

# Expert Witness Statement to Panel

Amendment C387 to the  
Melbourne Planning Scheme

178-188 William Street, Melbourne

Prepared under instruction from Planning & Property Partners  
August 2021

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## 1.0 Introduction

1. The following statement of evidence was prepared under instruction from Planning & Property Partners on behalf of the owners of the subject property at 178-188 William Street, Melbourne. It comments on the heritage considerations associated with the subject site and with Amendment C387 to the Melbourne Planning Scheme. Amendment C387 seeks to implement the recommendations of the *Hoddle Grid Heritage Review* (July 2020) on a permanent basis and apply the Heritage Overlay to 133 individual places, revise the boundary of four existing individual Heritage Overlays, and apply the Heritage Overlay to five precincts including one precinct extension.
2. As part of Amendment C387, it is proposed that a permanent individual Heritage Overlay control be introduced over the subject site at 178-188 William Street, Melbourne. I have been instructed to prepare a statement of expert evidence considering the heritage significance of the subject property and the appropriateness of the proposed overlay.
3. This statement was prepared with assistance from Carolynne Baker of my office. The views expressed are my own.
4. There is no private or business relationship between me and the party(s) for whom this report is prepared other than that associated with the preparation of this statement and associated advice on heritage issues associated with Amendment C387.

## 2.0 Sources of Information

5. The analysis below draws upon several site visits and an inspection of the environs of the site, along with a review of the relevant heritage studies and documents including the documentation associated with *Melbourne Planning Scheme Amendments C386 and C387*, and the *Summary of Submissions and Management Responses* (18 May 2021). We have also referenced the full citation for the site provided in the exhibited *Hoddle Grid Heritage Review* Volume 2B July 2020 (Context Pty Ltd & GJM Heritage, 2020). Reference is also made to the *Central Activities District Conservation Study* (1985), *Central City Heritage Study Review* (1993), *Review of Heritage Overlay Listings in the CBD* (2002) and the *Central City Heritage Review* (2011).
6. Other documents referred to include the *Guide to Expert Evidence* (April 2019), the *Victoria Planning Provisions Practice Note 1: Applying the Heritage Overlay* (August 2018), the *Victorian Heritage Register Criteria Threshold Guidelines*, and the document entitled *Guidance on identifying places and objects of state-level social value in Victoria* (4 April 2019).

7. Historical MMBW plans of the area, Sands & McDougall Directories, and the State Library of Victoria's Online Picture Collection have also been consulted. Other sources are referenced throughout.

### 3.0 Author Qualifications

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

### 4.0 Declaration

9. I declare that I have made all the inquiries that I believe are desirable and appropriate, and that no matters of significance which I regard as relevant have to my knowledge been withheld from the Panel.

A handwritten signature in black ink, appearing to read 'B. Raworth', followed by a period.

BRYCE RAWORTH

## 5.0 History and Description

10. The subject site at 178-188 William Street, Melbourne, is located on the south east corner of William and Little Bourke Streets. Constructed in 1972-73 to a design by architects McIntyre, McIntyre & Partners, the 11-storey office building stands as an example of the postwar Modernist style. It was constructed for Costain Australia Ltd – a multi-national infrastructure and mining company – and was completed in 1973.<sup>1</sup> Prior to this time, a double storey Victorian hotel building, the Four Courts Hotel, stood on the site.<sup>2</sup>
11. The primary north and west elevations are faced in precast concrete loadbearing panels with an exposed aggregate finish. These panels support the concrete floor slabs from the first floor upwards. Symmetrically arranged aluminium framed windows with splayed sills present in a highly repetitive grid-like arrangement across these facades. The secondary (east and south) elevations are plain concrete blockwork with a coloured render finish. On the northern elevation, the street level wall is recessed behind a double-height colonnade formed by the columns supporting the upper levels. The William Street elevation is similarly recessed at street level but to a single height only, with office space at the first floor level extending out to the columns. Overall, the building remains largely intact to its original 1972-73 form, having undergone little external change.
12. The building was sold to the Prudential Assurance Company Ltd in September 1974, not long after its completion, suggesting it may have been constructed as a speculative development venture.<sup>3</sup> It appears that the building was known as the Prudential Building at this time.<sup>4</sup> Price & Chamberlin, solicitors and barristers, occupied part of the building in 1974 until at least the early 1980s.<sup>5</sup> Barristers' Chambers Limited purchased the property in 1992.<sup>6</sup> Four years later, the building was launched as the Douglas Menzies Chambers in honour of Sir Douglas Menzies (1907-1974), Australian High Court Justice.
13. Architectural drawings dated 1972 show the principal elevations and ground floor plan (Figure 4 and Figure 5). Notes on the architectural drawings show that the north and west elevations were constructed of precast concrete units, with aluminium-framed windows.<sup>7</sup>

<sup>1</sup> McIntyre; BAF; CoM Maps.

<sup>2</sup> Building Application Index for the City of Melbourne, Building Application File No. 43022 (1972), City of Melbourne.

<sup>3</sup> Certificate of Title V9056/F780

<sup>4</sup> Graeme Butler, *Central Activities District Conservation Study*, 1985, p.24.

<sup>5</sup> The Age, 23 Dec 1974:15; 2 Nov 1981:2; S & Mc.

<sup>6</sup> Certificate of Title V9056/F780.

<sup>7</sup> Building Application Plans, City of Melbourne, sourced from citation.

**McIntyre McIntyre & Partners, architects**

14. The following information on McIntyre McIntyre & Partners is taken from the citation for 178-188 William Street, Melbourne:

*McIntyre McIntyre & Partners was established in 1962 as McIntyre, McIntyre & Associates following the merger of Peter and Dione McIntyre's architectural practice with that of Peter's father, Robert A McIntyre. From 1967 to 1972, the firm practiced as McIntyre, McIntyre & Partners, before changing to its current iteration, McIntyre Partnership. The amalgamation was a commercial move to gain larger commissions.*

*Prior to this, Peter and Dione's work involved small-scale domestic projects. Peter's work in particular focused on the interplay of function and structure, where he experimented with cantilevered and tensile structures, and the Ctesiphon arch. He gained public recognition with the commission for the Melbourne Olympic Swimming Stadium (1952-6) in collaboration with architects, Kevin Borland and John & Phyllis Murphy, and engineer Bill Irwin.*

*Following the McIntyre merger, the new firm designed a significant number of hotels and hospitality ventures (inherited from McIntyre Snr's practice), as well as skiing and alpine architecture. In central Melbourne, the firm completed the innovative Kings Parkade car park in Little Collins Street (1966), and commercial office buildings such as at 170 William Street (1968), 150 Lonsdale Street (1969), 178-188 William Street (1972-73) and Australia Pacific House at 136-144 Exhibition Street (1975-78). Other notable work included the adaptive reuse and conversion of the early twentieth century Henry Jones Jam Factory in Prahran into an up-market shopping centre (1974) and the design for Melbourne's Parliament Station (1973-82).*



Figure 1 The former Prudential Building at 178-188 William Street, Melbourne.

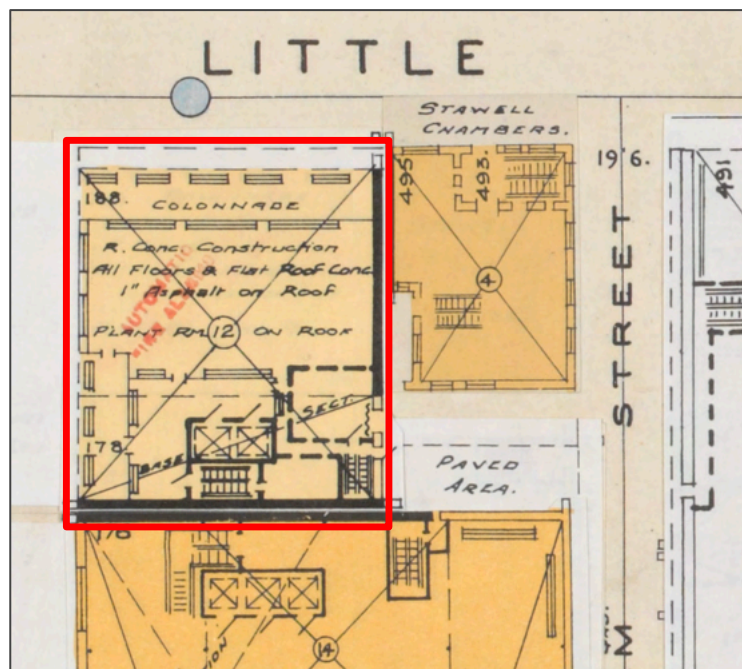


Figure 2 Detail of the Mahlstedt Fire Survey Plan showing the ground floor plan of the building at 178-188 William Street. Source: Mahlstedt Map Section 1, No.16, 1948 (updated at some point after c1973). State Library of Victoria Online Picture Collection.





Figure 3 The double storey colonnade to the northern frontage of the building.

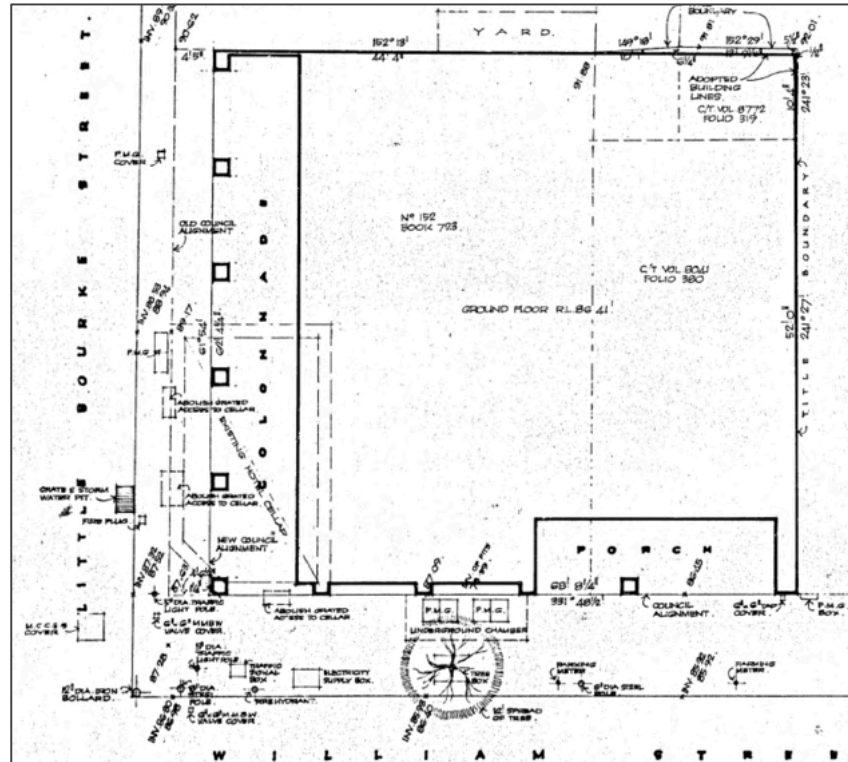


Figure 4 Ground floor plan of the building at 178-188 William Street, Melbourne, c1972.  
Source: Building Application Plans, CoM, from citation.



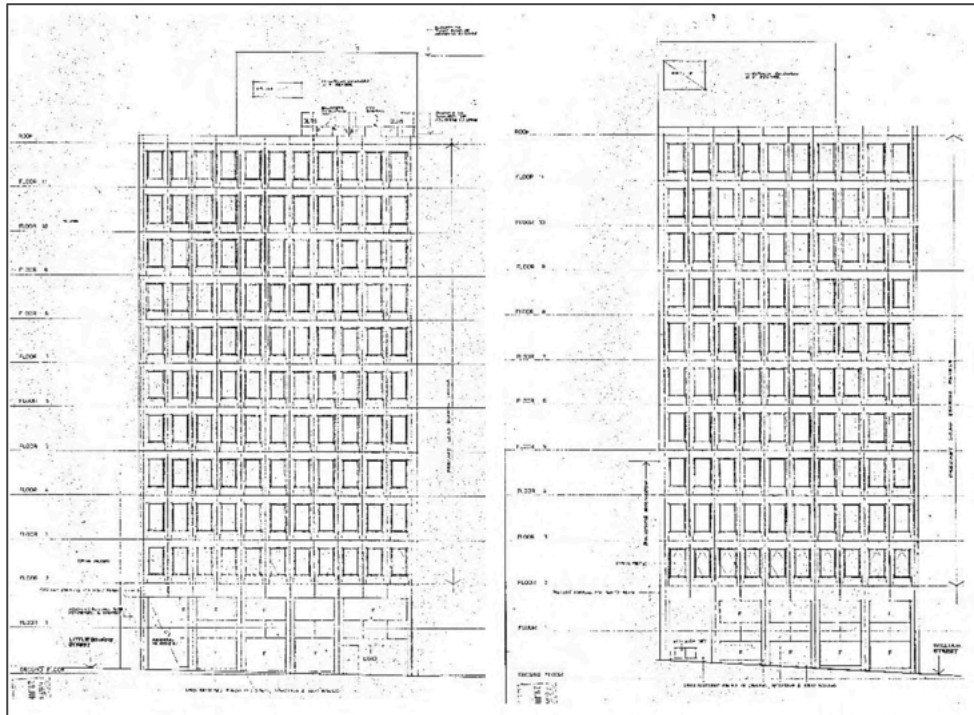


Figure 5 The principal west (L) and north (R) elevations of the building at 178-188 William Street, Melbourne, c1972. Source: Building Application Plans, CoM, from citation.



Figure 6 Detail of the aggregate concrete panelling of north and west facades.

## 6.0 Heritage Status

15. The former Prudential Building at 178-188 William Street, Melbourne, is currently subject to an interim Heritage Overlay, identified as HO1377 in the Schedule to the Heritage Overlay of the Melbourne Planning Scheme, which has an expiry date of 29/05/2022 (Figure 7). No external paint controls, internal alteration controls or tree controls apply under the provisions of HO1377.
16. It is proposed that this interim control will become permanent as part of Amendment C387 to the Melbourne Planning Scheme.

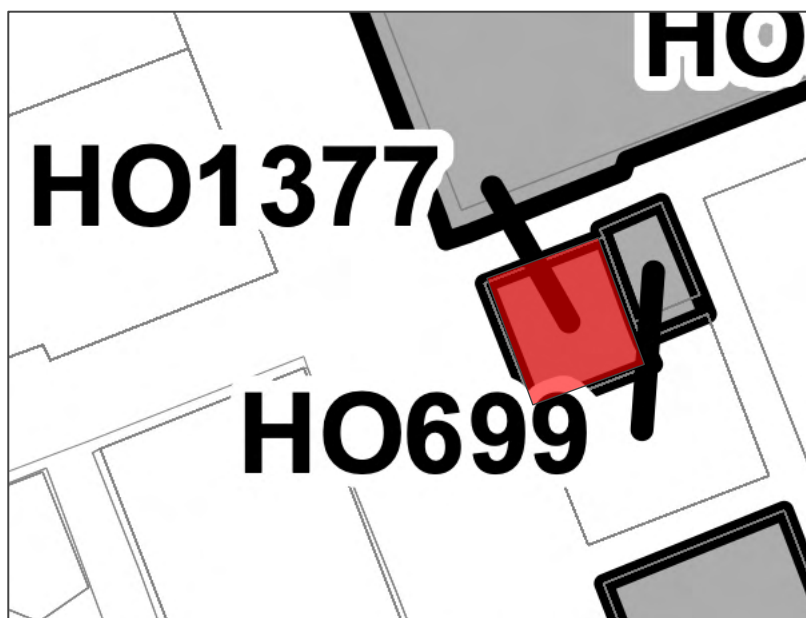


Figure 7 Part of proposed exhibited Heritage Overlay Map 8 showing the location and extent of HO1377 (shaded red).

17. The building at 178-188 William Street was identified as a D graded building in the 1985 *Central Activities District Conservation Study* and then reclassified as ungraded in the 1993 *Central City Heritage Study Review* (of which Bryce Raworth was a co-author). Inter alia, the study brief for the 1993 review sought to re-evaluate the 1985 study's response to buildings erected between 1956 and 1974 – the timeframe in which 178-188 William Street was built.
18. The building was not upgraded or identified as being of individual local significance in any of the subsequent studies, namely the 2002 *Review of Heritage Overlay listings in the CBD*, or the 2011 *Central City Heritage Review*.

## 7.0 Proposed Statement of Significance

19. The proposed Statement of Significance for the former Prudential Building at 178-188 William Street, Melbourne, as provided in the *Hoddle Grid Review* (Context & GJM Heritage, 2020, pp.1273-1274) and included the documentation for planning scheme Amendment C387, reads as follows:

*What is significant?*

*The office building at 178-188 William Street, a multi-storey office building constructed in 1972-73. Elements that contribute to the significance of the place include (but are not limited to):*

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

*How is it significant?*

*The office building at 178-188 William Street is of historical and representative significance to the City of Melbourne.*

*Why is it significant?*

*Constructed in 1972-73 to a design by McIntyre McIntyre & Partners, the office building at 178-188 William Street has a clear association with the postwar building boom which transformed central Melbourne into a modern high-rise city. The design of these commercial buildings from the late 1950s to the mid-1970s – many of which were architect designed – was driven by the commercial demands and the prestige afforded by a dominant city presence (Criterion A).*

*The office building at 178-188 William Street is a fine and highly intact representative example of a Post-War Modernist commercial building. The building strongly reflects the style which was popular in the 1960s to the mid 1970s, particularly in central Melbourne. The 11-storey building clearly demonstrates typical characteristics of a later postwar structure, including two grid-like walls of repetitive loadbearing precast concrete units, with distinctive sloped sills, which frame individual windows, as well as the use of materials such as precast concrete panels. These demonstrate important aspects of the Post-War Modernist style. The building remains very highly intact to clearly demonstrates the principle [sic] characteristics of a Post-War Modernist commercial high-rise building (Criterion D).*

## 8.0 Analysis

20. The following analyses the significance of the former Prudential Building at 178-188 William Street, Melbourne, and assesses whether the building is of sufficient significance to warrant the introduction of a permanent individual heritage overlay.
21. As noted above, the citation states that the former Prudential Building is of local historical and representative significance to the City of Melbourne (Criteria A & D). It is said to be a fine and highly intact representative example of the Post-War Modernist style and a building that clearly demonstrates the typical characteristics of 1960s to mid-1970s multi-storey building design.

### Victorian Heritage Register Criteria and Threshold Guidelines

22. Despite having been developed to help determine whether a place is of state significance, the *Victorian Heritage Register Criteria and Threshold Guidelines* can be adapted as a methodology that is also useful to help determine whether a place or object is likely to satisfy the local level threshold for each heritage assessment criterion.<sup>8</sup> These guidelines set out the following tests:
  - Step 1 sets out a basic test for satisfying each criterion. If the test is not met, the criterion is unlikely to be satisfied.
  - Step 2 sets out a basic test for determining the level of significance. If the specified level of significance – in this case local – is not met, the criterion is unlikely to be satisfied at the required threshold.
  - Step 3 sets out a list of exclusion guidelines by which a place/object will generally be disqualified from being able to satisfy the criterion at the local level. If one of the exclusion guidelines is triggered, the criterion is unlikely to be satisfied at the required threshold.
23. At present, to be identified as a place of local significance sufficient to warrant application of the Heritage Overlay, a place should meet one or more of the above criteria to a degree that meets a threshold level of local significance. The criteria in question should be satisfied not just in a simple or generic manner, but to a degree that is better than many or most other examples at a local level, or to a degree that is comparable to other examples that are subject to the Heritage Overlay. Having followed this approach, if a place appears to meet the local threshold for one or more criterion, then the place may, at the discretion of either the independent Planning Panel or the Minister, be included in the schedule to the Heritage

<sup>8</sup> Refer, for example, to the Nillumbik Amendment C100 Panel Report, pp.12-28.

Overlay. The various steps and tests for each criterion are reproduced in italics as follows, with our response below each:

#### ASSESSMENT CRITERION A

Step 1      *All the following requisites must be met:*

- *The place/object has a CLEAR ASSOCIATION with an event, phase, period, process, function, movement, custom or way of life in [the City of Melbourne's] cultural history.*
- *The association of the place/object to the event, phase, etc IS EVIDENT in the physical fabric of the place/object and/or in documentary resources or oral history.*
- *The EVENT, PHASE, etc is of HISTORICAL IMPORTANCE, having made a strong or influential contribution to [the City of Melbourne].*

24. To paraphrase the Heritage Victoria document, the threshold test (Step 2) for determining local level historical significance is that:

*The place/object allows the clear association with the event, phase, etc, of historical importance to be UNDERSTOOD BETTER THAN MOST OTHER PLACES OR OBJECTS [in Melbourne] WITH SUBSTANTIALLY THE SAME ASSOCIATION' (caps as per the Heritage Council document).*

25. As noted in the citation, the building at 178-188 William Street has a clear association with the postwar building boom which transformed central Melbourne into a modern high-rise city. However, the same could be said of all multi-storey buildings within central Melbourne that were constructed during this period. The former Prudential Building stands as an example of postwar office tower development in the CBD only in the most generic sense insofar as it is a multi-storey office building dating from the 1970s. The same would apply to numerous other postwar office towers in the CBD but this is not to say they would all meet Criterion A.
26. The former Prudential Building's association with the postwar construction boom is not understood better than most other places in Melbourne with the same association. The design is not considered to be unusual or particularly inventive, and the principal characteristics of the building as described in the citation are standard for multi-storey buildings of the era.

#### COMPARATIVE ANALYSIS

27. Although the citation for the building at 178-188 William Street then goes on to list nearly thirty multi-storey commercial buildings in the City of Melbourne that 'were constructed in the same period and display similar characteristics to the office building at 178-188 William Street', the comparative analysis fails to compare these buildings in any meaningful way. Although they may be similarly tall buildings, the buildings on the list address their street frontages in a variety

of different ways, and display a number of different approaches to cladding. The relative level of each building's architectural distinction or integrity is not assessed, beyond noting that these 'buildings clearly illustrate the advancement of construction techniques from the 1960s through to the mid 1970s and demonstrate the broad range of design approaches of the period.' The citation also notes that the podiums of the majority of these buildings have been modified at street level.

28. To accurately corroborate a criterion and threshold finding, some comparative analysis is required to substantiate the significance of each place. The comparative analysis should draw on other similar places within the study area, including those previously included in a heritage register or overlay. The process is essentially a comparative one within the local area.
29. One difficulty in this particular instance is that only a few postwar buildings within the Hoddle Grid have previously been assessed. Few buildings from this period are therefore currently included in the Heritage Overlay on a permanent basis. Given that the significance of these places has not been tested at Panel, they are not a useful benchmark for determining the threshold of significance that might be required for a postwar building to warrant an individual heritage overlay control.
30. A small number of 1960s to mid 1970s buildings in the Hoddle Grid within the City of Melbourne have been identified as being of State significance and are included in the Victorian Heritage Register (VHR) including the Brutalist buildings Total House at 170-90 Russell Street (Bogle & Banfield 1964-65; VHR H2329 & HO1095), and the Former Hoyts Cinema Centre at 134-44 Bourke Street (Peter Muller 1966-69). The Victorian Government Offices, Treasury Reserve Precinct (Yuncken Freeman 1967-68) is located just outside the Hoddle Grid. Both Eagle House at 473 Bourke Street (Yuncken Freeman 1971-72; VHR H1807 & HO901) and BHP House at 130-148 William Street (Yuncken Freeman 1969-72; VHR H1699 & HO767) are also registered places. It is clear that the building at 178-188 William Street does not possess this level of significance.
31. It is not established that the building at 178-188 William Street is of individual significance for its historical and representative significance within the context of similar places within the City of Melbourne. It is true that the building is characteristic of commercial architecture of the late 1960s and early 1970s. However, a place must be more than simply a standard representative example of an architectural style or period to warrant an individual heritage control. Rather, it is necessary to demonstrate that the place is a notable example of its type at a local level to satisfy the threshold for representativeness.



## ASSESSMENT CRITERION D

Step 1 All the following requisites must be met:

- The place/ object is one of a CLASS of places/ objects that has a CLEAR ASSOCIATION with an event/ phase, period, process, function, movement, important person(s), custom or way of life in [the City of Melbourne's] history.
- The EVENT, PHASE, etc. is of HISTORICAL IMPORTANCE, having made a strong or influential contribution to [the City of Melbourne].
- The principal characteristics of the class are EVIDENT in the physical fabric of the place/ object.

32. It is of some note that these Step 1 requisites are in themselves very similar to those identified with Criterion A. With respect to representative significance, and again paraphrasing *Victorian Heritage Register Criteria and Threshold Guidelines*, Step 2 is the basic test for determining whether Criterion D is met at a local level of significance:

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

33. In order to satisfy Step 2 of Criterion D, it is necessary to demonstrate that the place is a notable example of the class in the City of Melbourne (Figure 8). The term 'notable example' is used to include examples that are either fine, particularly highly intact, influential, and pivotal (Figure 8).

**Reference Tool D: What is a 'notable example' of a class?**

The term **notable example** is used to encompass any of the following:

- **A fine example** – the place/object displays a large number or range of characteristics that is typical of the class; the place/object displays characteristics that are of a higher quality or historical relevance than are typical of places/objects in the class; or the place/object displays the principal characteristics of the class in a way that allows the class to be easily understood/appreciated.
- **A highly intact example** – the place/object displays characteristics of the class that remain mostly unchanged from the historically important period of development or use of the place/object.
- **An influential example** – the place/object contains physical characteristics of design, technology or materials that were copied in subsequent places/objects of the class (direct physical influence), or other places/objects were created, altered or used in response to the characteristics of this place/object.
- **A pivotal example** – the place/object encapsulates a key evolutionary stage in the development of the class.

Figure 8 Reference Tool D setting out the definitions of a 'notable example' of a class.  
Source: *Victorian Heritage Register Criteria and Threshold Guidelines* (endorsed December 2012, and reviewed and updated 3 December 2020).

34. While the building may be representative in materials and method of construction (e.g. the use of the 'grid' facade of precast panels) of the postwar Modernist style, it is unremarkable in its overall architectural expression and could more accurately be described as a standard example of a 1970s modernist office tower. In this it might be compared to the ungraded building at 85 Queen Street, which also features a strong repetition of precast concrete panels



and was also constructed in 1973, accepting that the subject building's corner site allows it a more 'three dimensional' presentation than that of the Queen Street example.<sup>9</sup>

35. The building also compares unfavourably against earlier buildings such as the Scottish Amicable Life Assurance Society Building designed by Yuncken Freeman Architects Pty Ltd and constructed 1964-65. This building was identified in the Guildford and Hardware Lanes Heritage Study as a place of heritage significance and was recommended for an individual Heritage Overlay (at present identified as interim HO1213). The statement of significance for the place noted, in part, its pre-cast concrete façade:

*...The Scottish Amicable Building, which retains a substantially externally intact façade to Queens Street, is also of aesthetic/architectural significance. It is an innovative and early example of the return to more massive construction, and a departure from the wholly-glazed expression of office buildings of the previous decade. While its rigid geometry and the incorporation of an entry forecourt (the colonnade) reveal its roots in the International Style, its three dimensional quality, achieved through more assertive textures and the use of sculptural, moulded pre-cast concrete rather than a flat glass exterior, provides a successful Modernist outcome.*

36. The building has recently been demolished due to structural issues associated with retention of the concrete panels of the façade in a proposed redevelopment of the site.
37. The subject building does not display characteristics of a higher quality than is typical for postwar modernist office buildings. Nor did the building represent a key evolutionary stage in the design of multi-storey office buildings. No information has been brought forward to show that it is an influential example of its type. I do not believe it meets the threshold for individual significance to the City of Melbourne. An individual heritage overlay place should be more than just a standard/representative example of a building typology to warrant this form of protection. While accepting that the external integrity of the building remains high, intactness is not in and of itself a criterion for Heritage Overlay listing.
38. Nor is the building's association with Peter McIntyre of great importance in this particular instance as it is not representative of his important body of postwar work – i.e. experimental residential designs and the structurally adventurous Olympic swimming pool. While the *Encyclopedia of Australian Architecture* details the varying permutations of the McIntyre Partnership's work from the 1970s on in some detail, the building at 178-188 William Street is not one of the many buildings discussed.
39. Further to issues of significance, the building at 178-188 William Street was only graded 'D' in the 1985 *Central Activities District Conservation Study*, and was subsequently reclassified as

<sup>9</sup> *Melbourne's Marvellous Modernism*, p 59.

ungraded in the 1993 *Central City Heritage Study Review* (of which Bryce Raworth was a co-author). Inter alia, the study brief for the 1993 review sought to re-evaluate the 1985 study's response to buildings erected between 1956 and 1974. It was not identified in either of the two later studies dating from 2002 and 2011 respectively. Nor was the building listed in the Australian Institute of Architects (Victorian Chapter) 20<sup>th</sup> Century Building Register, and it is notably absent from the National Trust's 2014 comparative analysis of postwar buildings, *Melbourne's Marvellous Modernism*. Philip Goad's 1999 book, *Melbourne Architecture*, makes no mention of the building at 178-188 William Street either.

40. The inclusion of 178-188 William Street in the 1985 heritage study as a low 'D' graded building, and its absence from subsequent studies up until now, is indicative of its limited heritage value – particularly in comparison to other buildings of this era and style that have been deemed better examples that warrant Heritage Overlay protection. This is not necessarily due to the fact postwar buildings were overlooked in these studies. Even the earliest 1984 conservation study identified at least a few postwar buildings, most notably significant examples such as Eagle House (c1971) and BHP House (c1972).
41. The system of construction used at 178-188 William Street (ie concrete slab, grid arrangement) is not remarkable or unusual in the context of postwar Melbourne commercial architecture. Some notable examples include: Wales Corner at 221-231 Collins Street (Stephenson & Turner, 1964-66) included in HO502; the Block Precinct (fronting Collins Street) & HO506 (fronting Swanston Street) Collins East Precinct as a contributory place; the Former State Savings Bank of Victoria at 45-63 Swanston Street (Buchan Laird & Buchan, 1974) included in HO505 Flinders Gate Precinct (non-contributory); the Scottish Amicable Building at 128-146 Queen Street (Yuncken Freeman, 1966) (HO1213)(demolished), and the former RACV Club at 111-129 Queen Street (Bates Smart & McCutcheon, 1961) (Interim HO1068).
42. Although the building at 178-188 William Street is fairly typical of commercial architecture of the late 1960s and early 1970s – with its precast concrete panel exterior (marking a shift away from the sleek curtain walled modernism of the 1950s) and robust masonry character – it is not exceptional in the context of numerous other examples, and is not seen to meet the threshold for individual aesthetic/architectural significance to the City of Melbourne. Nor is any evidence presented to suggest that the building is either particularly influential or pivotal. Although the building remains largely intact to its original form, the benchmark for an individual heritage overlay controls should higher than a standard example of a building typology.

## 9.0 Conclusion

43. In conclusion, while the subject site may be of some limited historical and representative interest, it is not of sufficient historical or representative significance to warrant an individual Heritage Overlay control as proposed by Amendment C387 to the Melbourne Planning Scheme. The heritage citation does not provide sufficient analysis or evidence to substantiate the claim that it is a fine or notable example of a postwar modernist office tower. Despite having been designed by a well-regarded architectural firm, it is not a notable example of their work. Nor has any evidence been provided that the place meets the minimum threshold of representative significance required to warrant an individual heritage overlay.
44. For these reasons, the building at 178-188 William Street is not deemed of sufficient significance to warrant either the current interim control or the introduction of a permanent Heritage Overlay. It should be removed from Amendment C387 to the Melbourne Planning Scheme.

## 10.0 Other Sources

Other documents referred to include:

- *MELMO: Modernist Architecture in Melbourne* (Robin Grow, 2021).
- *The Victorian Heritage Register Criteria and Threshold Guidelines* (Updated 3 December 2020).
- *Planning Practice Note 1: Applying the Heritage Overlay* (August 2018).
- Panel Report - Nillumbik Planning Scheme Amendment C100 (26 March 2015).
- *Melbourne's Marvellous Modernism: A Comparative Analysis of Post-War Modern Architecture in Melbourne's CBD* (National Trust of Australia (Victoria), 2014).
- *The Encyclopedia of Australian Architecture* (Philip Goad & Julie Willis eds., 2011).
- *Melbourne Architecture* (Philip Goad, 2009).
- *Tall Buildings: Australian Business Going Up 1945-1970* (Jennifer Taylor, 2001).
- *Central City Heritage Study Review* (Philip Goad, Miles Lewis, Alan Mayne, Bryce Raworth & Jeff Turnbull, 1993).
- *Central Activities District Conservation Study* (Graeme Butler, 1985).

#### 4. GUIDELINES FOR THE HERITAGE ASSESSMENT CRITERIA

##### CRITERION A: IMPORTANCE TO THE COURSE OR PATTERN OF VICTORIA'S CULTURAL HISTORY

A place or object is likely to satisfy this criterion at the state level only if **all** of the following requisites are met:

###### STEP 1: A BASIC TEST FOR SATISFYING CRITERION A

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

+

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

+

The **EVENT, PHASE**, etc is of **HISTORICAL IMPORTANCE**, having made a strong or influential contribution to Victoria.

=

**CRITERION A IS LIKELY TO BE SATISFIED**

+

###### STEP 2: A BASIC TEST FOR DETERMINING STATE LEVEL SIGNIFICANCE

The place/object allows the clear association with the event, phase etc. of historical importance to be **UNDERSTOOD BETTER THAN MOST OTHER PLACES OR OBJECTS IN VICTORIA WITH SUBSTANTIALLY THE SAME ASSOCIATION**.

=

**CRITERION A IS LIKELY TO BE RELEVANT AT THE STATE LEVEL**

**Note:** the sub-themes in *Victoria's Framework of Historical Themes* will assist in understanding the events, phases, periods, processes, functions, movements, customs and ways of life in Victoria's history.

###### STEP 3: EXCLUSION GUIDELINES FOR CRITERION A

The place or object is unlikely to satisfy this criterion at the state level if any of the following conditions apply:

<b>XA1</b>	<b>Poor, indirect or unproven association</b>	The association of the place/object to the historically important event, phase etc <b>is either incidental</b> (minor, secondary) <b>or cannot be substantiated</b> . For instance, every rural property is not important in demonstrating the spread of European settlement or pastoral land use across Victoria and a 'legend' relating to a place or object needs to be backed up by strong documentary or other evidence if the place/object is to be registered on the basis of that story.
<b>XA2</b>	<b>Low or questionable historical importance</b>	The place/object has an association with, or demonstrates evidence of, an historical event, phase etc that is <b>of low or questionable historical importance</b> , i.e. the event, phase etc has not made a strong or influential contribution to Victoria. For example, the recreational pursuit of table tennis is considered to be a niche activity that has not made a strong or influential contribution to the state.
<b>XA3</b>	<b>Poor evidence</b>	<b>No reliable or verifiable physical, documentary or oral history evidence remains</b> to demonstrate the association of the place/object with an historical event, phase etc.

Figure 9 Guidelines for Assessing Criterion A. Source: Victorian Heritage Register Criteria and Threshold Guidelines (endorsed December 2012, and reviewed and updated 3 December 2020).

## CRITERION D: IMPORTANCE IN DEMONSTRATING THE PRINCIPAL CHARACTERISTICS OF A CLASS OF CULTURAL PLACES/OBJECTS

A place or object is likely to satisfy this criterion at the state level only if **all** of the following requisites are met:

### STEP 1: A BASIC TEST FOR SATISFYING CRITERION D

The place/object is one of a **CLASS\*** of places/objects that has a **CLEAR ASSOCIATION** with an event, phase, period, process, function, movement, important person(s), custom or way of life in Victoria's history.

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The **EVENT, PHASE**, etc is of **HISTORICAL IMPORTANCE**, having made a strong or influential contribution to Victoria.

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The principal characteristics of the class are **EVIDENT** in the physical fabric of the place/object.

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**CRITERION D IS LIKELY TO BE SATISFIED**

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### STEP 2: A BASIC TEST FOR DETERMINING STATE LEVEL SIGNIFICANCE

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

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**CRITERION D IS LIKELY TO BE RELEVANT AT THE STATE LEVEL**

**Note:** the sub-themes in *Victoria's Framework of Historical Themes* will assist in understanding the events, phases, periods, processes, functions, movements, customs and ways of life in Victoria's history.

\* Refer to p4 for definition of "class".

#### Reference Tool D: What is a 'notable example' of a class?

The term **notable example** is used to encompass any of the following:

- **A fine example** – the place/object displays a large number or range of characteristics that is typical of the class; the place/object displays characteristics that are of a higher quality or historical relevance than are typical of places/objects in the class; or the place/object displays the principal characteristics of the class in a way that allows the class to be easily understood/appreciated.
- **A highly intact example** – the place/object displays characteristics of the class that remain mostly unchanged from the historically important period of development or use of the place/object.
- **An influential example** – the place/object contains physical characteristics of design, technology or materials that were copied in subsequent places/objects of the class (direct physical influence), or other places/objects were created, altered or used in response to the characteristics of this place/object.
- **A pivotal example** – the place/object encapsulates a key evolutionary stage in the development of the class.

Figure 10 Guidelines for Assessing Criterion D. Source: Victorian Heritage Register Criteria and Threshold Guidelines (endorsed December 2012, and reviewed and updated 3 December 2020).

# Bryce Raworth

CONSERVATION | HERITAGE

## BRYCE RAWORTH

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

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

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

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

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

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



## **BRYCE RAWORTH**

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

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

