

Expert Witness Statement to Panel  
Amendment C305  
Melbourne Planning Scheme

Former PMG Garage, Stores & Workshops  
45-99 Sturt Street, Southbank

Prepared under instruction from Norton Rose Fulbright  
July 2020

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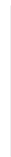
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## 1.0 Introduction

1. This statement of evidence to was prepared under instruction from Norton Rose Fulbright on behalf of the University of Melbourne, the occupants of the subject site at 49-99 Sturt Street, Southbank. I have been asked to comment on the proposed to apply a Heritage Overlay control to the subject site as part of Amendment C305 to the Melbourne Planning Scheme.
2. My instructions are to prepare an expert report considering the heritage significance of the place and the appropriateness of the proposed permanent heritage control. More specifically, my instructions are as follows:

*Our client wishes to engage you to:*

*(1) review the background materials in your brief;  
(2) confer with instructing solicitors and counsel where necessary; and  
(3) prepare an expert report in relation to heritage matters arising from the Amendment as it relates to the Land.*

3. This statement was prepared with assistance from Martin Turnor of my office. The views expressed are my own.
4. I note that there is no private or business relationship between myself and the party for whom this report is prepared other than that associated with the preparation of this statement and associated advice on heritage issues for this and other sites owned by that party.

## 2.0 Sources of Information

5. The analysis below draws upon an inspection of the exteriors of the buildings on the subject site and a review of the Amendment C305 documentation, which includes *Melbourne Planning Scheme Incorporated Document Former PMG garage, stores & workshops, part 44-49 Sturt Street Southbank* (19 December 2017) and *Melbourne Planning Scheme Incorporated Document Southbank Statements of Significance* (2 October 2017).
6. Regard has been had for the following documents and sources:
  - *South Melbourne Urban Conservation Study* (Allom Lovell Sanderson Pty Ltd, 1987).
  - *South Melbourne Conservation Study* (Bryce Raworth Pty Ltd, 1997).
  - *Southbank and Fishermans Bend Heritage Review* (Biosis, 23 June 2017).
  - Report to the Future Melbourne (Planning) Committee – Planning Scheme Amendment C305 Southbank Heritage (2 October 2018).
  - Panel Report Boroondara Planning Scheme Amendment C305 (December 2019).
  - *State Library of Victoria Picture Collection*.
  - *National Archives of Australia PhotoSearch*.
  - *Museum Victoria Collections*.

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, 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.

### 3.0 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 'Bryce Raworth', with a stylized 'B' and 'R'.

**BRYCE RAWORTH**



## 4.0 Description

9. The subject site forms part of the University of Melbourne's Southbank campus (formerly the Victorian College of the Arts). The site is bordered by Sturt Street to the west, Grant Street to the south, Dodds Street to the east and a recently created public open space to the north (known as Linear Park). The buildings on the site form part of a complex of workshops erected (in the most part) in the 1930s and 1940s for the Postmaster General (PMG). The workshop complex reached its mature stage of development by the end of the Second World War. The complex was extensively refurbished 1993/94 for use by the Victorian College of the Arts. Individual buildings on the subject site are discussed in further detail below.

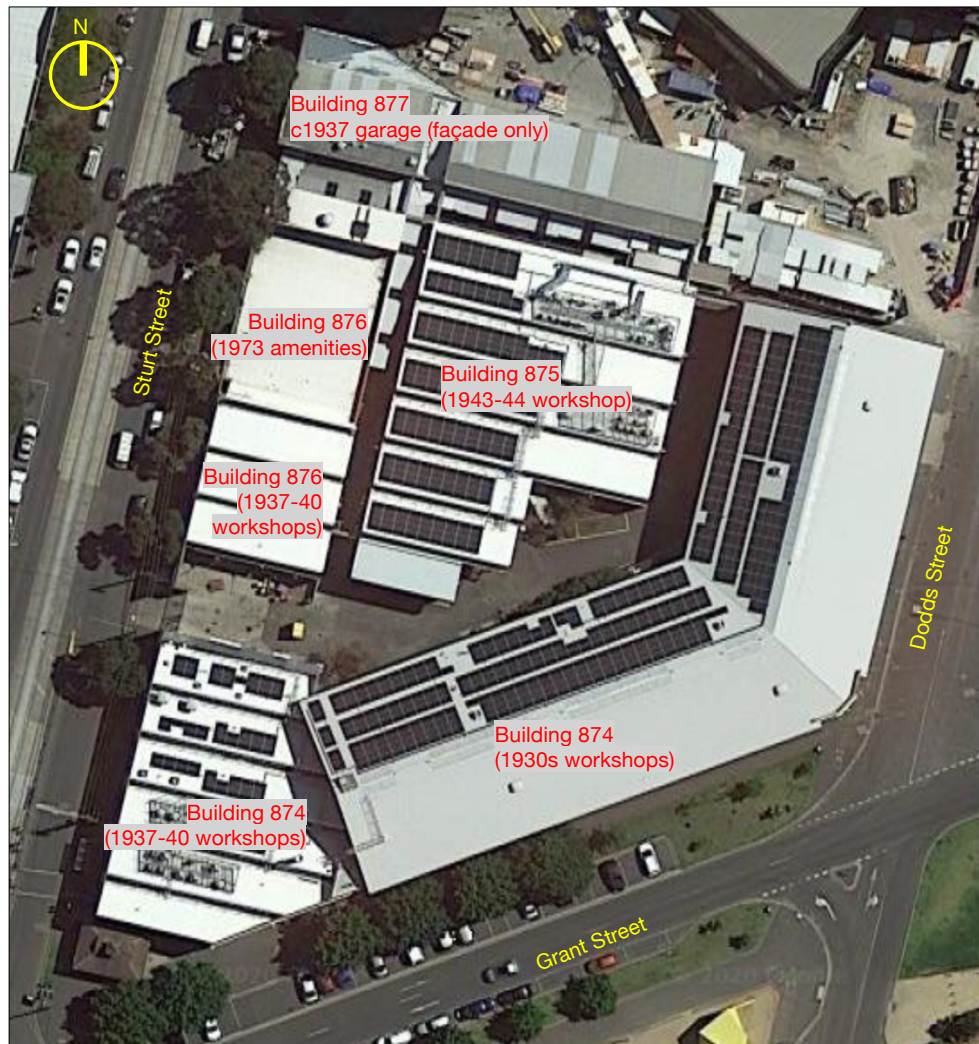


Figure 1 A c2018 aerial photograph of former PMG workshops showing current University of Melbourne building numbers and dates of construction/original building uses.

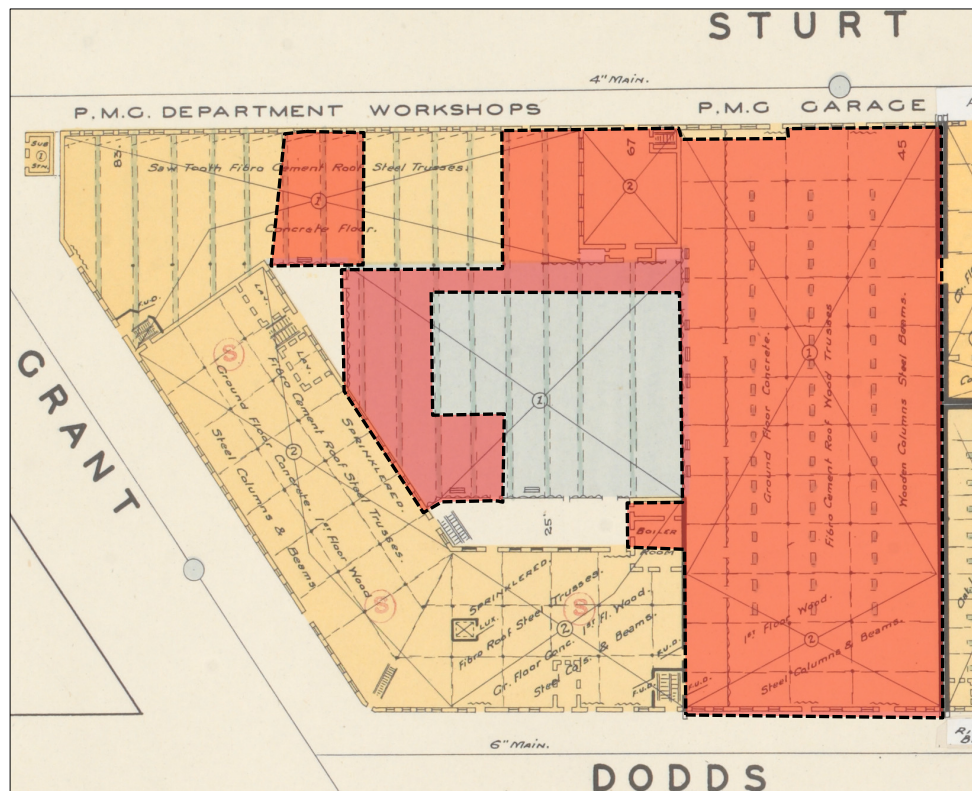


Figure 2 A c1950 fire insurance plan of the subject site. Buildings are shaded red where demolition has since occurred. Source: State Library of Victoria.

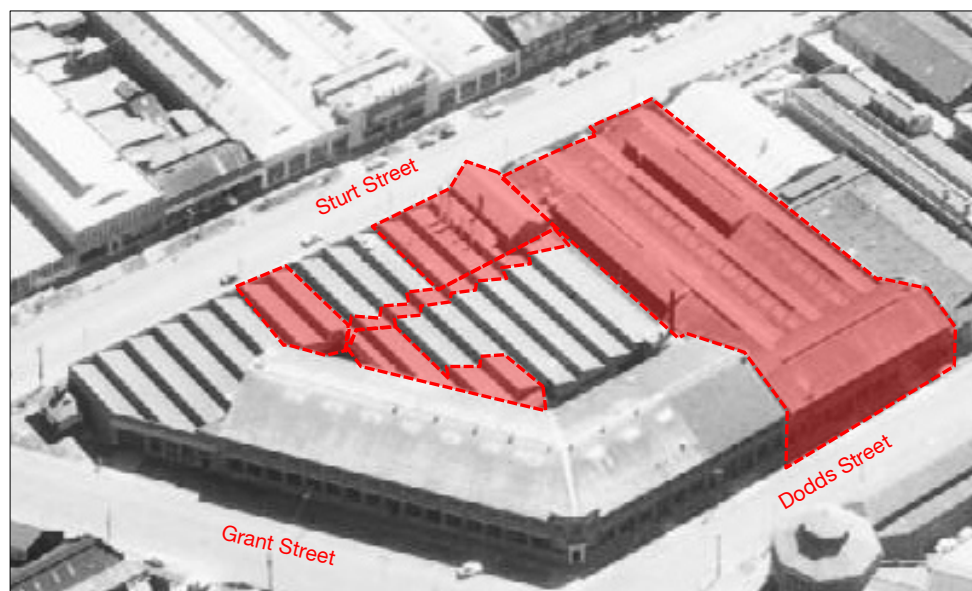


Figure 3 A c1965 aerial photograph of the PMG workshops. As per the c1950 plan above, buildings are shaded red where they have been demolished. Source: Museum Victoria.



*Building 874 (1930s workshops)*

Building 874 was constructed in 1930 with additions of matching design on Dodds Street dating from 1943-44. It is double-storey with a broad gabled roof and red brick walls divided into regular window bays with continuous concrete lintels. The building has for the most part a fairly plain interwar industrial character apart from some stripped classical ornament concentrated about the corner entry. The western single-storey wing to Building 874, fronting the corner and to Sturt Street, is a c1937 addition, as discussed below (p 10).

A c1930s addition to Dodds Street was demolished entirely c2019 to create new public open space. The remaining 1930 building is broadly intact in terms of its overall form, although all but two of the original multi-paned steel framed windows have been replaced with modern window frames. Two garage door openings on the Dodds Street facade have been fitted with modern pedestrian entrances. The roof has been reclad entirely in corrugated steel replacing the original corrugated fibro cement cladding.



Figure 4 The Grant Street frontage of the PMG workshops, 1945 with sandbags along the ground floor. Source: National Archives of Australia.



Figure 5 Building 874 viewed from the corner of Grant and Dodds Street.



Figure 6      *The Dodds Street frontage of the PMG workshops, 1945. Source: National Archives of Australia.*



Figure 7      *The Dodds Street frontage, 2014. Source: Google streetview.*



Figure 8      *The Dodds Street frontage, 2019. Source: Google streetview.*





Figure 9 (left) The corner entry to Building 874. Note original doors removed and modern recessed entrance created.



Figure 10 (right) Modern entrance to the Dodds Street façade.



Figure 11 The rear elevation. Note windows and doors are generally modern replacements.

*Building 875 (c1943-44 workshops)*

Building 875 is a utilitarian single-storey structure with a sawtooth roof. It has been subject to a number of alterations included demolition at the southern end to create a courtyard for the VCA and further demolition along the west side of the building to form an open walkway. The exterior has been entirely reclad in modern corrugated steel apart from bold red cladding applied to the south elevation. Part of the original steel frame has been left exposed where the demolition works have occurred.

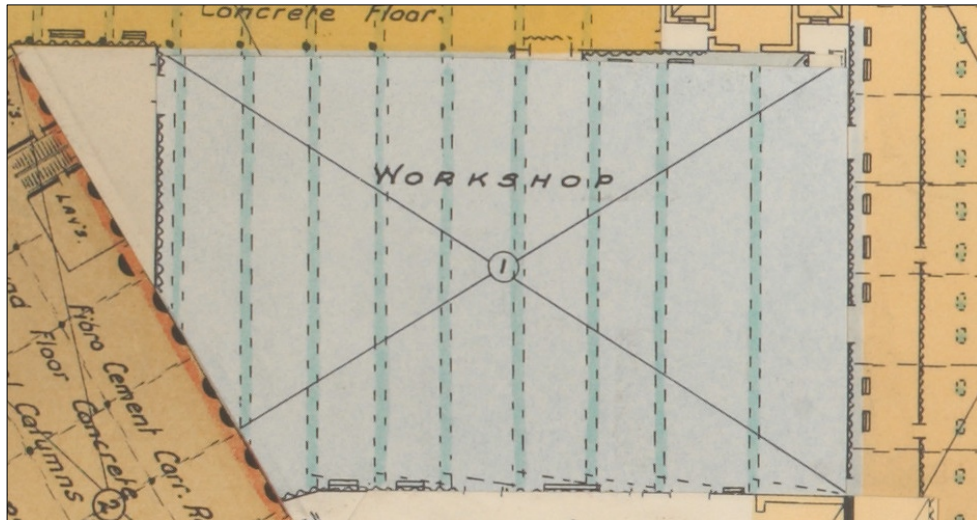


Figure 12 Part of a c1950 fire insurance plan showing the plan form of Building 875. The blue shading designates 'galvanised iron & wood construction'. Source: State Library of Victoria.



Figure 13 (left) The east elevation of Building 875.



Figure 14 (right) The south east corner of Building 875 showing early steel framing exposed by demolition works.





Figure 15 The remodelled south elevation Building 875.

*Building 876 and Part Building 874 (1937-40 workshops)*

Building 876 and the western end of Building 874 are single-storey factory-like structures with red-brick facades embellished by rendered parapets with simple Moderne style detailing. According to the Biosis citation, they were constructed 1937-40. An early photograph of the building shows a long, repetitive façade to Sturt Street, behind which were sawtooth roofed workshops (Figure 16). A c1940 fire insurance plan (Figure 2) indicates that the workshop roofs were originally clad corrugated fibro-cement.

The northern end of Building 876 was demolished in the early 1970s to make way for an amenities block. More recently part of the Sturt Street façade between Buildings 876 and 874 was demolished to provide vehicle access to a service yard. Two window openings to the Sturt Street façade of Building 874 have been bricked up and another fitted with a louvred vent. A garage roller door on the Grant Street façade has been replaced with a pedestrian entry and infill of modern design. The rear elevation of Building 874 has been entirely remodelled. The sawtooth roofed workshops to Building 876 have been part demolished and remaining sections entirely reclad in modern corrugated steel.



Figure 16      *The Sturt Street frontage of the PMG workshops, 1945. Source: National Archives of Australia.*



Figure 17      *Recent photograph of the Sturt Street façade.*





Figure 18      *The Sturt Street façade to Building 876.*



Figure 19 (left)      *The Sturt Street façade to Building 874 where it has been demolished and the exposed side elevation reclad.*



Figure 20 (right)      *The southern end of Building 876 where part of the building has been demolished behind the street façade.*



Figure 21 Building 874 Grant Street facade, 2014. Source: Google streetview.



Figure 22 Building 874 Grant Street facade, 2019. Note garage door replaced by new pedestrian entrance.





Figure 23      The rear of Building 876 showing part of the Sturt Street façade and original sawtooth workshops reclad in corrugated steel.



Figure 24      The modern rear elevation to Building 874

*Part Building 876 (1973 amenities block)*

The northern half of Building 876 was erected in 1973 as an amenities block for the PMG. It is a part single and part double-storey brick building adopting a basic modernist design. The northern end of the building was demolished to create a vehicle entrance to the site.



Figure 25      *The newly completed PMG amenities block (part Building 876), 1973. Source: National Archives of Australia.*



Figure 26      *Current photograph of the Sturt Street facade.*



*Building 877 (c1937 garage)*

This site was formerly occupied by a garage built c1937 for the PMG. The garage was almost entirely demolished c2018/19 and replaced with a modern end-of-trip facility and café. Only a small part of the c1937 Moderne style garage façade was retained. The glazed metal framed entrance at the centre of the retained façade is a modern element.

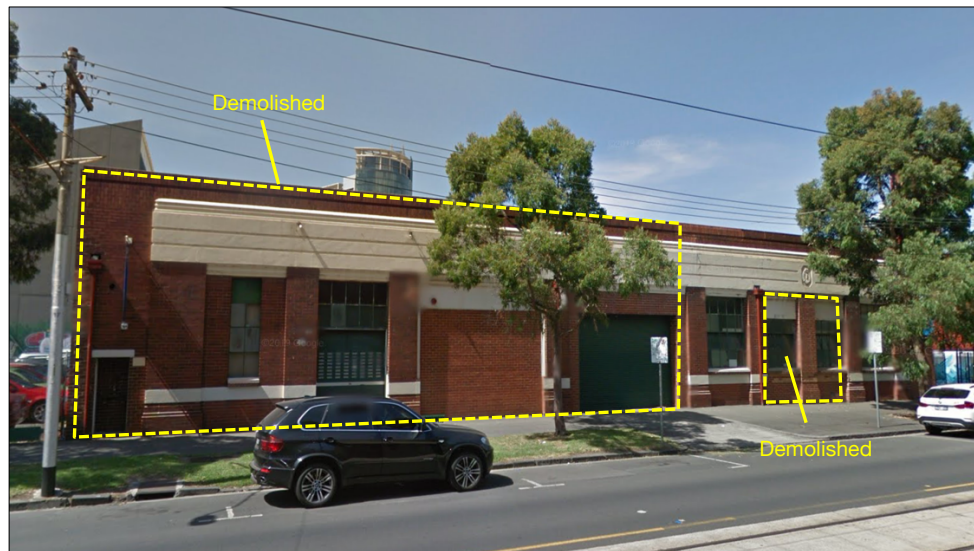


Figure 27 The Sturt Street façade of the c1937 garage, 2014. Source: Google streetview.



Figure 28 Recent view of the Sturt Street façade to Building 877.

## 5.0 Current Heritage Listings

10. An interim Heritage Overlay control has been applied to the subject site – listed as HO1201 ‘PMG Postal Workshops, Garages & Stores, 45-99 Sturt Street’ (refer Figure 29 below). A relatively small part of the former PMG complex (at 43 Sturt Street) is already subject to a Heritage Overlay (HO389) [noting that this part of the site has since been redeveloped as a park].

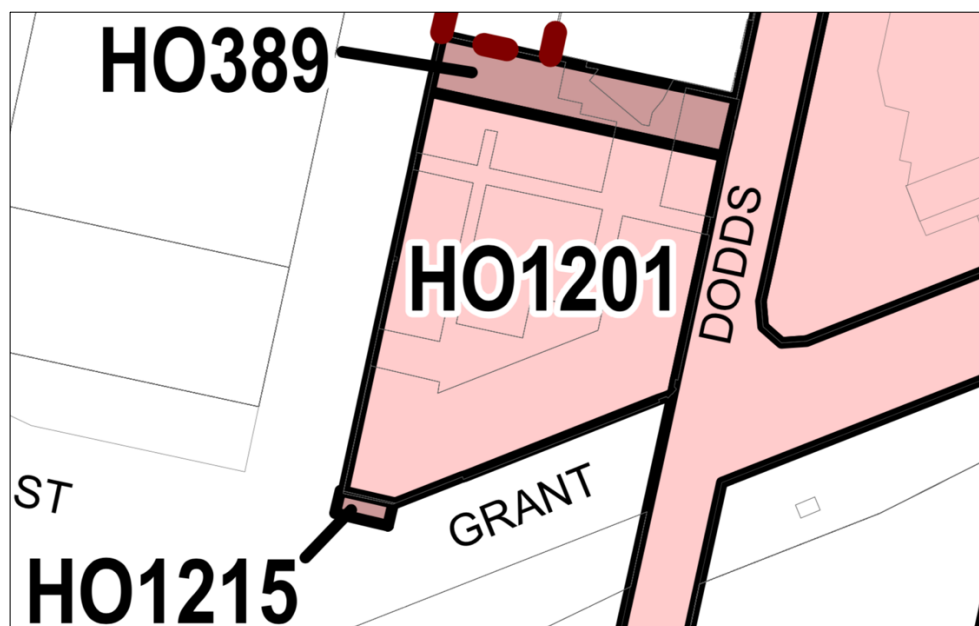


Figure 29 Heritage Overlay map showing interim control HO1201 applied to the subject site.

11. The site was graded C in the *South Melbourne Urban Conservation Study* (1987), listed under the address 43 Sturt Street. For the purposes of the 1987 study, C grade places were defined thus:

*Places that contribute to the architectural or historical character and cohesiveness of the City of South Melbourne. C structures are, in the main, severely altered examples of typical building types.*

12. Although the subject site was not identified as an individually significant place in the 1987 study, it was recommended for inclusion in an Urban Conservation Area – ‘Military Area’. That area was considered to be significant for its long association with industry and the military and public buildings lining St Kilda Road. This area has undergone substantial change since 1987, including the construction of the CityLink tunnel entrance (just to the west of the site) and the development of apartment complexes and new cultural institutions.

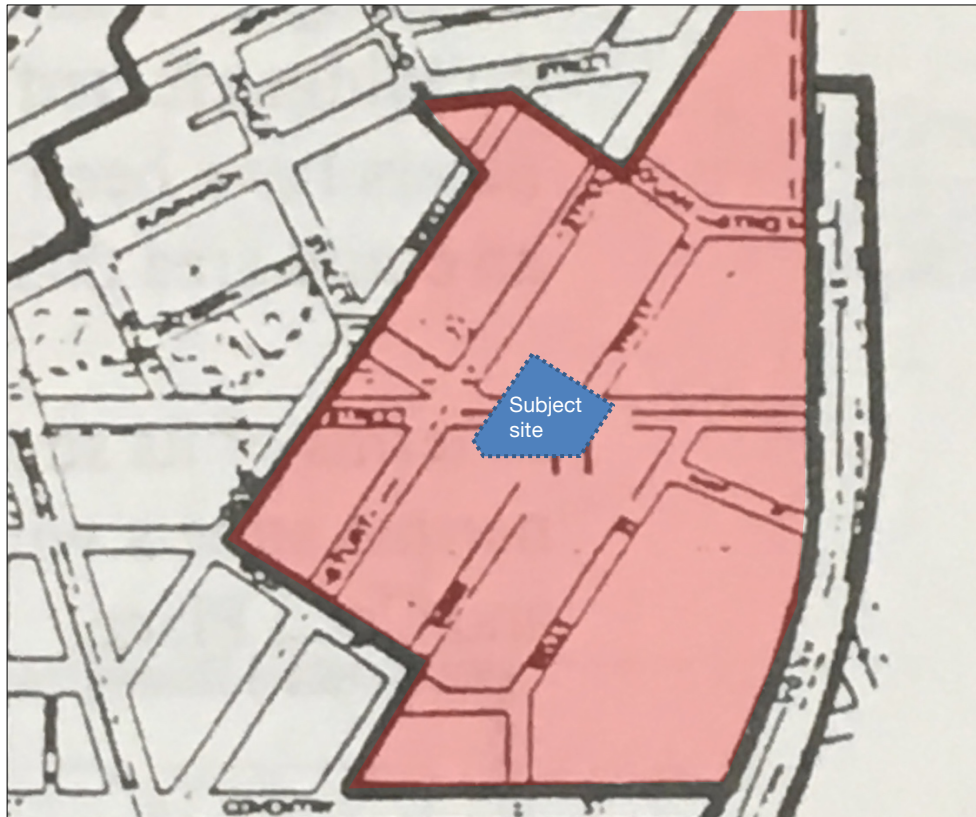


Figure 30 The Military Reserve Urban Conservation Area (Area H) identified in the 1987 South Melbourne Urban Conservation Study.

13. The subject site was reassessed by my office in 1997 as part of the *South Melbourne Conservation Study*, wherein the original C grading was reaffirmed. A datasheet was prepared for the site (under the address 43 Sturt Street), listing its notable features as 'elaboration/high standard design of cement rendered surfaces'. The datasheet also provided the following description of the site:

*This pair of factories has been extensively modified to create studio spaces for the Victorian College of the Arts. This has required the construction of a new, and unsympathetic infill structure and alterations to the red brick facades. Some of the unusual, cement rendered dressings, most notably those above the windows, have survived in good condition.*

14. The integrity of the site was listed as 'poor'. I note that the brief for the 1997 study precluded an investigation of the site history, such that the place's association with the PMG was not fully understood at that time.
15. The subject site is not classified by the National Trust of Australia (Victoria) and is not included on the Victorian Heritage Register.

## 6.0 Amendment C305

16. As noted, Amendment C305 to the Melbourne Planning Scheme proposes to introduce a permanent Heritage Overlay to the former PMG workshops at 45-99 Sturt Street, Southbank (HO1201). External paint controls would apply under the Heritage Overlay, but internal alteration controls and tree controls are not being sought.
17. It is noted that a Heritage Overlay control is also proposed for the electrical substation at the corner of Sturt and Grant Street, but this is not part of the Victoria College of the Arts land.

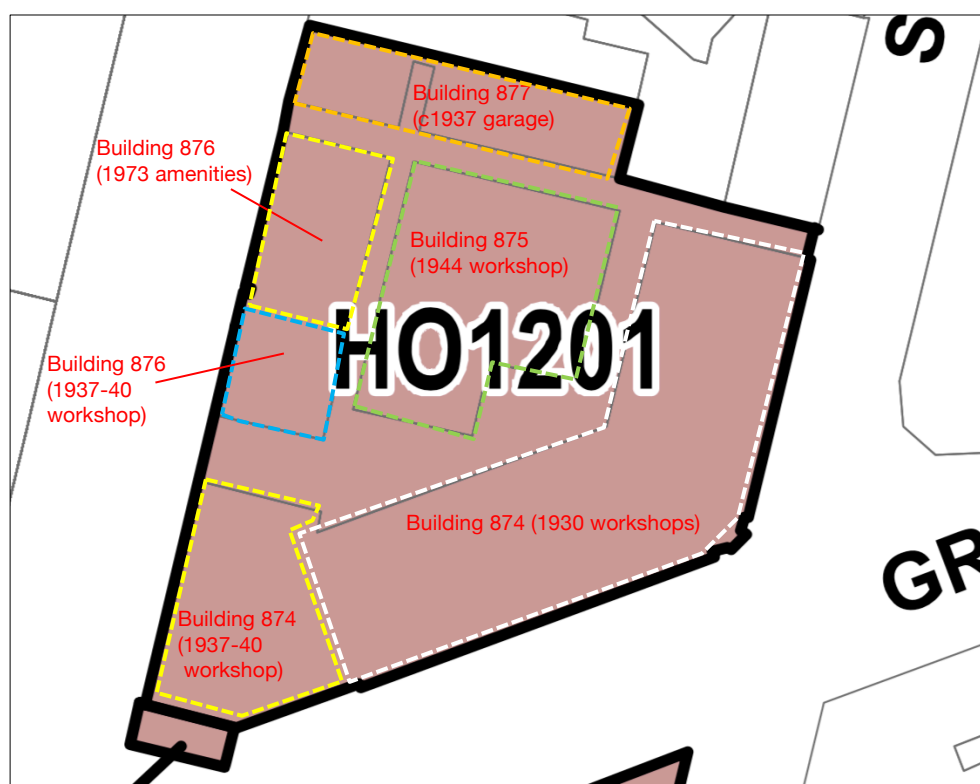


Figure 31 Proposed Heritage Overlay (updated October 2018) with current University of Melbourne building numbers and construction date/original use.

18. Council are seeking to adopt a statement of significance for the former PMG workshops, as set out in *Southbank Statements of Significance* (2 October 2017) [which is proposed to be incorporated document].

### *What is Significant?*

*The former Postmaster General's Department (PMG) workshops, garage & stores, comprising mostly 1930-40s one and two storey red brick buildings at 45-99 Sturt Street South Melbourne, bounded by Sturt Street, Dodds Street, Grant Street and the modern Recital Centre to the north.*



*Contributory elements include fabric from the 1930s-1940s:*

- *one and two storey form;*
- *modern classical and Moderne styling marking the staged construction in the lead-up to World War Two;*
- *parapeted wings and expressed eaves marking the two styles;*
- *red brick walls with some patterned brickwork;*
- *cemented panels with streamlining and stylised classical motifs;*
- *multi-pane metal framed glazing and joinery some as original and others as empathetic to the original;*
- *regular trabeation in the form of brick piers and spandrels, and fenestration;*
- *steel framing and timber flooring;*
- *pitched and sawtooth roofing; and*
- *proximity to and visual relationship with the former Victoria Police complex and other government sites, marking a public building precinct.*

*How is it Significant?*

*The former PMG postal workshops are significant historically and aesthetically to South Melbourne and the City of Melbourne.*

*Why is it Significant?*

*The former PMG postal workshops garage & stores are historically significant as representative of the growth of telecommunications in the lead-up to World War Two and a massive Commonwealth Government building program from the first decade after Federation to create unified communication services across the country. Prior to 1901, postal and telephone services were the responsibility of separate colonial governments but under the Federation of the colonies, the role reverted to the Commonwealth and became a major factor in the unification of the states.*

*The buildings are of aesthetic significance as well-preserved examples of the application of both the modern classical styles and Moderne style to utilitarian building under the important Commonwealth architects, J S Murdoch and H J Mackennal, respectively, also as complimentary to the similarly styled Victorian Police Mounted Branch.*

*This place has been assessed in accordance with the processes and guidelines outlined in the Australia ICOMOS Charter for Places of Cultural Heritage Significance ('The Burra Charter') 2013, using the HERCON criteria.*

19. The subject site is listed as a 'significant' graded place in the proposed incorporated document - *Southbank Fishermans Bend Heritage Inventory* (January 2017). The streetscape is not identified as being of significance. The inventory uses the gradings system proposed by Amendment C258 to the Melbourne Scheme, whereby heritage places are identified as being either significant, contributory or non-contributory:

*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 significance or historic character of the heritage precinct.*

20. Amendment C305 proposes to introduce an incorporated document that is specific to the subject site – *Former PMG garage, stores & workshops, part 45-99 Sturt Street Southbank* (19 December 2017). The stated purpose of that document is to acknowledge the significance of buildings and elements on the site, while at the same time recognising that the site will be subject to ongoing uses as part of the Victorian College of the Arts. The document sets out circumstances where no planning permit would be required, as follows:

*A planning permit is not required under Clause 43.01 of the Melbourne Planning Scheme for the following development within the whole of the former PMG Workshop site:*

- *Emergency and safety works to secure the site and prevent damage and injury to property and the public;*
- *Painting of previously painted structures provided that preparation or painting does not remove evidence of the original paint or other decorative scheme;*
- *Repairs, conservation and maintenance to hard landscape elements, buildings and structures, ornaments, roads and paths, fences and gates, drainage and irrigation systems;*
- *Maintenance of roads and paths and gutters to retain their existing plan layout; and*
- *Removal of extraneous items such as plant and equipment, external lighting, pipe work, ducting, wiring, etc and making good.*

*A planning permit is not required under Clause 43.01 of the Melbourne Planning Scheme for the following development of Building 876 - the former 1973 amenities building as marked on Figure 1:*

- *Demolish or remove a building or element provided the building or element has been recorded to the satisfaction of the responsible authority.*
- *Externally alter a building.*
- *Remedial treatment of corroded or contaminated elements.*
- *The erection of temporary security fencing, scaffolding, hoardings or surveillance systems to prevent unauthorised access or secure public safety which will not adversely affect significant fabric of the place including archaeological features.*

*A planning permit is not required under Clause 43.01 of the Melbourne Planning Scheme for development of Building 875 the 1944 workshop as marked on Figure 1:*

- *Alter, remove or install new openings for windows, doors, or services;*

- *Replace cladding with similar material – i.e. corrugated sheet steel.*
- *Remedial treatment of corroded or contaminated elements.*
- *The erection of temporary security fencing, scaffolding, hoardings or surveillance systems to prevent unauthorised access or secure public safety which will not adversely affect significant fabric of the place including archaeological features.*

## 7.0 Discussion

21. The University of Melbourne's position in respect to Amendment C305 is set out in a submission that was made on their behalf by Norton Rose Fulbright (dated 27 July 2018), as follows:

1. *The extent of HO1201 should be revised so that it does not include recently demolished buildings 878 and 877 (part), and the portion of building 876 which is the former 1973 amenities building;*
2. *HO1201 should be a precinct overlay, rather than a site-specific overlay, because it covers a number of buildings; and*
3. *The list of works that do not require a planning permit under the 'Former PMG garages, stores and workshops, part 45-99 Sturt Street Southbank Incorporated Document' under clause 43.01 should also include:*
  - *Constructing or building or carrying out works that will not harm the significance of the heritage place, subject to the agreement of the Responsible Authority;*
  - *Constructing a building or constructing or carrying out works including:*
    - *A solar energy facility attached to a building that primarily services the land on which it is situated if the services are visible [sic – this should read 'not visible'] from a street (other than a lane) or public park;*
    - *Non-domestic disabled access;*
    - *Construct or display a sign;*
    - *Landscaping and public realm works; and*
    - *A fence.*

22. In relation to the matter of solar energy facilities, I have been briefed that this was a typographic error and the term intended was 'not visible'.

23. The University's submission was referred by Council to Biosis for their review. Biosis' comments on the submission are summarised in the Council officer's report thus:

- *Biosis considers that changes to the extent of the Heritage Overlay may be appropriate, to exclude the area covered by the Melbourne Conservatorium, which is now under construction, and to exclude parts of the site where buildings have been demolished.*  
*However, Biosis argues that the Heritage Overlay should still cover a contiguous area, rather than just the footprints of surviving buildings. Biosis has prepared the following map with a revised Heritage Overlay extent:*



- *Biosis noted that precinct Heritage Overlay could be appropriate, if it is accompanied by appropriate management measures. Separate grading of the various buildings could be undertaken, but this process has to some extent been pre-empted by recent demolitions according to Biosis. Biosis identify that an appropriate alternative approach would be for the owners to commission a comprehensive Conservation Management Plan (CMP) for the whole site so that future development can be undertaken in an informed manner. If a CMP were undertaken, or specific works were proposed that can be undertaken without impacting on the heritage values of the place, then Biosis consider that there would be scope for including further permit exemptions within an incorporated document.*
- *Management notes the submission and Biosis' responses. Management considers it appropriate to maintain the use of an individual Heritage Overlay listing rather than a precinct listing as separate gradings of buildings has not been undertaken and recent demolitions have occurred. Management considers it appropriate to reduce the extent of the Heritage Overlay in accordance with Biosis' response.*
- *The recommendations related to Fishermans Bend in the Southbank and Fishermans Bend Heritage Review will be implemented through a separate process which will go through a public notice and exhibition process. There will be opportunities for affected parties to make submissions during this process.*
- *Management notes that the Southbank and Fishermans Bend Heritage Review is proposed to be listed as a policy reference in the heritage local policies 22.04 and 22.05 and that clarification could be provided in the proposed local policies to acknowledge that the recommendations relating to Fishermans Bend have no formal status.*

24. Biosis also made the following recommendations in response to the University's submission:

- *Changes to the Incorporated Document for 45-99 Sturt Street have been prepared by Biosis and are included as part of Attachment 4 to the 2 October 2018 Future Melbourne Committee report.*
- *Planning scheme amendment maps have been updated to reflect the amended extent of HO1201 so that it does not apply to the recently demolished building 878 and part of building 877 and are included as part of Attachment 4.*
- *Heritage local policies 22.04 and 22.05 have been updated to list the Southbank and Fishermans Bend Heritage Review as a policy reference document in relation to the recommendations for places in Southbank and South Wharf only and are included as part of Attachment 4.*

25. I agree that the subject site is, at least in part, a place of local significance. As such, the implementation of a Heritage Overlay control would be an appropriate outcome. However, the manner in which the Heritage Overlay control is best applied warrants further interrogation. Specifically, the application of a blanket 'significant' grading across the site, as currently proposed, fails to recognise that there is a marked variation in the degree of integrity of the different constituent elements, and the individual buildings do not warrant being classification as 'significant', notably in the context of heritage policy relating to matters such as part demolition, alterations and additions.
26. Beyond the comment that the buildings were 'extensively refurbished' in 1993/94 the Biosis citation does not adequately set out and analyse the considerable degree of change that has occurred in recent decades. As illustrated in figures 2 and 3 above, the former PMG complex has been much reduced in extent from its mature c1944 state. Contrary to the Biosis statement of significance, the buildings are not 'well-preserved'.
27. I am also of the opinion the Biosis citation lacks sufficient rigour in its analysis of the site's heritage values. The comparative analysis is very brief, being a single sentence that simply describes 'some similarities' to administration buildings at the Government Aircraft Factory and Materials Research Laboratories. The similarities are fairly slight, but it is of greater concern that the citation does not seek to benchmark the former PMG workshops against other industrial sites in the City of Melbourne that have been found to be worthy of a Heritage Overlay control.
28. I agree with Biosis insofar as a Conservation Management Plan (CMP) would be a useful document in terms of guiding future change on the subject site, but the issue of whether separate gradings can be applied does not need to be deferred until such time that a CMP is prepared. It is an issue which is best dealt with as part of the current Amendment process.
29. My observations on the levels of significance of individual buildings within the former PMG complex are as follows. The main double-storey component to Building 874 might at first be considered significant insofar as it is the earliest surviving and most intact part of the former PMG complex with a commanding streetscape presence. That said, the building is a generally conventional example of interwar industrial architecture in terms of its overall form, detailing and construction methods.
30. The architectural value of Building 874 has also been somewhat diminished by the replacement of virtually all of the original steel framed windows, and through changes to the roof and eaves detailing resulting from modern recladding works. The prosaic nature of the building design reflects its original ancillary or support role relative to what was the PMG's primary function of providing postal and telephone services.



31. That is, it is not significant in terms of either its architecture or its role within the site, and it has been altered. Having regard for this, it could reasonably be graded 'contributory'.
32. Further to the above, Building 874 is not a particularly good example of the stripped classicism favoured by John Smith Murdoch in his position as the Commonwealth Department of Works Chief Architect. Murdoch's work in this mode is far better represented in the imposing former Mail Exchange, corner of Bourke and Spencer Street (VHR H881) and the former Field Artillery Barracks, Wests Road, Maribyrnong (VHR 1098). Accepting that the subject site is closer to a factory in its character, it can also be compared with the Murdoch designed former Federal Woollen Mills, Geelong (VHR H1938). Completed 1915, the mill complex survives to a far higher degree of integrity than the PMG workshops and also demonstrates superior architectural design. Notwithstanding that the three examples of Murdoch's work discussed above are on the Victorian Heritage Register, they are still useful comparators in terms of demonstrating that the former PMG complex is not a major or important work within his oeuvre.

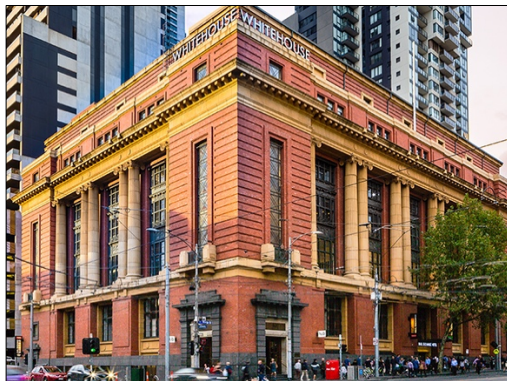


Figure 32 (left) Former Mail Exchange, corner of Burke and Spencer Streets.



Figure 33 (right) Former Artillery Barracks, Wests Road, Maribyrnong.



Figure 34 (left) Restored building at the former Federal Woollen Mills, Geelong.



Figure 35 (right) Restored building at the former Federal Woollen Mills.



Figure 36 Aerial view of the former Federal Woollen Mills.

33. The single-storey interwar Moderne style building(s) on Sturt Street comprising parts of Buildings 874 and 876 should be graded contributory. This would be appropriate recognition of their diminished intactness and integrity. As described in section 4.0 of this statement, part of the Sturt Street façade and the sawtooth workshops to the rear have been demolished. Behind its street facades, Building 874 has an entirely rebuilt facade with a bold contemporary architectural expression. The extant workshops forming part of Building 876 have been reclad in corrugated steel.
34. Having regard for these changes, the interwar components to Buildings 874 and 876 can hardly be described as ‘well preserved’ examples of the Moderne style, as stated in the Biosis citation. In and of themselves, these buildings are not individually significant examples of inter factory design.
35. Building 875 should also be graded contributory, if it is to be graded at all. Its sawtooth roof form contributes to the industrial character of the site in its mature c1944 state, but essentially all of the external fabric is modern. The integrity of Building 875 is further diminished by extensive demolition and alterations at the south end of the building and along the west side. The building appears to retain its original steel frame/roof trusses, but these are internal elements and no internal alteration controls are proposed. In its altered state, Building 875 essentially serves as a ‘character building’ within the site rather than a heritage building.

36. Building 877 is non-contributory and should be excluded from the Heritage Overlay. The interwar Moderne style façade to this (otherwise rebuilt) building represents only a very small fragment of what was originally a much larger PMG garage. The remnant interwar facade has been altered by demolition of the central window bays to fit a modern entrance, and it is physically separated from the matching interwar facades to the south by the 1973 amenities block (part Building 876).
37. The façade to Building 877 does not warrant inclusion on the Heritage Overlay on the basis of its historical association with the PMG, its architectural character, or because it would serve as a useful buffer to control the impacts of future development on the more intact parts of the PMG complex. In regard to the last point, this section of Sturt Street has experienced considerable change in recent years with the development of the recital centre and conservatorium of music, as well as apartment complexes on the west side of Sturt Street. That is to say, this is not a homogenous or highly intact urban environment and the key PMG heritage buildings would not be overly sensitive to change on adjoining sites.
38. The part of Building 876 that comprises the 1973 amenities block should also be excluded from the heritage overlay. It is an architecturally unprepossessing building and does not contribute to the historical character of the former PMG complex or usefully demonstrate the complex's original purpose.
39. Having regard for the above, it would be appropriate for the buildings on the site to be graded as follows:

Part Building 874 (double-storey 1930 workshops)	Contributory
Part Building 874 (1937-40 workshop)	Contributory
Building 875 (1944 workshop)	Contributory
Part Building 876 (1937-40 workshop)	Contributory
Part Building 876 (1973 amenities) [exclude from HO]	Non-contributory.
Building 877 (2018/19 with 1937 façade) [exclude from HO]	Non-contributory.





Figure 37 Plan showing contributory gradings applied to buildings on the subject site within a reduced Heritage Overlay curtilage.

40. With respect to the application of the Heritage Overlay to the site, one approach would be a site-specific control within which buildings were differently graded. This approach was recently proposed by the City of Boroondara for Methodist Ladies College, Kew (Amendment C305 to the Boroondara Planning Scheme). A single Heritage Overlay control was proposed for part of College, within which buildings were graded significant or contributory (using the heritage gradings defined at Clause 22.03 of the Boroondara Planning Scheme). The College was not specifically defined as a precinct but was treated similarly to a precinct in terms of the application of different gradings across different buildings. I gave expert witness statement to the C305 Panel on behalf of the College and was generally supportive of the proposed Heritage Overlay control.
41. However, the Boroondara C305 Panel considered the City of Boroondara's approach to be problematic and were of the view that the identification of multiple significant, contributory and non-contributory buildings and elements confuses the distinction between an individual place and a precinct.

42. The Boroondara C305 Panel concluded that gradings could not be applied to individual buildings within a single heritage place. This was in part based on how the terms significant and contributory might be interpreted. As per Clause 22.03 of the Boroondara Planning Scheme, the definition of 'significant' distinguishes between places that are significant individually or in a precinct, but gives them the same status. The definition of 'contributory' relates to precincts only, as does the term non-contributory. Similar issues arise in respect to the new gradings definitions proposed by Melbourne Amendment C258.
43. Notwithstanding the Boroondara C305 Panel's reservations, I believe that a site-specific heritage overlay with separately graded buildings would be appropriate for the subject site and would be consistent with the approach taken by the City of Melbourne for other historical industrial sites with multiple buildings. Of particular relevance is the example of the former R Lohn & Co. Factory at 391-399 Macaulay Road, Kensington (HO251). The more elaborated detailing main double-storey interwar Moderne style factory on the site is graded 'significant' in the adopted C258 heritage inventory. The adjoining single-storey interwar factory with a simpler Moderne style façade is proposed to be graded 'contributory'. Both buildings would continue to be listed on the Heritage Overlay schedule under single HO number.
44. Consideration might also be given to 'serial listing' as applied to Scotch College, Hawthorn. In that case the same Heritage Overlay number was given to each heritage building and they were listed in Clause 43.01 schedule as being either significant or contributory.



*Figure 38 The former R Lohn & Co. Factory at 391-399 Macaulay Road, Kensington (HO251). The adopted C258 heritage inventory identifies the single-storey Moderne style building in the foreground as 'contributory'. The main double-storey building to the right is identified as 'significant'.*

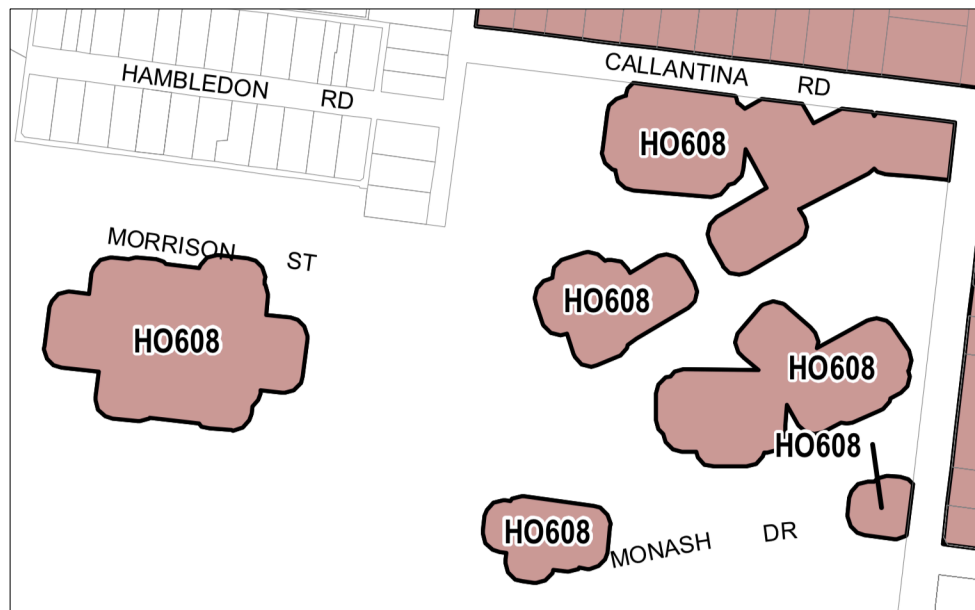


Figure 39 Heritage Overlay map showing HO608 applied selectively to significant and contributory buildings at Scotch College. The Heritage Overlay includes a curtilage of land around each building.

45. Regardless of what form that Heritage Overlay control might take, it should be recognised that the gradings applied to the site have ramifications in terms of future development outcomes, in that the proposed Amendment C258 heritage policies seek to curtail changes to a significant place to a greater degree than would be the case for a contributory place.
46. On the issue of permit exemptions, the works identified in Council's proposed incorporated document are generally reasonable and appropriate. Installation of a solar energy facility that is not visible from the public realm could be added to the permit exempt works, but I accept that other permit exemptions sought by the University are potentially more impactful than the type of works that are typically permit exempt.
47. To conclude, I am broadly supportive of the Amendment insofar as the subject site warrants a Heritage Overlay control. However, the application of a significant grading across all of the site would not be appropriate in that it fails to recognise the varying levels of significance of the buildings that comprise the former PMG complex. Moreover, the assessment of the subject site made by Biosis on behalf of Council does not demonstrate sufficient rigour and does not properly recognise that most of the buildings are of diminished intactness and integrity. Having regard for the C258 heritage policies recently adopted by Council, and the nexus established between the degree of significance of a place and the extent and nature of works that are supported by those policies, it is important that the generally low significance and intactness of buildings on the site is recognised.

# Bryce Raworth

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## BRYCE RAWORTH

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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.

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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 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>
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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>