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210 Stanley Street
West Melbourne

Expert Witness Statement to Panel
Amendment C258 to the Melbourne Planning Scheme

Bryce Raworth

Conservation Consultant and Architectural Historian

Prepared under instruction from Best Hooper Lawyers

July 2018

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1.0 Introduction

1. This report was prepared under instruction from Best Hooper Lawyers on behalf of the owners of the subject site at 210 Stanley Street, West Melbourne. I have been asked to provide comment on the heritage considerations associated with *Amendment C258* to the *Melbourne Planning Scheme*.
2. The Amendment has been prepared by Council and applies to all land within the Melbourne municipal area affected by a Heritage Overlay. The Amendment implements the recommendations of the *'Heritage Policies Review 2016'* and the *West Melbourne Heritage Review 2016*, and proposes, amongst other changes, to apply new heritage gradings to the subject site and update the heritage policy at Clause 22.05.
3. I have previously provided heritage advice in relation to the subject property, when an application to redevelop the site was reviewed by the VCAT in 2017.
4. This statement has been prepared with assistance from Martin Turnor of my office. The views expressed are my own.

2.0 Sources of Information

5. The analysis below draws upon inspections of the subject site, and a review of the relevant *Amendment C258* documentation, including the *West Melbourne Heritage Review* by Graeme Butler & Associates (2016). Reference has also been made to the City of Melbourne's *i-Heritage Database*, the *Melbourne Planning Scheme's Heritage Places Inventory* (March 2018), and the Heritage Overlay provisions in the *Melbourne Planning Scheme* (Clauses 43.01 and 22.05). This report also draws on my statement of evidence to the VCAT in regard to an application for redevelopment of the site, as well statement of evidence by Meredith Gould in relation to the same and the relevant Tribunal decision (VCAT Ref. No. P791/2017).
6. The *Amendment C258* documentation, including a corrected version of the *Heritage Places Inventory*, was re-exhibited in November 2017. Council subsequently made a range of changes to the *C258 Amendment documentation*, including Clause 22.05, as a result of submissions received, and these were adopted as a result of the Future Melbourne Committee Resolution of 20 February 2018. These changes have been reviewed, as has Council's Part A Submission, recently circulated.

3.0 Author Qualifications

7. 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, Heritage Council, Planning Panels Victoria and the Building Appeals Board on numerous occasions in the past, and have been retained in such matters variously by municipal councils, developers and objectors to planning proposals.

4.0 Declaration

8. 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 & Description

9. By the late nineteenth century, the area of West Melbourne around Stanley Street was largely residential in character, the land subdivided into narrow lots containing terrace housing. Through the turn of the century and into the interwar period, many dwellings were demolished for the construction of small factory buildings. This included a single-storey workshop built c1935, replacing two residences (numbered 210 and 212 Stanley Street on an 1895 MMBW plan). Building application records for the site list the 'erection of workshop' in October 1935 with a value of £1,432.¹

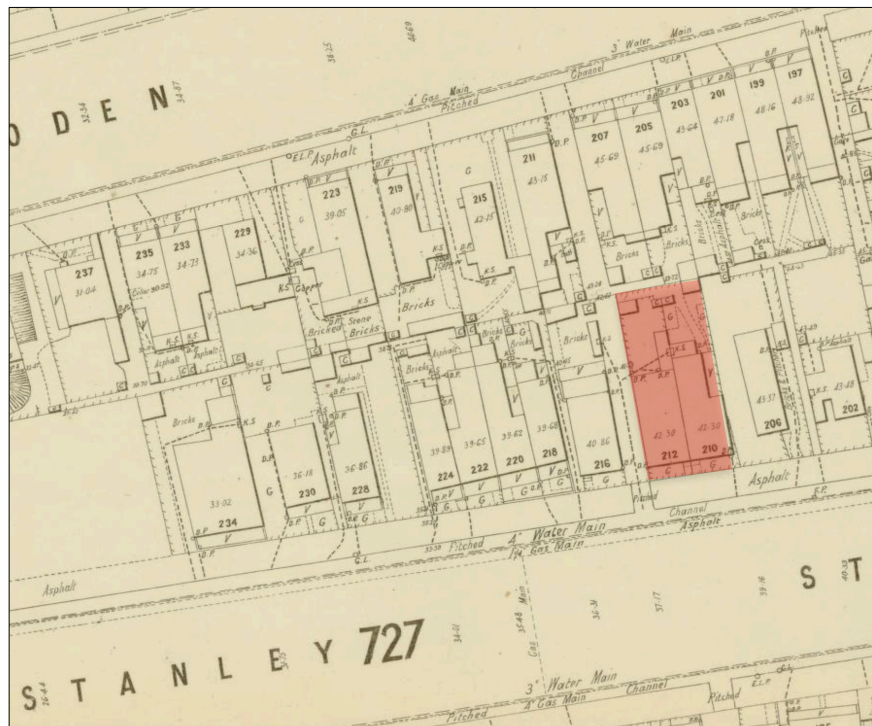


Figure 1 Extract from an 1895 MMBW plan of West Melbourne showing Stanley Street mainly developed with residential buildings. The subject site was occupied at that time by two semi-detached dwellings. Source: State Library Victoria.

10. The workshop at 210 Stanley Street was designed by architect G E Teague for J S Corden & Co Pty Ltd.² It is a modest, single-storey building with three bay sawtooth roof and symmetrical Moderne style façade constructed of brown brick. The façade is surmounted by a parapet with a rendered panel, originally displaying the business name in metal letters (since removed). The projecting brick course detail to the parapet, and recessed courses to the main body of the walls, create a horizontal emphasis that is typical of the Moderne style. The façade is otherwise plainly detailed. The original double-leaf timber doors at the centre of the façade have been replaced by a modern steel roller door and one of the original window openings has been converted into a door.

¹ City of Melbourne Building Permit Index, Application No. 16768.

² City of Melbourne Building Application No. 16768. PROV VPRS 11200/P0001, Unit 1907.



Figure 2 Extract from 1935 building application drawings showing the new factory façade at 210 Stanley Street.



Figure 3 Current photograph of the Stanley Street façade.

11. In terms of its context, the subject site is located in a mixed industrial/residential streetscape. A slither of vacant land to the west of the site is presently used as a carpark. The adjacent property at 218-228 Stanley Street is occupied by a double-storey modern brick and concrete walled office building that is of no heritage interest. Further to the west, 230-250 Stanley Street retains the double-storey red-brick façade of a 1920s factory that has been converted into townhouses with a third level addition.

12. Along Stanley Street, immediately east of the subject site, at 206 Stanley Street is a bland double-storey cream brick post-war factory of no heritage interest. The single-storey brick walled factory at 202 Stanley Street also appears to date from the post war period. East of this is an isolated late Victorian single-storey cottage and a plainly designed single-storey brick workshop (on the corner of Adderley Street).
13. Opposite the subject site, the south side of Stanley Street is predominately characterized by single-storey industrial buildings. There is a relatively recent three-storey townhouse development (183-185 Stanley Street), and a vacant lot with approval for a four-storey apartment building (187 Stanley Street). A reasonably intact row of late Victorian terraces of one and two storeys can be found at the western end of Stanley Street.



Figure 4 The north side of Stanley Street with the subject site visible at the centre.



Figure 5 Modern office building at 218-228 Stanley Street, west of the subject site.



Figure 6 *Townhouse development at 230-250 Stanley Street behind at 1920s factory façade.*



Figure 7 *Mixed industrial streetscape on the south side of Stanley Street, opposite the subject site.*



Figure 8 *Victorian terraces at the western end of Stanley Street.*

6.0 Heritage Listings

Victorian Heritage Register

14. The subject site is not included on the *Victorian Heritage Register*.

National Trust

15. The subject site is not classified by the National Trust.

City of Melbourne

16. The subject properties are included within the large North and West Melbourne Heritage Precinct, identified as HO3 in the Schedule to the Heritage Overlay. External paint controls apply under the provisions of this overlay, but no internal alteration controls or tree controls apply.
17. The current Heritage Overlay map also shows an individual Heritage Overlay, HO471 applying to 210 Stanley Street. However, the Schedule to the Heritage Overlay identifies HO471 as being 138-140 Stanley Street, West Melbourne, which is a property toward the north east of the site, near Spencer Street. The mapping is evidently an error, and seems to have been intended for 138-140 Stanley Street, a building that has been a graded property since the 1980s, whereas 210 Stanley Street is currently ungraded.

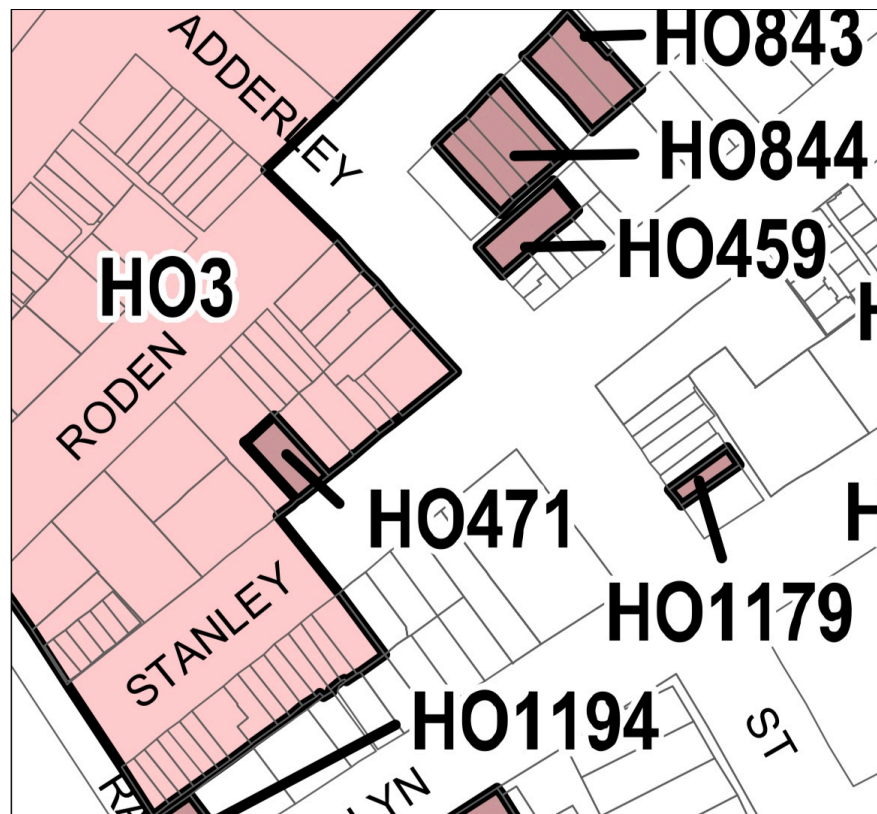


Figure 9

Extract of the current Heritage Overlay map showing HO471 applying to the subject site.

7.0 Significance

18. Inter alia, Amendment C258 proposes to introduce a statement of significance for North and West Melbourne Precinct (HO3) as follows:

What is significant?

North and West Melbourne Precinct was developed from the mid-nineteenth century as part of the extension of Melbourne to its north and west during a period of significant population growth. Significant and contributory development in the precinct dates from the mid nineteenth century through to the interwar period, although Victorian development predominates. Some places of heritage value may also be outside this date range. The precinct is mainly residential, but with historic mixed use development, and several commercial streetscapes.

The following are the identified 'key attributes' of the precinct, which support the assessed significance:

- *Typical nineteenth century building characteristics including:*
 - *Use of face brick and rendered masonry building materials, with timber and bluestone indicating earlier buildings.*
 - *Hipped roof forms with chimneys and parapets; verandahs which are simply detailed or have more decorative cast iron work; iron palisade fences on stone plinths; and limited or no front and side setbacks.*
- *Comparatively high number of buildings of the 1850s and 1860s.*
- *Modest workers' cottages as the common housing type, often in consistent and repetitive terrace rows, with simple forms and detailing.*
- *Other development including larger Victorian dwellings and two-storey terrace houses; Edwardian dwellings on the site of the former Benevolent Asylum; and interwar buildings.*
- *Typically low scale character, of one and two-storeys, with some larger three-storey buildings.*
- *Streets of consistent scale, or with greater scale diversity and contrasting modest and larger buildings.*
- *Streets which display historic mixed uses including residential, commercial, manufacturing and industrial uses.*
- *Nineteenth and twentieth century hotel buildings and shops located on corners and within residential street blocks.*
- *Secondary or 'little' streets, including named lanes, with workers cottages, warehouses and workshops, occasional stables and small scale early twentieth century commercial and industrial development.*
- *Importance of Errol, Victoria and Queensberry streets, being some of inner Melbourne's most extensive and intact commercial streetscapes.*
- *Remarkable 1870s-80s civic development at the corner of Errol and Queensberry streets, with the town hall tower being a local landmark.*
- *Views from lanes to historic outbuildings and rears of properties, providing evidence of historic property layouts.*
- *Undulating topography which has allowed for views and vistas of prominent elements such as the town hall tower and church spires.*
- *Important role of religion as demonstrated in the large and prominent ecclesiastical buildings and complexes.*
- *Evidence of change and evolution in the precinct, with streets having buildings from different periods, and historic buildings such as former factories and warehouses adapted and converted to new uses.*
- *Nineteenth century planning and subdivisions as evidenced in:*
 - *Hierarchy of principal streets and secondary streets and lanes.*
 - *Regular grid of straight north-south and east-west streets in the centre of the precinct.*

- *Contrasting street alignments in the north of the precinct, where streets angle east to meet Flemington Road; and in the south of the precinct, where the CBD streets extend to meet the precinct.*
- *Large and irregular street intersections including three or more streets meeting at oblique angles.*
- *Lanes which provide access to rears of properties and act as important minor thoroughfares.*
- *Principal streets characterised by their width and open character, with vistas available along their length; these are sometimes distinguished by street tree plantings including planes, elms and eucalypts.*
- *Importance of major roads and thoroughfares which border or traverse the precinct including Flemington Road, a grand Victorian boulevard which was historically the route to the goldfields; and Victoria, Peel and Elizabeth streets.*
- *Historic street materials including bluestone kerbs and channels, and lanes with original or relayed bluestone pitchers and central drains.*
- *Vehicle accommodation is generally not visible from principal streets, but more common to rears of properties, with lane access.*

How is it significant?

North and West Melbourne Precinct is of historical, social and aesthetic/architectural significance to the City of Melbourne.

Why is it significant?

North and West Melbourne Precinct is of historical significance, as a predominantly Victorian-era precinct associated with the nineteenth century growth of Melbourne to its north and west. As early as 1852, streets in the centre of the precinct, and north of Victoria Street, were laid down in a rigorous grid. Early development of the 1850s and 1860s also reflects local involvement in servicing the goldfields traffic and migration of people from Melbourne to the gold rush centres to the north-west. Hotham Hill, in the north of the precinct, was a notable development from the 1860s, its elevated position attracting grander residential development. West Melbourne also developed its own identity in the nineteenth century, being an early residential suburb with mixed housing types, which was later largely transformed including through the expansion of industry and manufacturing. Major roads and streets which traverse or border the precinct, including Victoria, Peel and Elizabeth streets, and Flemington Road, were historically important early Melbourne thoroughfares and boulevards. Flemington Road was envisioned by Robert Hoddle as major route out of Melbourne, its status confirmed in the Roads Act of 1853. The working class history of the precinct is particularly significant, demonstrated in the characteristically modest dwellings and historic mixed use development, including the proximity of houses to commercial, manufacturing and industrial buildings, historic corner shops and hotels, and churches and schools. The Catholic Church was a particularly prominent local denomination. Residents of the precinct were employed in some of Melbourne's most important nineteenth and early twentieth century industries, located close to the precinct, including markets, abattoirs, railways and the port at Victoria Dock. Residents were also politically active, forming various associations in the nineteenth and early twentieth centuries, and being prominent in the women's suffrage and World War I anti-conscription movements.

North and West Melbourne Precinct is of social significance. Residents value its historic streetscapes, its 'walkability', and its notable commercial development and village character centred on Errol, Victoria and Queensberry streets. Proximity to the nearby Victoria Market, Arden Street Oval and the city, is also highly valued.

The aesthetic/architectural significance of the North and West Melbourne Precinct largely rests in its Victorian-era development including workers' cottages, rows of simply detailed modest dwellings, and two- storey terrace houses. These are complemented by larger Victorian dwellings, Edwardian development on the site of the former Benevolent Asylum, and historic mixed use buildings, with the latter often located in residential streets. There is also some variety

in building and allotment sizes, and building heights, styles, materials and setbacks. In the Hotham Hill area, residential streets are wide and elevated, and comparatively intact, with larger residences. In the precinct's south, development is finer grained. Large brick warehouses, from the late nineteenth and early twentieth century, are located in the east of the precinct near Victoria Market. The precinct also has some of inner Melbourne's most extensive and intact commercial streetscapes, including significant concentrations on Errol, Victoria and Queensberry streets. Errol Street is particularly distinguished by the remarkable 1870s civic development, with the town hall tower a significant local landmark. Throughout the precinct, principal streets connect with secondary or 'little' streets, reflecting typical nineteenth century planning. These secondary streets reinforce the 'permeable' character and pedestrian nature of the precinct, enhanced by the network of lanes which are demonstrably of nineteenth century origin and function, and continue to provide access to the rears of properties. The lanes were also historically used to access small scale commercial and industrial operations, concentrated in the secondary streets of the precinct. Aesthetically, the precinct also has an open character, and internal views and vistas, deriving from the long and wide streets and several large and sometimes irregular intersections. Principal streets are also distinguished by street plantings of planes, elms and eucalypts.

19. The subject site is currently an ungraded place in HO3. It was not originally graded as part of the 1983 *North and West Melbourne Conservation Study*, and remained identified as not being contributory until recent years. It was provided with a datasheet in the *West Melbourne Heritage Review* (2016) describing the building as 'simple Moderne design, well-preserved'. The datasheet listed the heritage value of the building as 'aesthetic' and further identified the site as 'contributory to precinct' (Appendix 2, p.1121). The *West Melbourne Heritage Review* graded the site D in a level 3 streetscape. These gradings are currently defined thus:

D Graded Buildings

These buildings are representative of the historical, scientific, architectural or social development of the local area. They are often reasonably intact representatives of particular periods, styles or building types. In many instances alterations will be reversible. They may also be altered examples which stand within a group of similar period, style or type or a street which retains much of its original character. Where they stand in a row or street, the collective group will provide a setting which reinforces the value of the individual buildings.

Level 3 Streetscapes

These streetscapes may contain significant buildings, but they will be from diverse periods or styles, and of low individual significance or integrity.

20. As part of Amendment C258 the City of Melbourne are proposing to replace the current A-D grading system with a system that utilises 'significant', 'contributory' and 'non-contributory' gradings. The draft version of the heritage inventory that went on exhibition, using the new gradings system, identifies 210 Stanley Street as 'contributory'. Contributory places are defined thus:

A 'contributory' heritage place is important for its contribution to a heritage precinct. It is of historic, aesthetic, scientific, social or spiritual significance to the heritage precinct. A 'contributory' heritage place may be valued by the community; a representative example of a place type, period or style; and/or combines with other visually or stylistically related places to demonstrate the historic development of a heritage precinct. 'Contributory' places are typically externally intact, but may have visible changes which do not detract from the contribution to the heritage precinct.

8.0 Discussion

21. As noted, the *Heritage Places Inventory* proposed under Amendment C258 recommends that the building at 210 Stanley Street be upgraded to 'contributory'. This represents a grading 'uplift' from both its present ungraded status and the D3 grading previously nominated in the *West Melbourne Heritage Review*. It is important to note that D3 graded buildings are 'non-contributory' under the terms of the present heritage policy:

Contributory building means a 'C' grade building anywhere in the municipality, or a 'D' grade building in a Level 1 or Level 2 streetscape.

22. The subject site's non-contributory status remains appropriate having regard for the limited architectural and historical interest of the factory on the site and its location in a diverse streetscape. The building is of only the most limited heritage interest, and sits in a mixed streetscape with little remnant heritage character.
23. The statement of significance proposed for HO3 has its main emphasis on Victorian era development. HO3 is also considered to be of historical significance, as a '*predominantly Victorian-era precinct*'. The aesthetic/architectural values of HO3 are said to '*largely*' rest in its Victorian-era development. As an interwar factory, the subject building lies outside of the precinct's key period of development, notwithstanding that interwar buildings are more generally listed as a 'key attributes' of the precinct, with industry/manufacturing also mentioned in respect to historical significance.
24. While 210 Stanley Street is clearly an example of an interwar factory, it is a simple and unremarkable example. It has also been altered with the demolition of an original window opening, and the loss of original doors and signage.
25. The building does not exhibit any particularly remarkable aspects of design or place history that advocate a strong basis for listing as a contributory place in HO3. Industrial development in the interwar period is well represented in factories within HO3, and when compared to other industrial buildings from the interwar period in Melbourne, 210 Stanley Street does not stand out.
26. The building gains no additional significance through its association with architect George Eric Teague. Teague was in partnership with noted Melbourne architect Guyon Purchas from 1903. Meredith Gould's Statement of Evidence to the VCAT describes Purchas and Teague as the architects of influential mansion houses including Tay Creggan, Hawthorn (1898) and Purrumbete in the western district (1901). The design of both houses is generally accredited to Purchas (Tay Creggan was built as Purchas' own home), and moreover, both houses were built before Teague became a partner in the firm. Purchas retired in 1923 and as such would have had no role in the design of 210 Stanley Street. His lesser known partner Teague does not seem to have been as important or influential. There is no entry for Teague in the *Encyclopedia of Australian Architecture*, whereas his daughter Cynthia was given an entry for her role as a pioneering female architect and senior public servant.

27. Regardless of George Teague's standing within the architectural profession, the workshop at 210 Stanley Street can only be considered a very minor and insignificant work within his oeuvre. Moreover, an association with architect, however important or accomplished they may have been, does not necessarily impart additional significance on a building – especially one as unremarkable as the workshop at 210 Stanley Street.
28. It is a modest example of a building type that is already well-represented by more intact and more architecturally distinguished examples. Having regard for this, and the low integrity of the streetscape (discussed further below) its ungraded, non-contributory status seems appropriate.
29. For over 30 years there has been explicit recognition in Council's grading system that not all D grade buildings are of sufficient importance to warrant being considered contributory to a precinct. The 1985 Council document entitled *Urban Conservation in the City of Melbourne* included the following definitions of outstanding and contributory buildings.

*Outstanding Building – outstanding in its own right.
A grade A or B building anywhere in the municipality.*

*Contributory Building – contributory to the street and the area's character.
A grade C building anywhere in the municipality; and a D building in a Level 1 or 2 streetscape in an Urban Conservation Area.*

Other lesser graded buildings, while having some measure of historic or architectural significance, and in many cases worthy of restoration, are not considered to make as significant contribution to historic area character.

30. This document also included the table (see below, Summary Table 1) which later informed the present heritage policy under Clause 22.05:

SUMMARY TABLE 1

PRESERVING, ALTERING or RENOVATING GRADED BUILDINGS

		PRESERVATION OF INTACT SIGNIFICANT FABRIC	ALTERATION OR RENOVATION OF NO LONGER INTACT SIGNIFICANT FABRIC:	
			EVIDENCE OF EARLIER STATE AVAILABLE	NO EVIDENCE OF EARLIER STATE
'A' and 'B' buildings anywhere	"OUTSTANDING BUILDINGS"	Should be PRESERVED	Should be authentic RESTORATION/RECONSTRUCTION or should not preclude it happening in the future	RESPECTFUL or INTERPRETATIVE modern design preferred to "guesswork" reconstruction or reproduction. Refer to Summary Table 2.
'C' buildings anywhere; and 'D' buildings in Level 1 and 2 streetscapes	"CONTRIBUTORY BUILDINGS"	Should be PRESERVED where visible. DISCRETIONARY* where concealed.	Where visible, should be authentic RESTORATION/RECONSTRUCTION or should not preclude it happening in the future. DISCRETIONARY* where concealed.	
All other lesser graded buildings		DISCRETIONARY*	DISCRETIONARY*	
REFER TO PERFORMANCE STANDARD:		1	2	3

31. It has been policy that relatively isolated D grade buildings in mixed, or level 3, streetscapes, while having some interest sufficient to warrant a grading, are not of sufficient significance to warrant contributory status because their setting is of low value.
32. The present Amendment does not acknowledge this, and indeed the *Methodology* report barely engages with this long-established principle, identifying it as something that lead to ‘perception’ of diminished significance rather than a sound and well established principle (see page 13, September *Methodology*). The approach that has been adopted is flawed in that the methodology assumed that all D grade buildings now warrant ‘contributory’ status.
33. Further to this, one important aspect of methodology that was either missed or intentionally put aside was a review of D grade buildings deemed not to be contributory under the existing policy settings, to determine which warranted elevation to contributory status under the new policy settings. The absence of this step, which is not remarked upon in the *Methodology Report*, is a flaw in the process, a flaw that has impacted upon low interest sites such as 210 Stanley Street.
34. It is accepted that the VCAT refused a permit for redevelopment of the subject site which would have involved full demolition of 210 Stanley Street. In doing so the Tribunal made comment that they were required to consider and interrogate the ‘contributory’ grading proposed under Amendment C258, even though it was not a seriously entertained document at that time. The Tribunal were of the view that the building made a contribution to the historic character of the precinct as a ‘well-preserved’ example of industrial architecture of the interwar period.
35. Notwithstanding that the subject building is not especially well preserved, and accepting that intactness is not in and of itself a measure of significance, it is appropriate that the ‘contributory’ value of the subject site be interrogated in further detail. Particular consideration needs to be paid to the character of the surrounding streetscape. As noted, the subject site is located in a mixed streetscape. The draft statement of significance for HO3 lists as a key attribute ‘*streets which display historic mixed uses including residential, commercial, manufacturing and industrial uses*’. The subject site’s streetscape displays a mix of uses only in the sense that it contains some modern residential uses, postwar industry and modern commercial development.
36. It is understood that revisions to the HO3 boundary were not part of the brief for the *West Melbourne Heritage Review* (although some changes to boundaries do seem to have been recommended). This would suggest that individual buildings within this area were regarded without detailed consideration for streetscape context and integrity. Beyond this, the translation of the D3 grading as recommended in the *West Melbourne Heritage Review* to the ‘contributory’ grading proposed by C258 seems to have automatically occurred as a ‘default setting’.
37. The *Methodology Report* for the review of heritage gradings (*City of Melbourne Heritage Review: local heritage policies and precinct statements of significance methodology report*, September 2015, updated May 2016, Lovell Chen) notes that the process of re-

grading was largely undertaken as a desk-top study and relied chiefly upon existing information in relation to heritage properties.

38. An analysis of the proposed heritage gradings for H03 shows the environs of the subject site to be very much dominated by non-contributory buildings (refer Figure 10). Modern or post war buildings of no heritage value sit alongside the subject site. The group of Victorian terrace houses on the south side of Stanley Street is generally intact but physically separated from the subject site, and other more intact parts of H03.

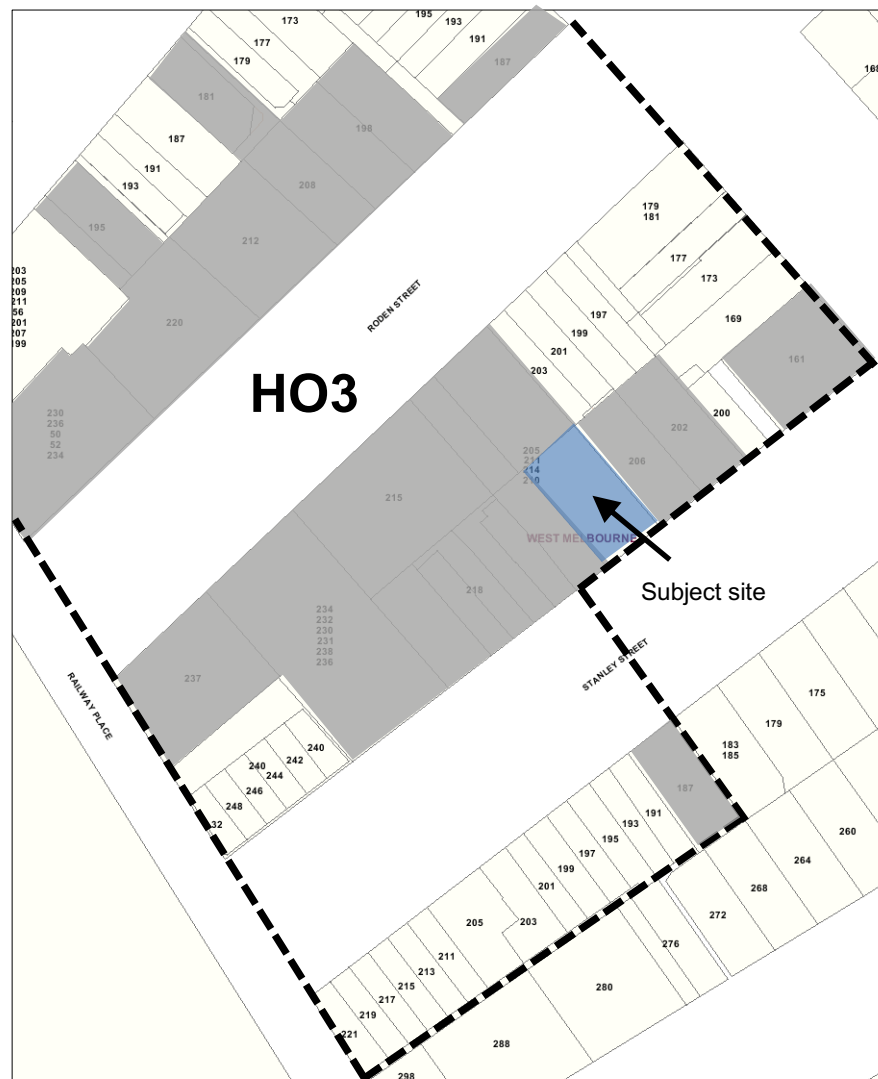


Figure 10 Map of West Melbourne with the boundary of HO3 indicated by the dashed line. Buildings that are proposed to be non-contributory are shaded grey. Note: 187 Stanley Street was graded significant in the latest version of the Heritage Places Inventory, but its shown as non-contributory because it has been demolished.

39. It is also noted that one of the Victorian terraces graded significant has been demolished (187 Stanley Street). The remainder of the south side of Stanley Street is mixed in character and appropriately excluded from HO3. It is noted also that a very high proportion of non-contributory buildings can be found on adjoining

parts of Roden Street north of the Stanley Street. This creates a situation whereby the environs of the subject site can be said to be physically cut off from the more intact parts of HO3.

40. It is apparent from the analysis above that there is little to differentiate the streetscape within which the subject site is located from adjoining streetscapes outside of HO3. East of Adderley Street, Stanley Street contains a similar proportion of postwar and modern industrial buildings and a smaller number of isolated pre-war factories. Also lying just outside of HO3, Rosslyn Street contains two modest interwar factories flanked by modern buildings – much like the situation that occurs in the immediate environs of 210 Stanley Street, albeit that the interwar factories on Rosslyn Street are more intact and more architecturally interesting than the building on the subject site.



Figure 11 The interwar factory buildings at 260 and 252 Rosslyn Street, West Melbourne (both outside of HO3).

41. Having regard for the above, Amendment C258 should be taken as an opportunity to reconsider or comment upon the boundaries of HO3 to at least exclude the north side of Stanley Street, and potentially a larger area including much of the western end of Roden Street. This area is located on the periphery of HO3 and is of such low integrity that it can reasonably be excluded from the precinct without adverse impact on its significance, character and appearance of the broader HO area. The subject building cannot be said to make a meaningful contribution to the heritage character of HO3 given that stands in a streetscape of such low integrity as to be largely devoid of the attributes for which the precinct is valued. As such, a contributory grading is not warranted for 210 Stanley Street.
42. It may also be appropriate within the context of Amendment C258 to question why there is no declared intent to correct the mapping error that has HO471 applying to the subject site instead of 138-140 Stanley Street (as per Figure 9 above). The exhibited C258 HO maps do not show HO471 deleted from the subject site.

9.0 Conclusion

43. In summary, the subject building at 210 Stanley Street is of only the most moderate architectural distinction and makes only a limited contribution to its streetscape which is, in any case, no longer intact or of substantial heritage value. The streetscape itself is not of sufficient interest to warrant retention within HO3, such that the boundaries of the precinct should be reconsidered, at least in so far as they apply to the subject site and adjoining parts of Stanley Street.
44. If the boundaries of HO3 are to remain unaltered, the subject site should be ungraded, as was originally the case, or be identified as a 'non-contributory' building, the status most directly equivalent to the D3 grading that was recommended in the more recent review by Butler.

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CONSERVATION CONSULTANTS
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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•Urban Design**, 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 Kingston, Frankston and Stonnington.

Bryce Raworth Pty Ltd has prepared conservation plans for a number of registered historic buildings, including Walter Burley Griffin's Essendon Incinerator. The company's experience with institutional buildings has led to preparation of conservation plans for the Mac.Robertson Girls' High School, Castlemaine Gaol, J Ward, Ararat, the former Russell Street Police Headquarters, Ballarat State Offices, Camberwell Court House, Shepparton Court House and the Mont Park asylum precinct.

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.

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 Coriule Homestead, Curlewis.

BRYCE RAWORTH
STATEMENT OF EXPERIENCE

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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
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 & 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: <i>A Question of Style: Domestic Architecture in Melbourne, 1919-1942</i>)</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>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 & 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 Coriule Homestead, Australian Institute of Architects, Victorian Chapter, 2015</p>

