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Dear Sir/Madam,

We continue to act for Shaun Driscoll and Margaret Bradshaw, Stanley Street Holdings Pty Ltd, and Domenico and Maria Patti in respect to the above matter.

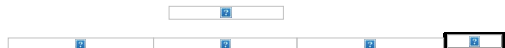
Please find **enclosed** in the link below, the following expert witness reports, to be relied upon by our clients at the forthcoming Panel Hearing:

1. Mr Bryce Raworth of Bryce Raworth and Associates (heritage) in respect to 159-161 Roden Street, West Melbourne;
2. Mr Bryce Raworth of Bryce Raworth and Associates (heritage) in respect to 210-212 Stanley Street, West Melbourne; and
3. Mr Bryce Raworth of Bryce Raworth and Associates (heritage) in respect to 322 Walsh Street, South Yarra.

https://www.dropbox.com/sh/wdkymk4dhbxkhsa/AABlvJ8Fve7MYeib_QXhDV4a?dl=0

Kind regards,

Isabel Barnes Legal Secretary
On behalf of **Dominic Scally**, Principal
Direct Tel: (03) 9691 0232 | **Dominic Scally**: (03) 9691 0219
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322 Walsh Street
South Yarra

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

322 Walsh Street South Yarra

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

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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 land at 322 Walsh Street, South Yarra. I have been asked to provide comment on the heritage considerations associated with Amendment C258 to the *Melbourne Planning Scheme*, which proposes, amongst other changes, to apply a new heritage grading to the subject property and update the heritage policy at Clause 22.05. The building at 322 Walsh Street, South Yarra, is currently subject to an individual heritage overlay control identified in the Schedule to the Heritage Overlay as HO457.
2. By way of background, Melbourne Planning Scheme Amendment C258 proposes to revise the local heritage planning policies, incorporate new heritage statements of significance for various precincts, and replace the current A to D grading system with a three-tier grading system that utilises 'significant', 'contributory', and 'non-contributory' gradings. Amendment C258 as first exhibited from 30 March to 12 May 2017, and re-exhibited with a corrected Heritage Inventory from 7 December 2017 to 29 January 2018.
3. The re-exhibited Heritage Places Inventory (2017) seeks to modify the grading of the subject property from D3 to 'significant'.
4. My office has previously provided heritage advice in relation to the property at 322 Walsh Street, which is currently the subject of an application for full demolition and redevelopment.
5. This statement has been prepared with assistance from Carolynne Baker of my office. The views expressed are my own.

2.0 Sources of Information

6. The analysis below draws upon multiple inspections of the subject site, and a review of the relevant documentation for Amendment C258. Reference has also been made to the current heritage policy at Clause 22.05, the *Practice Note 1: Applying the Heritage Overlay (July 2015)*, and the *City of Melbourne Planning Scheme Heritage Review (1999/2000)*. Other sources are referenced throughout.
7. Reference has also been made to the City of Melbourne's *i-Heritage Database*, the *Melbourne Planning Scheme's Heritage Places Inventory* (June 2016 and, more recently, March 2018), and the Heritage Overlay provisions in the *Melbourne Planning Scheme* (Clauses 43.01 and 22.05).
8. 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

9. 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

10. 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.



BRYCE RAWORTH

5.0 History and Description

11. The Ivel Flats at 322 Walsh Street, South Yarra were constructed in 1918 to a design by Howard Lawson, a prolific designer and developer of flats.¹ Lawson was also responsible for the block of flats that were built at the same time on the adjoining block of land at 31-33 Alexandra Avenue (demolished c2006).² A building application was lodged in September 1917 to erect 'residential flats' at 322 Walsh Street to the value of £2,000.³ Correspondence from Howard Lawson's office indicates that construction was under way by January 1918,⁴ and the building is first listed as 'Ivel Flats' in the 1919 Sands and McDougall directory.



Figure 1 The subject building – formerly known as the Ivel Flats – at 322 Walsh Street, South Yarra.

12. The Ivel Flats building is a double-storey block of flats with an unassuming bungalow character. The front facade is broadly symmetrical with a recessed central entry bay, flanked on either side by projecting wings with balconies at both levels (since enclosed). External walls are constructed of plainly detailed stretcher bond red brick. The hipped terracotta tiled roof projects forward to shelter the first floor balconies. The roof has exposed rafters at the eaves and simple red brick chimneys with projecting headers as ornament. Windows typically have double hung timber frames with multi-pane upper sashes.

¹ City of Melbourne Building Application Plans, No 919. PROV, VPRS 11200, Unit 106.

² City of Melbourne Building Application Plans, No 919. PROV, VPRS 11200, Unit 106.

³ City of Melbourne Building Application Index, No 919. PROV, VPRS 11202.

⁴ City of Melbourne Building Application Plans, No 919. PROV, VPRS 11200, Unit 106.



Figure 2 *The view south up Walsh Street.*



Figure 3 *Extract from the 1917 building application plans showing the front elevation of 322 Walsh Street.*

13. The subject building remains broadly intact externally apart from the enclosure of the front balconies with steel-framed windows. The decorative etched glass window above the entry porch also possibly dates from the post war period. More recent fabric includes the canvas awning over the front entry and the metal palisade front fence.



Figure 4 The neighbouring building at 320 Walsh Street, South Yarra.

14. In terms of context, the subject site is located in a heterogeneous streetscape dominated by apartment developments and large houses of recent origin. The building to the immediate north of the subject site at 324 Walsh Street is a three-storey c1970s block of flats with undercroft carparking accessed from Alexandra Avenue. The mixed context includes a double-storey apartment building with an incongruous juxtaposition of modern and faux classical elements (320 Walsh Street), a relatively recent three-storey apartment building (318 Walsh Street), a three storey cream brick block of flats constructed c1939 in hybrid Georgian Revival/Moderne style (310 Walsh Street), and a modern four storey apartment building on the corner of Clowes Street (304 Walsh Street).



Figure 5 The building at 310 Walsh Street, South Yarra.

15. The west side of Walsh Street (between Clowes Street and Alexandra Avenue) is similarly mixed. For example, the streetscape contains a recently constructed double-storey neo-Georgian house stands at 52-54 Clowes Street), a faux Classical-style double-storey house (313-315 Walsh Street), a heavily altered double-storey c1920s house (312 Walsh Street), a large modern double-storey house (323 Walsh Street), a heavily modified Edwardian residence with prominent modern garages at street level (325 Walsh Street), a largely intact single-storey Edwardian villa (327 Walsh Street), and a block of interwar flats with three levels above ground floor garages (25 Alexandra Avenue).



Figure 6 The building at 318 Walsh Street, South Yarra.



Figure 7 The building at 324 Walsh Street, South Yarra.



Figure 8 The four-storey building at 304 Walsh Street, viewed from the south.



Figure 9 The building at 52-54 Clowes Street, South Yarra (Walsh Street elevation).



Figure 10 The building at 313-315 Walsh Street, South Yarra.



Figure 11 The building at 321 Walsh Street, South Yarra.



Figure 12 The building at 323 Walsh Street, South Yarra.



Figure 13 The building at 325 Walsh Street, South Yarra.



Figure 14 The building at 327 Walsh Street, South Yarra.



Figure 15 The building at 25 Alexandra Avenue, South Yarra.

6.0 Heritage Status

16. The site is subject to an individual heritage overlay control (HO457). External paint controls apply under the provisions of this overlay, although internal paint controls and tree controls do not. The properties to the north and east of the subject site are partly located within the *South Yarra Precinct* (HO6).

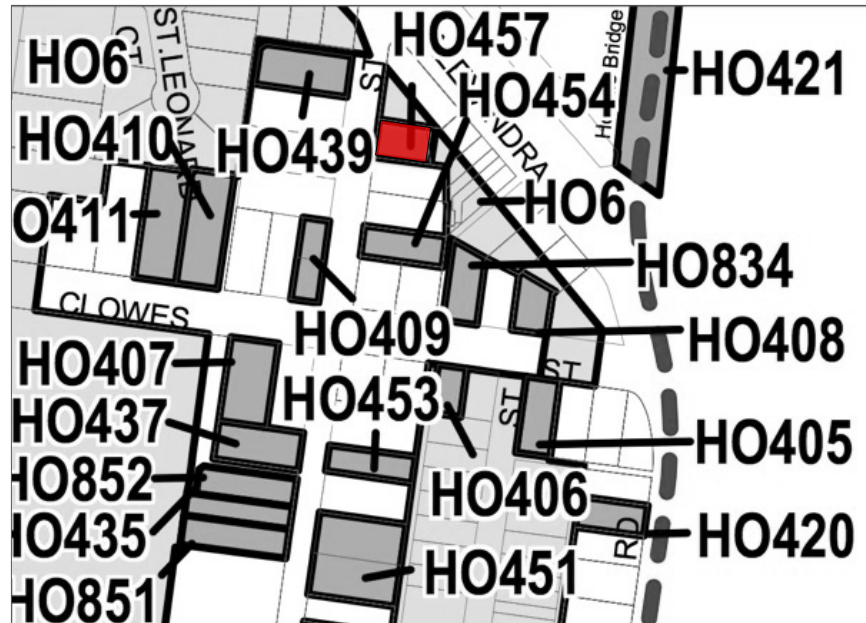


Figure 16 Detail of the Heritage Overlay map, with the subject site shaded red.

17. The building is currently identified as a D graded building in a Level 3 streetscape in the current *Heritage Places Inventory* (March 2018), an incorporated document at Clause 81.01. This grading was confirmed in the *Heritage Places Inventory* (May 2016) in a 5-tier grading system of A to E (noting that E gradings are not used outside of CBD). The existing grading system at Clause 22.05 is defined as follows:

'A' Buildings

'A' buildings are of national or state importance, and are irreplaceable parts of Australia's built form heritage. Many will be either already included on, or recommended for inclusion on the Victorian Heritage Register or the Register of the National Estate.

'B' Buildings

'B' buildings are of regional or metropolitan significance, and stand as important milestones in the architectural development of the metropolis. Many will be either already included on, or recommended for inclusion on the Register of the National Estate.

'C' Buildings

'C' buildings. Demonstrate the historical or social development of the local area and / or make an important aesthetic or scientific contribution. These buildings comprise a variety of styles and building types. Architecturally they are substantially intact, but where altered, it is

reversible. In some instances, buildings of high individual historic, scientific or social significance may have a greater degree of alteration.

'D' buildings

'D' 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 1 Streetscapes

Level 1 streetscapes are collections of buildings outstanding either because they are a particularly well preserved group from a similar period or style, or because they are highly significant buildings in their own right.

Level 2 Streetscapes

Level 2 streetscapes are of significance either because they still retain the predominant character and scale of a similar period or style, or because they contain individually significant buildings.

Level 3 Streetscapes

Level 3 streetscapes may contain significant buildings, but they will be from diverse periods or styles, and of low individual significance or integrity.

18. The Level 3 streetscape is the lowest streetscape grading in a three-tier hierarchy of 1 to 3.
19. The building was graded D in the *South Yarra Conservation Study 1985*. It was reviewed and confirmed as a D grade building in Allom Lovell & Associates review for the City of Melbourne, *City of Melbourne Planning Scheme Heritage Review* (1999/2000).
20. In the *C258 Heritage Places Inventory* (2017), the building at 322 Walsh Street is identified as a 'significant' building. The new three-tier grading system proposed under Amendment C258 is defined at proposed Clause 22.05-17 as follows:

'Significant' heritage place:

A 'significant' heritage place is individually important at state or local level, and a heritage place in its own right. It is of historic, aesthetic, scientific, social or spiritual significance to the municipality. A 'significant' heritage place may be highly valued by the community; is typically externally intact; and/ or has notable features associated with the place type, use, period, method of construction, siting or setting. When located in a heritage precinct a 'significant' heritage place can make an important contribution to the precinct.

'Contributory' heritage place:

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.

'Non-contributory' place:

A 'non-contributory' place does not make a contribution to the cultural heritage significance or historic character of the heritage precinct.

7.0 Statement of Significance

21. The key information from the citation for the Ivel Flats, as included in the i-Heritage database, is reproduced below:

History

Ivel Flats was constructed c.1918. The building is first listed in the Sands & McDougall directories in 1919.

Description/Notable Features

The building at 322 Walsh Street is a double storey inter-War block of flats, constructed of red brick with hipped terracotta tiled roofs. The building is divided into three bays, the centre bay being slightly higher and the flanking bays containing verandahs at each level, now enclosed. The building displays typical of the Bungalow style, including multi - paned timber framed double hung sashes, rendered window dressing and squat rendered verandah piers. The steel front fence is not original.

Statement of Significance

Ivel Flats, at 322 Walsh Street, South Yarra, are of local aesthetic and historical interest. The building is representative of the wave of flat-building which occurred in South Yarra in the inter-War period, a major phase in the development of the area. The block of flats is a good example of the inter-War bungalow style applied to a small block of flats.

22. It is noted that the building is described in the statement of significance as being of local 'interest' rather than local 'significance'. The former term is commonly applied in circumstances where a building is not seen to meet a threshold of local significance in its own right, and it would be typical and reasonable to apply it in this sense for a building with a confirmed grading of D only.

8.0 Analysis

23. The subject building at 322 Walsh Street, South Yarra, is identified as a ‘significant’ heritage place in the exhibited version of the *Heritage Places Inventory* (2017) – a proposed incorporated document under Amendment C258 to the Melbourne Planning Scheme. However, the subject building is currently identified as a D graded building in a Level 3 streetscape (i.e. the lowest possible grading outside of the CBD). Were it located in a heritage overlay precinct, the subject building would not be considered a contributory place in terms of Council 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.

24. Amendment C258 also proposes to revise the existing Clause 22.05. When coupled with the revised gradings, the proposed changes to Council’s heritage policy would have very significant implications for the assessment of development applications.
25. For example, Council’s current heritage policy under Clause 22.05 (the City of Melbourne’s local heritage policy for Heritage Places Outside the Capital City Zone) requires the responsible authority to consider, amongst other things, the degree of significance of the place before deciding whether demolition is appropriate:

Demolishing or removing original parts of buildings, as well as complete buildings, will not normally be permitted in the case of ‘A’ and ‘B’, the front part of ‘C’ and many ‘D’ graded buildings. The front part of a building is generally considered to be the front two rooms in depth.

Before deciding on an application for demolition of a graded building the responsible authority will consider as appropriate:

- *The degree of its significance.*
- *The character and appearance of the building or works and its contribution to the architectural, social or historic character and appearance of the streetscape and the area.*
- *Whether the demolition or removal of any part of the building contributes to the long-term conservation of the significant fabric of that building.*
- *Whether the demolition or removal is justified for the development of land or the alteration of, or addition to, a building.*

A demolition permit should not be granted until the proposed replacement building or works have been approved.

26. Under the existing heritage policy at Clause 22.05, the demolition of the rear parts of D graded buildings, as well as whole buildings, can be considered. Where a D graded building becomes ‘significant’ under the new grading system, there would at face value be a much greater restriction on the permissible extent of demolition. The proposed Clause 22.05 heritage policy generally seeks to preserve all original external fabric of significant buildings:

Full demolition of significant or contributory buildings will not normally be permitted. Partial demolition will not normally be permitted in the case of significant buildings or the front or principal part of contributory buildings.

27. Amendment C258 also deletes the provision from the current heritage policy which requires the responsible authority to consider:

Whether the demolition or removal is justified for the development of land or the alteration of, or addition to, a building.

28. This provision is helpful where an argument is to be made in favour of an application to partially or fully demolish a graded building to allow for a development offering appreciable benefits to the wider community. It enables a discretionary approach to be applied if such an approach is warranted.

29. Assigning a 'significant' grading to a D graded place also has implications in terms of new works, particularly in terms of the visibility of rear additions. Under the existing policy, the degree of concealment encouraged for upper storey additions is influenced by streetscape levels:

Higher rear parts of a new building, and of an addition to an existing graded building, should be concealed in a Level 1 streetscape, and partly concealed in a Level 2 and 3 streetscape. Also, additions to outstanding buildings ('A' and 'B' graded buildings anywhere in the municipality) should always be concealed. In most instances, setting back a second-storey addition to a single-storey building, at least 8 metres behind the front facade will achieve concealment.

30. The proposed heritage policy states that additions to significant or contributory buildings should be concealed in significant streetscapes, and:

In other streetscapes, additions to significant buildings should always be concealed, and to contributory buildings should be partly concealed.

31. Given the impact of the changes, it is important that a legitimate basis for these changes be established. However, the rationale for upgrading the building from D3 to 'significant' is not clear. There is no documentation trail to provide insight into what might have changed to warrant the apparent grading uplift, nor has there been an apparent attempt to justify the elevated status.

32. 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. It notes that buildings that are individually listed in the planning scheme were automatically translated to 'significant', and this must be assumed to be the basis of the change in the present instance. But how can this be appropriate for a building of such relatively low interest?

33. 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. Very reasonably, it has been policy that relatively isolated D grade buildings in mixed, or level 3, streetscapes – while having some significance sufficient to warrant a grading – are not of sufficient significance to warrant contributory status because their setting is of low interest. The present Amendment does not acknowledge this, and indeed the *Methodology* report barely engages with this long established principle, identifying it as something that leads to a 'perception' of diminished significance rather than a sound and well established principle. The approach that has been adopted is flawed in that the methodology assumed that all D grade buildings are now contributory (or if subject to a site specific Heritage Overlay, 'significant').
34. There seems to have been no other form of justification for the uplift in status, or upgrading, for this site. While the *Methodology* notes that a spreadsheet was annotated by Lovell Chen for Council to explain changes of grading from D to C or from C to 'significant' in terms of buildings, the subject site at 322 Walsh Street is not listed on this spreadsheet, even though its ungraded neighbour at 324-326 Walsh Street is listed.
35. An important step in the 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 (ie D3), to determine which of these 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 the categorisation of low interest sites such as 322 Walsh Street, South Yarra.
36. Even if it were accepted that the methodology for regrading properties were sound, it would still follow that the building should only be 'contributory' at best. There is no basis for the subject site to be regraded 'significant' within a context where that term is considered generally equivalent to buildings graded A or B.
37. However, there is limited scope for the building to be considered a 'contributory' heritage element either, given that the surrounding streetscape to Walsh Street is mixed in character and of negligible heritage value. Most buildings are ungraded, including the properties within HO6 abutting to the north and east of the subject site. The sites with individual heritage overlay controls at 310 and 327 Walsh Street are graded D and C respectively. The interwar flat building on the north-west corner of Walsh Street (25 Alexandra Avenue) is C graded within HO6. The site on the south west corner of Walsh Street and Clowes Street (52-54 Clowes Street) has an individual heritage overlay and is graded D but should be ungraded because the original dwelling was demolished and replaced with the present neo-Georgian style building in 1998. The i-Heritage citation for 52-54 Clowes Street has been updated to provide a current photograph but retains the description of the demolished bungalow style dwelling.

38. Accepting all the above, it can be argued that the most appropriate outcome in the case of the subject site is to recognise its lack of contributory value and to remove the Heritage Overlay from the site. This would be more appropriate than to elevate its apparent significance (and the onus of policy settings associated with it) simply on the basis of an adopted and imperfect methodology. In reality, it is hard to understand how lowly graded buildings such as this can be justified as warranting such site specific controls, and the evolution of such listings can only be considered anomalous.
39. Alternatively, if one accepts that the building will remain subject to the Heritage Overlay, one option to address its status would be to list it as 'contributory' and to redraft the definition of 'contributory' buildings to include the concept 'Some contributory buildings have site specific Heritage Overlays on the basis that they make a particular or identified contribution to the local area or municipality'. This would broaden the understanding of the range of sites within the municipality that have site specific Heritage Overlays to include lowly graded buildings such as 322 Walsh Street. As the Panel must be aware, there are a number of similar listings scattered across the municipality that could be addressed through this change.
40. Alternatively, lowly graded buildings such as this, ie buildings that are graded D, but that are subject to site specific heritage overlays, might be gathered into a group or serial listing of 'South Yarra contributory buildings' and assigned a 'contributory' status within that Heritage Overlay.
41. Although the subject building remains broadly intact externally, it is only of modest architectural interest as an undistinguished example of 1910s flat development. This is not the type of building that would normally warrant retention on its own merits. The subject building's i-Heritage citation serves primarily to emphasis the fact that this is a representative – that is to say typical – example of an interwar flat development. As such, the subject building does not have individual significance on the basis of its architectural character that is greater than the significance of countless other flats of the period in the municipality and inner metropolitan Melbourne.
42. Furthermore, the i-Heritage citation only identifies the subject building as being of local aesthetic and historical *interest*. The distinction between 'interest' and 'significance' is an important one – the former is typically used to by heritage practitioners to denote places that do not meet the threshold of local significance for heritage overlay listings.
43. Council's citation does not mention the place's association with flat designer and developer Howard Lawson. However, a building is not automatically of importance by virtue of having been designed by an historically important architect. Although this historical information adds to our knowledge of the site's history, it doesn't fundamentally change any assessment in relation to its architectural significance. Howard Lawson practised as an architect but moved into property development, promoting himself as the 'architect who builds'. His work includes a large number of bungalows and flats in Melbourne's inner and southern suburbs dating from the 1910s and 1920s. He designed a great many flats of variable quality, and the subject

building can only be considered a very minor work within his oeuvre. This is readily apparent when the subject building is compared to the architecturally distinctive collection of interwar flats designed and built by Lawson on the escarpment around Alexandra Parade and Darling Street, South Yarra (in the neighbouring municipality of Stonnington).



Figure 17 (Left) *Beverley Hills Flats, 61-63 Darling Street, South Yarra (1935-36).*



Figure 18 (Right) *Dorrington House, 73 Alexandra Avenue, South Yarra (c1933).*

44. Foremost among the Lawson flats is exotic Hollywood inspired Beverley Hills complex at 61-63 Darling Street, an A1 graded building in the Alexandra Avenue precinct (HO122). Other noteworthy Lawson flats in the area, such as Granada Court, Dorrington House, Devonshire House, The Manor, Warwick Lodge, Kildare and York house, are enlivened by precast decorative details of Plateresque and Churrigueresque origins. The precinct also includes some less prominent Lawson buildings in a craftsman bungalow mode that resemble the building at 322 Walsh Street. Examples such as the A2 graded flats at 49 Alexandra Avenue and the B graded Avignon flats at 51 Darling Street gain much of their significance as part of the collection of Lawson buildings. Taken in isolation, Lawson buildings of a similar standard would not be so highly graded.



Figure 19 (Left) *The Howard Lawson designed flats at 49 Alexandra Avenue, South Yarra.*



Figure 20 (Right) *The Howard Lawson designed flats at 51 Darling Street, South Yarra.*

45. Moreover, demolition has been permitted of the flats that were designed and built by Lawson at the same time as 322 Walsh Street on the adjoining property to the east at 31-33 Alexandra Avenue. These flats were graded D3 in the South Yarra Precinct – noting that only the rear portion of the site is covered by the overlay. It is unclear whether this is a result of a mapping error or a deliberate intention to control the impacts of new development in this part of South Yarra. It also seems that another D3 graded building nearby at 52-54 Clowes Street has been demolished, despite this site having been subject to an individual heritage overlay control (HO409).



Figure 21 Photograph of the Howard Lawson designed flats at 31-33 Alexandra Avenue (taken from the City of Melbourne's i-Heritage database). The flats were demolished c2006 and the site redeveloped with a three-storey apartment building.

9.0 Conclusion

46. The subject building at 322 Walsh Street is of limited architectural and historical interest. Although it remains largely intact externally, with a limited suite of changes visible from the street, it is only of modest architectural interest as an undistinguished example of 1910s flat development. This is not the type of building that would normally warrant an individual heritage control on its own merits. The building could theoretically warrant contributory status within a heritage overlay precinct were it in an intact streetscape, but the Walsh Street streetscape is no longer intact enough, or of sufficient significance, to warrant a precinct control. Rather, the building is located in a mixed streetscape dominated by modern development, and is isolated from more intact heritage streetscapes within HO6.
47. The building at 322 Walsh Street is a building of low significance, such that substantial or even full demolition and redevelopment may potentially be considered a reasonable response having regard for the level of significance and the proper balancing of planning matters including non-heritage considerations. The

grading upgrade and policy change as proposed by Amendment C258 have the potential to be prejudicial to such redevelopment in a manner that is not justified.

48. Having regard for this, the most appropriate outcome would be the removal of the anomalous site specific Heritage Overlay from this site (and from others like it). Alternatively, if this is not to be done, it should be identified as 'contributory' only, not 'significant', and either listed individually as at present, or as part of a group or serial listing of low significance buildings within South Yarra.

BRYCE RAWORTH PTY LTD
CONSERVATION • URBAN DESIGN
CONSERVATION CONSULTANTS
ARCHITECTURAL HISTORIANS

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 Coriyule Homestead, Curlewis.

BRYCE RAWORTH
STATEMENT OF EXPERIENCE

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BRYCE RAWORTH

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>