name: <b>Former RACV Club</b>

## Areas of disagreement

Issue (and evidence reference)	Response
Inaccuracies and errors Page 2	I welcome any corrections for inaccuracies, omissions or errors that have occurred in the preparation of the citation and Statement of Significance.
Intactness and integrity Pages 4 & 5	<p>The citation recognises the changes made to the lower levels since the departure of the RACV from the building in 2007. These changes are common in scope and type to many that have occurred to buildings considered within this review and elsewhere within the Hoddle Grid (refer to section 4.4 of my initial evidence for further discussion on this issue).</p> <p>Mr Barrett does acknowledge that ‘...the tower does retain its original form, materiality and fenestration pattern’. Notwithstanding the changes identified in the HGHR citation and the more detailed analysis provided by Mr Barrett, I remain of the view that the citation accurately recognises that ‘...above the first-floor level the building has retained its integrity’.</p>
Internal changes Page 10	The interior changes are, in my view, of no relevance to the application of the Heritage Overlay to this property as the HGHR does not seek to apply ‘Internal Alteration Controls’.
Changes sought to the citation Page 10	<p>I agree with Mr Barrett that a more comprehensive list of the changes made to the former RACV Club could be added to the citation and likewise, the photographs included in Mr Barrett’s evidence could also be included in an amended citation.</p> <p>I do not agree that it is necessary or appropriate to include this list of changes within the Statement of Significance as these do not fit easily into the ‘What is significant?’, ‘How is it significant?’ and ‘Why is it significant?’ format required by PPN1. Instead, the statement at the end of ‘What is significant?’ should be amended to read:</p> <p><i>Alterations that occurred after 2007 are not significant.</i></p> <p>It remains my view that the former RACV is of high integrity as it remains highly legible to its original form and design.</p>
Errors and Omissions in the Citation Pages 11 & 12	<p>I consider that the information contained within the citation is adequately cited using the ‘author/date’ format (also known as the APA Style). If Mr Barrett has specific references he thinks are required, these can be considered further.</p> <p>I note Mr Barrett’s comments, but believe the description of Melbourne’s role is correct in an Australian context. Comparisons with New York and London are, in my view, unhelpful as these two cities have collectively been the preeminent cultural and economic world cities over the past 150 years. No such claim is made for Melbourne.</p> <p>I also note Mr Barrett’s comments in relation to tourism but remain of the view that the short discussion on tourism is accurate.</p>

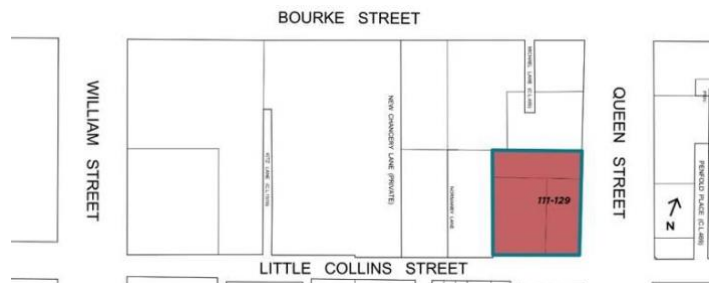
	<p>In relation to other clubs noted by Mr Barrett, it is my view that the citation adequately places the more egalitarian RACV Club in the context of similar clubs and community organisations.</p> <p>I am not able to immediately provide sources for or address the factual errors Mr Barrett notes at pages 11 and 12 of his evidence. I recommend these be referred to the principal authors for further review prior to the finalisation of Amendment C387melb.</p> <p>In relation to the use of Criteria G (social significance) and H (associative significance), I consider that the approach taken in the HGHR to articulate each separately is appropriate.</p> <p>111-129 Queen Street has a strong and longstanding association with past and many current members, staff and board members of the RACV Club (Criterion G) <u>and</u> it has an enduring and close relationship with the Royal Automobile Club of Victoria, an membership organisation that has made an influential contribution to Melbourne's history through its tourist promotion and motorist advocacy (Criterion H).</p>
Amended Statement of Significance	<p>A number of the changes Mr Barrett recommends add clarity while others I consider do not improve the wording or content of the Statement of Significance.</p> <p>I attach a tracked change version of the exhibited Statement of Significance incorporating the changes that Mr Barrett recommends and which I consider improves the document.</p>

## STATEMENT OF SIGNIFICANCE

(tracked change version following review of Mr Barrett's evidence)

**Heritage Place:** Former Royal Automobile Club of Victoria

**PS ref no:** HO1068



### What is significant?

The former Royal Automobile Club of Victoria (RACV) building at 111-129 Queen Street, Melbourne, completed in 1961 and designed by Bates Smart McCutcheon. Elements that contribute to the significance of the place include (but are not limited to):

- The building's original external form, materials and detailing; and
- The building's high level of integrity to its original design.

~~Later alterations, particularly at street level,~~ Alterations that occurred after 2007 are not significant.

### How it is significant?

The former Royal Automobile Club of Victoria building at 111-129 Queen Street is of historical, representative, aesthetic, social and associative significance to the City of Melbourne.

### Why it is significant?

The former Royal Automobile Club of Victoria building is historically significant as the headquarters of the large and influential RACV who were advocates for the rights of motorists, including the spending of significant public money on infrastructure for motorised transport. ~~In the 1950s and 60s the~~ The RACV ~~was~~ is highly influential in the promotion of tourism in Victoria. (Criterion A)

The former Royal Automobile Club of Victoria building is a fine example of a recreational club in the city centre. Built in 1961, and designed by noted ~~modernist~~ Modernist architects Bates Smart McCutcheon, it expresses its function through the glazed lower floors for semi-public use and the masonry-clad ~~residential~~ tower ~~containing accommodation~~ above. ~~In design it~~ It is a relatively early example of a modern tower departing from the glazed curtain wall of the 1950s. Its construction program was purportedly an early example of the fast-track method that enabled construction to commence concurrently with detailed design. (Criterion D)

The former Royal Automobile Club of Victoria building is aesthetically significant for its composition, of which the ~~three~~ two-storey ~~transparent~~ cantilevered podium is a notable feature. ~~Despite some alterations~~ Alterations that have reduced this architectural effect, but its form and detailing are ~~filled in the undercroft,~~ the podium is still



legible. Other attributes of aesthetic value include the ~~main visible~~ structural ~~columns visible in a recessed glass~~  
~~clerestorey window above the podium~~ piers supporting the tower and the butterfly roof ~~over~~ of the tower block.  
(Criterion E)

The former Royal Automobile Club of Victoria building is of social significance for its strong and long-standing association with the RACV Club members, staff and board. Designed as a central city meeting place for members, the club facilities served as a place ~~of social congregation~~ for RACV members ~~to socialise~~ for more than 45 years. Members used the Club as a place ~~for to conduct~~ business and for personal celebrations and events, resulting in a strong and continuing sense of connection to the ~~premises building~~ even after the club had moved to ~~its~~ new premises. (Criterion G)

The former Royal Automobile Club of Victoria building is ~~historically~~ significant as the headquarters of the State's premier road lobbyist, as a major tourism promoter, and as a private club serving Melbourne's business, professional and social elite that has hosted many significant political and public events for more than four decades. It has remained a highly influential organisation over several decades with many amongst its wide membership also highly influential within Victorian society. (Criterion H)

Primary source:

*Hoddle Grid Heritage Review (Context & GJM Heritage, 2020)*

# Melbourne Amendment C387 – Hoddle Grid Heritage Review

Evidence in Reply from Jim Gard'ner

19 August 2021

Submission number: 21	In response to: Evidence of Mr Bryce Raworth
Address: 178-188 William Street	Property Name: Office Building

## Areas of disagreement

Issue (and evidence reference)	Response
Use of the Heritage Council Criteria and Thresholds Guidelines Paragraphs 22 & 23	Refer to my response to Mr Raworth's evidence on p.2 of this document in respect of the Guidelines.
Criterion A is not met Paragraphs 25 & 26	<p>Refer to my response to Mr Raworth's evidence on p.2 of this document in respect of the Guidelines and the "better than most" test for Criterion A.</p> <p>In my view Mr Raworth's application of the Guidelines in relation to Criterion A (historical significance) goes beyond that usually applied to local heritage studies.</p> <p>In the case of 178-188 William Street, it is my view that the building is highly intact to its original form and detailing and the building clearly demonstrate the key architectural and economic drivers operating in the postwar period. It demonstrates this historic value at least as well as those other buildings identified in the comparative analysis within the citation for the place. In particular, the high level of integrity of this building ensures its association is legible to the same degree as comparable places.</p> <p>It should also be noted that the HGHR is not seeking to include every postwar commercial building in the HGHR. Of the approximately 200 post-war buildings remaining in the City of Melbourne, 55 are sought to be included in the HO through this amendment.</p>
Criterion D is not met Paragraphs 34, 35, 37, 38, 41 & 42	<p>I acknowledge that the Scottish Amicable Building was an earlier example of a building with a precast façade and is identified in part for the innovative use of this material both within the Lovell Chen citation and <i>Melbourne's Marvellous Modernism</i> (National Trust of Australia (Victoria), 2014). However, it is no longer extant having recently been demolished. The relevance of this building to a consideration of extant examples including 178-188 William Street is not clear to me other than illustrating that this building type and construction method from the postwar period is increasing disappearing from the historic landscape of Melbourne.</p> <p>I remain of the view that 178-188 William Street is a fine example of a Post-War Modernist building. It demonstrates many of the key architectural devices employed during this period and does so in an understated and refined manner utilising well-proportioned precast elements. The high level of intactness allows this building to demonstrate the principal characteristics of this class of place.</p> <p>The citation makes no claim for this building to have been an 'influential' example. A building does not need to be an influential example to be considered 'notable' under the Reference Tool for Criterion D in the Guidelines.</p> <p>In relation to the association with renowned architect Peter McIntyre, I agree that this is not a seminal or influential work of his practice and hence the HGHR does not assert that Criterion H (associative significance) has been met. I note that a number of the examples Mr Raworth identifies</p>

	<p>as being representative of Mr McIntyre's work including the former Olympic Pool are included on the VHR. Again, Mr Raworth appears to be applying a threshold for this building which is substantially higher than 'local'.</p> <p>I note that it is relatively uncommon for locally significant heritage places of any era to feature in stylistic reference documents. This is in contrast with those places included on State registers or the National Heritage List which are more commonly found in architectural reference works, particularly where these are innovative, seminal or influential examples. Therefore, the absence of discussion of 178-188 William Street in the <i>Encyclopaedia of Australian Architecture</i> for a major and prolific architect is unsurprising and is, in my view, of limited relevance to the assessment of this place against the local threshold.</p> <p>No claim is made for the construction method used at 178-188 William Street being 'remarkable', 'unusual' or 'exceptional'. Mr Raworth again appears to be applying additional qualifiers that go beyond the usual application of the local threshold for satisfying Criterion D. Even the test under Criterion D in the Guidelines does not refer to the need for a place to be 'remarkable', 'unusual' or 'exceptional'.</p> <p>While Mr Raworth provides his opinion on why this building is not 'influential' or 'pivotal' (tests for 'notable' in Reference Tool D in the Guidelines) and does not meet Criterion E (aesthetic significance), the HGHR citation does not make any claims in regards to these values. The absence of these assessed qualities does not diminish those that 178-188 William Street does meet at the local level, that is Criteria A and D.</p>
Previous gradings Paragraph 40	<p>As indicated in section 4.2 of my initial evidence it is appropriate to reassess properties considered in previous studies.</p> <p>I note that the previous studies that Mr Raworth or his practice were involved in were prepared in 1993 and 2002, which is now 28 and 19 years ago respectively, and since that time dramatic change has occurred in the central city including the demolition of buildings of the postwar period, including the Scottish Amicable Life Assurance Society Building at 128-146 Queen Street.</p>
Comparative Analysis is deficient Paragraphs 27-31	<p>I consider the comparative examples to be appropriate given these are buildings with substantially the same association to this period of economic development in Melbourne. Notwithstanding the variety of form that these buildings take – tower built to boundary (as in this case), podium and tower, or plaza and tower – the buildings provided in the comparative analysis are of similar form, are part of the Modern movement of the postwar years and were constructed to fulfil largely the same function (the office building type).</p> <p>Mr Raworth notes that 178-188 William Street does not compare favourably against postwar places included in the Victorian Heritage Register and this is not disputed. No claims are made that the place is of state-level significance.</p> <p>I agree with Mr Raworth's assertion that to meet Criterion D a place should be a notable example of its class at the local level and it remains my view that two of the tests identified in 'Reference Tool D' of the Guidelines are met, that 178-188 William Street is a 'fine' and a 'highly intact' representative example of a Modernist building of the postwar period.</p> <p>Also refer to my response to Mr Statham's evidence on p13 of this document in respect of the comparative analysis for postwar places.</p>
Conclusion Paragraph 43-44	<p>Mr Raworth acknowledges '...some limited historical and representative interest' and it remains my view that both Criteria A and D are met at the local level.</p>

# Melbourne Amendment C387 – Hoddle Grid Heritage Review

Evidence in Reply from Jim Gard'ner

19 August 2021

Submission number: 22	In response to: <b>Evidence of Mr Bryce Raworth</b>
Address: 269-275 William Street	Property Name: <b>Nubrik House</b>

## Areas of disagreement

Issue (and evidence reference)	Response
Defining the postwar period	My response to this issue is provided at section 6.2.1 of my initial evidence, and I remain of the view that the period 1945-1975 is appropriate.
Association with Buchan, Laird & Buchan Paragraph 18	In relation to the association with the prominent architectural practice Buchan, Laird & Buchan, the HGHR does not assert that Criterion H (associative significance) has been met. The absence of this building being included within the entry within <i>The Encyclopaedia of Australian Architecture</i> (p.111) is not in my view determinative of Nubrik House's significance. The entry for Buchan, Laird & Buchan by Professor Julie Willis provides a summary of the practice over 120 years and includes examples of their work in Japan, New Zealand and the United Kingdom. The absence of this building from this overview is therefore not surprising or unreasonable in my view.
Previous studies Paragraph 19	I note Mr Raworth's agreement in respect of the appropriateness of revisiting the significance of postwar buildings. I can clarify that it is not claimed that earlier heritage studies purposefully overlooked these places, but it has been noted that comparatively few postwar buildings were identified in these earlier studies in contrast to Victorian, Edwardian and Interwar-era buildings. I maintain that this is an accurate representation of those earlier studies.
Use of the Heritage Council Criteria and Thresholds Guidelines Paragraphs 22 & 24	Refer to my response to Mr Raworth's evidence on p2 of this document in respect of the Guidelines.
Criterion A is not met Paragraphs 27-30	<p>Refer to my response to Mr Raworth's evidence on p2 of this document in respect of the Guidelines and the "better than most" test for Criterion A.</p> <p>I disagree with Mr Raworth's assertion that the association with Brick and Pipe Industries Ltd is not readily understood. The removal of signage from a building over time is commonplace, particularly in the CBD, and does not diminish the significance of the place (in fact most postwar places on the VHR in the Hoddle Grid no longer retain signage for their original occupants). Through the extensive use of brick cladding in a series of expressed brick piers and published contemporary accounts, it is clear that Nubrik House was intended to showcase the use of the company's product. This is a more tangible and legible connection between the architectural expression of the building and the building's owner than applied signage is likely to provide. This approach is consistent with the basic test for satisfying Criterion A in the Guidelines, which reads:</p> <p><i>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.</i> [emphasis added]</p> <p>I note the other examples of face brick buildings referred to by Mr Raworth but am of the view that in these examples the use of brick is clearly as a thin cladding element rather than vertical elements that express the structural piers behind, as is evident at Nubrik House.</p>

	<p>The inclusion of the Former Standard Brickworks in Box Hill on the VHR has, in my view, no bearing on the local-level heritage significance of Nubrik House to the City of Melbourne.</p>
<p>Criterion D is not met Paragraphs 33, 34, 37 &amp; 38</p>	<p>I am of the view that, as asserted in the assessment under Criterion D (representative significance), Nubrik House is a 'highly intact example of a Post-War Modernist commercial building'. It is my view that this building demonstrates an accomplished and well-resolved design that can be considered a 'fine example'.</p> <p>The assessment against Criterion D makes no claim for Nubrik House being 'influential' or 'pivotal'. I note that 'Reference Tool D' in the Guidelines the term notable example is used to encompass <u>any</u> of the following:</p> <ul style="list-style-type: none"> <li>• <i>A fine example ...</i></li> <li>• <i>A highly intact example ...</i></li> <li>• <i>An influential example ...</i></li> <li>• <i>A pivotal example...</i> (page. 12)</li> </ul> <p>Of the examples illustrated by Mr Raworth, the former RACV Club at 123 Queen Street utilised brick in a veneer-like manner which places equal emphasis on the horizontal spandrel elements as the vertical module of the fenestration pattern. Two of the examples (319-325 Collins Street and 54-60 Market Street) have been reclad so the vertical emphasis of brick piers is no longer evident. The final example provided, the Raymond Priestly Building at the University of Melbourne, while being located within the City of Melbourne did not fall within the HGHR study area and may well be identified should a comprehensive heritage assessment of the university be undertaken in the future.</p> <p>The lack of later buildings that continued to use a loadbearing brick or hybrid structural system does not, in my view, diminish the local heritage significance articulated under Criterion D. Nubrick House has not been identified as meeting Criterion F (technical significance) and therefore comparisons between this and the now long-demolished Australia Property Investment Company Building on the corner of Elizabeth Street and Flinders Lane is of little or no relevance in the consideration of this matter. Likewise, the relevance of the Monadnock Building in Chicago, IL, which is I note is included on the US Department for the Interior's National Register of Historic Places, to an assessment of Nubrik House is arguably non-existent.</p>
<p>Criterion E is not met Paragraphs 46-47</p>	<p>As discussed in my response to Mr Raworth's evidence on p.2 of this document, a degree of caution needs to be exercised when applying the State-level threshold test contained in the Guidelines to a local level assessment. This is particularly the case for Criterion E. While I acknowledge that Nubrik House did not receive critical recognition beyond The Age article, nor wide public acknowledgment or exceptional merit, these State-level tests are seldom met by places that are identified for their aesthetic significance at a local level. The majority of locally-listed buildings that meet Criterion E, even within the central city, have not been written up or wide acclaim, for instance through the awards program of the Australian Institute of Architects.</p> <p>By way of example, a number of buildings identified within the <i>Guildford and Hardware Lanes Study</i> (Lovell Chen, 2016) have been assessed as meeting Criterion E. These buildings and streetscapes have had the Heritage Overlay applied, including for their aesthetic significance, without critical acclaim or having been written up in articles or monographs.</p> <p>I remain of the view that Criterion E is met in the case of Nubrik House as the aesthetic expression of the building was directly informed by the building material produced by the building owner. Specific, and still legible, design decisions were taken by the architects Buchan, Laird &amp; Buchan to visually express the load-bearing perimeter brick structure and showcase the aesthetic opportunities of Brick &amp; Pipe Industries products through the dramatic vertical panels and piers of the street facades. This use of the building as advertising of the owner's product is a deliberate and distinctive aesthetic decision that goes beyond what is typical for Modernist office buildings of the postwar period.</p>
<p>Comparative Analysis is deficient</p>	<p>I consider the comparative examples to be appropriate given these are buildings with substantially the same association to this period of economic development in Melbourne. Notwithstanding the</p>

Paragraphs 39-42	<p>variety of form that these buildings take – tower built to boundary (as in this case), podium and tower, or plaza and tower) – the buildings provided in the comparative analysis are of similar form, are part of the Modern movement of the postwar years and were constructed to fulfil largely the same function (the office building type).</p> <p>While the Scottish Amicable Building was an earlier example of a Modernist building of the postwar period, it is no longer extant having recently been demolished. The relevance of this building to a consideration of extant examples including Nubrik House is not clear to me other than to illustrate that this building type is increasingly disappearing from the historic landscape of Melbourne.</p> <p>I note that the level of alteration made to 50 Queen Street is greater than has occurred at Nubrik House and that it also lacks the dramatic vertical emphasis of the expressed piers of Nubrik House by using the same brick for the recessed spandrel panels.</p>
<p>Conclusion</p> <p>Paragraphs 54-55</p>	<p>I remain of the view that Nubrik House meets Criteria A, D and E at the local level and warrants inclusion on the Heritage Overlay.</p>

# Melbourne Amendment C387 – Hoddle Grid Heritage Review

Evidence in Reply from Jim Gard'ner

19 August 2021

Submission number: 25	In response to: <b>Evidence of Ms Robyn Riddett</b>
Address: 57-67 Little Collins Street	Property Name: <b>Former Craig, Williamson Pty Ltd Complex</b>

## Areas of disagreement

Issue (and evidence reference)	Response
Intactness Paragraphs 21-24	<p>It is the case that the majority of buildings subject to the Heritage Overlay across Victoria will primarily retain their intactness to their principal façade (or façades) only. It is acknowledged that like many properties within Melbourne's CBD, the ground floor of 57-67 Little Collins Street has been more substantially altered than may be found in other commercial contexts (refer to section 4.4 of my initial evidence for further discussion on this issue).</p> <p>I agree within Ms Riddett that the side elevations of 57-67 Little Collins Street have also undergone a degree of change, but this does not substantially reduce the legibility of the principal façade or the place as a whole.</p> <p>The interior changes are, in my view, of no relevance to the application of the Heritage Overlay to this property as the HGHR does not seek to apply 'Internal Alteration Controls'.</p>
Historic association with the Commonwealth Postmaster General's Department Paragraph 25	<p>While I concur with Ms Riddett that the purchase of privately-owned buildings by the Commonwealth Government is not uncommon, the historic ownership and use by the Postmaster-General's Department extended over a period of 60 years. This is an enduring association during which time the building housed nationally important research laboratories and a Mayser (or 'atomic') clock. This association is well documented in historical sources.</p>
Use of the Heritage Council Criteria and Thresholds Guidelines Paragraph 38	<p>I agree with Ms Riddett that the Guidelines are useful in guiding heritage assessments at the local level and note the Panel Report for Amendment C262morn Part 2 she cites. Refer to my response to Mr Raworth's evidence on p2 of this document in respect of the use of the Guidelines in local assessments.</p>
Criterion A is not met Paragraphs 45 & 51	<p>The criticism Ms Riddett makes in relation of Criterion A (historical significance) could equally apply to almost any warehouse, factory or office building form. Other than buildings whose form represents a particular manufacturing process (such as a shot tower or maltings) or communicates their function through iconography (such as places of worship or town halls) or specific design features (theatres or railway stations), the historical uses or ownership, no matter how significant, are seldom written or articulated in the fabric visible from the public realm.</p> <p>In this case, documentary evidence clearly illustrates that 57-67 Little Collins Street is associated with two significant owners and occupiers: drapers, clothiers and house furnishers Craig, Williamson Pty Ltd; and the Commonwealth Postmaster-General's Department. Further, the use of the building as Research Laboratories and as home to Australia's Mayser Clock, while not evident in the façade of the building, occurred within this building. These historical uses are more distinctive and unusual than is typically found in buildings identified under Criterion A, and it remains my view that this criterion is met at the local level. This is consistent with the basic test for satisfying Criterion A in the Guidelines, which reads:</p>

	<p><i>The association of the place/object to the event, phase, etc IS EVIDENT in the physical fabric of the place/object <b>and/or in documentary resources or oral history.</b> [emphasis added]</i></p> <p>While Ms Riddett asserts that ‘there is nothing rare about this site’ (para. 51), it should be noted that the HGHR has not identified that 57-67 Little Collins Street meets Criterion B (rarity).</p>
<p>Criterion D is not met Paragraphs 57 &amp; 61</p>	<p>I consider the principal façade to Little Collins Street to be highly intact above street level. The replacement of some (but not all) of the upper-level steel joinery in the same pattern does not in my view reduce the integrity of this façade. The side elevations to Club and McGrath lanes have been altered as one would expect over the 95+ year lifespan of the building. These elevations still retain their original face brick finish and a variety of openings made as required in the laneway elevations.</p> <p>The architectural expression of the Little Collins Street façade is not highly elaborate, which is a characteristic of this class of place (factory/warehouse of the Interwar period). The detailing, while less evident because of the current uniform black colour scheme, is highly intact and well considered in the context of this building type.</p> <p>While, Ms Riddett asserts ‘...there is no clear association, beyond historical fact...’ I contend this is the usual level of proof or evidence that a place warrants for inclusion on the Heritage Overlay. Likewise, Ms Riddett acknowledges that ‘...the principal characteristics of the class may be evident in the physical fabric...’, which I contend is the principal test under Criterion D (representative significance).</p>
<p>Criteria E and F are not met Paragraph 29</p>	<p>I concur with Ms Riddett that Criterion E (aesthetic significance) and Criterion F (technical significance) are not met. However, the absence of these criteria being met does not suggest that the building ‘has no architectural interest’. Criterion D (representative significance) embodies architectural values as articulated in the Statement of Significance. These values are, in my view, legible through the intact Little Collins Street elevation above street level and to a lesser degree the exposed brick secondary elevations to Club and McGrath lanes.</p>
<p>Comparative Analysis is deficient Paragraphs 33 &amp; 39</p>	<p>I consider the comparative examples to be appropriate. The comparators, while varying in scale and materiality, are of the same class of place, that is factory/warehouses of the Interwar period.</p> <p>I disagree with Ms Riddett’s position that to demonstrate significance at a local level the place needs to be ‘elevate(d) <u>above</u> other cited examples’ [emphasis added]. As discussed in my response to Mr Raworth’s evidence on p.2 of this document, it is my view that the place does not need to be elevated above other places, but that it instead should demonstrate its values in a manner that is reflective of, consistent with, or comparable to other similar places. This approach is consistent with the application of the Heritage Overlay at the local level throughout Victoria over a long period.</p>
<p>The property does not warrant inclusion on the Heritage Overlay Paragraph 62</p>	<p>I remain of the opinion that 57-67 Little Collins Street meets Criteria A and D at a local level and therefore warrants inclusion on the Heritage Overlay.</p>



# Melbourne Amendment C387 – Hoddle Grid Heritage Review

Evidence in Reply from Jim Gard'ner

19 August 2021

Submission number: 45	In response to: <b>Evidence of Mr Bryce Raworth</b>
Address: <b>56-64 Collins Street</b>	Property Name: <b>Former Reserve Bank of Australia Building</b>

Note: as stated at paragraphs 23-25 of my initial evidence GJM Heritage under my direction provided written advice to Dexus, the owners of 56-64 Collins Street.

## Areas of disagreement

Issue (and evidence reference)	Response
Changes made to the building Paragraphs 28, 29 & 35	<p>The omission of specific references to the two stone cornices and the aluminium glazing within the ground floor was because it was considered that the scope of these changes were adequately encompassed by the final paragraph of the description on page 245 of Volume 2b of the HGHR.</p> <p>I note Mr Raworth's observation that the vertical marble engaged piers to the main form of the tower have been replaced or overclad with stainless steel, and am of the view that the description in the citation should be amended to clearly reflect the change of these elements. However, I do not agree that '...the original spandrel panels at the summit of the building have been replaced by a cornice.' No cornice has been introduced and the terminating form of the tower remains the same. The building, as constructed, has a flat parapet (Figure 3 of Raworth evidence/ Figure 12 of the citation), which it retains. The change has been in the replacement or over-cladding of the uppermost spandrel panels in stainless steel.</p> <p>I disagree with Mr. Raworth that the upper levels of the former Reserve Bank of Australia have been so altered as to have lost its integrity to its original form. A visual comparison between the building in 1969 and now demonstrates that the form, architectural expression, fenestration patterns and substantial proportion of the original materiality is clearly legible.</p> <p>In terms of the '...International style character of the building has been overwritten with a modest but appreciable Postmodern decorative scheme...' this is only true in relation to the changes made to the ground floor which, as discussed in my initial evidence at section 4.4, are commonplace for buildings of all periods within the Hoddle Grid.</p>



56-64 Collins Street in 1969 (NAA, A1200\_L79669) (from Figure 12 of the HGHR citation)



56-64 Collins Street in August 2021 (GJM Heritage)

Use of the Heritage Council Criteria and Thresholds Guidelines Paragraphs 37 & 41	Refer to my response to Mr Raworth's evidence on p.2 of this document in respect of the Guidelines and the "better than most" test for Criterion A.
Criterion A is not met Paragraph 40	The statement against each criteria is intended to convey the relevant historical themes. The fact that this building was constructed for the Reserve Bank of Australia, as noted in the assessment against Criterion A (historical significance) clearly, in my view, links this place to the historic themes of 'Governing, administering and policing the city' and 'Building the commercial city' and the sub-themes of 'Commonwealth Government' and 'Business and finance'. These themes could be elaborated on if it was considered by Panel that this would add clarity to the Statement of Significance.
Criterion D is not met	While noting the alterations made to the former Reserve Bank of Australia Building, I remain of the view that its form, architectural expression, fenestration patterns and a substantial proportion of

Paragraphs 47, 48 & 49-51	<p>its materials are highly intact above ground floor level. I contend, contrary to Mr Raworth's position, that the building remains highly legible to its original form and can be clearly understood as a Modernist building of the postwar period.</p> <p>I do not accept that to meet the local threshold the building needs be of higher quality or demonstrate a greater range of characteristics than another well-resolved and detailed example of this class of place. Mr Raworth appears to be advocating for a higher threshold be applied to this building than might, for instance, be applied to a building from the nineteenth century or the first half of the twentieth century.</p> <p>I note that it is relatively rare for locally significant heritage places of any era to feature in stylistic reference documents or publications. This is in contrast with those places included on State registers or the National Heritage List which are more commonly found in architectural reference works particularly where these are innovative, seminal or influential examples. Notwithstanding this, the former Reserve Bank of Australia Building does appear in two publications of which <i>MELMO: Modernist Architecture in Melbourne</i> notes it as '...an important building at the eastern end of Collins Street'.</p>
Previous gradings Paragraphs 52-55	<p>As indicated in section 4.2 of my initial evidence it is appropriate to reassess properties considered in previous studies.</p> <p>Of the seven examples of postwar buildings identified in the 1993 <i>Central City Heritage Review</i>, I note that four are included on the VHR and three are recommended for inclusion on the Heritage Overlay through Amendment C387melb. The high percentage of these properties that are of State-level significance suggests that a very high threshold was applied to the 1993 Review when considering '...the critical appreciation of postwar building stock dating between 1956 and 1974'.</p>
Comparative Analysis deficient Paragraphs 42-44	Refer to my response to Mr Statham's evidence on p.13 of this document in respect of the comparative analysis for postwar places.
Inclusion on the Heritage Overlay is not warranted Paragraph 58	It remains my view that the former Reserve Bank of Australia Building meets Criteria A and D at the local level and warrants inclusion on the Heritage Overlay.

# Melbourne Amendment C387 – Hoddle Grid Heritage Review

Evidence in Reply from Jim Gard'ner

19 August 2021

Submission number: 46	In response to: <b>Evidence of Mr Bryce Raworth</b>
Address: 330-336 Collins Street	Property Name: <b>Former Colonial Mutual Life Assurance Society Building and plaza with 'Children's Tree' Sculpture</b>

## Areas of disagreement

Issue (and evidence reference)	Response
Use of the Heritage Council Criteria and Thresholds Guidelines Paragraphs 22, 25-27	Refer to my response to Mr Raworth's evidence on p.2 of this document in respect of the Guidelines and the "better than most" test for Criterion A.
Comparable buildings excluded with greater extent of alteration Paragraphs 32-34	<p>458-466 Bourke Street has had its spandrels replaced with fully glazed walls over the two floors above street level, compromising the presentation of the lower three storeys of its 14 storey height, which is a more impactful change than what has occurred at the former CML Building.</p> <p>The building at 60 Market Street (now an Oaks Hotel) has, I agree, undergone similar recladding as well as a similar level of change to the ground floor and entry. However, the recladding has more dramatically changed the expression of this building with the introduction of a strong vertical emphasis on the façade. This building has also been increased in height, altering the overall form of this building in a way that has not occurred in the case of the former CML Building.</p> <p>The recladding of the former Reserve Bank of Australia Building at 56-64 Collins is acknowledged, and this building, has like the former MLC Building been recommended for inclusion on the Heritage Overlay through Amendment C387melb.</p> <p>I remain of the view that, although reclad, the former CML building retains a high degree of integrity to its original form and, in combination with the plaza and 'Children's Tree' sculpture, is worthy of inclusion in the Heritage Overlay.</p>
Further change to façade cladding Paragraphs 36 & 37	I note that Mr Raworth states that recladding of the former CML Building will be required due to flammable aluminium composite panels (ACP). Such works would provide the opportunity to reinstate the grid-like pattern evident by removing the later random pattern of horizontal and vertical cladding elements on the building while rectifying earlier material defects. Such works could further reveal the original design intent, which I acknowledge has been diminished through the early-2000s work. Figure 8 and 9 of Mr Raworth's evidence illustrate the detail of the original cladding system and the current arrangement with its random colour pattern.
Criterion A is not met Paragraphs 24, 27-29	<p>The HGHR recognises that not all places that demonstrate a clear association with the relevant historical themes, in this case 'Shaping the urban landscape' and 'Building the commercial city' will warrant inclusion on the Heritage Overlay. This is borne out by the refinement process that occurred through the shortlisting and assessment process within the HGHR, which included 49 postwar period properties that were shortlisted but not recommended for inclusion on the Heritage Overlay.</p> <p>It is my view that the former CML Building and plaza with 'Children's Tree' sculpture demonstrates this key postwar phase of Melbourne's development through the relationship between the former</p>

	<p>CML Building, the plaza space and the ‘Children’s Tree’ sculpture by Tom Bass. While the building has been reclad and the ground floor altered, I consider it to be a good representative example of this class of building which retains a distinct and strong connection with the ‘Children’s Tree’ sculpture and associated plaza. This relationship is clearly evident in the extant fabric and documentary evidence and is consistent with the basic test for satisfying Criterion A in the Guidelines, which reads:</p> <p><i>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.</i> [emphasis added]</p> <p>I note that of the other examples of public artworks discussed in the HGHR citation (pp.408-410), two are included on the VHR (1 Spring Street and the ‘Shell Mace’ [H2356]; and the Hosies Hotel Mural [H2094]) and two (158-164 Queen Street and ‘Transformation’; and 527-55 Bourke Street and ‘Awakening’) are proposed to be included on the Heritage Overlay through Amendment C387melb.</p> <p>The former CML Building and plaza clearly demonstrate the postwar practice of utilising a publicly accessible plaza to house public art.</p>
<p>Criterion D is not met Paragraphs 40-46</p>	<p>I acknowledge that the recladding of the facades to the tower has diminished the intactness of the former CML Building, however I disagree with Mr Raworth’s opinion that the postwar Modernist character of the building is no longer readily understood. I remain of the view that it continues to be a good representative example of the tower and plaza sub-class of postwar Modernist office buildings – a typology that is rapidly disappearing from the CBD landscape. It retains its form, fenestration and spandrel panels at the upper levels. While the visual strength of the structural grid has been diminished through the over cladding in ACP in a random colour pattern, the external expression of columns and floor plates remains evident. The building retains substantial original detail at first floor level although, like the majority of buildings within the Hoddle Grid, the ground floor has been more substantially altered (refer to section 4.4 of my initial evidence for further discussion).</p> <p>The HGHR makes no claim for this building as an ‘influential’ example nor as representing ‘a key evolutionary stage [i.e. a ‘pivotal’ example] in the design of multi-storey office buildings’. I contend, contrary to Mr Raworth’s position, that the building remains highly legible to its original form and can be clearly understood as a Modernist building of the postwar period with associated plaza and public artwork.</p> <p>I note that it is relatively rare for locally significant heritage places of any era to feature in publications and reference documents. This is in contrast with those places included on State registers or the National Heritage List which are more commonly found in architectural reference works, particularly where these are innovative, seminal or influential examples. Notwithstanding this, Mr Raworth notes that the former CML Building is discussed in <i>Australian Modern: The Architecture of Stephenson and Turner</i> (Goad, Wilkin &amp; Willis, 2004), the National Trust of Australia (Victoria)’s <i>Melbourne’s Marvellous Modernism</i> (2014), <i>Tall Buildings: Australian Business Going Up: 1945-1970</i> (Taylor, 2001) and <i>MELMO: Modernist Architecture in Melbourne</i> (Grow, 2021). This degree of academic and professional interest is exceptional in the context of a place proposed for inclusion on the Heritage Overlay and, to my mind, demonstrates a level of importance that exceeds what is usual or commonplace for this class of place.</p>
<p>Criterion E is not met Paragraphs 56-58</p>	<p>The intent of the references to Eagle House within the citation for the former CML Building is to note the shared similar characteristics such as the use of steel and reinforced concrete frame and grid-like expression of the non-loadbearing glazed façade system. The citation explicitly states that Eagle House is included in the VHR (H1807) and it is not suggested that the former CML Building is of equal cultural heritage significance or warrants State-level listing.</p> <p>While the plaza space is relatively small it represents a typical response of the period to creating a public interface to an office tower. I am unaware of any meaningful distinction or inherent differentiation of size between the Italian term ‘piazza’ and the Spanish ‘plaza’. I agree with both Mr Raworth and Professor Philip Goad that the plaza (or piazza, if this term is preferred) can be described as small in the context of other tower and plaza-type office buildings. I also acknowledge</p>

	<p>that the original colonnade has been infilled at ground floor level and this as reduced the semi-public space that comprised the plaza; however, I remain of the view that the relationship between the former CML Building , the plaza and the 'Children's Tree' sculpture can be readily understood as part of the proposed heritage place. As noted in Mr Raworth's evidence, the 'Children's Tree' sculpture has been described as 'one of the city's favourite pieces of public art' by Prof. Goad.</p> <p>Stephen &amp; Turner's design set the building back from Elizabeth Street to create the – albeit modestly sized – plaza and provided the space for the 'Children's Tree' sculpture. The HGHR citation (at pages 398-399) clearly articulates the connection between the building, plaza and the sculpture which was commissioned by the Colonial Mutual Life Assurance Society as part of the site design. As sculptor Tom Bass is quoted as saying in <i>Tom Bass: totem maker</i> (Bass &amp; Smart, 2006) he "...had been asked by an insurance company to do a sculpture for a space that had been created in the forecourt of their new building, right in the heart of the city..."</p> <p>I note the other plaza spaces illustrated in Mr Raworth's evidence at Figures 22-26 and also note that two of these more substantial plazas form part of places on the VHR (Treasury Reserve Precinct [H1526] and former BHP House, 140 William Street [H1699]) and one is enclosed under the space frame of Collins Place, the completion of which falls outside the period of this study. The similarly scaled example of a plaza associated with a tower noted by Mr Raworth – the former Royal Insurance Group Building at 440 Collins Street – is also recommended for inclusion on the Heritage Overlay through Amendment C387melb.</p>
<p>Previous gradings Paragraphs 64-66</p>	<p>As indicated in section 4.2 of my initial evidence it is appropriate to reassess properties considered in previous studies.</p> <p>Of the seven examples of postwar buildings identified in the 1993 <i>Central City Heritage Review</i>, I note that four are included on the VHR and three are recommended for inclusion on the Heritage Overlay through Amendment C387melb. The high percentage of these properties that are of State-level significance suggests that a very high threshold was applied to the 1993 Review when considering '...the critical appreciation of postwar building stock dating between 1956 and 1974'.</p>
<p>Comparative Analysis is deficient Paragraphs 52-53</p>	<p>Refer to my response to Mr Statham's evidence on p13 of this document in respect of the comparative analysis for postwar places.</p>
<p>Conclusion Paragraph 67-68</p>	<p>It remains my view that the former CML Building, associated plaza and 'Children's Tree' sculpture meets Criteria A, D and E at the local level and warrants inclusion on the Heritage Overlay.</p>


# Melbourne Amendment C387 – Hoddle Grid Heritage Review


Evidence in Reply from Jim Gard'ner

19 August 2021

Submission number: 46	In response to: Evidence of Mr Geoffrey Edwards
Address: 330-336 Collins Street	Property Name: Former Colonial Mutual Life Assurance Society Building and plaza with 'Children's Tree' Sculpture

## Areas of disagreement

Issue (and evidence reference)	Response
Criteria A and D Pages 5 & 7	<p>I note Mr Edward's statement that the 'Children's Tree' sculpture</p> <p><i>'...exemplif[ies] the sculptor's express response to a widespread movement in the late 1950s and 1960s to commission sculpture for prominent metropolitan precincts that would encourage children to play on or about the works and engage with the imaginative or whimsical narratives that such works expressed. This was a notable aspect of public art theory and practice at that time.'</i></p> <p>This accords with the assessment within the HGHR citation for the former Colonial Mutual Life Assurance Society Building and plaza with 'Children's Tree' Sculpture.</p> <p>While I acknowledge Mr Edward's view that passing pedestrians either in 1963 or today would not immediately make a connection between the 'Children's Tree' and the former CML Building, the historical association is evident through the sculpture being in its original location as well as through the clear documentary resources that show that it was commissioned as public artwork by the Colonial Mutual Life Assurance Society as part of the site design.</p>
Compromised Setting Page 7	<p>I note Mr Edward's view that the sculpture previously <i>'...enjoyed a far less cluttered and more sympathetic open space...'</i> than when constructed; however, I consider his analysis to be somewhat overstated, as Figures 14 and 15 of Mr Raworth's evidence attests. In particular I note that the 1985 photograph demonstrates a similar level of corporate advertising and clutter as is evident today.</p>  <p><i>The Elizabeth Street frontage, 1985. The building exterior appears to be intact at that time. Source: City of Melbourne Library (Figure 14, Raworth evidence)</i></p>

	 <p><i>Current photograph of the Elizabeth Street frontage. (Figure 14, Raworth evidence)</i></p> <p>It is my view that the sculpture's original relationship to both the plaza and former CML Building remains clearly legible.</p>
Significance of the object Pages 8 & 9	As a piece of art I acknowledge that the 'Children's Tree' would retain intrinsic aesthetic value in an alternative location; however, the sculpture is currently located on its original site and retains its historical and physical relationship to the former CML Building and these matters go to the historical significance of the artwork as well as its aesthetic significance.
Comparative Analysis Pages 10-14	The comparative examples of the artist's public work provided by Mr Edwards are outside the HGHR study area. I note that the sculptures by Tom Bass are specifically identified as being of State-level aesthetic significance in the Statement of Significance for the VHR-listing of Wilson Hall (H1012).
Conclusion Page 9	I note that in his conclusion Mr Edwards states that the 'Children's Tree' is '...a much-loved and readily accessible work or public art' (page 9) and it is arguable that this work holds equal or greater significance to the public his works at Melbourne University included on the VHR.



# Melbourne Amendment C387 – Hoddle Grid Heritage Review

Evidence in Reply from Jim Gard'ner

19 August 2021

Submission number: 47	In response to: Evidence of Mr Bryce Raworth
Address: 588-600 Little Collins Street	Property Name: Stella Maris Seafarer's Centre

## Areas of disagreement

Issue (and evidence reference)	Response
Level of Intactness Paragraph 26	The citation in the HGHR makes no claim of architectural significance for the Stella Maris Seafarer's Centre. The changes that have occurred to the building over the past fifty years have all been undertaken to fulfil the mission of Stella Maris to provide for the spiritual, social and material support of seafarers. These changes, therefore, do not diminish the integrity or legibility of the significance of the place in any meaningful way.
Use of the Heritage Council Criteria and Thresholds Guidelines Paragraph 35	Refer to my response to Mr Raworth's evidence on p.2 of this document in respect of the application of the Guidelines.
Legibility of social significance Paragraph 52	I acknowledge that PPN1 advises that there needs to be 'something' to manage if the Heritage Overlay is to be applied. In this case there is an extant building constructed specifically for and used by Stella Maris, which is patently 'something' that can be managed. The historical associations and current use of the property can be readily discerned from the documentary record, the physical presence of the building and the external signage. This is consistent with the basic test for satisfying Criterion A in the Guidelines, which reads:  <i>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.</i> [emphasis added]
Historical and social significance questioned Paragraphs 28, 30-33	The relative age of the Stella Maris organisation in comparison with other Catholic organisations such as the Society of St Vincent de Paul is of limited relevance to the assessment of the Stella Maris Seafarers' Centre. The Stella Maris Seafarers' Society arose from the Society of St Vincent de Paul to address an identified community need at the time (the provision of support to seafarers). This reflects the adaptability of religious organisations across the globe to respond to changing needs within their community and does not lessen their importance.  I accept that a place in use for a period of 50 years is (obviously) going to have a shorter association with its site than a neighbouring property than has retained the same use on the site for a period of 170 years. I note that the Statement of Significance for the neighbouring St Augustine's Church – included on the VHR (H0002) – acknowledges the role of both the Church site and the Stella Maris Seafarers' Centre in supporting seafarers under 'Why is it significant?', which reads:  <i>St Augustines has had a long association with many national groups through its mission to seamen, which now operates separately on the southern part of the site through the Stellar Maris Club.</i>  In this respect Mr Raworth appears to be substantially understating this historical association which was recognised by the Heritage Council of Victoria when this registration was revised in 1998.  While most buildings have a utility value to their respective communities, the community attachment to the Stella Maris Seafarers' Centre has been assessed as going beyond this and

	<p>represents a strong attachment to a specific community – that is the Catholic community of lay staff, volunteers and religious staff – who serve seafarers regardless of nationality, ethnicity, faith, gender or social standing. While I understand that there will places that have social significance to larger community groups, the size of the community is not an exclusionary matter.</p> <p>Through his statement that ‘...Stella Maris’s association with the site is also that in which sea transportation arguably became less socially significant to Melbourne than in previous eras due to the introduction of mass air travel’ Mr Raworth misrepresents the purpose of the Stella Maris Seafarers’ Centre which is not to provide pastoral care to tourists and business travellers – the significant majority of which arrive by air – but rather to the seafarers who come to the Port of Melbourne, which remains Australia’s largest container port and supports a significant proportion of Melbourne and Victoria’s international trade.</p> <p>I do not consider it necessary for the citation for the Stella Maris Seafarers’ Centre to include additional ‘...information about the historical provision of welfare services to mariners in Melbourne by non-Catholic religious organisations or by unions or other professional organisations’ as this goes beyond what is normally considered necessary to demonstrate the significance of a place at the local level.</p>
<p>Criterion A is not met Paragraphs 38 &amp; 39</p>	<p>The criticism Mr Raworth makes in relation to the legibility of the building form could apply to a large number of recognised heritage places. Other than buildings whose form represents a particular manufacturing process (such as a shot tower or maltings) or communicates their function through iconography (such as places of worship or town halls) or specific design features (theatres or railway stations), the historical uses or ownership, no matter how significant, are seldom written or articulated in the fabric visible from the public realm. In this case, documentary evidence clearly illustrates the historic importance of this site from the late 1960s in continuing the Catholic Church’s official missionary work to provide pastoral care, services and support for seafaring people.</p> <p>The additions to the building made in 1981 were to expand the services Stella Maris was able to provide to seafarers. These changes do not diminish the legibility of the building in any regard and relate specifically to the historic purpose of the building. In my view, the current and historic function of the place remains highly legible through its extant fabric, signage and in the documentary record.</p> <p>Sea trade and services to support merchant mariners is captured under Victoria’s Framework of Historical Themes through ‘Travelling by water’ and ‘Providing health and welfare services’. I disagree with Mr Raworth’s assertion that the Stella Maris Seafarers’ Centre ‘... is likely to have been of more historical importance in previous eras before widespread air travel and international communications’. In my view this does not adequately recognise that Melbourne is home to a relatively inner city port where seafarers come into the city for rest and recreation. The advent of ‘widespread air travel and international communications’ did not diminish the need for pastoral care to merchant seamen as the majority of imported goods and export products continue to be transported by sea through to the Port of Melbourne.</p>
<p>Criterion G is not met Paragraphs 40-42,44 &amp; 45</p>	<p>The existence of other similar centres around Australia and worldwide does not diminish the social importance of the Stella Maris Seafarers’ Centre to the City of Melbourne.</p> <p>I acknowledge that many religious and other institutions have strong and enduring connections with recognisable communities or cultural groups; however these are less commonly identified in heritage assessments due, in part, to the bias of earlier heritage studies towards historic and aesthetic/architectural values and, in part, because of the increasing awareness and practice around identifying social values in more recent years. Mr Raworth’s comment that the same values could apply to ‘...any hospital, retreat or medical clinic’ does not invalidate the assessment against Criterion G in relation to the Stella Maris Seafarers’ Centre.</p> <p>The 2019 revision to the Heritage Council’s Criteria and Thresholds Guidelines modified the wording of Criterion G to clarify that it applies to a <u>present-day</u> community or cultural group. PPN1, which was last amended in August 2018 is yet to add this qualifier, but it is consistent with current heritage practice and the approach taken in the HGHR to consider Criterion G in terms of present-</p>

	<p>day communities or cultural groups. The longer term (historical) associations is therefore less relevant in the assessment of Criterion G. The use of the Guidelines to assess places against the local threshold (i.e. applying the Test for Step 2) must be undertaken with a degree of caution as the State-level threshold is clearly higher than local.</p> <p>In this regard, I note that Mr Raworth appears to be setting a higher than local threshold by suggesting that it is necessary for the social significance of this place to be ‘...particularly influential’; however, this test is not included in either PPN1 or the Guidelines in relation to Criterion G.</p> <p>I would argue that as home to Australia’s largest port, Mr Raworth’s statement that shipping no longer plays as central a role in Melbourne’s culture as it did before the advent of mass air travel, is not entirely accurate.</p> <p>I acknowledge that the social contribution that the Stella Maris Seafarers’ Centre makes to Melbourne as whole may be less than some other institutions, including the neighbouring State-significant St Augustine’s Church, but this does not invalidate the local-level assessment of social significance undertaken in relation to this place and its social importance to a clearly defined community group.</p>
<p>Comparative Analysis is deficient</p> <p>Paragraphs 27, 47-51</p>	<p>I agree that the Missions to Seamen building at 717 Flinders Street is the nearest comparable building in terms of role and function to the Stella Maris Seafarer’s Centre. This building is included on the VHR for its State-level architectural, historic and social significance. I note that no architectural significance is claimed for the Stella Maris Seafarer’s Centre within the HGHR.</p> <p>As few places have been assessed as meeting Criterion G at a local level in any meaningful way within the City of Melbourne, a ‘first principles’ approach has been undertaken to identify these under-represented values utilising the methodology described in Volume 1, Appendix A3 of the HGHR.</p> <p>I consider this methodology, prepared by Context P/L, who have extensive and recognised expertise in this area of heritage practice, to be adequately rigorous to assess social significance at a local level.</p> <p>It is acknowledged that the Lyceum Club and YWCA Building have very different types of social significance attributed to them; however they are postwar buildings specifically designed to meet a community need at the time, and in this regard they are of some value as comparators to the Stella Maris Seafarers’ Centre.</p> <p>While being acknowledged as part of a much longer history of the Church’s provision of support services to their respective communities, I do not consider it helpful to compare the assessed social values of the Stella Maris Seafarer’s Centre against places associated with other Catholic missions and charities which provide a wide range of services to a wide range of communities. In a similar way, it would not be useful to compare a post office against other buildings that provide some service to the public such as town halls, hospitals or schools for instance. The social values for the Stella Maris Seafarers’ Centre lie very specifically in the provision of support to the seafaring community and in this regard, the Missions to Seafarers is the most relevant comparator.</p>
<p>Future interpretation and management of the property</p> <p>Paragraph 53</p>	<p>The future demolition, development and/or interpretation of the place is not generally a relevant matter for a Panel considering inclusion of a place on the Heritage Overlay (refer to section 4.6 of my initial evidence for further discussion).</p>
<p>Age of building / historical association</p> <p>Paragraph 54</p>	<p>While the Stella Maris Seafarers’ Centre is a more recently established community service than either the Anglican Missions to Seamen or many other religious organisations operating within the City of Melbourne, it is a service that has been operating on this site for more than 50 years. This is a time period of two generations and a more than adequate period to demonstrate ‘time depth’.</p> <p>Mr Raworth’s view in this regard is inconsistent with current and emerging heritage practice and his own practice’s recognition of postwar heritage in heritage studies.</p>

Conclusion Paragraph 55	<p>The Stella Maris Seafarers' Centre is, in my view highly legible for its current and historic function, through its extant fabric, signage and the documentary record.</p> <p>It remains my view that the Stella Maris Seafarers' Centre meets Criterion A and G and warrants inclusion on the Heritage Overlay.</p>
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# Melbourne Amendment C387 – Hoddle Grid Heritage Review

Evidence in Reply from Jim Gard'ner

19 August 2021

Submission number: 55	In response to: <b>Evidence of Mr Bryce Raworth</b>
Address: 120 Exhibition Street	Property Name: <b>Former Morris House</b>

## Areas of disagreement

Issue (and evidence reference)	Response
Previous gradings Paragraphs 14 & 40	As indicated in section 4.2 of my initial evidence it is appropriate to reassess properties considered in previous studies.
Use of the Heritage Council Criteria and Thresholds Guidelines Paragraphs 18 & 20	Refer to my response to Mr Raworth's evidence on p2 of this document in respect of the application of the Guidelines and the "better than most" test for Criterion A.
Criterion A is not met Paragraphs 22-24 & 28	<p>Mr Raworth's comment on the legibility of the specific historic function of the building in its exterior fabric could equally apply to almost any warehouse, factory or office building. Other than buildings whose form represents a particular manufacturing process (such as a shot tower or maltings) or communicates their function through iconography (such as places of worship or town halls) or specific design features (theatres or railway stations), the historical uses or ownership, no matter how significant, are seldom written or articulated in the fabric visible from the public realm.</p> <p>In this case, documentary evidence clearly illustrates that 120 Exhibition Street was associated with multiple charitable uses of historical importance to the City of Melbourne. Contrary to Mr Raworth's opinion, this does meet the basic test for satisfying Criterion A in the Guidelines, which reads:</p> <p><i>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.</i> [emphasis added]</p> <p>The historical values do not need to be 'well known to the community' or currently 'associated with the building' to be historically important, and I contend that a large number of commercial, factory and warehouse buildings included on the Heritage Overlay across the State do not fulfil their original function nor is their historic occupancy well known to the current community.</p> <p>In his evidence Mr Raworth does not identify that the Missions to Seamen Building is included on the VHR (H1496) for its State-level architectural, aesthetic, historical and social significance. At paragraphs 26-27 Mr Raworth then compares the former Morris House to five other places included on the VHR and one included in North Melbourne (categorised 'contributory' within HO3). In this regard I contend that Mr Raworth is generally attempting to apply a threshold that is substantially higher than 'local' in relation to Criterion A.</p> <p>The assessment against Criterion A identifies the use of Morris House as the women's clubrooms for the Australian American Association, one of the few in Melbourne. I consider it appropriate to capture this in the Statement of Significance, but note that meeting Criterion A does not solely rely on this historical connection.</p>
Criterion D is not met	No claim is made that the former Morris House is an 'influential' or 'pivotal' example, and it is not necessary for these tests to be satisfied to meet Criterion D (representative significance). Instead

Paragraphs 32-34, 41	<p>the former Morris House is identified as a conservative and restrained design that ‘...displays a large number or range of characteristics typical of the class’ as per the definition of ‘fine example’ in the Guidelines. The characteristics of an Interwar classical revival style commercial building that are evident in the former Morris Building include its ‘... scale and form, rhythm of the street façades with steel-framed decorative windows, stucco pilasters that extend over the two storeys with moulded, recessed panels, window spandrels and a moulded string course beneath the parapet.’ (HGHR assessment against Criterion D). It is my view the level of characteristics displayed in the extant fabric is consistent with the definition in ‘Reference Tool D’ of a ‘fine’ example.</p> <p>I remain of the view that the former Morris House is a good example of its type, noting that ‘representative’ is defined in the Macquarie Dictionary as “typical; exemplifying a class”. I disagree that building has to be considered architecturally remarkable to meet Criterion D, as Mr Raworth asserts at paragraph 41 of his evidence.</p>
Criterion H is not met Paragraphs 21 & 29	<p>The HGHR does not assert that the former Morris House meets Criterion H (associative significance) as the historical connection was with several charitable organisations over a period of time. None of these associations were assessed as meeting Criterion H in its own right, however the occupation by this range of groups forms an important part of the place’s history and it is appropriate to record this under Criterion A (historical significance).</p>
Level of alteration Paragraphs 12 & 41	<p>The loss of the roof behind a parapeted building form is relatively common within the Hoddle Grid with either vertical expansions (such as the Presgrave Building 273-279 Little Collins Street [categorised ‘significant’ within HO502] or the former Russell Street Telephone Exchange, 114-120 Russell Street [proposed to be included on the Heritage Overlay through Amendment C387melb]), or through the addition of roof-top bars (such as the Imperial Hotel, 2-8 Bourke Street [‘significant’ within HO500 and HO524]).</p> <p>In my view, the alterations to the exterior of the building have some impact on its level of intactness, but I remain of the view that overall the building retains a good degree of legibility of it to its original form. Further, I note that a number of the alterations are readily reversible, including:</p> <ul style="list-style-type: none"> <li>• Black over painting;</li> <li>• Projecting awnings;</li> <li>• Lightweight roof terrace structures;</li> <li>• Glass balustrading; and</li> <li>• Projecting external signage.</li> </ul>
Conclusion Paragraph 43	<p>It remains my view that former Morris House meets Criteria A and D at the local level and warrants inclusion on the Heritage Overlay.</p>

# Melbourne Amendment C387 – Hoddle Grid Heritage Review

Evidence in Reply from Jim Gard'ner

19 August 2021

Submission number: 56	In response to: <b>Evidence of Mr Tim Biles</b>
Address: 527-555 Bourke Street	Property Name: <b>AMP Tower and St James Building Complex</b>

## Areas of disagreement

Issue (and evidence reference)	Response
Interaction of heritage, urban design and planning Paragraph 4	I note that Mr Biles' position appears inconsistent with usual heritage practice where listing decisions are made principally on whether a place reaches the local threshold against one or more heritage criterion, while matters of use or adaptation are dealt with through the planning permit process (refer to section 4.6 of my initial evidence for further discussion).
Level of changes Paragraphs 13-17, 19	I note Mr Biles' thorough description of the changes to the fabric of the buildings and the associated plaza and interstitial spaces in 2011-2012. I remain of the opinion that the complex, including the original form and the detailing of the exterior of the buildings above street level, remains largely intact to its original construction in 1965- 69 and that the complex retains a high degree of architectural integrity to the Post-War Modernist style in fabric, form and detail. While it has undergone some alterations, these changes do not diminish the ability to understand and appreciate the buildings and their plaza setting as a fine example of a Post- War Modernist multi-storey complex.
Application of Design and Development Overlays Paragraphs 20-35	I note Mr Biles' analysis of the objectives and controls within DDO1 and DDO10. In my view these matters are not relevant to the question 'does the AMP Tower and St James Building Complex meet one or more heritage criteria at the local level?'. The provisions of the Capital City Zone, DDO1, DDO10 and any other planning provision applicable to this site would properly be considered as part of a future planning permit application.
Conclusion Paragraph 38	<p>In his conclusion Mr Biles describes the building as '...not just a historically valuable piece of the puzzle...', which appears to acknowledge the historical significance of this place.</p> <p>I note that Mr Biles' evidence does not provide material which contradicts the assessment that the AMP Tower and St James Building Complex meets Criteria A, B, D and E at a local level. Further I note this example is raised as an exemplar in evidence prepared by Mr Raworth and Mr Trethowan in relation to other postwar-era buildings considered as part of the HGHR.</p>

# Melbourne Amendment C387 – Hoddle Grid Heritage Review

Evidence in Reply from Jim Gard'ner

19 August 2021

Submission number: 56	In response to: <b>Evidence of Mr Bruce Trethowan</b>
Address: <b>457-469 Little Collins Street</b>	Property Name: <b>Cowan House</b>

## Areas of disagreement

Issue (and evidence reference)	Response
Intactness and integrity Paragraphs 13 & 14	Notwithstanding the early 1990s changes, it is my view that Cowan House remains remarkably intact to its original form, design and detailing. The infilling of the colonnade and the extension of the columns as engaged piers over the first-floor level of the podium has impacted on the intactness of the building at its lower level. These changes are recognised under the heading of 'Integrity' in the citation (HGHR, Volume 2b, p.811) and I am of the view that overall Cowan House retains very high integrity.
Criterion A is not met Paragraphs 29-31	Refer to my response to Mr Raworth's evidence on p.2 of this document in respect of the Guidelines and the 'better than most' test for Criterion A.  Refer to my response to Mr Trethowan's evidence on pp. 10-11 of this document in respect of quantifying the number of places to include in the Heritage Overlay and the need to meet tests of being a 'landmark' or 'outstanding' building.  In respect of Cowan House, documentary and physical evidence clearly demonstrates that this building was constructed in the postwar period, a period of rapid development that comprehensively changed the face of the city and is worthy of heritage recognition. The design of the building expresses the postwar architectural movement of the time to a high standard and is a refined and well resolved examples of Post-War Modernism.
Criterion D is not met The building is not a fine example Paragraphs 39-41	Mr Trethowan notes that the former Cowan House displays a number of typical characteristics of the period but he dismisses some of these as not being 'particularly noteworthy'. It is unclear why some representative characteristics are considered by Mr Trethowan as 'noteworthy' while others are not. There appears to be considerable common ground in the assessment of Criterion D the HGHR Statement of Significance and Mr Trethowan's description of typical elements of Modernist buildings of this period. If by 'noteworthy' Mr Trethowan is meaning 'notable', guidance is provided in the Guidelines. A 'notable example' may include a 'fine example' which includes a place that 'displays a large number or range of characteristics that is typical of the class'. It is my view that the characteristics Mr Trethowan describes in relation to Cowan House constitute a 'large number or range' of those typical of Post-War Modernist buildings.  Mr Trethowan asserts that '... one notable characteristic is not enough'. While I agree a large number or range of characteristic should be present to meet the test of 'a fine example', Reference Tool D only requires that one of the tests for 'notable' to be met i.e. 'a fine example'; 'a highly intact example'; 'an influential example' or 'a pivotal example'. In this case, it is my view that Cowan House is both a 'fine' and a 'highly intact' example and therefore can be considered a 'notable' example of this class of place.  Mr Trethowan compares the undercroft/colonnade element of Cowan House unfavourably with that of BHP House but fails to note that 140 William Street is one of the handful of buildings of the period and style included on the VHR. In this regard I consider Mr Trethowan is attempting to apply a threshold for this assessment which is much higher than 'local' as established in PPN1.



	Refer to my response to Mr Trethowan's evidence on p.11 of this document in respect of the use of the term 'Post-War Modernist Style' to capture this architectural typology.
Criterion D is not met The building is not highly intact Paragraph 42	<p>The changes made to the podium of Cowan House are common in scope and type to many that have occurred to buildings considered within this review and elsewhere within the Hoddle Grid (refer to section 4.4 of my initial evidence for further discussion on this issue).</p> <p>The distinction between 'highly intact' as described in the HGHR citation and 'intact' as Mr Trethowan prefers to describe Cowan House is a fine one. Even if one was to consider this building to be 'intact' rather than 'highly intact', it retains a high degree of integrity to its original form, materiality and detailing. It is Cowan House's high level of integrity that makes it legible as a representative example of a Modernist commercial building of the postwar period.</p>
Criterion D is not met The building is not an influential example Paragraph 43	The assessment within the HGHR makes no claim that the building is a 'influential' or 'ground breaking' example.
Criterion D is not met The building is not an pivotal example Paragraph 46	The assessment within the HGHR makes no claim that the building is a 'pivotal' example and I agree with Mr Trethowan's assessment in this regard.
Criterion E is not met Paragraphs 51, 52, 54, 55	<p>Mr Trethowan provides a comprehensive discussion of the aesthetic qualities of Cowan House in the context of an archetype of the International Style. While he provides a detailed account of this Modernist style within Appendix B of his evidence, this includes a number of places included on the VHR for their aesthetic and architectural significance including BHP House (H1699) and ICI House (H0786) along with a number of now demolished properties and several proposed for inclusion on the Heritage Overlay through Amendment C387melb. In my view it is not necessary for a building to meet the pre-prescribed attributes of the International Modern style as described by Mr Trethowan to be considered to meet Criterion E.</p> <p>Mr Trethowan also provides a discussion of engineer and architect Erik and Grethe Kolle, and provides further examples of their work from those included in the HGHR citation; these are noted. While he considers that the former Houston Building (also known as Aviation House) at 184-192 Queen Street (also proposed to be included in the Heritage Overlay through Amendment C387melb) is a better example of their practice's oeuvre, it is my opinion that this does not diminish the qualities of Cowan House.</p> <p>Cowan House is recognised in the HGHR as meeting Criterion E (aesthetic significance) for the designer's fine attention to detail on all four elevations, and for the variety of materials of differing colours and textures – including precast concrete panels, glazed ceramic wall tiles and rough-cast concrete blockwork – which together create a greater modularity and three-dimensional qualities to the facades than is typical.</p>
Recommendations Paragraph 56	Mr Trethowan appears to be applying a higher than local threshold discounting Cowan House on the basis that it is '... not an outstanding example of the type'. For a place to warrant inclusion on the Heritage Overlay it must meet on or more of the heritage criteria set out in PPN1 at the local level, but it is not necessary for it to be 'an outstanding example' of its type or class'.
Conclusion Paragraphs 57-59	I remain of the view that Cowan House meets Criterion A, D and E at the local level and should be included on the Heritage Overlay as an individual place.